

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

In the Matter of)	
)	
ATN Undersea Cable Corporation,)	File No. SCL-LIC-20180417-00008
)	
Application for a License to Construct, Land)	
and Operate a Fiber-Optic Submarine Cable)	
System Connecting St. Thomas and St.)	
Croix in the U.S. Virgin Islands,)	
)	
)	
)	
)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Homeland Security (“DHS”) hereby submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, DHS advises the Commission that DHS has no objection to the Commission approving the authority sought in the above-referenced proceedings, provided that the Commission conditions its approval on the commitment of ATN Undersea Cable Corporation (“ATN”) to abide by the undertakings set forth in the June 18, 2019 Letter of Assurances (“2019 LOA”), which is attached hereto as Attachment A. The above-referenced proceedings involve an application seeking Commission approval to construct, land and operate a fiber optic submarine cable system connecting St. Croix and St. Thomas in the United States Virgin Islands (FCC File No. SCL-LIC-20180417-00008).

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of

¹ 47 C.F.R. § 1.41.

other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of ATN in connection with the above-referenced proceedings, DHS has concluded that the commitments set forth in the 2019 LOA will help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, DHS advises the Commission that it has no objection to the Commission granting the applications in the above-referenced proceedings, provided that the Commission conditions its consent on compliance by ATN with the 2019 LOA.

Respectfully submitted,

/S/ Brien Beattie
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Attachment A (2019 Letter of Assurances)