

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

<i>In the Matter of</i>)	
)	
The Taino-Carib Submarine Cable System)	File No. SCL-LIC-2018_____
Operating Between Puerto Rico and St.)	
Thomas in the U.S. Virgin Islands and the)	File No. SCL-LIC-19920107-00005
British Virgin Islands)	

APPLICATION FOR CABLE LANDING LICENSE

The Taino-Carib Consortium, pursuant to 47 U.S.C. §§ 34-39, Executive Order 10,530, and 47 C.F.R. § 1.767, hereby applies for a cable landing license for the Taino-Carib Cable System to allow the continued operation of this submarine cable for an additional 25-year term.¹

The Taino-Carib Cable System links Puerto Rico with the U.S. Virgin Islands and the British Virgin Islands and connects at these landing points to other cables extending to the U.S. Mainland, other Caribbean islands and Central and South America. The cable has operated successfully for 25 years pursuant to the cable landing license granted in 1992, has been upgraded multiple times between 2000 and 2016, currently provides more than 650 Gbps of cumulative available capacity and has a cumulative design capacity of 2.4 Tbps. The continued operation of this cable will serve customers in Puerto Rico, the U.S. Virgin Islands and elsewhere by providing bandwidth capacity for broadband traffic on domestic and international routes between Puerto Rico, the U.S. Virgin Islands and the British Virgin Islands, and the U.S.

¹ The Taino-Carib Cable System commenced operation on January 1, 1993, pursuant to its original cable landing license granted on June 25, 1992, which expired on January 1, 2018. *See, Telefonica Larga Distancia De Puerto Rico, et al.*, 7 FCC. Rcd. 4275 (1992). The cable continues in operation pending the Commission's action on this application pursuant to Special Temporary Authority granted on January 25, 2018. *See* IB201800024, SCL-STA-20180119-00001.

Mainland, other Caribbean islands, and Central and South America. The reauthorization of the Taino-Carib submarine cable is therefore strongly in the public interest.

I. DESCRIPTION OF THE CABLE SYSTEM

The Taino-Carib Cable System is a common carrier submarine cable connecting two landing points in Puerto Rico and one landing point in St. Thomas in the U.S. Virgin Islands with Tortola in the British Virgin Islands. The cable is 130 kilometers in length, consists of six fiber pairs, and has a current cumulative design capacity of 2.4 terabits per second (“Tbps”). The United States terminal points currently operate at up to 1.2 Tbps of cumulative capacity. Because of its short length, the cable system uses repeaterless technology. The cable was upgraded from its original cumulative capacity of 4.5 Gbps to 34 Gbps in 2000, 260 Gbps in 2011, 460 Gbps in 2013, 500 Gbps in 2015 and 670 Gbps in 2016. The cable will be further upgraded in 2018 to 1.17 Tbps of cumulative equipped capacity, using new technology that will increase the cumulative design capacity to 48 Tbps (and upgrade the United States terminal points to operate at up to 24 Tbps of cumulative capacity). The upgraded cable provides a robust platform to support broadband traffic and interconnects with submarine cables extending to the mainland U.S., Caribbean and Central and South America, including the Americas-1, Americas-2, Columbus-2, Eastern Caribbean Fiber System, and Pan Am cables.

The Taino-Carib consortium is comprised of 21 members who are parties to the Taino-Carib Construction and Maintenance Agreement (“C&MA”). Each party has a varying degree of voting rights and ownership in the cable corresponding to its level of investment in the cable. The five parties with 5% or greater ownership interests, individually or through their wholly-owned affiliates, are: AT&T Corp.; Cable & Wireless (BVI) Limited; MCI International, Inc.; Sprint Communications Company L.P.; and Telefonica Larga Distancia de Puerto Rico, Inc. Greater detail regarding each of these entities is provided in the attached individual appendices

(A – G). All of these parties with 5% or greater ownership interests, in addition to Prepa Networks, LLC, which is a U.S. landing party, and Antelecom N.V., which holds an ownership interest of 4.10483%, are parties to the instant application.

The Taino-Carib Cable System has four landing stations, two in Puerto Rico (at Miramar and Isla Verde), one at Magens Bay, St. Thomas in the U.S. Virgin Islands, and one at Tortola in the British Virgin Islands. The Taino-Carib parties jointly own landing station equipment, including submarine line terminal equipment, add/drop multiplexer equipment and optical distribution frames, which collectively provide the interface between the submersible cable and each party's terrestrial network. Each landing party owns the building housing the landing station, its own network protection equipment and digital cross connects, and its share of the jointly-owned facilities.² AT&T of Puerto Rico, Inc., a wholly owned subsidiary of AT&T Corp., owns the landing station in Miramar, Puerto Rico, and Prepa Networks, LLC operates the landing station in Isla Verde, Puerto Rico.³ AT&T of the Virgin Islands, Inc., a wholly-owned subsidiary of AT&T Corp., owns the Magens Bay landing station in St Thomas. Cable & Wireless (BVI) Limited owns the landing station in Tortola in the British Virgin Islands. Further details of the landing stations are in Appendix H.

Any member of the consortium may enhance the capabilities of the Taino-Carib Cable System by exercising the right to upgrade the system, as long as that party (and others that join in the expansion) covers the cost of the upgrade. Any member may transfer its right to use capacity to any of its subsidiaries or affiliates. In addition, there are no restrictions on the resale of

² In addition, the C&MA requires the operators of the Puerto Rico and U.S. Virgin Islands landing stations to provide U.S. owners with colocation space, at or near such stations, to be used with their capacity on the Taino-Carib cable.

³ As described in Appendix H, Tab 2, operations at the landing station in Isla Verde, Puerto Rico operated by Prepa Networks LLC are transitioning to a new landing station in Isla Verde also operated by Prepa Networks LLC.

capacity, which means that any member may sell private IRUs to any properly licensed non-member (either individually or through collaborative agreements).

II. PUBLIC INTEREST STATEMENT

The continued operation of the Taino-Carib Cable System is overwhelmingly in the public interest because it will continue to help meet the demand for voice, data and Internet traffic on routes between Puerto Rico, the U.S. Virgin Islands and the British Virgin Islands, and the U.S. Mainland, other Caribbean islands, and Central and South America; it will continue to provide important facilities-based competition on these routes; and it will continue to enhance service quality, increase resiliency, and decrease latency in providing service on the above routes.

The reauthorization of the Taino-Carib Cable System will allow the continued operation of an upgraded network capable of handling the full range of emerging voice and data services and technologies, including multimedia and Internet services. The demand for communications services between Puerto Rico, the U.S. Virgin Islands and the British Virgin Islands, and the U.S. Mainland, other Caribbean islands, and Central and South America is increasing with the growth of broadband traffic, and the continued operation of the upgraded cable will provide facilities to meet this demand.⁴ The Taino-Carib Cable System also increases facilities-based competition on United States-Caribbean, United States-Central American and United States-South American routes and provides an important connection for other cables,⁵ as well as an

⁴ See, e.g., *Unleashing the Internet in the Caribbean*, UNCTAD, Feb. 2017, at 6 (“Caribbean countries are increasingly looking to the internet to drive economic and social development.”) available at:

https://cdn.prod.internetsociety.org/wp-content/uploads/2017/08/ISOC_Unleashing_Internet_in_Caribbean_20170221.pdf.

⁵ The Americas-2 and ARCOS cables link the Puerto Rico landing points of the Taino-Carib cable to the U.S. Mainland. The Americas-1, Americas-2 (via the St. Thomas-St. Croix cable)

alternative to the other cables serving routes between Puerto Rico, the U.S. Virgin Islands and the British Virgin Islands.⁶ The cable greatly improves service quality, adds capacity and diversity and provides increased resiliency to the above routes.

Maintaining reliable international communications facilities serving Puerto Rico and the U.S. Virgin Islands is particularly important following the “massive damage” to both territories⁷ and “catastrophic impact on Puerto Rico’s communications networks” caused by Hurricane Maria.⁸ As a result, “[t]he challenges Puerto Rico and the U.S. Virgin Islands face in rebuilding will be enormous and the recovery process long.”⁹ As Puerto Rico and the U.S. Virgin Islands continue to work to overcome these major challenges, it is critical to avoid any diminution in the communications facilities that link consumers in both territories with the rest of the world.

III. INFORMATION REQUIRED BY 47 C.F.R. § 1.767

The information requested by 47 C.F.R. § 1.767(a)(1)-(3) and (8)-(9) of the Commission’s rules for each of the applicants can be found in the attached appendices as follows:

APPENDIX A: Antelecom N.V.

and Columbus-2 cables connect Tortola in the British Virgin Islands to the U.S. Mainland, and the Eastern Caribbean Fiber System connects Tortola to Montserrat, Dominica, St. Lucia, Barbados, Grenada, and Trinidad and Tobago, while the Pan Am cable connects Tortola to Aruba, Chile, Colombia, Ecuador, Panama, Peru, and Venezuela.

⁶ The landing points of the Pacific Caribbean Network include San Juan, Puerto Rico and Tortola, British Virgin Islands, as well as the Mainland U.S., and Central and South America, and the landing points of the Global Caribbean Network include San Juan, Puerto Rico and St. Croix, U.S. Virgin Islands.

⁷ *Connect America Fund*, WC Docket No. 10-90, Order, 2017 WL 4479977, rel. Oct 4, 2017, ¶ 1. *See also, The Uniendo a Puerto Rico Fund and the Connect USVI Fund*, Order and Notice of Proposed Rulemaking, WC Docket No. 18-143, rel. May 29, 2018 (approving additional funding to restore communications networks in Puerto Rico and the Virgin Islands and seeking comment on almost \$900 million in long-term funding for network expansion).

⁸ Press Release, FCC, Chairman Pai Statement on Hurricane Maria (Sept. 21, 2017).

⁹ *Connect America Fund*, *supra*, ¶ 7.

APPENDIX B: AT&T Corp.

APPENDIX C: Cable & Wireless (BVI) Limited

APPENDIX D: MCI International, Inc.

APPENDIX E: Prepa Networks, LLC

APPENDIX F: Sprint Communications Company L.P.

APPENDIX G: Telefonica Larga Distancia de Puerto Rico, Inc.

The information required by Section 1.767(a)(4)-(7) is provided below.

Information Required by 47 C.F.R. § 1.767(a)(4) through (7):

(4) Description of the Cable

See Section I above.

(5) Landing Points

Information about the four landing points of the Taino-Carib Cable System is included in Appendix H as follows:

Tab 1: Miramar, San Juan, PR

Tab 2: Isla Verde, Carolina, PR

Tab 3: Magens Bay, St. Thomas, VI

Tab 4: Tortola, British Virgin Islands

(6) Common Carrier or Non-Common Carrier Status

The Taino-Carib cable system will continue to be operated as a common carrier cable.

(7) A list of the proposed owners of the cable system, including each U.S. cable landing station, their respective voting and ownership interests in each U.S. cable landing station, their respective voting interests in the wet link portion of the cable system, and their respective ownership interests by segment in the cable

The ownership and voting interests of the Taino-Carib Cable System¹⁰ are as follows:

Party	Ownership	Voting
Dominican All America Cables and Radio, Inc.	1.32000%	1.32000%
Antelecom N.V.	4.10483%	4.10483%
AT&T Corp.	48.39526%	48.39526%
Cable & Wireless (Barbados) Limited	0.80201%	0.80201%
Cable & Wireless (BVI) Limited	14.80817%	14.80817%
Compania Anonima Nacional Telefonos de Venezuela	0.26613%	0.26613%
Claro S.A.	0.14623%	0.14623%
Compania Dominicana de Telefonos, S.A.	2.48878%	2.48878%
Global Interlink Ltd.	1.04750%	1.04750%
Japan KDDI Corporation	0.01597%	0.01597%
MCI International, Inc.	10.41681%	10.41681%
Orange	1.23026%	1.23026%
Prepa Networks, LLC	0.10329%	0.10329%
Servicio Di Telecomunicacion Di Aruba N.V.	1.02222%	1.02222%
Sprint Communications Company L.P.	6.55303%	6.55303%
Telefonos De Mexico, S.A. De C.V.	0.15454%	0.15454%
Telecom Italia Sparkle, S. p. A.	0.13130%	0.13130%
Telefonica Larga Distancia De Puerto Rico, Inc.	5.70462%	5.70462%
Telefonica de Espana S.A.U.	0.35657%	0.35657%
Telecommunications Services of Trinidad and Tobago Limited	0.89348%	0.89348%

¹⁰ Under the terms of the Taino-Carib Construction and Maintenance Agreement (“C&MA”) consortium parties may leave the consortium on 12 months' notice after the expiration of the original 25-year term. As of the date of filing, Orange and Telefonos De Mexico, S.A. De C.V. have given notice of withdrawal to be effective on March 1, 2019. Additionally, there are pending amendments to the C&MA under which Dominican All America Cables and Radio Inc. and Telecom Italia Sparkle, S. p. A. will transfer all their rights and obligations to Prepa Networks, LLC, and Telefonica de Espana S.A.U. will transfer all its rights and obligations to Servicio Di Telecomunicacion Di Aruba N.V. None of these pending changes will change the number or identity of the parties with 5% or greater ownership interests. It is possible that the ownership and voting interests may change further as the result of consortium parties exercising their transfer or withdrawal rights under the C&MA. Applicants will file supplements as necessary to update this application to reflect these and any further changes.

Verizon Hawaii International Inc.	0.03900%	0.03900%
-----------------------------------	----------	----------

The ownership interests by segment in the cable are as follows:

Party	Segment 1 ¹¹	Segment 2 ¹²	Segment 3 ¹³	Segment 4 ¹⁴
Dominican All America Cables and Radio, Inc.	0.06614%	0.03139%	0.05101%	0.12092%
Antelecom N.V.	1.71070%	6.34534%	3.72826%	9.87325%
AT&T Corp.	88.78242%	67.52527%	79.52871%	12.14842%
Cable & Wireless (Barbados) Limited	0.01210%	0.00000%	0.00683%	0.59790%
Cable & Wireless (BVI) Limited	6.57424%	16.92892%	11.08186%	72.75170%
Compania Anonima Nacional Telefonos de Venezuela	0.01049%	0.00314%	0.00729%	0.00000%
Claro S.A.	0.00242%	0.00105%	0.00182%	0.00448%
Compania Dominicana de Telefonos, S.A.	0.19196%	0.04917%	0.12980%	0.21498%
Global Interlink Ltd.	1.64295%	0.02720%	0.93958%	0.00448%
Japan KDDI Corporation	0.00081%	0.00000%	0.00046%	0.00000%
MCI International, Inc.	0.84608%	4.35438%	2.37332%	1.64368%
Orange	0.00403%	0.00105%	0.00273%	0.98979%
Prepa Networks, LLC	0.00323%	0.00000%	0.00182%	0.00224%
Servicio Di Telecomunicacion Di Aruba N.V.	0.05162%	0.00000%	0.02915%	0.00000%
Sprint Communications Company L.P.	0.05162%	4.47155%	1.97572%	0.93381%
Telefonos De Mexico, S.A. De C.V.	0.01774%	0.00209%	0.01093%	0.00000%

¹¹ Segment 1 comprises the submarine cable from the landing station at Miramar, Puerto Rico to the Branching Unit.

¹² Segment 2 comprises the submarine cable from the landing station at Isla Verde, Puerto Rico to the Branching Unit.

¹³ Segment 3 comprises the submarine cable from the Branching Unit to the landing station at Magens Bay, St. Thomas.

¹⁴ Segment 4 comprises the submarine cable from the landing station at Magens Bay, St. Thomas to the landing station at Tortola, British Virgin Islands.

Telecom Italia Sparkle, S. p. A.	0.00565%	0.00105%	0.00364%	0.00000%
Telefonica Larga Distancia De Puerto Rico, Inc.	0.00000%	0.24900%	0.10840%	0.06046%
Telefonica de Espana S.A.U.	0.01210%	0.00628%	0.00956%	0.00000%
Telecommunications Services of Trinidad and Tobago Limited	0.01371%	0.00105%	0.00820%	0.65389%
Verizon Hawaii International Inc.	0.00000%	0.00209%	0.00091%	0.00000%

The ownership of the landing stations is as follows:

Party	Landing Station
AT&T of Puerto Rico, Inc.	Miramar, San Juan, PR
Prepa Networks, LLC	Isla Verde, Carolina, PR
AT&T of the Virgin Islands, Inc.	Magens Bay, St. Thomas, VI
Cable & Wireless (BVI) Limited	Tortola, British Virgin Islands

The ownership of the jointly held equipment in the U.S. landing stations is as follows:

Party	Miramar, PR	Isla Verde, PR	Magens Bay, VI
Dominican All America Cables and Radio, Inc.	0.06614%	0.03139%	0.06283%
Antelecom N.V.	1.71070%	6.34534%	4.76682%
AT&T Corp.	88.78242%	67.52527%	68.14081%
Cable & Wireless (Barbados) Limited	0.01210%	0.00000%	0.10673%
Cable & Wireless (BVI) Limited	6.57424%	16.92892%	21.50464%
Compania Anonima Nacional Telefonos de Venezuela	0.01049%	0.00314%	0.00606%
Claro S.A.	0.00242%	0.00105%	0.00227%
Compania Dominicana de Telefonos, S.A.	0.19196%	0.04917%	0.14420%
Global Interlink Ltd.	1.64295%	0.02720%	0.78154%
Japan KDDI Corporation	0.00081%	0.00000%	0.00038%
MCI International, Inc.	0.84608%	4.35438%	2.25000%
Orange	0.00403%	0.00105%	0.16955%
Prepa Networks, LLC	0.00323%	0.00000%	0.00189%

Servicio Di Telecomunicacion Di Aruba N.V.	0.05162%	0.00000%	0.02422%
Sprint Communications Company L.P.	0.05162%	4.47155%	1.79962%
Telefonos De Mexico, S.A. De C.V.	0.01774%	0.00209%	0.00908%
Telecom Italia Sparkle, S. p. A.	0.00565%	0.00105%	0.00303%
Telefonica Larga Distancia De Puerto Rico, Inc.	0.00000%	0.24900%	0.10029%
Telefonica de Espana S.A.U.	0.01210%	0.00628%	0.00795%
Telecommunications Services of Trinidad and Tobago Limited	0.01371%	0.00105%	0.11733%
Verizon Hawaii International Inc.	0.00000%	0.00209%	0.00076%

IV. ADDITIONAL MATTERS

The Applicants certify that they are not required to submit a consistency certification to any state or territory pursuant to section 1456(c)(3)(A) of the Coastal Zone Management Act., codified at 16 U.S.C. Sect. 1456(c)(3)(A).¹⁵ Neither Puerto Rico nor the U.S. Virgin Islands, the territories in which the Taino-Carib Cable System lands, lists a cable landing license as a federal activity requiring a consistency certification.¹⁶

The Applicants have sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense.¹⁷ Such service is certified in the certificate of service attached to this application.

¹⁵ See 47 C.F.R. § 1.767(k)(4).

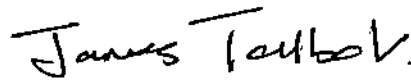
¹⁶ See National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Puerto Rico's Listed Federal Actions, <https://coast.noaa.gov/czm/consistency/media/pr.pdf>; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, U.S. Virgin Island's Listed Federal Actions, <https://coast.noaa.gov/czm/consistency/media/usvi.pdf>.

¹⁷ See 47 C.F.R. § 1.767(k).

V. CONCLUSION

As demonstrated above, the public interest, convenience and necessity will be served by a grant of this application to authorize the continued landing and operation of the Taino-Carib Cable System linking Puerto Rico with the U.S. Virgin Islands and the British Virgin Islands. The Taino-Carib Consortium respectfully requests that the Commission grant this application.

Respectfully submitted,



Of Counsel:

Mark D. Schneider
Sidley Austin LLP
1501 K Street, NW
Washington, DC 20005
(202) 736-8058
mschneider@sidley.com

James Talbot
AVP- Senior Legal Counsel
AT&T Services, Inc. &
Assistant Secretary
AT&T Corp.
Suite 1000
1120 20th Street, N.W.
Washington, D.C. 20036
(202) 457-3048
jjtalbot@att.com

Dated: June 29, 2018

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application and attachments were served on the following by first-class mail on June 29, 2018:

U.S. Coordinator, EB/CIP
U.S. Department of State
2201 C Street, NW
Washington, DC 20520-5818

Office of Chief Counsel/NTIA
U.S. Department of Commerce
14th St., NW and Constitution Ave., NW
Washington, DC 20230

Defense Information Systems Agency
ATTN: GC/DOI
6910 Cooper Avenue
Fort Meade, MD 20755-7088



Marc Korman