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March 27, 2019

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

*Re: American Telephone and telegraph Company, et al., The Americas I
Submarine Cable System, File No. ITC-214-19930103-00258*

Dear Ms. Dortch:

The Americas I Consortium supplements and amends the above-referenced Application filed on March 6, 2019 (“Application”) as follows.

The table set forth below replaces the table set forth in Appendix B, pages 3-4, of the request to modify the Section 214 authority previously granted to construct and operate the Americas I Cable System. The modification seeks, *inter alia*, Federal Communications Commission approval to add Atlantic Telecommunication Operation Company Limited (“ATOC”) as a licensee of the Americas I Cable System. No individual or entity other than those set forth in the table below holds a ten percent or greater direct or indirect equity or voting interest in ATOC.

Blackrock, Inc. (“Blackrock”) has been added to this new table. Although Blackrock will not hold a ten percent or greater indirect interest in ATOC if the multiplier is used to calculate Blackrock’s interest, use of the multiplier is inappropriate in this instance pursuant to the Note to Section 63.18(h) of the FCC’s rules, 47 C.F.R. § 63.18(h), note. This is because the indirect interest of ATN International, Inc. (“ATNI”) in ATOC is above 50 percent and is controlling, and Blackrock holds a direct interest in ATNI. The multiplier is not used to dilute an indirect interest in a submarine cable landing licensee held through the controlling ownership chain of that licensee.

Name	Address	Citizenship or Country	Principal Business	Percentage of Equity/Voting Held
Atlantic Teleconnection Holdings Company Limited (“ATHC”)	Commerce House, Wickhams Cay 1, POB 3140, Road Town, Tortola, British Virgin Islands, VG111TBC	British Virgin Islands	Telecom	100% of ATOC
GTT International	79 Brickdam	Barbados	Telecom	100% of

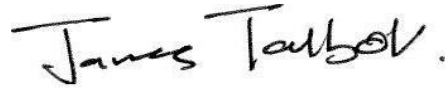
Name	Address	Citizenship or Country	Principal Business	Percentage of Equity/Voting Held
Service SRL (“GTT SRL”)	Georgetown, Guyana			ATHC
Guyana Telephone & Telegraph Company Ltd (“GTT”)	79 Brickdam Georgetown, Guyana	Guyana	Telecom	100% of GTT SRL
Hong Kong Golden Telecom Company Limited (“HKGT”)*	Room 2801A, Lippo Centre, Tower 1, 89 Queensway, Hong Kong	Hong Kong	Telecom	20% of GTT
ATN International, Inc. (“ATNI”)**	500 Cummings Center, Suite 2450, Beverly, MA 01915	USA	Telecom	80% of GTT
Blackrock, Inc.	55 East 52nd Street New York, NY 10055	USA	Investment Management	10.2% of ATNI
Cornelius B. Prior Jr.	P.O. Box 12030 St. Thomas, U.S. Virgin Islands 00801	USA	Retired	27.4% of ATNI

* ATOC was informed by representatives of HKGT in May 2018 that HKGT is 100% owned by Datang Telecom International Technology (Hong Kong) Co., Ltd. (“DTIT”) and that DTIT is indirectly controlled, but not wholly owned, by China Academy of Telecommunications Technology. ATOC does not have any additional information about HKGT’s ultimate ownership.

** ATNI is a publicly traded company listed on the NASDAQ (Ticker: ATNI). As of the date of this filing, no individual or entity, has reported to the Securities and Exchange Commission that it holds a direct or indirect 10 percent or greater equity or voting interest in ATNI, other than the individual and the entity listed in the table above.

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:

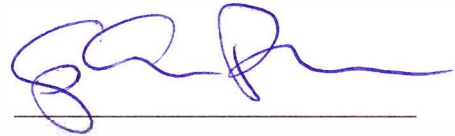
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CC: Jodi Cooper, International Bureau
David Krech, International Bureau
U.S. Coordinator, EB/CIP, U.S. Department of State
Office of Chief Counsel/NTIA, U.S. Department of Commerce
Defense Information Systems Agency, Attn: GC/DOI

CERTIFICATION

I am authorized to enter this certification on behalf of Atlantic Teleconnection Operating Company Limited. All of the information contained herein is true and correct to the best of my knowledge and belief.



Dated: March 27, 2019

Christopher Pepper
c/o ATOC
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Beverly, MA 01915
(561) 414-5543