

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
GU HOLDINGS INC., EDGE CABLE)	File No. SCL-LIC-2017-_____
HOLDINGS USA, LLC and PACIFIC LIGHT)	
DATA COMMUNICATION CO. LTD.)	
)	
Application for a License to Construct, Land,)	
and Operate an Undersea Fiber Optic Cable)	
Connecting the United States, Hong Kong,)	
Taiwan, and the Philippines)	

APPLICATION FOR A CABLE LANDING LICENSE
STREAMLINED PROCESSING REQUESTED

GU Holdings Inc. (“GU Holdings”),¹ Edge Cable Holdings USA, LLC (“Edge USA”),² and Pacific Light Data Communication Co. Ltd. (“PLDC”) (collectively, the “Applicants”), pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39, Executive Order 10530, and Section 1.767 of the Commission’s rules, 47 C.F.R. § 1.767, request a license to land and operate a non-common carrier fiber-optic submarine telecommunications cable extending between the United States, Hong Kong, Taiwan, and the Philippines. This submarine cable system is known as the Pacific Light Cable Network (“PLCN”).

For the reasons set forth below, the Applicants respectfully submit that the grant of this application will serve the public interest and should be granted on a streamlined basis. In the event the Commission does not grant streamlined processing, the Applicants request that the

¹ GU Holdings is an indirect, wholly-owned subsidiary of Google Inc. (“Google”).

² Edge USA is a wholly-owned subsidiary of Facebook, Inc.

Commission grant the cable landing license no later than January 2018 to avoid delaying the construction and commencement of commercial operation of the PLCN system.

I. DESCRIPTION OF THE CABLE SYSTEM

Construction of PLCN is scheduled to begin in February 2018, and the commencement of commercial service is targeted for the summer of 2018. PLCN will land in California, Hong Kong, Taiwan, and the Philippines, and will have a total length of approximately 13,000 kilometers. The system will have a capacity of 120 terabits per second and a useful life of 25 years. The system will have two segments: submarine Segment S and terrestrial Segment T.

As described in further detail in part II.D below, the main trunk between the U.S. and Hong Kong will have six fiber pairs and will be owned and controlled in specified percentages by the three Applicants and their affiliates. The branch to Taiwan will be wholly-owned and controlled by Google Cable Bermuda Ltd. (“GCB”) or a local Google affiliate.³ The two branches to the Philippines will be wholly-owned and controlled by Edge USA’s affiliate Edge Network Services Limited (“Edge”). The terrestrial segments between the Hong Kong cable landing station and the Hong Kong terminal station will be wholly-owned by PLDC. A fourth, stubbed, branch is currently being considered and, if constructed, would also be wholly-owned by PLDC. Appendix A provides a geographic overview and conceptual segment configuration of the cable.

³ In both Hong Kong and Taiwan, GCB (or a local affiliate) intends to contract with a third party to be the landing party in that country. In such case, a landing party agreement will govern the relationship between GCB (or a local affiliate) and the third party and provide that, upon completion, GCB (or a local affiliate) will convey to the third party ownership of the portion of PLCN that extends 12 nautical miles from the shores of the foreign country. The third party will then grant GCB an indefeasible right of use or similar substitute interest for the same portion of PLCN.

The Applicants intend to enter into contractual arrangements with third parties for support services in connection with the operation and management of U.S. facilities associated with PLCN, including the landing and terminal equipment associated with the U.S. landing (“U.S. Landing Services”), as well as the U.S. network operations center (“NOC”). Negotiations with potential vendors for the U.S. Landing Services and the U.S. NOC, all of whom are U.S. persons, are ongoing, and the Applicants will promptly advise the Commission once vendors are selected. Regardless of the identity of the vendors, the U.S. NOC will manage access to the U.S. common infrastructure.

PLDC and its affiliates will use capacity on PLCN to offer individually negotiated wholesale capacity services on the U.S.-Hong Kong route. GU Holdings, Edge USA, PLDC, and their respective affiliates will use the PLCN capacity to connect each of their respective affiliates’ data centers and POPs in the U.S. and Asia. GU Holdings and its affiliates may also offer private, individually negotiated wholesale services on the U.S.-Hong Kong and U.S.-Taiwan routes. Edge USA and its affiliates do not presently intend to sell transmission services to third parties using PLCN.

II. PUBLIC INTEREST STATEMENT

Grant of this application will serve the public interest, convenience, and necessity by making advanced facilities-based telecommunications services available between the United States and foreign points. Specifically, PLCN will (i) help connect U.S. Internet users and businesses to Asia, the world’s biggest Internet market; (ii) increase competition on the trans-Pacific route, and (iii) enhance the service quality, redundancy, and resilience of communications systems in the region.

A. PLCN Will Better Connect the United States to the World's Biggest Internet Market

PLCN will help connect U.S. businesses and Internet users with a strong and growing Internet community in Asia. Asia is already “the main contributor to the world’s Internet population; 42% of the world’s Internet users live in Asia.”⁴ Yet there is still room for substantial growth in the Asian market, as Internet penetration rates are still quite low. At the same time, PLCN will help expand connectivity within Asia by linking the Philippines, Hong Kong, and Taiwan.

B. PLCN Will Increase Competition on U.S.-Asia Routes

The Commission has previously found that expanding submarine capacity through facilities-based competition serves the public interest. Indeed, in its *Streamlining Report and Order*, the Commission noted that its new procedures were intended to “promote the expansion of capacity and competition in the submarine cable market.”⁵ PLCN serves that objective. With the largest design capacity of any existing or announced cable on any U.S.-Asia route, PLCN will immediately and significantly increase regional capacity upon deployment. PLCN will also compete directly with existing and other planned systems on the U.S.-Hong Kong route, which will increase bandwidth supply and, in turn, spur greater service innovation and lower prices for consumers of international communications services.

⁴ Information Geographies at the Oxford Internet Institute: Internet Population and Penetration, <http://geography.ox.ac.uk/?page=internet-population-and-penetration> (last visited March 24, 2017).

⁵ *Review of Commission Consideration of Applications under the Cable Landing License Act*, Report and Order, IB Docket No. 00-106, ¶76 (2001) (*Streamlining Report and Order*).

C. PLCN Will Improve Service Quality and Increase Redundancy and Resiliency

The substantial increase in capacity that will result from PLCN's deployment will improve service for voice and high-bandwidth applications such as video. While the age and length of existing submarine cables between the U.S. and Asia make upgrading that infrastructure a challenge,⁶ PLCN will provide state-of-the-art technology. In addition, by interconnecting with other submarine and terrestrial systems serving the region, PLCN will reduce congestion on those networks and enable carriers and service providers to expand their dynamic routing.

PLCN also will improve the redundancy and resiliency of the communications network in the region. PLCN will interconnect, directly and indirectly, with many of the existing and planned regional and international cables, thus providing additional transmission options in the event of disruptions to other systems, whether natural or manmade. U.S. consumers and carriers will have the ability to use capacity on PLCN as an alternative, diverse transmission route between the U.S. and Asia.

III. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

Information about the Applicants required by Sections 1.767(a)(1)-(3) of the Commission's rules is contained in the attached Appendices:

Appendix B: GU Holdings

Appendix C: Edge USA

Appendix D: PLDC

⁶ Submarine Telecoms Forum, *Submarine Telecoms Industry Report* (Oct. 2016), <http://www.subtelforum.com/Report5>.

IV. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(4)-(7)

A. 47 C.F.R. § 1.767(a)(4): Description of the Cable

A general description of PLCN is provided in Section I above, and a geographic overview and conceptual system configuration are provided in Appendix A.

B. 47 C.F.R. § 1.767(a)(5): Landing Stations

As described above, PLCN will land in Los Angeles, California, Hong Kong, Taiwan, and the Philippines.

Los Angeles, California

The Los Angeles cable landing station will be located at:

Street Address: 445 North Douglas Street
El Segundo, CA 90245

Coordinates: Latitude 33° 55' 18.0278" N
Longitude 118° 23' 1.9165" W

The beach manhole will be located at:

Coordinates: Latitude 33° 56.521' N
Longitude 118° 26.494' W

Maps and images of the Los Angeles landing are provided in Appendix E.

Hong Kong

The Hong Kong cable landing station will be located at:

Street Address: Deep Water Bay Cable Station
45 Deep Water Bay Road
Hong Kong

Coordinates: Latitude 22° 14.894' N
Longitude 114° 11.134' E

The beach manhole will be located at:

Coordinates: Latitude 22° 14.756' N
Longitude 114° 11.173' E

Maps and images of the Hong Kong landing are provided in Appendix F.

Taiwan

The Taiwan cable landing station will be located at:

Street Address: 468 Xietian Road, Toucheng Township
Yilan County, Taiwan 261

Coordinates: Latitude 24° 51.254' N
Longitude 121° 49.765' E

The beach manhole will be located at:

Coordinates: Latitude 24° 51.2280' N
Longitude 121° 49.8426' E

Maps and images of the Taiwan landing are provided in Appendix G.

Aurora, Philippines

The Aurora cable landing station will be located at:

Street Address: Aurora Trading Center, Setan-Calabuanan Road
Baler, Aurora, Philippines 3200

Coordinates: Latitude 15.757145° N
Longitude 121.537872° E

The beach manhole will be located at:

Coordinates: Latitude 15° 46' 06.36" N
Longitude 121° 33' 50.580" E

Maps and images of the Aurora landing are provided in Appendix H.

San Fernando La Union, Philippines

The San Fernando La Union cable landing station will be located at:

Street Address: San Fernando Airport, Airport Road, San Fernando
La Union, Philippines 2500

Coordinates: Latitude 16.598703° N
Longitude 120.306834° E

The beach manhole will be located at:

Coordinates: Latitude 16° 35' 58.60" N
 Longitude 120° 18' 2.80" E

Maps and images of the San Fernando La Union landing are provided in Appendix H.

C. 47 C.F.R. § 1.767(a)(6): Regulatory Status

PLCN will be operated on a private, non-common carrier basis. Pursuant to the *NARUC I* analysis, there is (1) no legal compulsion for the Applicants to serve the public indifferently and (2) no reason to expect that capacity on PLCN will be offered indifferently and indiscriminately to the public, and thus no basis for finding common carriage status.⁷

With respect to the first prong of the *NARUC I* analysis, the Commission has focused on whether an applicant will be able to exercise market power because of the lack of alternative facilities.⁸ In this instance, although PLCN will add important additional capacity on the U.S.-Hong Kong route, a number of alternative facilities on existing and proposed cable systems will compete with PLCN. The U.S.-Hong Kong route is already served directly by Asia-America Gateway. More generally, the U.S.-Hong Kong route is served by a variety of systems landing in Japan, Korea, and China (including, in addition to those listed above, FASTER, Japan-U.S. Cable Network, Pacific Crossing-1, TGN-Pacific, Trans-Pacific Express ("TPE"), and Unity) that provide onward connectivity to Hong Kong via a variety of intra-Asia submarine cable systems (including APCN-2, APG, EAC/C2C, SJC, and TGN Intra-Asia).

The U.S.-Philippines and U.S.-Taiwan routes are also served by competing systems that would preclude PLCN from becoming a bottleneck facility on those routes. The U.S.-Taiwan

⁷ See *National Ass'n of Regulatory Utility Commissioners v. FCC*, 525 F.2d 630, 641-42 (D.C. Cir. 1976), *cert. denied*, 425 U.S. 992 (1976) ("*NARUC I*").

⁸ See *Cable and Wireless PLC*, 12 FCC Rcd 8516, ¶15 (1997); *Optel Communications, Inc.*, 8 FCC Rcd. 2267, 2269 (1993).

route is currently served directly by TPE and FASTER and will soon be served by the NCP system. The U.S.-Philippines route is currently served directly by AAG and will soon be served directly by SEA-US. More generally, like the U.S.-Hong Kong route, the U.S.-Philippines and U.S.-Taiwan routes are served by a variety of systems landing in Japan, Korea, and China that provide onward connectivity to Taiwan and the Philippines via a variety of intra-Asia submarine cable systems. Thus, while PLCN will provide substantial new connectivity between the U.S., Hong Kong, Taiwan, and the Philippines, there are sufficient alternative facilities serving those routes that the Commission should not require the Applicants to serve the public indiscriminately.

Under the second prong of the *NARUC I* analysis, the Commission considers whether there is any reason implicit in the nature of the application that the Applicants would make capacity available to the public indifferently and indiscriminately. In this case, capacity on PLCN will either be used by the Applicants to meet their own internal needs for bandwidth or, as with other non-common carrier cable systems, made available to third parties based on individually tailored agreements. In the latter circumstance, because the Applicants will make “individualized decisions, in particular cases, [on] whether and on what terms to deal,” they will not hold out services indifferently when using capacity on PLCN.

For these reasons, the Commission should license PLCN on a non-common carrier basis.

D. 47 C.F.R. § 1.767(a)(7): List of Owners and Ownership Interests

**Table 1: Ownership of Segment S1
(U.S. Landing to Hong Kong Landing, Excluding Branches)**

The Applicants and their affiliates will own Segment S1 as described below:

Party	Participation Interest	Voting Interest
PLDC	66.67% of all geographic portions of segment	66.67% of all geographic portions of segment
GU Holdings	16.67% of U.S. territorial waters portion of segment	16.67% of U.S. territorial waters portion of segment
GCB	16.67% of international waters portion of segment	16.67% of international waters portion of segment
GCB (or local affiliate)	16.67% of Hong Kong territorial waters portion of segment	16.67% of Hong Kong territorial waters portion of segment
Edge USA	16.67% of U.S. territorial waters portion of segment	16.67% of U.S. territorial waters portion of segment
Edge	16.67% of international waters portion of segment	16.67% of international waters portion of segment
Edge Network Services Hong Kong Limited	16.67% of Hong Kong territorial waters portion of segment	16.67% of Hong Kong territorial waters portion of segment

Table 2: Ownership of Segments S2-S5 and T1-T3

The Applicants and their affiliates will own the remaining segments as described below:

Segment	Party	Participation Interest	Voting Interest
Segment S2: BU1 to Taiwan (including BU1)	GCB (or local affiliate)	100%	100%
Segment S3: BU2 to Aurora, Philippines (including BU2)	Edge	100%	100%
Segment S4: BU3 to San Fernando La Union, Philippines (including BU3)	Edge	100%	100%

Segment S5: BU4 and branch stub (if constructed)	PLDC	100%	100%
Segment T1: Terrestrial link between Hong Kong cable landing station and Hong Kong terminal station	PLDC	100%	100%
Segment T2: Terrestrial link between Hong Kong cable landing station and Hong Kong terminal station (diverse from Segment T1)	PLDC	100%	100%
Segment T3: Terrestrial link between Philippines cable landing stations	Edge	100%	100%

V. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

A. Information Requested by 47 C.F.R. §§ 1.767(a)(8)(i)-(iv) and 63.18(h)

Appendices B through D contain the information requested by Sections 1.767(a)(8)(i)-(iv) and 63.18(h) of the Commission's rules for each of the Applicants.

B. Information Requested by 47 C.F.R. § 63.18(o)

The Applicants' certifications, as required by 47 C.F.R. §§1.2001-1.2003, that they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, are contained in Appendices B through D.

VI. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

The Applicants' certifications that they accept and will abide by the routine conditions in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g), are contained in Appendices B through D.

VII. ELIGIBILITY FOR STREAMLINED PROCESSING UNDER 47 C.F.R. § 1.767(k)

As described in Appendices B through D, each of the Applicants qualifies for streamlined treatment. Therefore, this application is eligible for streamlined processing under Section

1.767(k) of the Commission's rules. The application qualifies under Section 1.767(k)(1), as none of the applicants is affiliated with a foreign carrier with market power in any of PLCN's landing countries. The application further qualifies for streamlining under Section 1.767(k)(4), as California, the only U.S. state in which PLCN will land, does not list a cable landing license as a federal activity requiring a consistency certification under the Coastal Zone Management Act.⁹

VI. CONCLUSION

For the reasons set forth above, the Commission should grant this application to land and operate a private, non-common carrier, fiber optic submarine telecommunications cable between the United States, Hong Kong, Taiwan, and the Philippines. The Applicants respectfully request that the Commission grant this application on a streamlined basis and, in any event, issue approval no later than January 2018.

Respectfully submitted,



Darah Franklin
Counsel
Stephanie Selmer
Associate Corporate Counsel
Google Inc.
25 Massachusetts Avenue NW, Ninth Floor
Washington, DC 20001

Counsel for GU Holdings Inc.

Dated: April 21, 2017

⁹ See California's List of Federal Licenses and Permits Subject to Certification for Consistency, https://www.coastal.ca.gov/fedcd/listlic_2015.pdf (last visited March 24, 2017).

APPENDICES

Appendix A: Geographic Overview and Conceptual Segment Configuration

Appendix B: GU Holdings Inc.

Appendix C: Edge Cable Holdings USA, LLC

Appendix D: Pacific Light Data Communication Co. Ltd.

Appendix E: Maps and Images of U.S. Landing

Appendix F: Maps and Images of Hong Kong Landing


Appendix G: Maps and Images of Taiwan Landing

Appendix H: Maps and Images of Philippines Landings

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served this date upon the following:

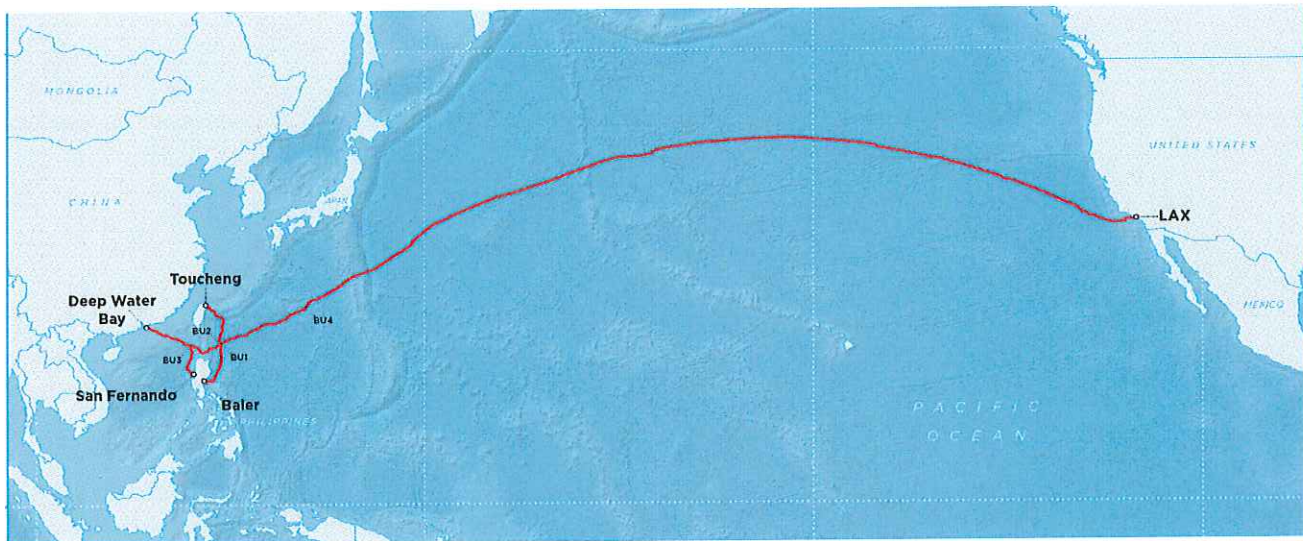
Marlene Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via first class U.S. mail, postage prepaid)	U.S. Coordinator EB/CIP U.S. Department of State 2201 C Street NW Washington, D.C. 20520-5818 (via first class U.S. mail, postage prepaid)
David Krech International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to david.krech@fcc.gov)	Office of Chief Counsel/NTIA U.S. Department of Commerce 14 th Street and Constitution Ave. NW Washington, DC 20230 (via first class U.S. mail, postage prepaid)
Jodi Cooper International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to jodi.cooper@fcc.gov)	Defense Information Systems Agency Attn: GC/DO1 6910 Copper Avenue Fort Meade, MD 20755-7088 (via first class U.S. mail, postage prepaid)
Thomas Sullivan Acting Chief International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to thomas.sullivan@fcc.gov)	Troy Tanner International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to troy.tanner@fcc.gov)


Stephanie Selmer
April 21, 2017

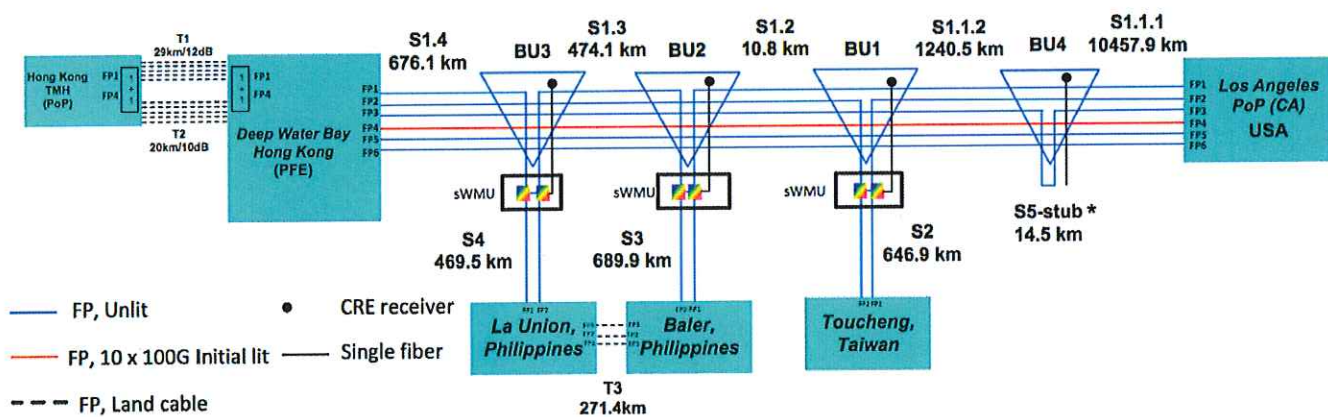
APPENDIX A

GEOGRAPHIC OVERVIEW AND CONCEPTUAL SEGMENT CONFIGURATION

Geographic Overview



Conceptual Segment Configuration



*The addition of BU4 and S5-stub is still under consideration.

APPENDIX B

GU HOLDINGS INC.

GU Holdings Inc. ("GU Holdings") is an indirect, wholly-owned subsidiary of Google Inc. ("Google"). Google's innovative search technologies connect millions of people around the world with information every day. Founded in 1998 by Stanford Ph.D. students Larry Page and Sergey Brin, Google today is a top web property in all major global markets. Google's targeted advertising program provides businesses of all sizes with measurable results, while enhancing the overall web experience for users. Google is headquartered in Silicon Valley with offices throughout the Americas, Europe, and Asia. For more information, visit www.google.com.

GU Holdings holds three licenses under the Cable Landing License Act, 47 C.F.R. § 1.767, in connection with the Unity, FASTER, and Monet cable systems.¹

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

(1) Name, Address and Telephone Number of the Applicant:

GU Holdings Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043
(650) 253-0000

FRN Number: 0017777483

(2) Place of Formation:

GU Holdings is a corporation organized under the laws of Delaware.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Austin Schlick
Director, GU Holdings Inc.
25 Massachusetts Avenue NW, Ninth Floor
Washington, DC 20001
(202) 346-1100
schlick@google.com

With a copy to:

Darah Franklin
Counsel, Google Inc.

¹ See File No. SCL-LIC-20080516-00015 (Unity); File No. SCL-LIC-20150626-00015 (FASTER); File No. SCL-LIC-20150408-00008 (Monet).

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Washington, DC 20001
(202) 346-1100
darahfranklin@google.com

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

(1) Information Requested by 47 C.F.R. § 63.18(h):

GU Holdings is wholly-owned by Google International LLC:

Name: Google International LLC
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 100%
Citizenship: United States (Delaware)
Principal Business: Holding company

Google International LLC is wholly-owned by Google Inc.:

Name: Google Inc.
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 100%
Citizenship: United States (Delaware)
Principal Business: Technology search services and advertising

Google Inc. is wholly-owned by Alphabet Inc.

Name: Alphabet Inc.
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 100%
Citizenship: United States (Delaware)
Principal Business: Holding company

As of February 13, 2017, the following persons have a 10% or greater voting or equity interest in Alphabet Inc.:

Name: Larry Page
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 42.3% of Class B common stock
Citizenship: United States
Principal Business: CEO of Alphabet Inc.

Name: Sergey Brin
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 41.0% of Class B common stock
Citizenship: United States
Principal Business: President of Alphabet Inc.

The shares held by Mr. Page and Mr. Brin together represent more than 50 percent of voting power. No other person or entity has 10 percent or greater direct or indirect voting or equity interest in GU Holdings.

GU Holdings does not have any interlocking directorates with foreign carriers.

(2) Information Requested by 47 C.F.R. § 1.767(a)(8)(ii):

GU Holdings certifies that it: (A) is not a foreign carrier in any foreign country; (B) does not own or control a cable landing station in any foreign country; (C) is affiliated with only the following foreign carriers or entities owning or controlling a cable landing station in any foreign country:

- Google Singapore Pte Ltd is authorized to provide public telecommunications services in Singapore.
- Infraco (Hong Kong) Limited ("Infraco") is authorized to provide public telecommunications services in Hong Kong.
- Google Infraestrutura Brasil Ltda. will own and control the landing station in Santos, Brazil, for the Monet cable system.

(3) Information Requested by 47 C.F.R. § 1.767(a)(8)(iii):

GU Holdings certifies to the following:

- (A) GU Holdings is not a foreign carrier in Hong Kong, Taiwan, or the Philippines, the three foreign destination markets in which the PLCN system will land.
- (B) GU Holdings does not control a foreign carrier in Hong Kong, Taiwan, or the Philippines.
- (C) No entity owning more than 25 percent of GU Holdings or controlling GU Holdings controls a foreign carrier in Taiwan or the Philippines. Alphabet Inc. indirectly holds 100 percent of both GU Holdings and Infraco, which holds a Class License in Hong Kong for purposes of swapping/reselling excess submarine cable capacity.
- (D) No grouping of two or more foreign carriers in Hong Kong, Taiwan, or the Philippines (or parties that control foreign carriers in Hong Kong, Taiwan, or the Philippines) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision of marketing or

arrangements of the terms of acquisition, sale, lease, transfer, and use of capacity on the PLCN system in the United States.

(4) Information Requested by 47 C.F.R. § 1.767(a)(8)(iv):

Not applicable. As noted in response to Section 1.767(a)(8)(iii), GU Holdings is affiliated with a foreign carrier in Hong Kong, which is a member of the World Trade Organization (WTO).

(5) Information Requested by 47 C.F.R. § 63.18(o):

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, GU Holdings is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

GU Holdings accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

ELIGIBILITY FOR STREAMLINED PROCESSING UNDER 47 C.F.R. § 1.767(k)

GU Holdings is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. GU Holdings certifies that it is not a foreign carrier in any of PLCN's foreign destination markets. GU Holdings certifies that it is not affiliated with a foreign carrier in Taiwan or the Philippines. GU Holdings is affiliated with Infraco, a foreign carrier in Hong Kong. Hong Kong is a WTO member and Infraco—which accounts for only a small fraction of Hong Kong's international capacity—lacks 50 percent market share in the international transport and local access markets in Hong Kong. Indeed, in addition to land routes into Hong Kong through mainland China, eleven international submarine cables currently land in the territory² and Infraco does not land any of those cables or have an ownership interest in any landing station. Moreover, Infraco does not appear on the Commission's list of foreign carriers presumed to have market power in foreign destination markets.³ GU Holdings' affiliation with Infraco therefore poses no risk to competition on the U.S.-Hong Kong route and GU Holdings qualifies for presumptive non-dominant treatment pursuant to Section 63.10(a)(3).

Further, GU Holdings is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the "CZMA"). California, the only U.S. state in which the PLCN cable system will land,

² See TeleGeography, Submarine Cable Map, <http://www.submarinecablemap.com/#/country/hong-kong> (last visited Feb. 16, 2017).

³ See International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets, Public Notice, 22 FCC Rcd. 945 (Int'l Bur. 2007).


does not list a cable landing license as a federal activity requiring a consistency certification under the CZMA.⁴

⁴ See California's List of Federal Licenses and Permits Subject to Certification for Consistency, available at <https://www.coastal.ca.gov/fedcd/fedcndx.html>.

Certification

I am authorized to enter this certification on behalf of GU Holdings Inc.

All of the information contained in this application and Appendix B is true and correct to the best of my knowledge and belief.

By: 
Austin Schlick
Director, GU Holdings Inc.
25 Massachusetts Avenue NW, Ninth Floor
Washington, DC 20001
(202) 346-1100
schlick@google.com

For and on behalf of GU Holdings Inc.

Dated: April 14, 2017

APPENDIX C

Edge Cable Holdings USA, LLC

Edge Cable Holdings USA, LLC (“Edge USA”) is a wholly owned, direct subsidiary of Facebook, Inc. Edge USA is organized under Delaware law, with its principal place of business in Menlo Park, California. Edge USA provides connectivity exclusively to data centers and points of presence in the United States owned and operated by its affiliates. Edge USA does not currently hold any FCC licenses or authorizations, although it is a joint applicant for a cable landing license for the Marea system.¹

Facebook, Inc., through its affiliates, will own 16.67% of the PLCN cable system and have capacity on routes between the United States, Philippines, and Hong Kong. For the wet segment of PLCN, Edge USA will own the U.S.-territory portion, Edge Network Services Hong Kong Limited will own the Hong Kong-territory portion, and Edge Network Services Limited will own the Philippines-territory and international waters portions. Neither Facebook, Inc. nor any of its affiliates will have an ownership interest in the Hong Kong, Philippines, or U.S. cable landing stations.

Below, Edge USA provides information required by 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), and (k).

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

(1) Name, Address and Telephone Number of the Applicant:

Edge Cable Holdings USA, LLC
1601 Willow Road
Menlo Park, California 94025-1452
+1 650 543 4800

¹ FCC File No. SCL-LIC-20160525-00012.

(2) **Place of Formation:**

Edge USA is a limited liability company organized under Delaware law.

(3) **Points of Contact:**

Correspondence concerning the application should be sent to the following:

Johanna Ravelo
Associate General Counsel
Facebook, Inc.
One Hacker Way
Menlo Park, California 94025-1452
+1 650 796 7804
jravelo@fb.com

With a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for the Edge Cable Holdings USA, LLC, and Facebook, Inc.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

(1) **Information Requested by 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(h):**

The following are 10% or greater direct or indirect interest holders in Edge USA, as of

December 31, 2016:

Facebook, Inc. ("Facebook")

Address: 1601 Willow Road, Menlo Park, CA 94025

Citizenship: Delaware

Principal Business: software and technology

Relationship: Facebook holds a 100% voting and equity interest in Edge USA.

CZI Holdings, LLC ("CZI")

Address: 314 Lytton Avenue, Suite 200, Palo Alto, CA 94301

Citizenship: Delaware

Principal Business: philanthropy

Relationship: CZI holds owns 13.9% of Facebook's outstanding shares and holds a

51.96% voting interest in Facebook.

Mark Zuckerberg

Address: 1601 Willow Road, Menlo Park, CA 94025

Citizenship: USA

Principal Business: software and technology

Relationship: Mr. Zuckerberg, who serves as Chairman and CEO of Facebook, owns all of CZI's member interests and, together with his other ownership positions in Facebook, approximately 14.35% of Facebook's outstanding shares and holds an approximate 59.58% voting interest in Facebook that includes (a) a 51.96% voting interest for shares he holds directly or controls through CZI and (b) a 6.3% voting interest that he has authority to vote pursuant to voting agreements with (i) Dustin Moskovitz, Trustee of The Dustin Moskovitz 2008 Annuity Trust dated March 10, 2008, and (ii) Dustin Moskovitz, Trustee of The Dustin A. Moskovitz Trust dated December 27, 2005.

Facebook's shares trade publicly on the NASDAQ Stock Market under the symbol "FB."

As there is an active market in Facebook's shares, Facebook's share ownership is always fluid.

Moreover, Facebook can ascertain its significant shareholders only on the basis of its records and may not know of possibly related or affiliated shareholders that are not disclosed to it.

Recognizing these limitations, as of the most recent measurable date, December 31, 2016,

Facebook has no 10% or greater direct or indirect shareholders other than CZI and Mr.

Zuckerberg.

Edge USA further certifies that no corporate officer and director of Edge USA is also an officer or director of any foreign carrier.

(2) Information Requested by 47 C.F.R. § 1.767(a)(8)(ii):

Edge USA certifies that it:

(A) is not a foreign carrier in any foreign country;

(B) does not own or control a cable landing station in any foreign country;

(C) is not affiliated with any foreign carrier and is not affiliated with any entity owning or controlling a cable landing station in any foreign country (although it is affiliated Edge Network Holdings Limited, the Spain Branch of which will own a 25-percent interest in the Bilbao, Spain, cable landing station for the Marea system).

(3) Information Requested by 47 C.F.R. § 1.767(a)(8)(iii):

Edge USA certifies to the following: (A) it is not a foreign carrier in Hong Kong, the Philippines, or Taiwan, the three foreign destination market in which the PLCN system will land; (B) it does not control a foreign carrier in Hong Kong, the Philippines, or Taiwan; (C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in Hong Kong, the Philippines, or Taiwan; and (D) no grouping of two or more foreign carriers in Hong Kong, the Philippines, or Taiwan (or parties that control foreign carriers in Hong Kong, the Philippines, or Taiwan) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the PLCN system in the United States.

(4) Information Requested by 47 C.F.R. § 1.767(a)(8)(iv):

Not applicable, as Edge USA did not identify any markets in response to 47 C.F.R. § 1.767(a)(8)(iii).

(5) Information Requested by 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(o):

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, Edge USA is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862(a).

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

Edge USA accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

ELIGIBILITY FOR STREAMLINED PROCESSING UNDER 47 C.F.R. § 1.767(k)

Edge USA is eligible for streamlined processing under Section 1.767(k)(1) of the Commission's rules. Edge USA is not a foreign carrier in Hong Kong, Taiwan, or the

Philippines, and is not affiliated with a foreign carrier in any of those countries.

Further, Edge USA is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the “CZMA”). California, the only U.S. state in which the PLCN cable system will land, does not list a cable landing license as a federal activity requiring a consistency certification under the CZMA.²

² See California’s List of Federal Licenses and Permits Subject to Certification for Consistency, available at https://www.coastal.ca.gov/fedcd/listlic_2015.pdf.

Certification

I am authorized to enter this certification on behalf of Edge USA. All of the information contained in this application and Appendix C is true and correct to the best of my knowledge and belief.

Edge Cable Holdings USA, LLC



Michael L. Johnson
Assistant Secretary
Edge Cable Holdings USA, LLC
1601 Willow Road
Menlo Park, CA 94025-1452
+1 650 543 4800
mj@fb.com

Dated: April 6, 2017

APPENDIX D

PACIFIC LIGHT DATA COMMUNICATION CO., LIMITED

Pacific Light Data Communication Co., Ltd. (PLDC), which was founded in 2015 in Hong Kong in the heart of Asia, is set to become a leading communications service provider in the region. PLDC's first project, the Pacific Light Cable Network (PLCN), will be the first subsea cable directly connecting Hong Kong and the United States. PLCN includes the C+L technology, providing high speed, low latency, and more secure bandwidth to all Internet users. Neither PLDC nor any of its affiliates hold any FCC licenses.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

(1) Name, Address and Telephone Number of the Applicant:

Pacific Light Data Communication Co., Ltd. FRN Number: 0026037341
Unit 1705-1706, 17/F, One Peking, 1 Peking Road,
Tsim Sha Tsui, Kowloon, Hong Kong
+852 2682 6369

(2) Place of Formation:

PLDC is a private company limited by shares organized under the laws of Hong Kong, Companies Ordinance Chapter 622H.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Tsang, Yu Hoi
Administration Manager
Unit 1705-1706, 17/F, One Peking, 1 Peking Road,
Tsim Sha Tsui, Kowloon, Hong Kong
+852 2682 6369
christsang@pldcglobal.com

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

(1) Information Requested by 47 C.F.R. § 63.18(h):

PLDC is 100% owned by PLD Holdings Limited:

Name: PLD Holdings Limited
Address: P.O. Box 3340 Road Town, Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Holding company

PLD Holdings Limited is 100% owned by China Culture Silicon Valley Limited:

Name: China Culture Silicon Valley Limited
Address: Unit 1705-1706, 17/F, One Peking, 1 Peking Road, Tsim Sha Tsui, Kowloon, Hong Kong
Citizenship: Hong Kong
Principal Business: Holding company

China Culture Silicon Valley Limited is 100% owned by Mr. Wei, Junkang:

Name: Wei, Junkang
Address: G/F, 19 Cumberland Road, Kowloon Tong, Kowloon, Hong Kong
Citizenship: Hong Kong SAR of China
Principal Business: Business Investment in Information Technology

PLDC does not have any interlocking directorates with foreign carriers.

(2) Information Requested by 47 C.F.R. § 1.767(a)(8)(ii):

PLDC certifies that it: (A) is not a foreign carrier in any foreign country; (B) does not own or control any cable landing stations in any foreign country; and (C) is not affiliated with any foreign carrier and is not affiliated with any entity owning or controlling a cable landing station in any foreign country.

(3) Information Requested by 47 C.F.R. § 1.767(a)(8)(iii):

PLDC certifies to the following: (A) it is not a foreign carrier in Hong Kong, Taiwan, or the Philippines, the three foreign destination markets in which the PLCN system will land; (B) it does not control a foreign carrier in Hong Kong, Taiwan, or the Philippines; (C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in Hong Kong, Taiwan, or the Philippines; and (D) no grouping of two or more foreign carriers in Hong Kong, Taiwan, or the Philippines (or parties that control foreign carriers in Hong Kong, Taiwan, or the Philippines) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision of marketing or arrangements of the terms of acquisition, sale, lease, transfer, and use of capacity on the PLCN system in the United States.

(4) Information Requested by 47 C.F.R. § 1.767(a)(8)(iv):

Not applicable.

(5) Information Requested by 47 C.F.R. § 63.18(o):

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, PLDC is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

PLDC accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

ELIGIBILITY FOR STREAMLINED PROCESSING UNDER 47 C.F.R. § 1.767(k)

PLDC is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. PLDC is not a foreign carrier in Hong Kong, Taiwan, or the Philippines, and is not affiliated with a foreign carrier in any of those countries.

Further, PLDC is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the "CZMA"). California, the only U.S. state in which the PLCN cable system will land, does not list a cable landing license as a federal activity requiring a consistency certification under the CZMA.¹

¹ See California's List of Federal Licenses and Permits Subject to Certification for Consistency, available at <https://www.coastal.ca.gov/fedcd/fedcndx.html>.

Certification

I am authorized to enter this certification on behalf of Pacific Light Data Communication Co., Limited.

All of the information contained in this application and Appendix D is true and correct to the best of my knowledge and belief.

By:


Tsang, Yu Hoi
Administration Manager
Unit 1705-1706, 17/F, One Peking,
1 Peking Road, Tsim Sha Tsui, Kowloon, Hong
Kong
+852 2682 6369
christsang@pldcglobal.com

**For and on behalf of Pacific Light Data
Communication Co., Limited.**

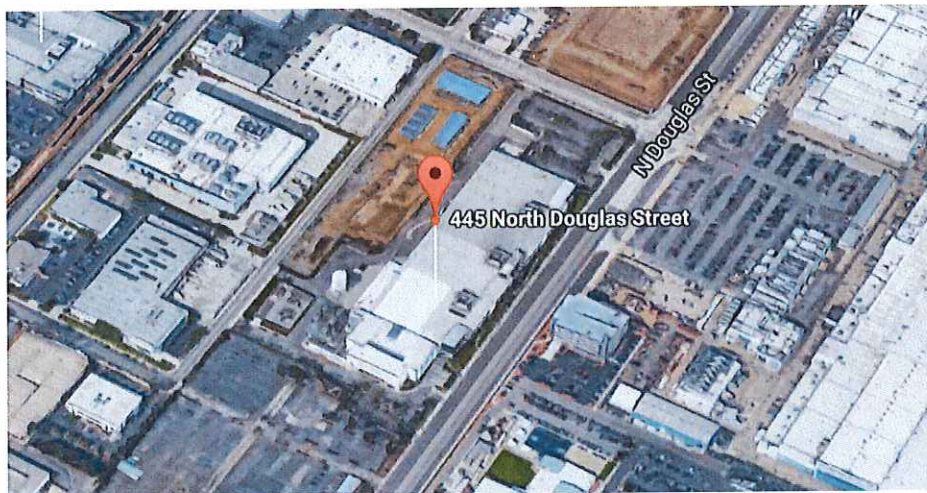
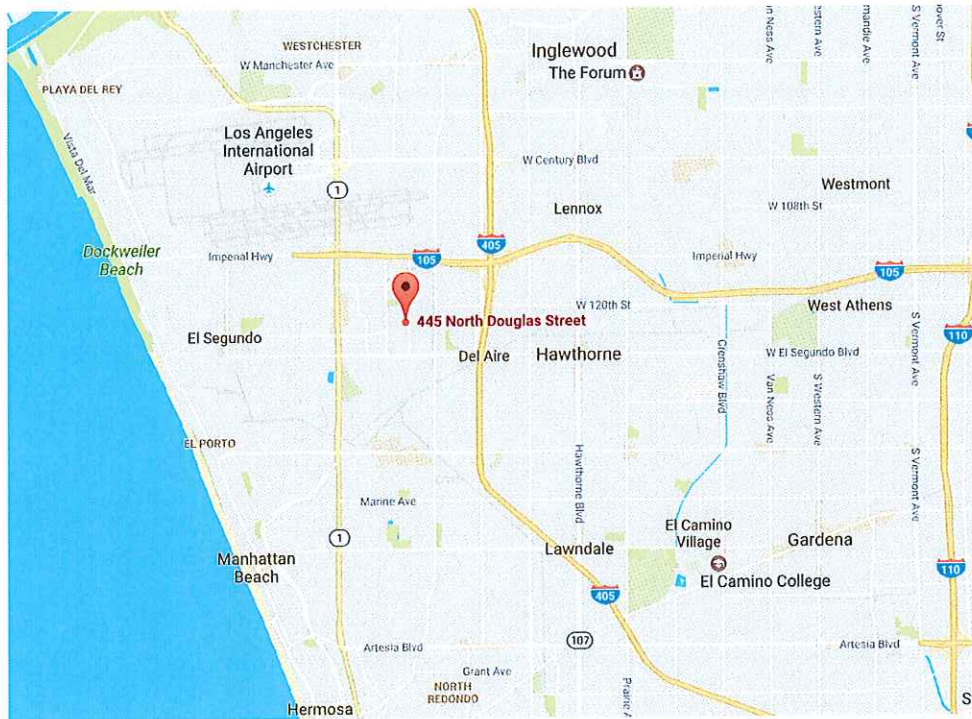
Dated: [April 13, 2017]

APPENDIX E

MAPS AND IMAGES OF U.S. LANDING

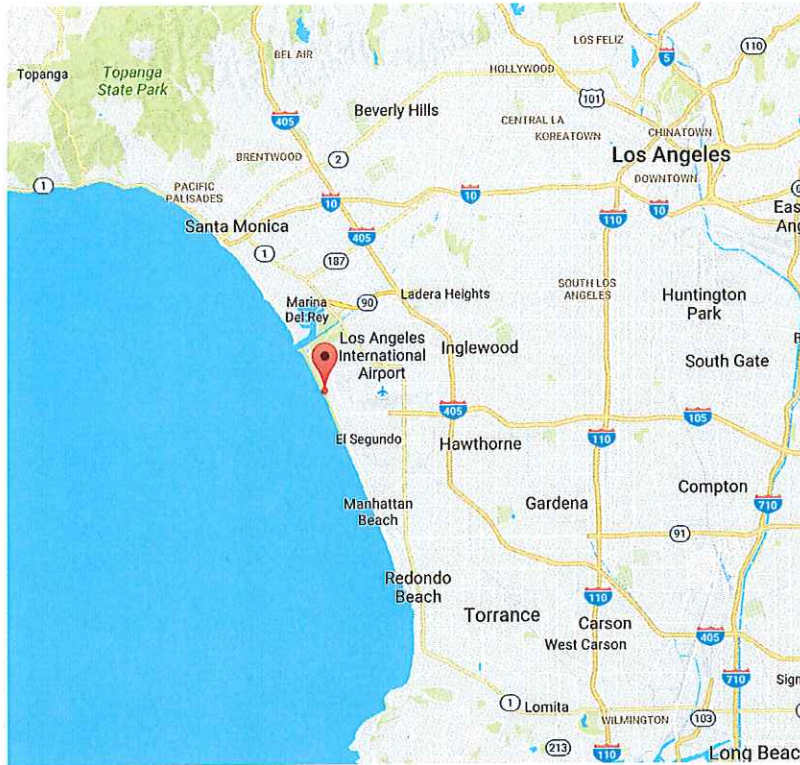
Cable Landing Station in Los Angeles, CA

Lat: 33° 55' 18.0278" N, Long: 118° 23' 1.9165" W



Beach Manhole in Los Angeles, CA

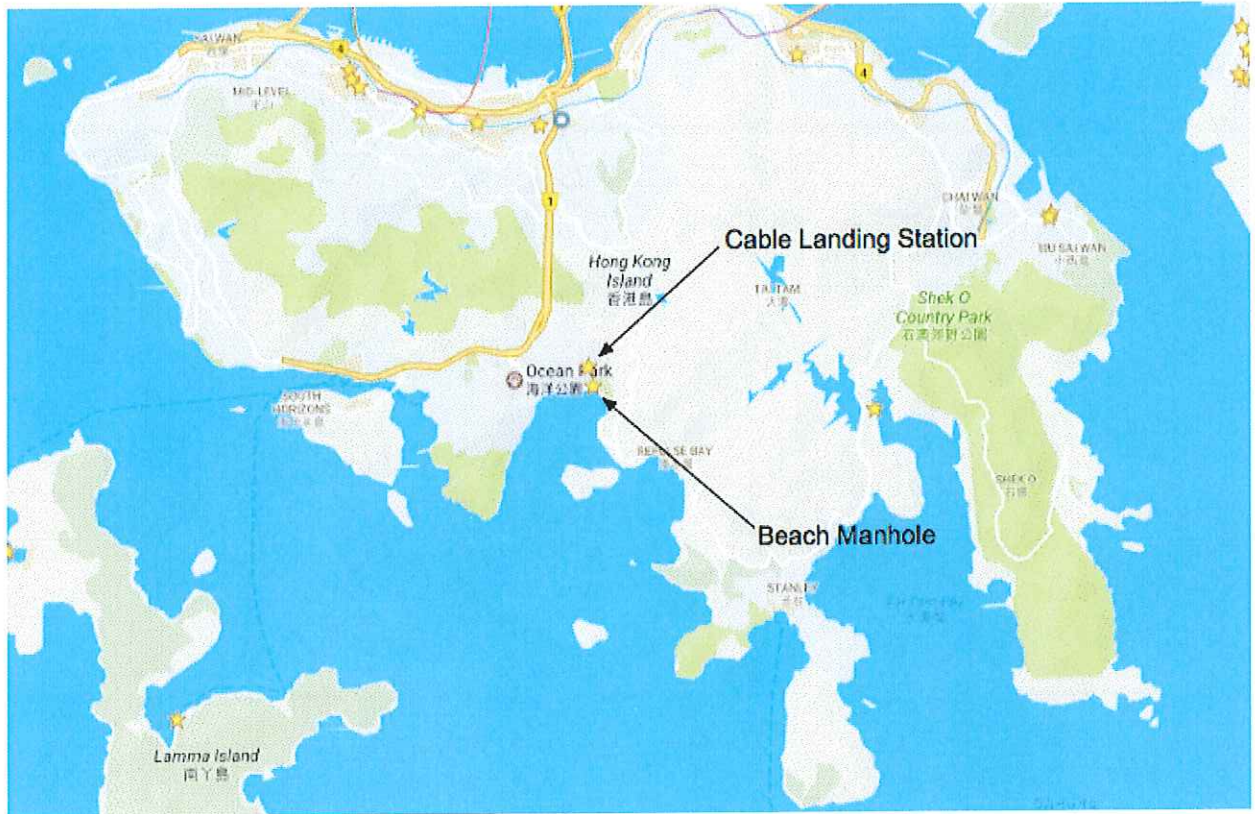
Lat: 33° 56.521' N, Long: 118° 26.494' W



APPENDIX F

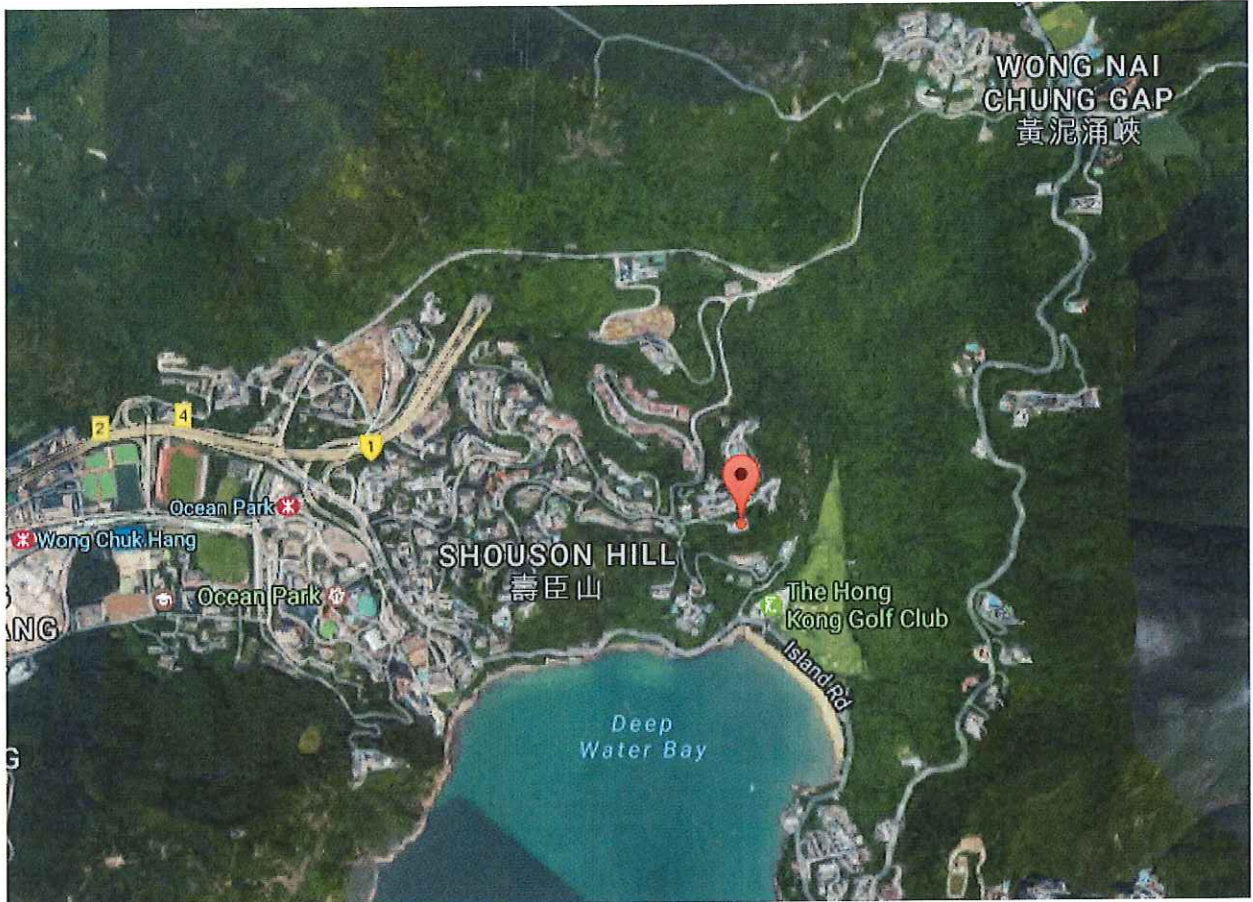
MAPS AND IMAGES OF HONG KONG LANDING

Hong Kong



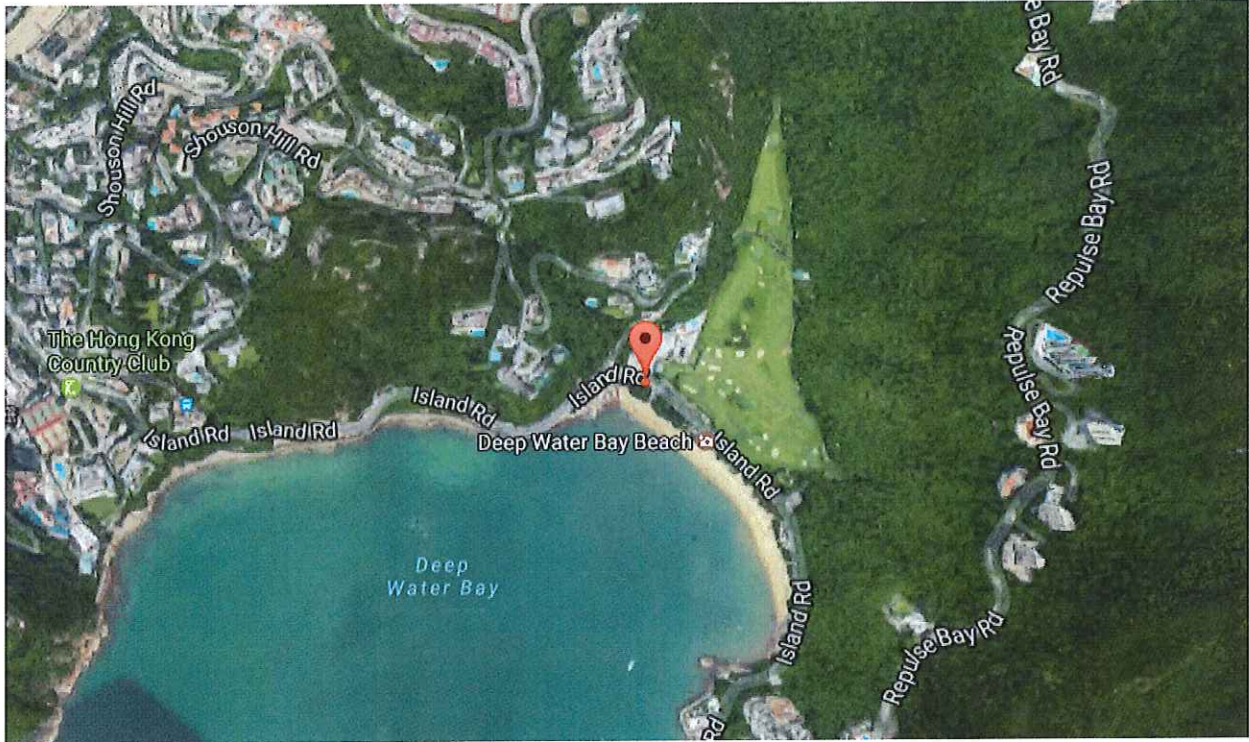
Cable Landing Station in Deep Water Bay

Lat: 22° 14.894' N, Long: 114° 11.134' E
Street Address: 45 Deep Water Bay Road, Hong Kong



Beach Manhole in Deep Water Bay

Lat: 22° 14.756' N, Long: 114° 11.173' E



APPENDIX G

MAPS AND IMAGES OF TAIWAN LANDING

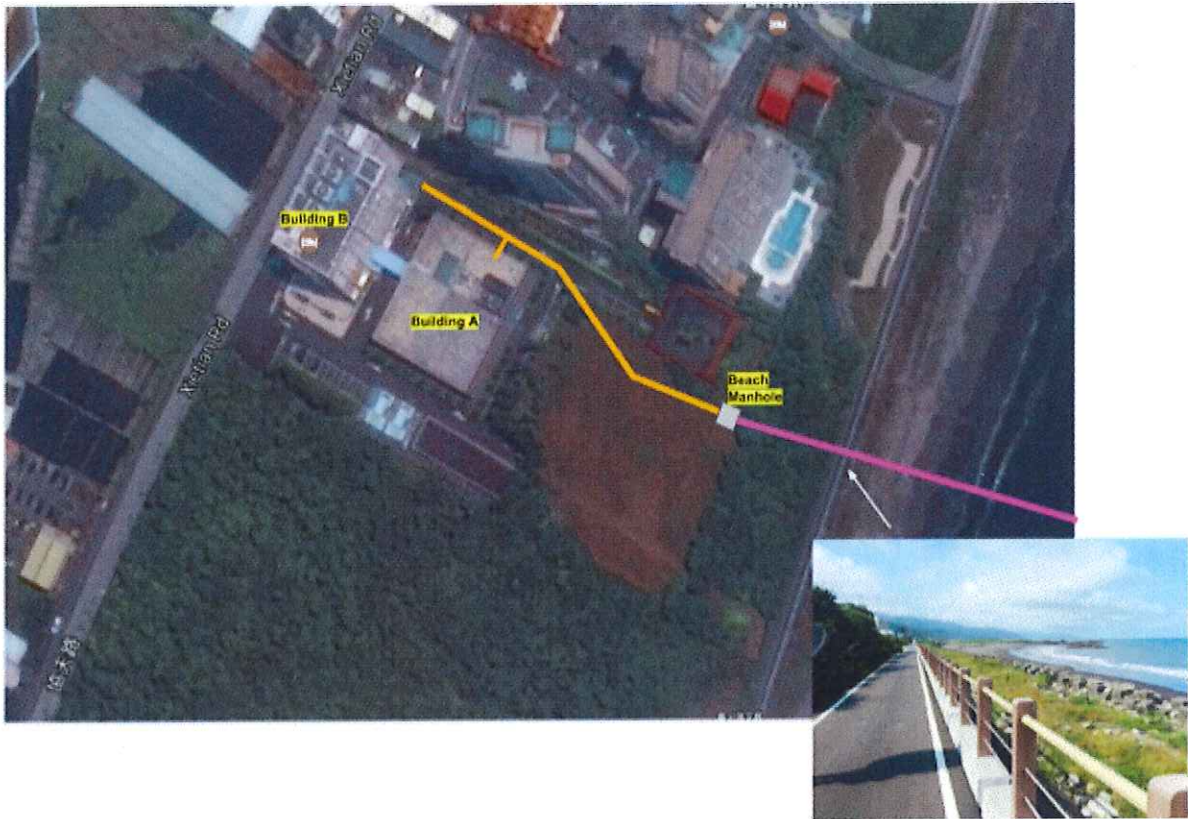
Taiwan



Cable Landing Station and Beach Manhole in Toucheng

Cable Landing Station Lat: 24° 51.254' N, Long: 121° 49.765' E
Cable Landing Station Street Address: 468 Xietian Road, Toucheng Township,
Yilan County, Taiwan 261

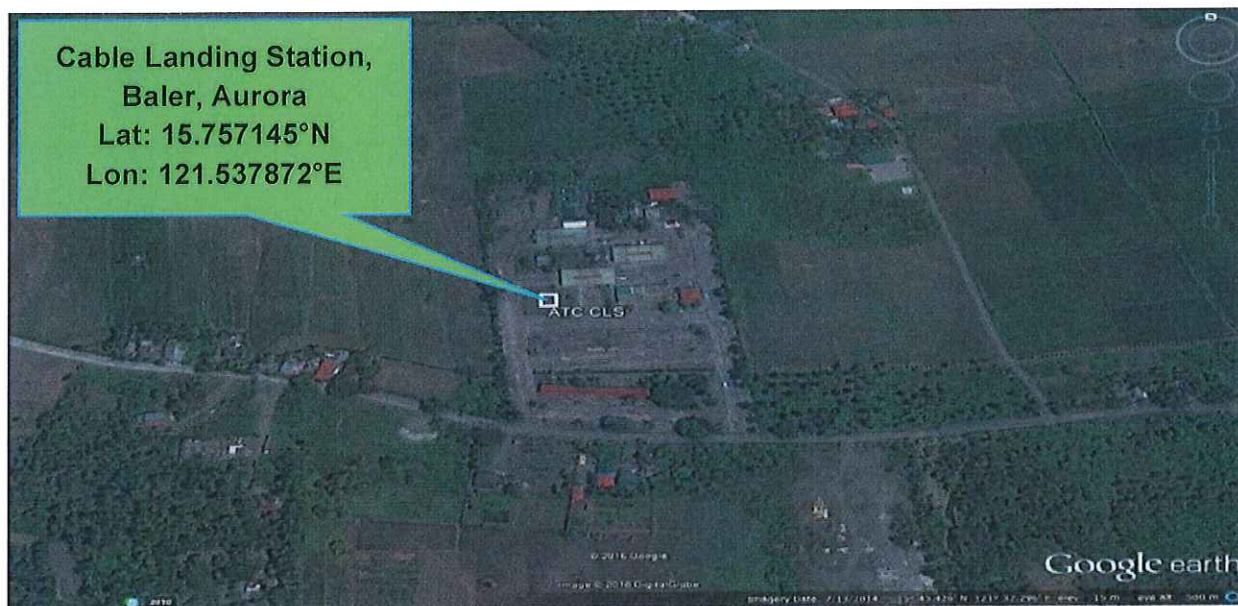
Beach Manhole Lat: 24° 51.2280' N, Long: 121° 49.8426' E



APPENDIX H

MAPS AND IMAGES OF PHILIPPINES LANDINGS

Cable Landing Station in Aurora



Cable landing station street address:
Aurora Trading Center, Setan-Calabuanan Road, Baler, Aurora, Philippines 3200

Beach Manhole in Aurora

Beach Manhole,
Baler, Aurora
Lat: N15°46' 06.36"
Lon: E121°33' 50.580"



Cable Landing Station in San Fernando La Union



Cable landing station street address:
San Fernando Airport, Airport Road, San Fernando La Union, Philippines 2500

Beach Manhole in San Fernando La Union

