

August 10, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Re: Cable Landing License Application for the Crosslake Fibre System, File Nos.
SCL-LIC-20180216-00002 and SCL-AMD-20180510-00009*

Dear Ms. Dortch:

Through its counsel, Crosslake Fiber USA LP (“CF USA LP”) supplements the above-referenced application to land and operate within the United States a private fiber-optic submarine cable network connecting Toronto, Ontario, with Cambria, New York (the “Application”). This supplement updates the ownership disclosures set forth in paragraph H of the Application to reflect the establishment of a new investment vehicle, Tiger Infrastructure Partners Fund II (Europe) Crosslake AIV LP (“Tiger Europe”), which will have a 22-percent economic interest in Connect Investments LP (“Connect Investments”) as a limited partner. The economic interest of Tiger Infrastructure Partners Fund II Crosslake AIV LP (“Tiger”) will correspondingly be reduced to 78 percent. (Connect Investments is a limited partner of CF USA LP’s Canadian parent, Crosslake Fibre LP, and the controlling shareholder of 2608254 Ontario, Inc., Crosslake Fibre LP’s general partner.) Further, one of Tiger Europe’s limited partners, Nationwide Pension Fund Trustee Limited, will hold a disclosable interest, as it will have an indirect 22-percent economic interest in CF USA LP.

As this new investment will result in slight reductions in the ownership percentages of several other interest holders, for clarity and ease of reference, CF USA LP restates its 10-percent-or-greater interest holders as follows:

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Crosslake Fiber USA LLC (“CF USA LLC”)

Address: 235 Allan Street, Oakville, Ontario L6J 3P2, Canada

Place of Organization: Delaware

Principal Business: telecommunications

Relationship: CF USA LLC is the general partner of CF USA LP, with a 100-percent voting interest and no economic interest in CF USA LP.

Crosslake Fibre LP

Address: 235 Allan Street, Oakville, Ontario L6J 3P2, Canada

Place of Organization: Ontario, Canada

Principal Business: telecommunications

Relationship: Crosslake Fibre LP is the sole limited partner of CF USA LP and holds a 100-percent economic interest and no voting interest in CF USA LP. Crosslake Fibre LP is also the sole member of, and holds a 100-percent voting and economic interest in, CF USA LLC.

2608254 Ontario Inc.

Address: 235 Allan Street, Oakville, Ontario L6J 3P2, Canada

Place of Organization: Ontario, Canada

Principal Business: telecommunications

Relationship: 2608254 Ontario Inc. serves as the general partner of Crosslake Fibre LP, and holds 100-percent voting interest and a 0.01-percent economic interest in Crosslake Fibre LP.

Connect Investments LP (“Connect Investments”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Place of Organization: Delaware

Principal Business: investments

Relationship: Connect Investments is a limited partner of Crosslake Fibre LP and will hold no voting interest and a 93.26-percent economic interest in Crosslake Fibre LP. Connect Investments will also hold a 93.26-percent voting and economic interest in 2608254 Ontario Inc.

Tiger Infrastructure Partners Fund II Crosslake AIV LP (“Tiger”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Place of Organization: Delaware

Principal Business: investments

Relationship: Tiger is a limited partner of Connect Investments and holds a 78-percent economic interest and no voting interest in Connect Investments.

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Tiger Infrastructure Associates GP II LP (“Tiger Infra”)

Address: 717 Fifth Avenue, Floor 12A, New York, NY 10022

Place of Organization: Delaware

Principal Business: investments

Relationship: Tiger Infra is the general partner of Connect Investments and holds a 100-percent voting interest and no direct economic interest in Connect Investments. Tiger Infra is also the general partner of Tiger and holds a 100-percent voting interest and a 1.5-percent economic interest in Tiger.

Emil Henry VI LLC (“Tiger LLC”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Place of Organization: Delaware

Principal Business: investments

Relationship: Tiger LLC is the general partner of Tiger Infra and holds a 100-percent voting and economic interest in Tiger Infra.

Emil W. Henry, Jr. (“Emil Henry”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Citizenship: United States

Principal Business: investments

Relationship: Emil Henry is the sole member and manager of Tiger LLC and holds a 100-percent voting and economic interest in Tiger LLC. Emil Henry is also the sole member and manager of Tiger 2 LLC (identified below) and holds a 100-percent voting and economic interest in Tiger 2 LLC.

District of Columbia Retirement Board (“DCRB”)

Address: 900 7th Street, N.W., 2nd Floor, Washington, D.C. 20001

Place of Organization: District of Columbia

Principal Business: benefits administration and investments

Relationship: DCRB is a limited partner of Tiger and holds a 15.22-percent economic and no voting interest in Tiger. No investor in DCRB has a 10-percent-or-greater indirect voting or economic interest in CF USA LP.

CAT Holding, LLC (“CAT”)

Address: 285 Madison Avenue, 20th Floor, New York, New York 10017

Place of Organization: Delaware

Principal Business: investments

Relationship: CAT is a limited partner of Tiger and holds a 10.87-percent economic interest and no voting interest in Tiger.

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Trust u/a/d December 24, 1985 f/b/o the Issue of Dirk Ziff (“CAT Trust”)

Address: 350 Park Avenue, 4th Floor, New York, New York 10022

Place of Organization: Florida

Principal Business: trust administration and investments

Relationship: CAT Trust owns a 99-percent voting and economic interest in CAT. No beneficiary under the CAT Trust holds a 10-percent-or-greater indirect voting or economic interest in CF USA LP.

Kiewit Infrastructure Co. (“Kiewit”)

Address: 3555 Farnam Street, Omaha, Nebraska 68131

Place of Organization: Delaware

Principal Business: infrastructure

Relationship: Kiewit is a limited partner of Tiger and holds a 8.70-percent economic interest and no voting interest in Tiger.

Kiewit Infrastructure Group, Inc. (“Kiewit Group”)

Address: 3555 Farnam Street, Omaha, Nebraska 68131

Place of Organization: Delaware

Principal Business: infrastructure

Relationship: Kiewit Group holds a 100-percent voting and economic interest in Kiewit.

Kiewit Corporation (“Kiewit Corp.”)

Address: 3555 Farnam Street, Omaha, Nebraska 68131

Place of Organization: Delaware

Principal Business: infrastructure

Relationship: Kiewit Corp. holds a 100-percent voting and economic interest in Kiewit Group.

Peter Kiewit Sons’, Inc. (“Kiewit Sons”)

Address: 3555 Farnam Street, Omaha, Nebraska 68131

Place of Organization: Delaware

Principal Business: infrastructure

Relationship: Kiewit Sons holds a 100-percent voting and economic interest in Kiewit. Kiewit Sons is employee-owned, with no controlling shareholder and no shareholder holding a 10-percent or greater indirect voting or economic interest in CF USA LP.

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BAE Systems Pension Scheme (“BAE Scheme”)

Address: Warwick House, P.O. Box 87, Farnborough Aerospace Centre, Farnborough, GU14 6YU, United Kingdom

Place of Organization: England

Principal Business: pension administration and investments

Relationship: BAE Scheme is a limited partner of Tiger and holds a 26.09-percent economic interest and no voting interest in Tiger. No investor in BAE Scheme has a 10-percent or greater indirect voting or economic interest in CF USA LP.

Tiger Infrastructure Partners Fund II (Europe) Crosslake AIV LP (“Tiger Europe”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Place of Organization: Delaware

Principal Business: investments

Relationship: Tiger Europe is a limited partner of Connect Investments and holds a 22-percent economic interest and no voting interest in Connect Investments.

Nationwide Pension Fund Trustee Limited (“Nationwide”)

Address: One Threadneedle Street, London EC2 R8AW, United Kingdom

Place of Organization: United Kingdom

Principal Business: pension administration and investments

Relationship: Nationwide is a limited partner of Tiger Europe and holds a 98.5-percent economic interest and no voting interest in Tiger Europe.

Tiger Infrastructure Associates GP II LP (Europe) Ltd. (“Tiger Infra Europe”)

Address: Lansdowne House, Third Floor, 57 Berkeley Square, London W1J6ER, United Kingdom

Place of Organization: Cayman Islands

Principal Business: investments

Relationship: Tiger Infra Europe is the general partner of Tiger Europe and holds a 100-percent voting interest and a 1.5-percent economic interest in Tiger Europe.

Tiger Infrastructure Associates GP II LP (Europe) S.a.r.l. (“Tiger Infra Europe S.a.r.l.”)

Address: Lansdowne House, Third Floor, 57 Berkeley Square, London W1J6ER, United Kingdom

Place of Organization: Luxembourg

Principal Business: investments

Relationship: Tiger Infra Europe S.a.r.l. holds a 100-percent voting and economic interest in Tiger Infra Europe.

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Tiger Infrastructure UK 1 Limited (“Tiger Infra UK.”)

Address: Lansdowne House, Third Floor, 57 Berkeley Square, London W1J6ER, United Kingdom

Place of Organization: United Kingdom

Principal Business: investments

Relationship: Tiger Infra UK holds a 100-percent voting and economic interest in Tiger Europe Infra S.a.r.l.

Tiger Infrastructure Partners LP (“Tiger Infra LP”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Place of Organization: Delaware

Principal Business: investments

Relationship: Tiger Infra LP holds a 100-percent voting and economic interest in Tiger Infra UK.

Emil Henry III LLC (“Tiger 2 LLC”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Place of Organization: Delaware

Principal Business: investments

Relationship: Tiger 2 LLC holds a 100-percent voting and economic interest in Tiger Infra LP.

Emil W. Henry, Jr. (“Emil Henry”)

Address: c/o Tiger Infrastructure Partners LP, 717 Fifth Avenue, Floor 12A, New York, New York 10022

Citizenship: United States

Principal Business: investments

Relationship: Emil Henry is the sole member and manager of Tiger 2 LLC and holds a 100-percent voting and economic interest in Tiger 2 LLC.

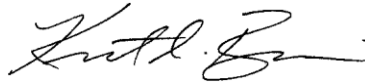
No other entity or individual will hold a ten-percent-or-greater direct or indirect voting or economic interest in CF USA LP. As stated in the Application, the remaining 6.74-percent economic interest in each of Crosslake Fibre LP and 2608254 Ontario Inc. is held by a mix of Canadian and U.S. investors, including Canadian-citizen management of CF USA LLC.

As reflected in the information supplied above—and as illustrated on Exhibit A—the new investment does not alter the control structure of CF USA LP: CF USA LP will continue to be ultimately controlled by Emil W. Henry, Jr., a U.S. citizen.

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Should you have any questions regarding the information provided above, please contact Kent Bressie at +1 202 730 1337 or kbressie@hwglaw.com or Colleen Sechrest at +1 202 730 1308 or csechrest@hwglaw.com.

Yours sincerely,



Kent Bressie
Colleen Sechrest
Counsel for Crosslake Fiber USA LP

Attachments

cc: Jodi Cooper
David Krech

EXHIBIT A-1
Crosslake Fiber USA LP Ownership Structure

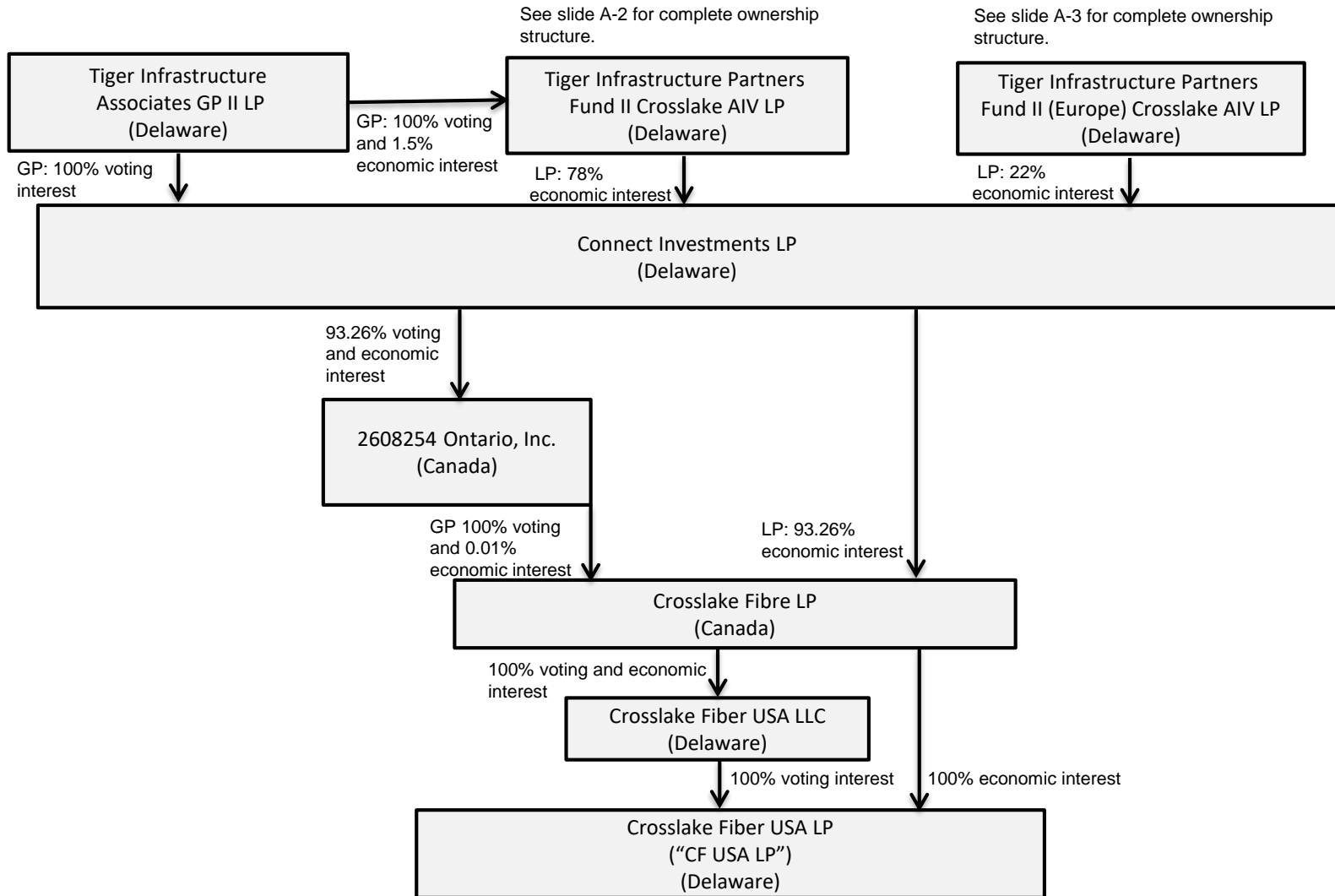


EXHIBIT A-2
Crosslake Fiber USA LP Ownership Structure

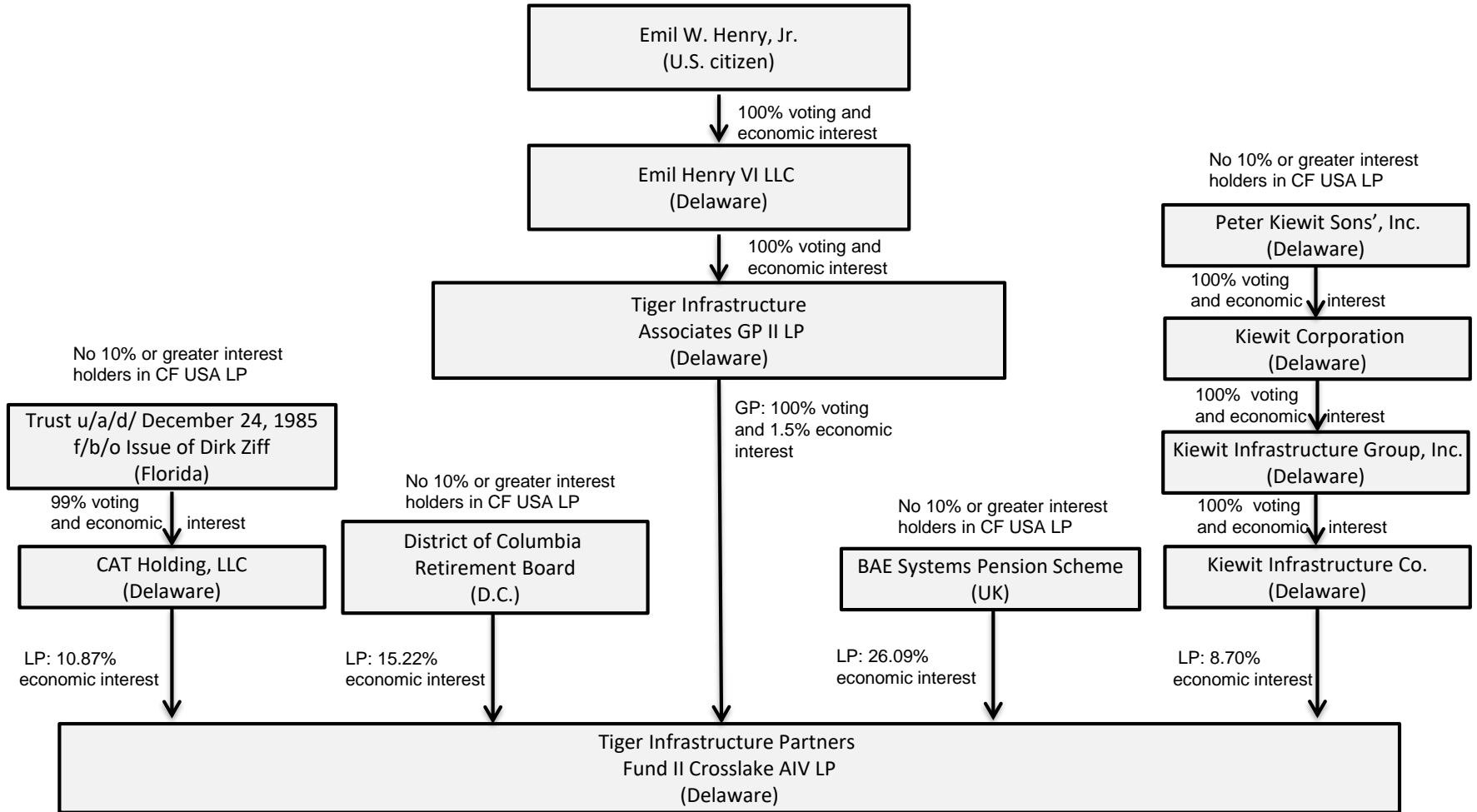


EXHIBIT A-3
Crosslake Fiber USA LP Ownership Structure

