

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

In the Matter of	)	
	)	
The Americas I Submarine Cable System	)	File No. SCL-LIC-20190326-00009
Operating Between the United States	)	
Mainland and St. Thomas 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.<sup>1</sup> Through this Petition, DHS advises the Commission that it 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 AT&T Corp. (“AT&T”) to abide by the undertakings set forth in the June 22, 2020 Letter of Assurances (“LOA”), which is attached hereto as Attachment A. The above-referenced proceeding involves an application for a cable landing license for the Americas I Cable System to allow the continued operation of this domestic submarine cable for an additional 25-year term following the expiration of the existing cable landing license<sup>2</sup> on September 1, 2019 (FCC File No. SCL-LIC-20190326-00009).

The Commission has long recognized that law enforcement, national security, and public safety

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<sup>1</sup> 47 C.F.R. § 1.41.

<sup>2</sup> FCC File No. SCL-LIC-19921110-00002.

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 AT&T 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 AT&T with the LOA.

Respectfully submitted,

/S/ Brien Beattie

Brien Beattie

U.S. Department of Homeland Security

Director – Foreign Investment Risk Management

Office of Strategy, Policy and Plans

U.S. Department of Homeland Security

2707 Martin Luther King Jr. Ave SE

Washington, D.C. 20528-0445

[IP-FCC@hq.dhs.gov](mailto:IP-FCC@hq.dhs.gov)

June 30, 2020

Attachment A (Letter of Assurances)