

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

In the Matter of)
)
Application of ATN Undersea Cable Corporation for a) File No. SCL- _____
License to Construct, Land, and Operate the VILink)
Cable System, an Undersea Cable System Linking the)
Islands of St. Thomas and St. Croix in the United)
States Virgin Islands, United States)

**APPLICATION FOR DOMESTIC SUBMARINE CABLE LANDING LICENSE
AND REQUEST FOR STREAMLINED TREATMENT**

ATN Undersea Cable Corporation (“ATN Cable”), pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (the “Cable Landing License Act”), Executive Order 10530, and Section 1.767 of the Commission’s rules, 47 C.F.R. § 1.767, hereby applies for a license to construct, land, and operate a fiber-optic submarine cable system, to be known as the VILink Submarine Cable System (“VILink System”), directly linking the island of St. Thomas with the island of St. Croix, which is approximately 40 miles south of St. Thomas. Both islands are part of the United States Virgin Islands (“USVI”), a U.S. territory, and therefore both are in the United States. The VILink System will not have a landing station in a foreign country.

I. DESCRIPTION OF THE VILINK SYSTEM

The VILink System will be a high-capacity digital fiber-optic cable system that will provide increased capacity, redundancy, resiliency, and reliability in connection with communications between the islands of St. Thomas and St. Croix, both of which are located within the USVI. The VILink System’s landing station in St. Thomas will be located in Nazareth, and the landing station in St. Croix will be located in Christiansted. Additional

information about these landing locations is set forth in Exhibit A. The VILink System is a non-repeated, linear cable segment composed of 24 fiber strands. Initially, the cable will be deployed with long range transceivers using 10 Gigabit/second wavelengths on a single fiber pair. The VILink System may be upgraded to use 40 and/or 100 Gigabit/second technology in the future. The completion target date for the VILink System is nine months after all required approvals have been obtained. The engineered life expectancy of the VILink System will be 25 years.

The VILink System will be owned by ATN Cable, a wholly owned and controlled subsidiary of ATN International, Inc. (“ATN”). ATN also is the ultimate parent company of Virgin Islands Telephone Corporation d/b/a Viya (“Viya”), and various Viya affiliates that provide wireline voice and broadband, mobile wireless, and cable television services in the USVI. More detailed ownership information for ATN Cable is set forth in Exhibits B and C. ATN Cable will be responsible for operating the landing terminal equipment for the VILink System. ATN Cable, as the landing party for the VILink System at each landing location, will seek all required government approvals, permits, and licenses for operation of the VILink System from the relevant regulatory authorities. ATN Cable will operate the VILink System on a non-common-carrier basis.

II. PUBLIC INTEREST STATEMENT

Grant of this Application will serve the public interest, convenience and necessity because the VILink System will provide increased capacity, redundancy, resiliency, and reliability in connection with communications between St. Thomas and St. Croix—the two most populous islands in the USVI. St. Thomas and St. Croix collectively account for more than 95 percent of the total USVI population.

As an initial matter, the VILink System will ensure that there is always adequate and reliable capacity available between St. Thomas and St. Croix for interisland communications.¹ The bandwidth needs of Virgin Island residents and businesses are expected to exponentially increase as new Internet-based data technologies are increasingly embraced, especially bandwidth intensive streaming video. The substantial additional interisland capacity provided by the VILink System will help satisfy these connectivity needs well into the future.

In addition, the submarine cable system will create redundancy and thereby improve the reliability of these interisland communications. Connectivity between St. Thomas and St. Croix currently primarily is accomplished using microwave facilities, which can become misaligned in high winds.² An additional submarine fiber optic facility will create a new and redundant communications path between the islands that is much less prone to storm damage. Moreover, the VILink System will be the first submarine cable between the islands in which ATN holds an ownership interest. Consequently, the deployment of the cable system will provide market discipline to other submarine cable operators.

Moreover, the VILink System will provide an increased level of redundancy, and therefore reliability, on communications routes between St. Thomas and the U.S. mainland and St. Croix and the U.S. mainland. It will reduce the likelihood of connectivity downtime in the event of normal-course operational issues, during maintenance windows, and during disasters. Voice and broadband communications originating and terminating on the separate “local”

¹ Cable television services on St. Croix originate from Viya’s headend on St. Thomas and are transported to Viya’s cable system to St. Croix for distribution on St. Croix.

² The vulnerabilities of Viya’s interisland microwave link were exposed by Hurricanes Irma and Maria in September 2017. Some of Viya’s microwave facilities became misaligned during the storms, and certain microwave towers were toppled by the storms’ hurricane-speed winds. By contrast, because they are deployed deep under water, submarine cables are much more resilient in storms.

networks in St. Croix and St. Thomas are backhauled to the U.S. public switched telephone network (“PSTN”) and the Internet through direct connections between the U.S. mainland and each of these islands. Consequently, if either island’s connectivity with the U.S. mainland is severed, the communications traffic from that island that is destined for the Internet or the PSTN on the U.S. mainland can be rerouted through the U.S. mainland connection originating on the other island. Interisland connectivity closes the loop. But this only can be accomplished if there is adequate capacity available between the two islands to carry this additional traffic in addition to the day-to-day interisland traffic normally carried between the islands. The VILink System will help ensure that such adequate capacity always exists.

II. INFORMATION REQUIRED BY SECTION 1.767 OF THE FCC’S RULES

In support of this Application, ATN Cable submits the following information in accordance with Section 1.767(a) of the Commission’s Rules, 47 C.F.R. § 1.767(a):

(1) Name, address and telephone number of Applicant:

Licensee: ATN Undersea Cable Corporation
c/o ATN International, Inc.
500 Cummings Center, Suite 2450
Beverly, MA 01915
Tel: (978) 619-1300
FRN: 0027367788

(2) Place of Formation:

Licensee: ATN Undersea Cable Corporation is a corporation organized under the laws of the U.S. Virgin Islands.

(3) Correspondence concerning this Application should be sent to:

For ATN Cable:

Douglas J. Minster, Vice President Government and Regulatory Affairs
Mary Mabey, Senior Vice President and General Counsel
ATN International, Inc.
500 Cummings Center, Suite 2450

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DMinster@atni.com
MMabey@atni.com

with a copy to:

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Erin M. Griffith
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(202) 783-4141
PMarchesiello@wbklaw.com
EGriffith@wbklaw.com

(4) Description of the Cable

See Section I above.

(5) Landing Points

As set forth above, the VILink System's landing station in St. Thomas will be located in Nazareth, and the landing station in St. Croix will be located in Christiansted. Each of the landing points associated with the VILink System consist exclusively of beach manholes and will not involve the construction or use of buildings. Additional information about these landing locations is set forth in Exhibit A. In accordance with Section 1.767(a)(5) of the Commission's rules, ATN Cable will file with the Commission for its review a more specific description of the cable landing stations, including a map showing specific geographic coordinates and street addresses of each landing station and any beach joints, no later than 90 days prior to commencement of construction of the VILink System.³

³ See 47 C.F.R. § 1.767(a)(5) ("The applicant initially may file a general geographic description of the landing points; however, grant of the application will be conditioned on the Commission's final approval of a more specific description of the landing points, including all information

(6) Non-Common Carrier Status

The VILink System will be operated on a non-common carrier basis. Non-common carrier status of the proposed system is consistent with established Commission policy and will advance the public interest. As discussed below, other submarine cable systems serve the same St. Thomas-to-St. Croix route that will be served by ATN Cable's proposed system. This demonstrates that there are other routing options and competitive alternatives to the proposed system in the region. Additionally, ATN Cable will not offer capacity to the public indifferently. ATN Cable primarily intends to use the VILink System's capacity to provide communications services to the residential and enterprise retail wireline, wireless, and cable television customers of ATN Cable's affiliate Viya. But ATN Cable may also sell excess capacity on a wholesale basis to other carriers pursuant to individually negotiated rates, terms, and conditions tailored to their particular needs.

The Commission has authorized non-common carrier cables where: (A) there is no legal compulsion to serve the public indifferently⁴ and (B) there are no reasons implicit in the nature of its operations to expect that ATN Cable would make capacity available to the public indifferently and indiscriminately.⁵ ATN Cable satisfies both of these tests.

required by this paragraph, to be filed by the applicant no later than ninety (90) days prior to construction.”).

⁴ There is no legal compulsion to serve the public indifferently where there is no public interest reason to require facilities to be offered on a common carrier basis. *See, e.g., Cable & Wireless Order*, 12 FCC Rcd 8516, 8522 ¶¶ 14-15 (1997). The Commission has focused its public interest analysis on whether an applicant will be able to exercise market power because of the lack of alternative facilities. *See id.*; *see also Nat'l Ass'n of Regulatory Utility Comm'rs v. FCC*, 525 F.2d. 630, 642 (D.C. Cir. 1976) (*NARUC I*), *cert. denied*, 425 U.S. 992 (1976) (stating that the court must inquire “whether there will be any legal compulsion . . . to serve [the public] indifferently”).

⁵ *See Cable & Wireless Order* at 8520 ¶¶ 11-17; *see also Optel Communications, Inc., Application for a license to land and operate in the United States a submarine cable*

The Commission has consistently found that competing submarine cable facilities ensure that a new submarine cable on the same route would not function as a bottleneck facility.⁶ In this case, there are several alternative facilities serving the route between St. Thomas and St. Croix, including other submarine cables, microwave facilities, and satellite links. Specifically, in 2013 the Commission granted viNGN a non-common carrier license to operate a fiber-optic submarine cable system directly linking the islands of St. Thomas and St. Croix.⁷ In addition, AT&T has direct submarine fiber optic cable connectivity (AT&T C-1) between St. Croix and St. Thomas over the AT&T C-1 cable system.⁸ In addition, St. Croix and St. Thomas are indirectly connected

extending between Canada and the United States, File No. SCL-92-004, Conditional Cable Landing License, 8 FCC Rcd 2267 (Int'l Bur. 1993); *NARUCI*, 525 F.2d at 642.

⁶ See, e.g., *Emerald Networks Holdings Limited*, File SCL-LIC-20140206-00002, Actions Taken Under the Cable Landing License Act, Public Notice, 29 FCC Rcd. 12743, 12744 (Int'l Bur. 2015) (finding that showing by Emerald Networks (now Aquacomms) of multiple competing submarine cable systems on the North Atlantic route obviated the need for common-carrier regulation of the AEConnect system under the public interest prong of the *NARUC I* test); *Telefonica International Wholesale Services USA, Inc.*, Order and Authorization, 29 FCC Rcd. 496, 503 ¶ 24 (Int'l Bur. 2015) (“There are seven cable systems currently serving the region of the proposed PCCS cable. Given the availability of these alternative facilities in the region to be served by the PCCS cable, we find that there is no public interest reason to require the licensee to offer capacity on the proposed cable on a common carrier basis. Therefore, we find that the Applicants have met the first part of the non-common carrier test.”).

⁷ See *viNGN, Inc. d/b/a Virgin Islands Next Generation Networks, Inc.*, File SCL-LIC-20121221-00015, Actions Taken Under Cable Landing License Act, Public Notice, 28 FCC Rcd 1909, 1910 (Int'l Bur. 2013) (holding that viNGN demonstrated that its operation of a submarine cable on a non-common carrier basis between St. Thomas and St. Croix was consistent with the public interest) (“*viNGN Grant*”).

⁸ See *AT&T Submarine Systems, Inc.* File SCL-94-006, Cable Landing License, 11 FCC Rcd 14885 (Int'l Bur. 1996). In granting AT&T a submarine cable landing license on a non-common carrier basis in 1998, the Commission noted the existence of sufficient existing and proposed alternatives to the AT&T submarine cable. *Id.* at 14906 ¶ 69. See *AT&T Submarine Systems, Inc.*, FCC File No. SCL-94-006, Memorandum Opinion and Order, 13 FCC Rcd 21585 ¶ 11 (1998). There, the Commission also identified a proposed Pan American cable, with landing stations in St. Thomas and St. Croix, as a future common carrier alternative. *Id.*; see *Application of viNGN, INC. d/b/a Virgin Islands Next Generation Networks, Inc. for a License to Construct, Land and Operate an Undersea Cable System Linking the Islands of St. Thomas and*

through their individual connectivity to common remote locations.⁹ Further, other entities provide connectivity between St. Croix and St. Thomas via microwave.¹⁰

All of these routing options will continue to be available when ATN Cable's proposed VILink System is placed in operation. Therefore, the deployment of this new submarine cable between St. Thomas and St. Croix, in addition to the existing connectivity between the islands, will not enable ATN Cable to exercise market power on this route, but instead will increase competition and service on the route. Moreover, given the availability of multiple competitive alternatives to the proposed VILink System, ATN Cable will not be able to impose unreasonable terms and conditions, restrict output, or raise prices. Therefore, the Commission need not require ATN Cable to serve the public indiscriminately.

ATN Cable also satisfies the second prong of the Commission's test because there is no reason implicit in the nature of ATN Cable's operations that would require ATN Cable to make capacity available to the public indifferently.¹¹ To the extent that ATN Cable sells capacity on the

St. Croix in the United States Virgin Islands, United States St. Thomas-St. Croix Submarine Cable System, File No. SCL-LIC-2012, page 6, n.7 (2012) ("The Pan American cable was constructed in 1998-1999 and significantly upgraded by multiples of 10 Gbps wavelengths in 2009.") ("viNGN Application").

⁹ St. Croix and St. Thomas are connected through Puerto Rico using AT&T's Taino-Carib submarine cable and either AT&T's Americas II or Global Caribbean Network's submarine cable; through Miami using either AT&T's Americas I or Columbus-II submarine cable and either AT&T's Americas II or Level 3's (f.k.a. Global Crossing) MAC 2 submarine cable; and through New York and Miami using Level 3's MAC 3, Level 3's MAC 1 and either AT&T's Americas I or Columbus 2 submarine cable.

¹⁰ For example, Broadband VI (<http://www.broadband.vi/>) operates a microwave link between St. Thomas and St. Croix.

¹¹ See *NARUC I*, 525 F.2d at 642 (stating that the court must inquire "whether there are reasons implicit in the nature of [the] operations to expect an indifferent holding out to the eligible user public"); see also *Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999) (affirming FCC's use of *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

VILink System to third parties, rather than solely utilizing the capacity for ATN Cable's operations, ATN Cable will make individualized decisions with regard to the rates, terms, and conditions pursuant to which it will offer such capacity. ATN Cable will tailor its capacity offerings to the special requirements of individual customers and will separately negotiate these customer contracts. Thus, because ATN Cable will not operate the VILink System on a common carrier basis, customers will have no expectation that the VILink System is a common carrier cable system.

(7) List of Proposed Owners

ATN Cable is the only proposed owner of the VILink System. The proposed landing locations for the VILink System will either be owned or leased by ATN Cable (or by its affiliates Viya or ATN, which, in turn, would lease the landing locations back to ATN Cable) or will be accessed pursuant to negotiated easements that will afford ATN Cable all necessary access to the landing locations.¹² No portion of the VILink System will be located in international waters or otherwise outside of U.S. jurisdictional waters.

¹² ATN Cable will operate and have exclusive control over the VILink System, including its landing points which consist of beach manholes. ATN Cable may rely on its direct parent company ATN and/or its USVI sister company Viya to obtain certain real estate, easements, or other access rights from third parties in connection with the construction of the VILink System, but ATN Cable will lease any such third party rights from ATN and/or Viya. Further, ATN Cable, and not ATN or Viya, will exclusively control the operation of all VILink System landing stations. Accordingly, ATN Cable is the only entity required to be a licensee for the VILink System under the Commission's cable landing license rules. *See* 47 C.F.R. § 1.767(h)(1); *Microsoft Infrastructure Group, LLC, Actions Taken Under Cable Landing License Act*, SCL-LIC-20151104-00029 (2017) (granting application where applicant proposed to lease the U.S. cable landing station without requiring the lessor to be listed as an owner on the application or requiring a waiver of Section 1.767(h)(1)); *see also Review of Commission Consideration of Applications under the Cable Landing License Act*, Report and Order, 16 FCC Rcd 22167, 22194 ¶ 53 (2001) ("The new rule will ensure that entities having a significant ability to affect the operation of a cable system are applicants and thus become licensees upon grant so that they are subject to the conditions and responsibilities that are associated with a cable landing license.").

(8)(i) Certification and Ownership Information Required by Sections 63.18(h) and (o) of the Commission’s Rules, 47 C.F.R. §§ 63.18(h), (o):

The information and certifications required by 47 C.F.R. 1.767(a)(8)(i) are contained in Exhibits B and C.

(8)(ii) Certification Regarding Foreign Carrier Status and Foreign Affiliation:

ATN Cable certifies that it:

- (A) is not a foreign carrier in any foreign country;
- (B) does not own or control a cable station in any foreign country; and
- (C) is affiliated with foreign carriers, including foreign carriers that control cable landing stations in foreign countries, as summarized the table below.

Entity	Country	License/Business	Owns/Controls Cable Landing Station?
Bermuda Digital Communications Ltd.	Bermuda	Cellular carrier	N
Cable Co. Ltd.	Bermuda	International Public Telecommunications License and a Foreshore License	N
Cedar Cable, Ltd.	Bermuda	CB-1 Submarine cable between Bermuda and the United States	Y
DTH Television & Telecommunications N.V., d/b/a MIO Aruba	Aruba	Wireless telecommunications carrier	N
Guyana Telephone & Telegraph Company, Ltd. (“GT&T”)	Guyana	Incumbent Guyana telecommunications carrier	N
WestTel Limited, d/b/a Logic	Cayman Islands	Cayman data, video and voice services provider	N

(8)(iii) Certification Regarding Destination Markets:

The proposed VILink System is a U.S. domestic submarine cable system and does not land in any foreign destination country. Consequently, ATN Cable certifies that it does not seek

to land and operate a submarine cable connecting to any foreign country, including any foreign country in which (A) ATN Cable is a foreign carrier; (B) ATN Cable controls a foreign carrier; (C) there exists any entity that owns more than 25 percent of ATN Cable, or controls ATN Cable, or controls a foreign carrier in such a country; or (D) a grouping of two or more foreign carriers in such a country (or parties that control foreign carriers in such a country) own, in aggregate, more than 25 percent of ATN Cable 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.

(8)(iv) Certification Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Market:

No response is required because ATN Cable did not identify any non-WTO markets in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

(9) Certification of Compliance:

ATN Cable certifies that it accepts and will abide by the routine conditions set forth in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

IV. STREAMLINED PROCESSING REQUEST

ATN Cable requests streamlined processing under Section 1.767(k) of the Commission's rules, 47 C.F.R. § 1.767(k). ATN Cable certifies that the proposed VILink System will have no foreign country destination markets and therefore that ATN Cable has no affiliation with a foreign carrier in any of the VILink System's destination markets. In addition, pursuant to Section 1.767(k)(4), ATN Cable certifies that the proposed VILink System is subject to the consistency certification requirements of the Coastal Zone Management Act, 16 U.S.C. § 1456, that ATN Cable's activities proposed in this Application will comply with the enforceable

policies of the USVI's approved coastal zone management program, and that such activity will be conducted in a manner consistent with the program.¹³

V. CONCLUSION

For the foregoing reasons, ATN Cable respectfully submits that the public interest, convenience, and necessity would be furthered by the expeditious grant of this Application. ATN Cable respectfully requests streamlined processing of this Application.

Respectfully submitted,

ATN Undersea Cable Corporation,
by its parent company ATN International, Inc.

By: /s/ Douglas J. Minster
Douglas J. Minster
Vice President, Government and Regulatory Affairs
ATN International, Inc.
500 Cummings Center, Suite 2450
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(978) 619-1303

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1800 M Street, N.W., Suite 800N
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(202) 783-4141

Counsel for ATN Cable and ATN International, Inc.

Date: April 12, 2018

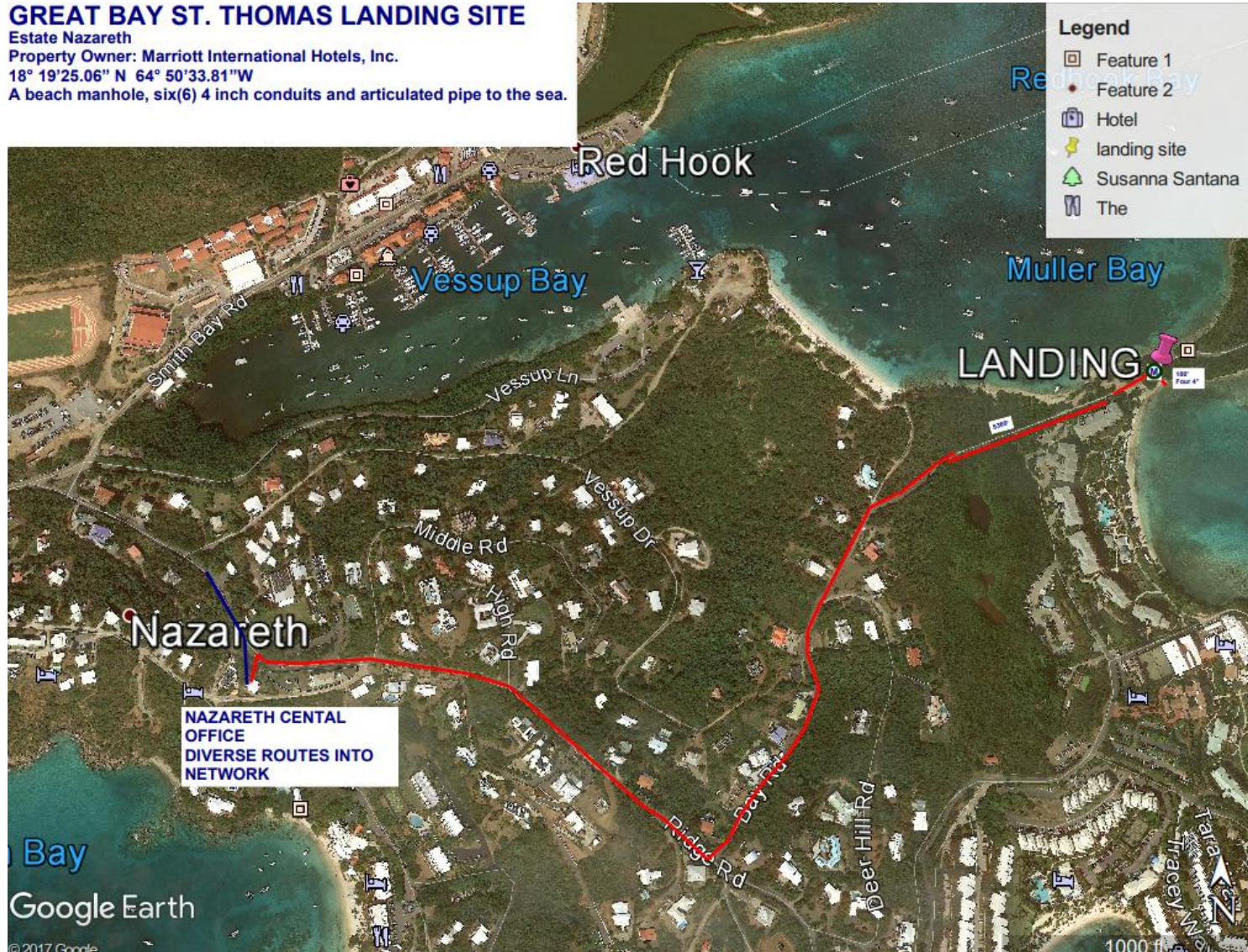
¹³ See viNGN Application, Appendix A at 3 (“[P]ursuant to 47 C.F.R. § 1.767(k)(4), viNGN certifies that the proposed St. Thomas-St. Croix System is subject to the consistency certification requirements of the Coastal Zone Management Act, 16 U.S.C. § 1456, that viNGN’s activities proposed in this application will comply with the enforceable policies of the USVI’s approved coastal zone management program, and that such activity will be conducted in a manner consistent with the program.”); *viNGN Grant* (granting that the viNGN Application pursuant to, inter alia, “section 1.767 of the Commission’s rules, 47 C.F.R. § 1.767”).

EXHIBIT A

LANDING POINT INFORMATION

GREAT BAY ST. THOMAS LANDING SITE

Estate Nazareth
Property Owner: Marriott International Hotels, Inc.
18° 19'25.06" N 64° 50'33.81" W
A beach manhole, six(6) 4 inch conduits and articulated pipe to the sea.



CHRISTIANSTED, ST. CROIX LANDING SITE

Altona Lagoon - Estate Altona REM 1

Property Owner: V. I. Government

17° 45' 09.41" N 64° 41' 38.92" W

A beach manhole, four (4) 4 inch conduits and articulated pipe to the sea.

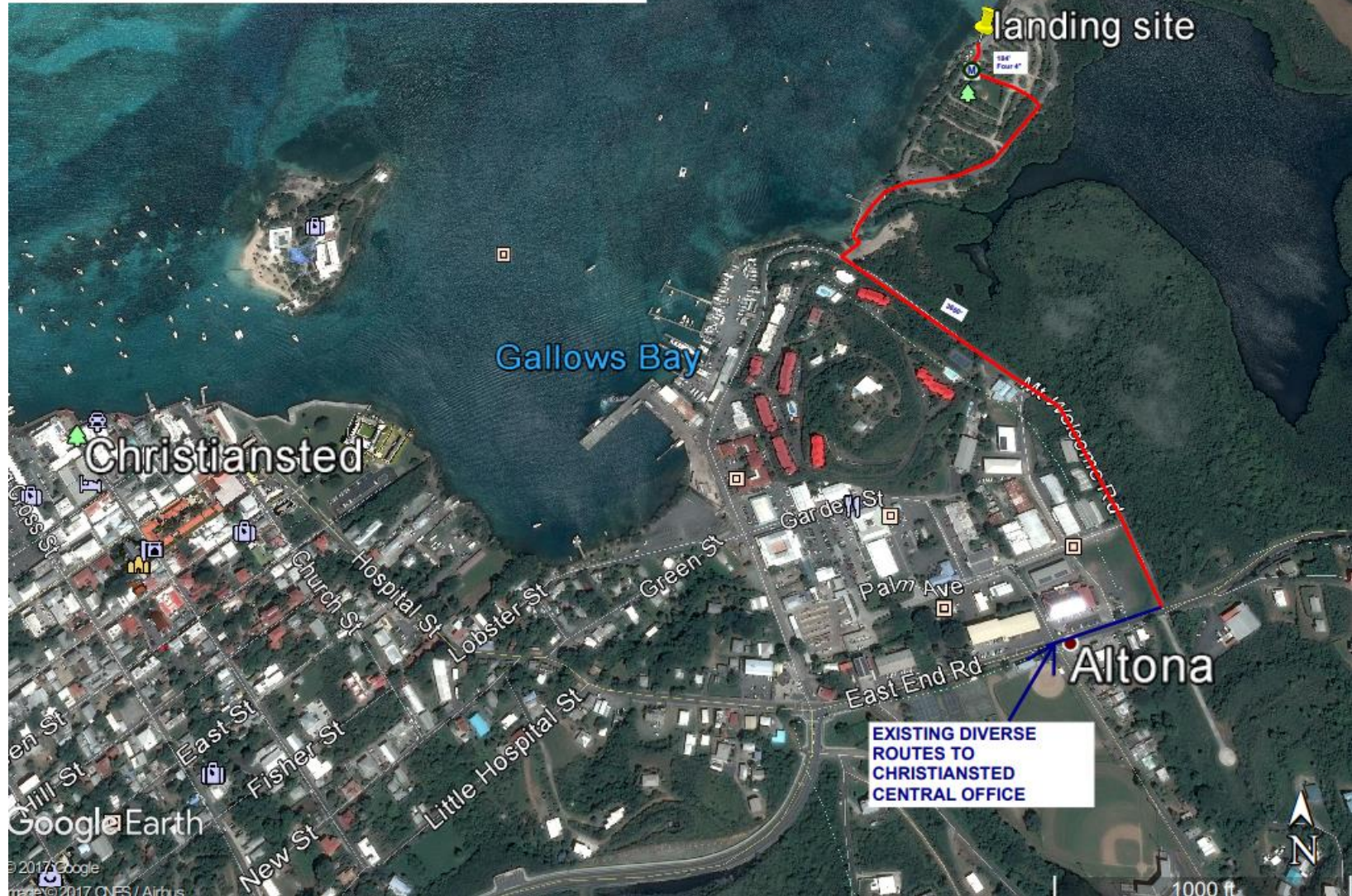


EXHIBIT B

**CERTIFICATION AND OWNERSHIP INFORMATION
REQUIRED BY 47 C.F.R. 1.767(A)(8)(I)**

(8)(i) Certification and Ownership Information Required by Sections 63.18(h) and (o) of the Commission's Rules, 47 C.F.R. §§ 63.18(h), (o):

Section 63.18(h) Ownership Information

The following entities hold a 10% or greater direct voting and equity ownership interest in ATN Cable:

Name	Nationality	Ownership %	Principal Business
ATN International, Inc.	Delaware	100%	Publicly traded holding company (NASDAQ: ATNI)

The following entities currently hold a 10% or greater direct interest in ATN International, Inc.:

Name	Nationality	Ownership %	Principal Business
Cornelius B. Prior, Jr. <i>P.O. Box 12030 St. Thomas, U.S. Virgin Islands 00801</i>	U.S.	27.3% ¹⁴	Retired

No other person or entity will hold a 10% percent or greater direct or indirect interest in ATN Cable. The ownership of ATN Cable is depicted in the organizational diagram attached hereto as Exhibit C.

¹⁴ See ATN International, Inc., SEC Schedule 13G/A, filed February 12, 2018, available at <http://ir.atni.com/secfiling.cfm?filingID=1047469-17-3043&CIK=879585>.

Section 63.18(h) Interlocking Directorates

The following officers and directors of ATN Cable are part of the following interlocking directorates:

Name	Position with ATN Cable	Foreign Carrier and Position
Justin D. Benincasa	Director and Treasurer	<ul style="list-style-type: none">• Director, Bermuda Digital Communications, Ltd.• Chairman, Board of Directors, Guyana Telephone and Telegraph, Ltd.
Barry C. Fougere	Director and President	<ul style="list-style-type: none">• Director, Bermuda Digital Communications, Ltd.• Director, Guyana Telephone and Telegraph, Ltd.
Michael T. Prior	Director	<ul style="list-style-type: none">• Director, Bermuda Digital Communications, Ltd.

ATN International, Inc. currently has the following interlocking directorates with foreign carriers:

Name	Position with ATN International, Inc.	Foreign Carrier and Position
Cornelius B. Prior, Jr.	Chairman, Board of Directors	<ul style="list-style-type: none">• Director, Bermuda Digital Communications, Ltd.
Michael T. Prior	President and Chief Executive Officer	<ul style="list-style-type: none">• Director, Bermuda Digital Communications, Ltd.
Justin D. Benincasa	Treasurer and Chief Financial Officer	<ul style="list-style-type: none">• Director, Bermuda Digital Communications, Ltd.• Chairman, Board of Directors, Guyana Telephone and Telegraph, Ltd.
Barry C. Fougere	Senior Vice President – Business Operations	<ul style="list-style-type: none">• Director, Bermuda Digital Communications Ltd.• Director, Guyana Telephone and Telegraph Company, Ltd.
John Audet	Vice President – Finance	<ul style="list-style-type: none">• Director, Guyana Telephone and Telegraph Company, Ltd.

Section 63.18(o) - Certification Regarding the Anti-Drug Abuse Act of 1988

ATN Cable certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003 (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301), that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

EXHIBIT C

ATN CABLE ORGANIZATIONAL DIAGRAM

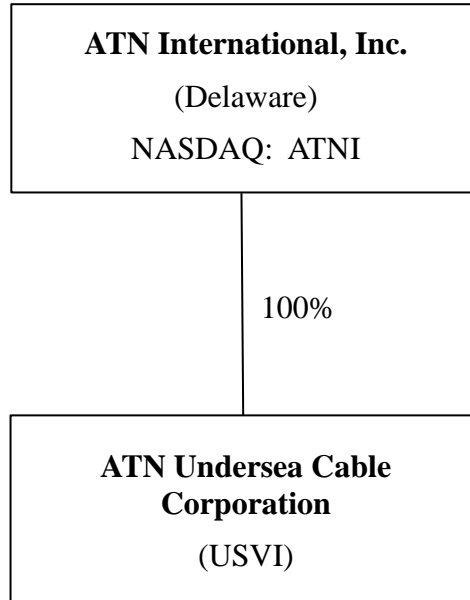


EXHIBIT D

CERTIFICATION

I hereby depose and state under penalty of perjury as follows:

I, Barry C. Fougere, am President of ATN Undersea Cable Corporation. I am authorized to enter this certification on behalf of ATN Undersea Cable Corporation. All of the factual information contained in this Application and the Exhibits hereto are true and correct to the best of my knowledge and belief.

By: /s/ Barry C. Fougere

Name: Barry C. Fougere
Title: President, ATN Undersea Cable Corporation
Address: ATN Undersea Cable Corporation
c/o ATN International, Inc.
500 Cummings Center, Suite 2450
Beverly, MA 01915
Phone: (978) 619-1300

Date: April 12, 2018

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, S.W.
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(via first class U.S. mail, postage prepaid)

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Susan O'Connell
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
(via electronic mail to Susan.O'Connell@fcc.gov)

/s/ Theresa Edwards
Name: Theresa Edwards

April 12, 2018