

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

In the Matter of	)	
	)	
Edge Cable Holdings USA, LLC;	)	File No. SCL-LIC-20180517-00012
NTT America, Inc.;	)	
NTT Worldwide Telecommunications	)	
Corporation; HKT Global (Singapore) Pte.	)	
Ltd.; PLDT, Inc.; SoftBank Corp.; and	)	
Amazon Data Services, Inc.	)	
	)	
Application for a License to Land and	)	
Operate a Submarine Cable Network	)	
Connecting the United States, Japan, and	)	
the Philippines	)	

**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.<sup>1</sup> Through this Petition, DHS advises the Commission that DHS has no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the commitment of Edge Cable Holdings USA, LLC; NTT America, Inc.; NTT Worldwide Telecommunications Corporation; HKT Global (Singapore) Pte. Ltd.; PLDT, Inc.; SoftBank Corp.; and Amazon Data Services, Inc. (collectively, the “Licensees”) to abide by the undertakings set forth in the May 22, 2020 Letter of Assurances (“LOA”), which is attached hereto as Attachment A. The above-referenced proceeding involves an application seeking

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<sup>1</sup> 47 C.F.R. § 1.41.

Commission approval to land and operate within the United States a private fiber-optic submarine cable network connecting California; Oregon; Maruyama and Shima, Japan; and Daet, the Philippines known as the JUPITER system (FCC File No. SCL-LIC-20180517-00012).

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 other U.S. government agencies with expertise in those areas. *See Comsat*

*Corporation d/b/a Comsat Mobile Communications*, 16 FCC Rcd. 21661, 21707, ¶ 94 (2001).

After discussions with the Licensees in connection with the above-referenced proceeding, DHS has concluded that the commitments set forth in the 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 application in the above-referenced proceeding, provided that the Commission conditions its consent on compliance by the Licensees with the LOA.

Respectfully submitted,

/S/ Brien Beattie

Brien Beattie

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June 22, 2020

Attachment A (Letter of Assurances)