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August 24, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: The Taino-Carib Submarine Cable System Operating between Puerto Rico and St. Thomas in the U.S. Virgin Islands and the British Virgin Islands, File No. SCL-LIC-2018-0702-00019

Dear Ms. Dortch:

In response to questions from the International Bureau staff, the Taino-Carib Consortium supplements and amends the above-referenced Application filed on June 29, 2018 (“Application”) as follows.

1. AT&T of Puerto Rico, Inc. and AT&T of the Virgin Islands, Inc.

The Applicants request a waiver of Section 1.767(h)(1) of the Commission’s rules, so that AT&T of Puerto Rico, Inc. and AT&T of the Virgin Islands, Inc. need not be joint applicants for the Taino-Carib cable landing license. “The purpose of [Section 1.767(h)(1)] is to ensure that entities having a significant ability to affect the operation of the cable system become licensees so that they are subject to the conditions and responsibilities associated with the license.”¹ Neither AT&T of Puerto Rico, Inc. which owns the Miramar, Puerto Rico cable landing station, or AT&T of the Virgin Islands, Inc., which owns the Magens Bay, Virgin Islands cable landing station, will have any ability to affect significantly the operation of the Taino-Carib cable.

AT&T of Puerto Rico, Inc. and AT&T of the Virgin Islands, Inc. are 59.10% owned indirect subsidiaries of AT&T Corp., one of the Applicants for this authorization, and wholly owned indirect subsidiaries of AT&T Inc., the 100% parent of AT&T Corp.² Additionally, all

¹ See *Actions Taken Under the Cable Landing License Act*, 23 FCC Rcd. 227, 229 (2008) citing *Review of Commission Consideration of Applications under the Cable Landing License Act*, 16 FCC Rcd. 22,167, 22,194-95 ¶¶ 53-54 (2001).

² The ownership information for these entities provided in the Application is corrected as follows. Both entities are 100% owned by Beach Holding Corp, which is 40.90% owned by SBC Telecom, Inc., 29.48% owned by AT&T International Holdings, LLC, and 29.62% owned by AT&T Corp. SBC Telecom, Inc. is 100% owned by AT&T Teleholdings, Inc., which is 100% owned by AT&T Inc. AT&T International Holdings, LLC is 100% owned by AT&T Corp.

personnel who operate these two landing stations are supervised, directly or indirectly, by AT&T Corp. personnel. AT&T Corp. has and will retain operational authority over the Miramar, Puerto Rico and Magens Bay, Virgin Islands cable landing facilities and will continue to provide direction to AT&T of Puerto Rico, Inc. and AT&T of the Virgin Islands, Inc. in all matters relating to the Taino-Carib Cable System. Accordingly, the inclusion of these two entities as joint applicants is not necessary to ensure compliance by the Applicants with the Cable Landing License Act, the Commission's cable landing license rules, or the terms of any cable landing license. Grant of the waiver is therefore consistent with longstanding Commission precedent.³

2. The Taino-Carib Cable System

A map of the Taino-Carib Cable System is attached at Tab 1 hereto. The cable has four wet segments: Segment 1 comprises the submarine cable from the landing station at Miramar, Puerto Rico to the Branching Unit; Segment 2 comprises the submarine cable from the landing station at Isla Verde, Puerto Rico to the Branching Unit; Segment 3 comprises the submarine cable from the Branching Unit to the landing station at Magens Bay, St. Thomas; and Segment 4 comprises the submarine cable from the landing station at Magens Bay, St. Thomas to the landing station at Tortola, British Virgin Islands. As shown on the attached map, Segments 1, 2, 3, and 15.9 km. of Segment 4 are in U.S. territorial waters, and 29.9 km. of Segment 4 is outside U.S. territorial waters. The ownership shares in Segments 1, 2, 3 and 4 are as stated on pages 8-9 of the Application. The ownership shares in the portions of Segment 4 that are inside and outside U.S. territorial waters are the same.

3. Additional Matters

The docket number for the T-Mobile / Sprint merger is WT Docket No. 18-197, and the transfer of control filing for the submarine cable licenses is SCL-T/C-20180618-00015.

The file number for the construction permit granted in 1992 for the Taino-Carib Cable is SCL-LIC-19920107-00005 (Old file number: SCL-92-002).

³ See, e.g., *Actions Taken Under the Cable Landing License Act*, 32 FCC Rcd. 1436, 1437 (2017) (accepting the applicant's representations that Tata "will not have the ability to affect significantly Atisa's operation" and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under the Cable Landing License Act*, 24 FCC Rcd. 7828, 7829-30 (2009) (accepting the applicants representations that "Tata will not be able to affect significantly the operation of HANTRU-1" and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under the Cable Landing License Act*, Public Notice, 24 FCC Rcd. 226, 227-28 (2009) (noting that "Applicants will retain operational authority over their ASHC System facilities and provide direction to AT&T in all matters relating to the ASHC System"); *Actions Taken Under the Cable Landing License Act*, 23 FCC Rcd. 13,419, 13,420 (2008) (declining to require that Tata Communications (US) Inc. be a joint applicant or licensee for the PPC 1 System, noting that "Applicants will retain operational authority over PPC 1 System facilities and provide direction to [Tata] in all matters relating to the PPC 1 System.").

4. Appendices A through G

The Applicants amend and supplement Appendices A through G of the Application as follows.

Appendix A – Antelecom N.V.

As stated in Appendix A, United Telecommunications Services N.V. holds a 100% direct ownership interest in Antelecom N.V.

The State of Curacao holds a 87.5% direct ownership interest in United Telecommunications Services N.V. The State of Sint Maarten holds a 12.5% direct ownership interest in United Telecommunications Services N.V.

Except as stated above, no person or entity holds a 10% or greater ownership or voting interest in Antelecom N.V. or United Telecommunications Services N.V.

Appendix B - AT&T Corp.

The 10% or greater ownership interests held by persons or entities in the ownership chain of AT&T Corp. are as stated on page 2 of Appendix B. No person or entity holds a ten percent or greater direct or indirect ownership and voting interest in AT&T Corp. except as stated on page 2 of Appendix A.

Appendix C - Cable & Wireless (BVI) Limited

The following persons and/or entities hold 10% or greater ownership interests in Liberty Latin America Ltd. (Bermuda), which as stated in Tab 1 of Appendix C owns 100% of Cable & Wireless (BVI) Limited through several intermediaries:

John C. Malone
 c/o 1550 Wewatta Street
 Suite 710
 Denver, Colorado 80202
 Citizenship: United States
 Business: Cable and telecommunications services
 Ownership and Voting Interest: 25.5%

Genesis Asset Managers
 Heritage Hall, Le Marchant Street
 St. Peter Port
 Guernsey GY1 4WY Channel Islands
 Citizenship: Delaware
 Business: Institutional investment manager
 Ownership and Voting Interest: 11.5 %

Except as stated above, no individual or entity holds a 10 percent or greater voting or equity interest in Liberty Latin America Ltd (Bermuda).

Except as stated above and in Tab 1 of Appendix C, no individual or entity holds a 10 percent or greater voting or equity interest in Cable & Wireless (BVI) Limited.

Appendix D - MCI International, Inc.

The 10% or greater ownership interests held by persons or entities in the ownership chain of MCI International, Inc. are as follows: MCI International Inc. is wholly (100%) owned by Verizon Business Network Services, Inc.; which is wholly owned by MCI Communications Corporation; which is wholly owned by Verizon Business Global LLC; which is wholly owned by Verizon Communications Inc. – a widely-owned and publicly traded parent holding company. Further details of these entities are provided below.

Name	Address	Citizenship or Country	Principal Business	Percentage of Equity Held
Verizon Business Network Services Inc.	One Verizon Way Basking Ridge, New Jersey 07920	U.S.A.	Telecommunications	100% (direct)
MCI Communications Corporation	One Verizon Way Basking Ridge, New Jersey 07920	U.S.A.	Telecommunications	100% (indirect)
Verizon Business Global LLC	899 Heathrow Park Lane Lake Mary, Florida 32746	U.S.A.	Telecommunications	100% (indirect)
Verizon Communications Inc.	1095 Avenue of the Americas New York, New York 10036	U.S.A.	Holding company	100% (indirect)

Except as stated above, no person or entity holds a ten percent or greater direct or indirect ownership and voting interest in MCI International, Inc.

No person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Verizon Communications Inc.

Appendix E - Prepa Networks, LLC

The 10% or greater ownership interests held by persons or entities in the ownership chain of Prepa Networks, LLC are as follows: Prepa Networks LLC is wholly owned by Prepa Holdings, LLC., which is wholly owned by the Puerto Rico Electric Power Authority (PREPA). Further details of these entities are provided below.

Name	Address	Citizenship or Country	Principal Business	Percentage of Equity Held
Prepa Holdings, LLC	Condominium AquaBlue at the Golden Mile, Commercial Building, 4 th floor, Muñoz Rivera Avenue, San Juan, PR 00918	Delaware, USA	Holding company	100%
Puerto Rico Electric Power Authority	1110 Ave. Ponce de Leon, Edificio Neos Piso 8, Santurce, PR 00907	Commonwealth of Puerto Rico	Public electric utility	100% of PREPA Holdings, LLC, indirectly holds 100% of PREPA Networks, LLC.

Except as stated above, no person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Prepa Networks, LLC.

No person or entity holds a ten percent or greater direct or indirect ownership and voting interest in the Puerto Rico Electric Power Authority (PREPA).

Appendix F - Sprint Communications Company L.P.

No person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Sprint Communications Company L.P. except as stated in Appendix F.

An organizational chart of the ownership and voting interest holders listed in Appendix F for Sprint Communications Company L.P. is included at Tab 2 hereto.

Appendix G - Telefonica Larga Distancia de Puerto Rico

The 10% or greater ownership interests held by persons or entities in the ownership chain of Telefonica Larga Distancia de Puerto Rico are as follows: Telefonica International Holding B.V. holds a 100% ownership and voting interest in Telefonica Larga Distancia de Puerto Rico, Inc. Telefonica Latinoamerica Holding S.L. holds a 100% ownership and voting interest in Telefonica International Holding B.V. Telefonica S.A. holds a 100% ownership and voting interest in Telefonica Latinoamerica Holding S.L. Further details of these entities are provided below.

Name	Address	Citizenship or Country	Principal Business	Percentage of Equity Held
Telefonica Internacional Holding B.V.	Zuidplein 112 1077XV Amsterdam, the Netherlands	Amsterdam, the Netherlands	To acquire, hold and dispose of participations in other companies and enterprises	100%
Telefonica Latinoamerica Holding, S.L.	Edificio Central Pl 2 ^a C/Ronda de la Comunicación s/n, Madrid, Spain	Spain	To administer and manage businesses in the telecommunications industry	100%
Telefonica S.A.	Edificio Central Pl 2 ^a C/Ronda de la Comunicación s/n, Madrid, Spain	Spain	Telecommunications	100%

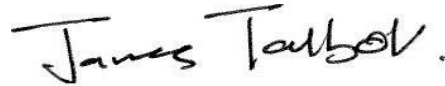
Except as stated above, no person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Telefonica Larga Distancia de Puerto Rico.

No person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Telefonica S.A.

The Applicants' certifications regarding the above information are attached at Tab 3 hereto.

Please let us know if you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "James Talbot." The signature is written in a cursive, slightly slanted style.

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.

CC: Jodi Cooper, International Bureau
David Krech, International Bureau
U.S. Coordinator, EB/CIP, U.S. Department of State
Office of Chief Counsel/NTIA, U.S. Department of Commerce
Defense Information Systems Agency, Attn: GC/DOI

CERTIFICATE OF SERVICE

I hereby certify that the foregoing amendment was served on the following by first-class

mail on August 24, 2018:

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

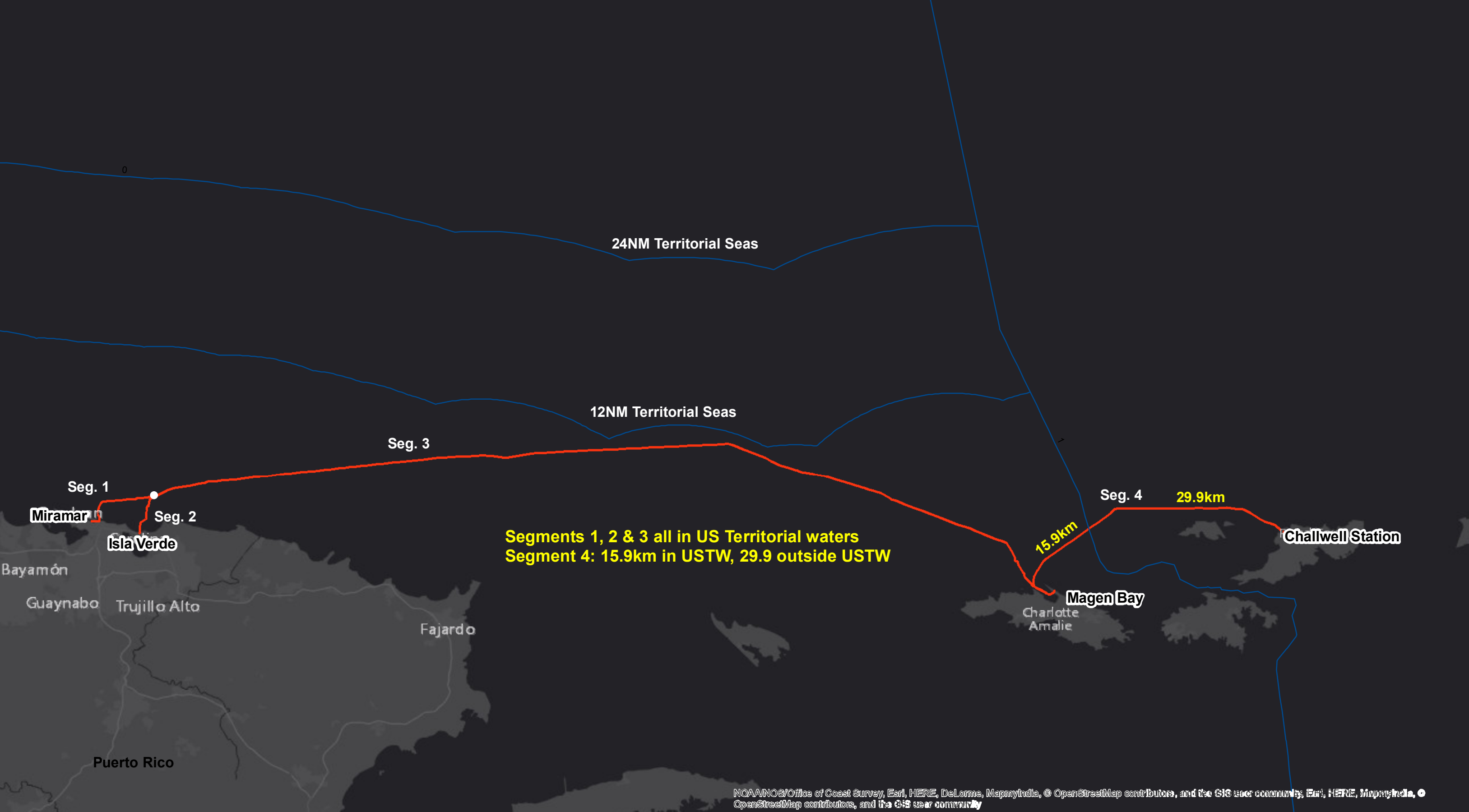
Office of Chief Counsel/NTIA
U.S. Department of Commerce
14th St., NW and Constitution Ave., NW
Washington, DC 20230

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



Marc Korman

TAB 1



24NM Territorial Seas

12NM Territorial Seas

Seg. 3

Seg. 1

Seg. 2

Seg. 4

29.9km

15.9km

**Segments 1, 2 & 3 all in US Territorial waters
Segment 4: 15.9km in USTW, 29.9 outside USTW**

Miramar

Isla Verde

Challwell Station

Magen Bay

Charlotte Amalie

Fajardo

Bayamón

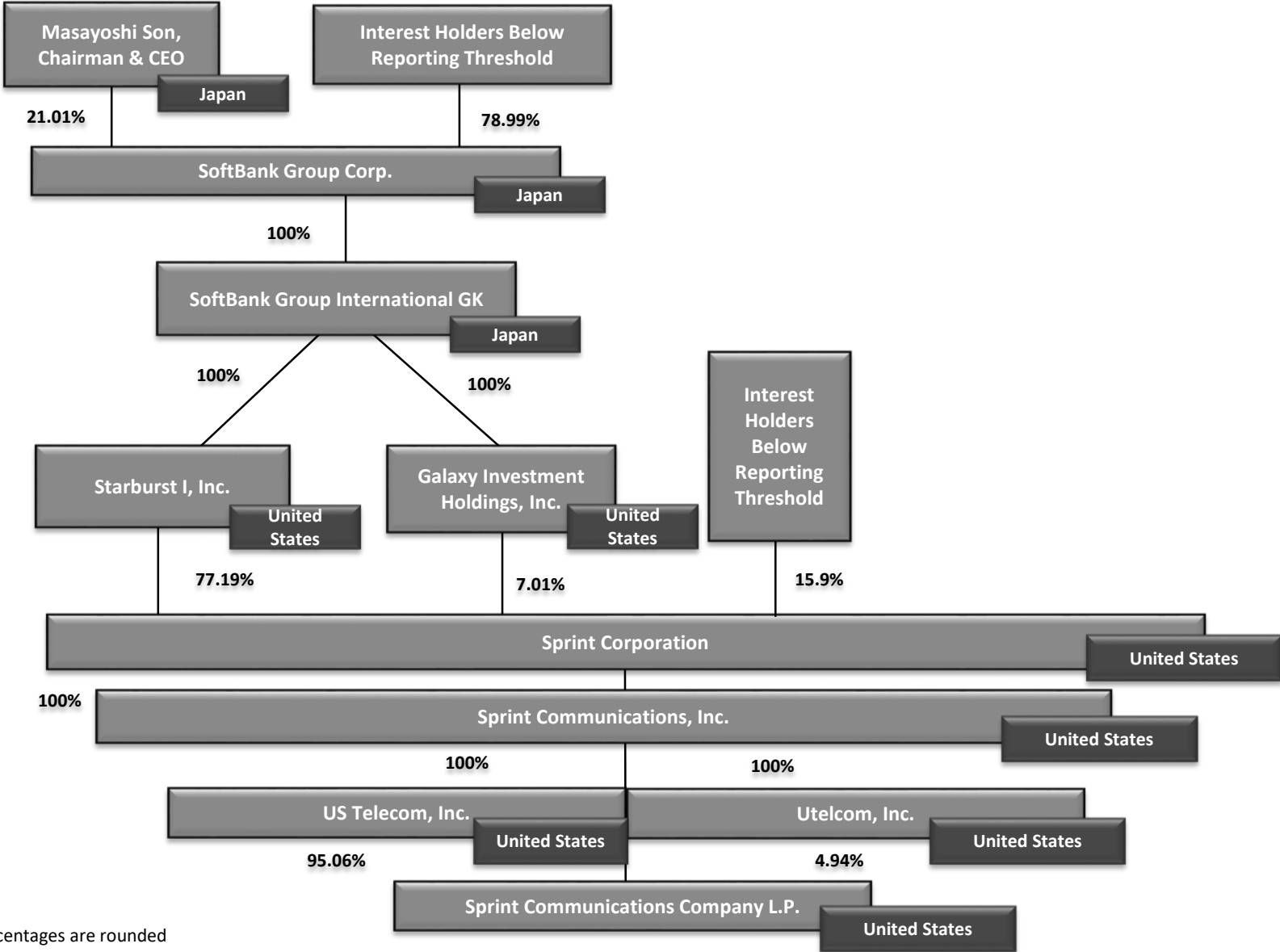
Guaynabo

Trujillo Alto

Puerto Rico

TAB 2

Current Ownership Structure¹



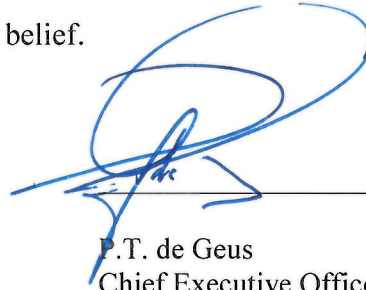
¹ Ownership percentages are rounded

TAB 3

CERTIFICATION

I am authorized to enter this certification on behalf of Antelecom N.V.

All information in the attached Letter amending and/or supplementing Appendix A is true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by 'T. de Geus'.

Dated: August 15, 2018

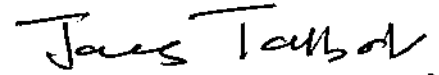
P.T. de Geus
Chief Executive Officer
Antelecom N.V.
Berg Arrarat # 1
Willemstad
Curacao

CERTIFICATION

I am authorized to enter this certification on behalf of AT&T Corp.

All information amending and/or supplementing Appendix B is true and correct to the best of my knowledge and belief.

Dated: August 21, 2018



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

(202) 457-3048

CERTIFICATION

I am authorized to enter this certification on behalf of Cable & Wireless (BVI) Limited

All information in the attached Letter amending and/or supplementing Appendix C is true and correct to the best of my knowledge and belief.



Dated: August ^{8/21/2018} __, 2018

Christine Morris Gillespie
Director of C&W BVI
Windsor Lodge
Government Hill
St. Michael
Barbados
Telephone: 1-246-292-6232

CERTIFICATION

I am authorized to enter this certification on behalf of MCI International, Inc.

All information contained in the attached Letter amending and/or supplementing Appendix

D is true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "William H. Johnson", is written over a horizontal line.

Dated: August 7, 2018

William H. Johnson
SVP — Federal Regulatory & Legal
Affairs
1300 I St., NW, Suite 500E
Washington, DC 20005
Telephone: 202-515-2492

CERTIFICATION

I am authorized to enter this certification on behalf of Prepa Networks, LLC.

All information included in the attached Letter amending and/or supplementing Appendix E is true and correct to the best of my knowledge and belief.

Dated: August 6, 2018



José D. Casillas
General Manager
Prepa Networks, LLC
PO Box 195600
San Juan, PR 00919
Telephone: (787) 705-9950

CERTIFICATION

I am authorized to enter this certification on behalf of Sprint Communications Company
L.P.

All of the information contained in the attached Letter amending and/or supplementing
Appendix F is true and correct to the best of my knowledge and belief.

Ann Shee for
Maria Cattafesta

Dated: August 6, 2018

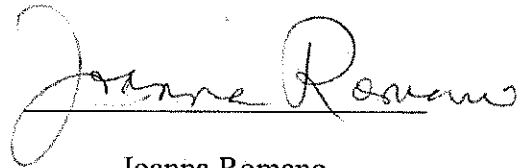
Maria Cattafesta
Senior Counsel, Government Affairs
900 7th Street, N.W., Suite 700
Washington, DC 20001
Telephone: (703) 592-5110

CERTIFICATION

I am authorized to enter this certification on behalf of Telefonica Larga Distancia de Puerto Rico, Inc.

All information contained in the attached Letter amending and/or supplementing Appendix G is true and correct to the best of my knowledge and belief.

Dated: August 6, 2018

A handwritten signature in black ink that reads "Joanna Romano". The signature is written in a cursive style with a large, looping initial "J".

Joanna Romano
800 Waterford Way
Suite 300
Miami, FL 33126