

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

In the Matter of	)	
	)	
GU HOLDINGS INC., EDGE CABLE	)	File No. SCL-LIC-20170421-00012
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	)	

SUPPLEMENT TO 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”), submit this supplement to their application filed on April 21, 2017, 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 (“Application”). The Applicants 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”).

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

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

As set forth below, the Applicants supplement the Application with additional information regarding the control of U.S facilities and equipment, PLCN's segment configuration, and the landing party arrangements for PLCN's foreign branches.

I. CONTROL OF U.S. FACILITIES AND EQUIPMENT

As stated in Part I of the Application, the Applicants intend to enter into contractual arrangements with third parties for specified 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, terrestrial transmission facilities associated with the U.S. landing, as well as the U.S. network operations center ("NOC"). Negotiations with potential vendors, all of whom are U.S. persons, are ongoing. Regardless of the vendor, the U.S. common infrastructure will be managed, controlled, and operated by the U.S. NOC pursuant to a contract with the Applicants (or their affiliates). The U.S. landing services vendor contract will provide for proper control and the authority to direct the vendor in all matters related to PLCN's U.S. common infrastructure. The Applicants will promptly advise the Commission once vendors are engaged.

II. CABLE SEGMENTS

As noted in Part I of the Application, PLCN will have two segments: submarine Segment S and terrestrial Segment T. Each of the two segments will be divided into subsegments as described in Part IV.D and Appendix A of the Application.

III. FOREIGN LANDING ARRANGEMENTS

Below is a description of the non-U.S. landing arrangements. Appendix A of the Application provides a geographic overview and conceptual segment configuration of the cable.³ The Applicants will promptly advise the Commission once landing services vendors are engaged.

A. Hong Kong

PLCN's 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 as stated in Part IV.D, Table 1 of the Application. Edge Network Services Limited ("Edge"), Google Cable Bermuda Ltd. ("GCB"), and PLDC (or their respective local affiliates) each intends to contract with a third party to provide landing services in Hong Kong.

B. Philippines

The two branches to the Philippines will be wholly-owned and controlled by Edge. Edge intends to contract with a third party to provide landing services in the Philippines.

C. Taiwan

The branch to Taiwan will be wholly-owned and controlled by GCB or a Google affiliate incorporated in Taiwan. GCB (or a local affiliate) intends to contract with a third party to provide landing services in Taiwan.

D. Stubbed Branch

A fourth, stubbed, branch will be wholly-owned by PLDC.

³ In addition to the terrestrial links identified in the Application, there are expected to be other terrestrial connections within landing countries for Applicants' private use.

VI. CONCLUSION

For the reasons set forth above and in the Application, the Commission should grant the cable landing license 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 the license on a streamlined basis and, in any event, issue approval no later than January 2018.

Respectfully submitted,



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Dated: August 4, 2017

CERTIFICATE OF SERVICE

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

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