

# Morgan Lewis

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March 26, 2020

## VIA IBFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, DC 20554

**Re: IB File No. SCL-LIC-20190410-00015**  
**GU Holdings Inc**  
**Application for a License to Construct, Land, and Operate a Submarine Cable**  
**Connecting the United States and France**

### SUPPLEMENT

Dear Secretary Dortch:

Pursuant to IB staff's request, GU Holdings, Inc. ("GU Holdings"), hereby supplements its above captioned submarine cable landing application for the Dunant submarine cable system, by amending the ownership information previously submitted to the Commission by GU Holdings and substituting it for the following:

#### **(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates<sup>1</sup>**

GU Holdings certifies that it has the following 10-percent-or-greater direct or indirect interest holders as of April 22, 2019<sup>2</sup>:

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<sup>1</sup> See §§ 1.767(a)(8)(i), 63.18(h).

<sup>2</sup> April 22, 2019 is the record date of the ownership information contained in the most recent proxy statement for Alphabet Inc.

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Name: Google International LLC (“Google International”)  
Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043  
Citizenship: Delaware  
Principal Business: Holding company  
Relationship: Google International holds a 100-percent voting and equity interest in GU Holdings.

Name: Google LLC  
Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043  
Citizenship: Delaware  
Principal Business: Technology search services and advertising  
Relationship: Google directly holds a 97-percent voting and equity interest in Google International.<sup>3</sup>

Name: XXVI Holdings Inc. (“XXVI Holdings”)  
Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043  
Citizenship: Delaware  
Principal Business: Holding company  
Relationship: XXVI Holdings holds a 100-percent voting and equity interest in Google LLC.

Name: Alphabet Inc. (“Alphabet”)  
Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043  
Citizenship: Delaware  
Principal Business: Holding company  
Relationship: Alphabet holds a 100-percent voting and equity interest in XXVI Holdings.

Name: Larry Page  
Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043  
Citizenship: USA  
Principal Business: CEO, Co-Founder, and Director of Alphabet  
Relationship: Mr. Page holds 42.9 percent of Alphabet’s Class B common stock, giving him a 26.1-percent voting interest in Alphabet.

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<sup>3</sup> YouTube, LLC (“YouTube”) holds a 3-percent voting and equity interest in Google International. Google holds a 100-percent voting and equity interest in YouTube.

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Name: Sergey Brin  
Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043  
Citizenship: USA  
Principal Business: Co-Founder, President, and Director of Alphabet  
Relationship: Mr. Brin holds 41.3percent of Alphabet’s Class B common stock, giving him a 25.2-percent voting interest in Alphabet.

Alphabet’s shares trade publicly on the NASDAQ Stock Market under the ticker symbols “GOOG” and “GOOGL.” As there is an active market in Alphabet’s shares, Alphabet’s share ownership is always fluid. Moreover, Alphabet can ascertain its significant shareholders only on the basis of its records and may not know of possibly related or affiliated shareholders that are not disclosed to it. Recognizing these limitations, as of April 22, 2019, Alphabet has no 10-percent-or-greater direct or indirect shareholders other than Messrs. Page and Brin.

GU Holdings further certifies that no corporate officer or director of GU Holdings is also an officer or director of any foreign carrier.

Please do not hesitate to contact us with any questions.

Respectfully submitted,

*/s/ Ulises R. Pin*

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*Counsel for GU Holdings Inc.*

cc: David Krech (FCC)  
Jodi Cooper (FCC)