

October 14, 2019

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Pacific Carriage Limited Inc. and Southern Cross Cables Limited, Application for a License to Land and Operate a Private Fiber-Optic Submarine Cable System Connecting Australia, New Zealand, Fiji, Samoa, Tokelau, Kiribati, and California, the Southern Cross NEXT System

Dear Ms. Dortch:

Through their counsel, Pacific Carriage Limited Inc. and Southern Cross Cables Limited (collectively, “Applicants”) supplement the above-referenced application to land and operate the Southern Cross NEXT system¹ to include updated ownership information.

Specifically, Applicants update part H of the application to add MFS Globenet, Inc. as an indirect holder of a 12.3-percent voting and economic interest in each of PCLI and SCCL, and to identify corresponding reductions in the interests held by each of TCNZ (Bermuda), Optus Networks Pty Limited (“Optus”), and SingTel EInvestments Pte Ltd (“SingTel EInvestments”). The interests held by Telstra Holdings Pty Limited remain unchanged.

For clarity, Applicants restate the direct and indirect ownership interests in each of PCLI and SCCL as follows:

¹ Pacific Carriage Limited Inc. and Southern Cross Cables Limited, Application for a License to Land and Operate a Private Fiber-Optic Submarine Cable System Connecting Australia, New Zealand, Fiji, Samoa, Tokelau, Kiribati, and California, FCC File No. SCL-LIC-210190809-00026 (filed Aug. 9, 2019) (“Application”).

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PCLI certifies that it has the following 10-percent-or-greater direct or indirect interest holders (as generally illustrated in revised Appendix J of the Application, attached hereto):

Pacific Carriage Holdings Limited Inc. (“PCHLI”)

Address: Canon’s Court, 22 Victoria Street, Hamilton HM12, Bermuda

Place of Organization: Delaware

Principal Business: investments

Relationship: PCHLI holds a 100-percent voting and economic interest in PCLI.

TCNZ (Bermuda) Limited (“TCNZ Bermuda”)

Address: Victoria Place, 5th Floor, 31 Victoria Street, Hamilton HM10, Bermuda

Place of Organization: Bermuda

Principal Business: investments

Relationship: TCNZ Bermuda holds a 34.8-percent voting and economic interest in PCHLI.

Ownership of TCNZ Bermuda: See Appendix K of the Application.

Optus Networks Pty Limited (“Optus”)

Address: 1 Lyonpark Road, Macquarie Park, NSW 2113, Australia

Place of Organization: Australia

Principal Business: telecommunications

Relationship: Optus holds a 27.9-percent interest in PCHLI.

Ownership of Optus: See Appendix L of the Application.

Telstra Holdings Pty Limited (“Telstra Holdings”)

Address: Level 41, 242 Exhibition Street, Melbourne 3000, Australia

Place of Organization: Australia

Principal Business: investments

Relationship: Telstra Holdings holds a 25.0-percent voting and economic interest in PCHLI.

Ownership of Telstra Holdings: See Appendix M of the Application.

MFS Globenet, Inc. (“Verizon”)

Address: 899 Heathrow Park Lane, Lake Mary, Florida 32746

Place of Organization: Delaware

Principal Business: telecommunications

Relationship: Verizon holds a 12.3-percent voting and economic interest in PCHLI.

Ownership of Verizon: See new Appendix P, attached hereto.

SCCL certifies that it has the following 10-percent-or-greater direct or indirect interest holders (as generally illustrated in revised Appendix N of the Application, attached hereto):

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Southern Cross Cables Holdings Limited (“SCCHL”)

Address: Victoria Place, 5th Floor, 31 Victoria Street, Hamilton HM10, Bermuda
Place of Organization: Bermuda
Principal Business: investments
Relationship: SCCHL holds a 100-percent voting and economic interest in SCCL.

TCNZ (Bermuda) Limited (“TCNZ Bermuda”)

Address: Canon’s Court, 22 Victoria Street, Hamilton HM12, Bermuda
Place of Organization: Bermuda
Principal Business: investments
Relationship: TCNZ Bermuda holds a 34.8-percent voting and economic interest in SCCHL.
Ownership of TCNZ Bermuda: See Appendix K of the Application.

SingTel EInvestments Pte Ltd (“SingTel EInvestments”)

Address: Comcentre, 31 Exeter Road, Singapore 239732
Place of Organization: Singapore
Principal Business: investments
Relationship: SingTel EInvestments holds a 27.9-percent interest in SCCHL.
Ownership of Optus: See Appendix O of the Application.

Telstra Holdings Pty Limited (“Telstra Holdings”)

Address: Level 41, 242 Exhibition Street, Melbourne 3000, Australia
Place of Organization: Australia
Principal Business: investments
Relationship: Telstra Holdings holds a 25.0-percent voting and economic interest in SCCHL.
Ownership of Telstra Holdings: See Appendix M of the Application.

MFS Globenet, Inc. (“Verizon”)

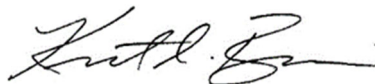
Address: 899 Heathrow Park Lane, Lake Mary, Florida 32746
Place of Organization: Delaware
Principal Business: telecommunications
Relationship: Verizon holds a 12.3-percent voting and economic interest in SCCHL.
Ownership of Verizon: See new Appendix P, attached hereto.

There are no other direct or indirect holders of 10-percent-or-greater interests in either PCLI or SCCL.

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Should you have further questions, please do not hesitate to contact the undersigned.

Yours sincerely,

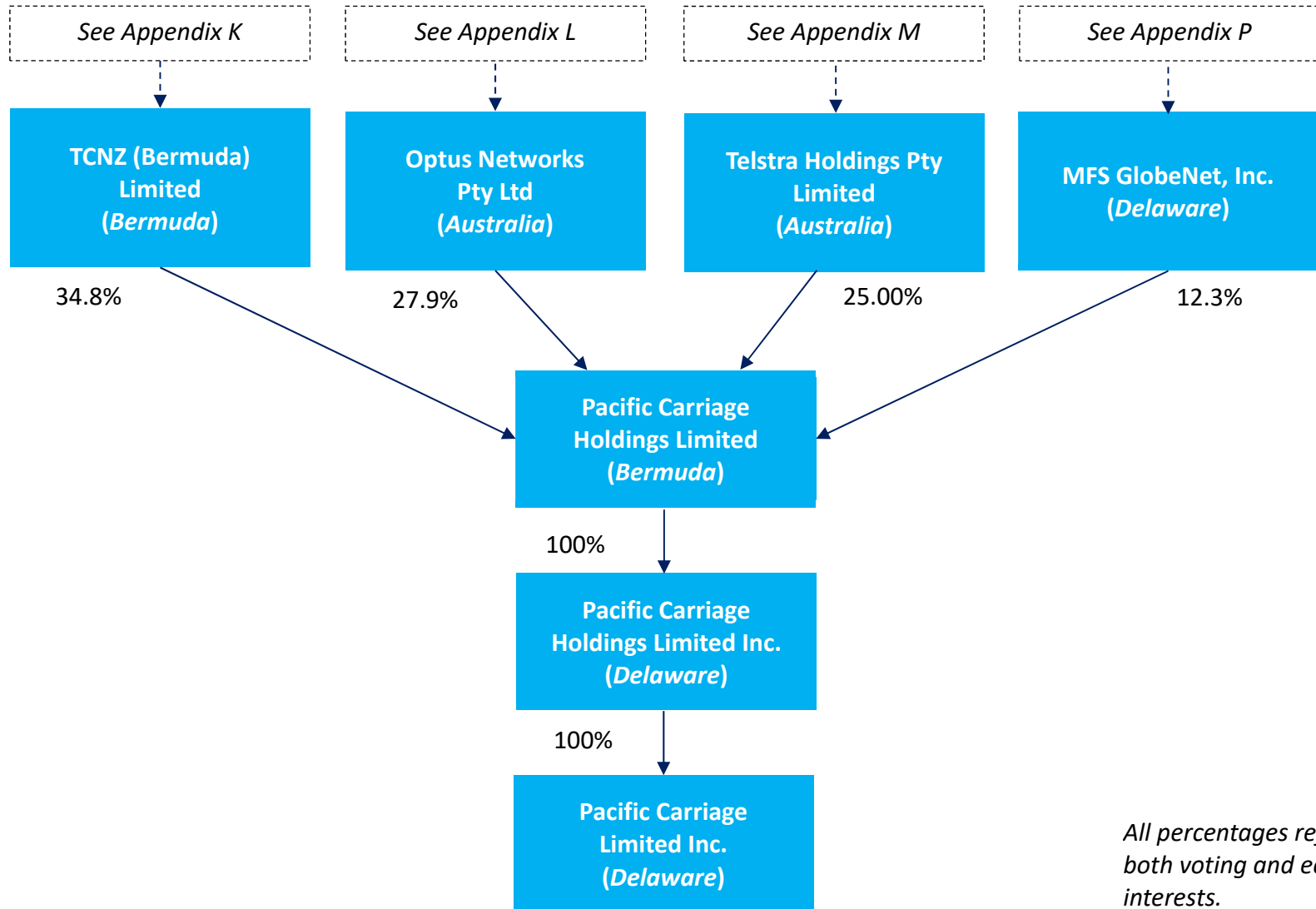


Kent Bressie
Colleen Sechrest
*Counsel for Pacific Carriage Limited Inc. and
Southern Cross Cables Limited*

Attachments

cc: Denise Coca
Jodi Cooper
David Krech

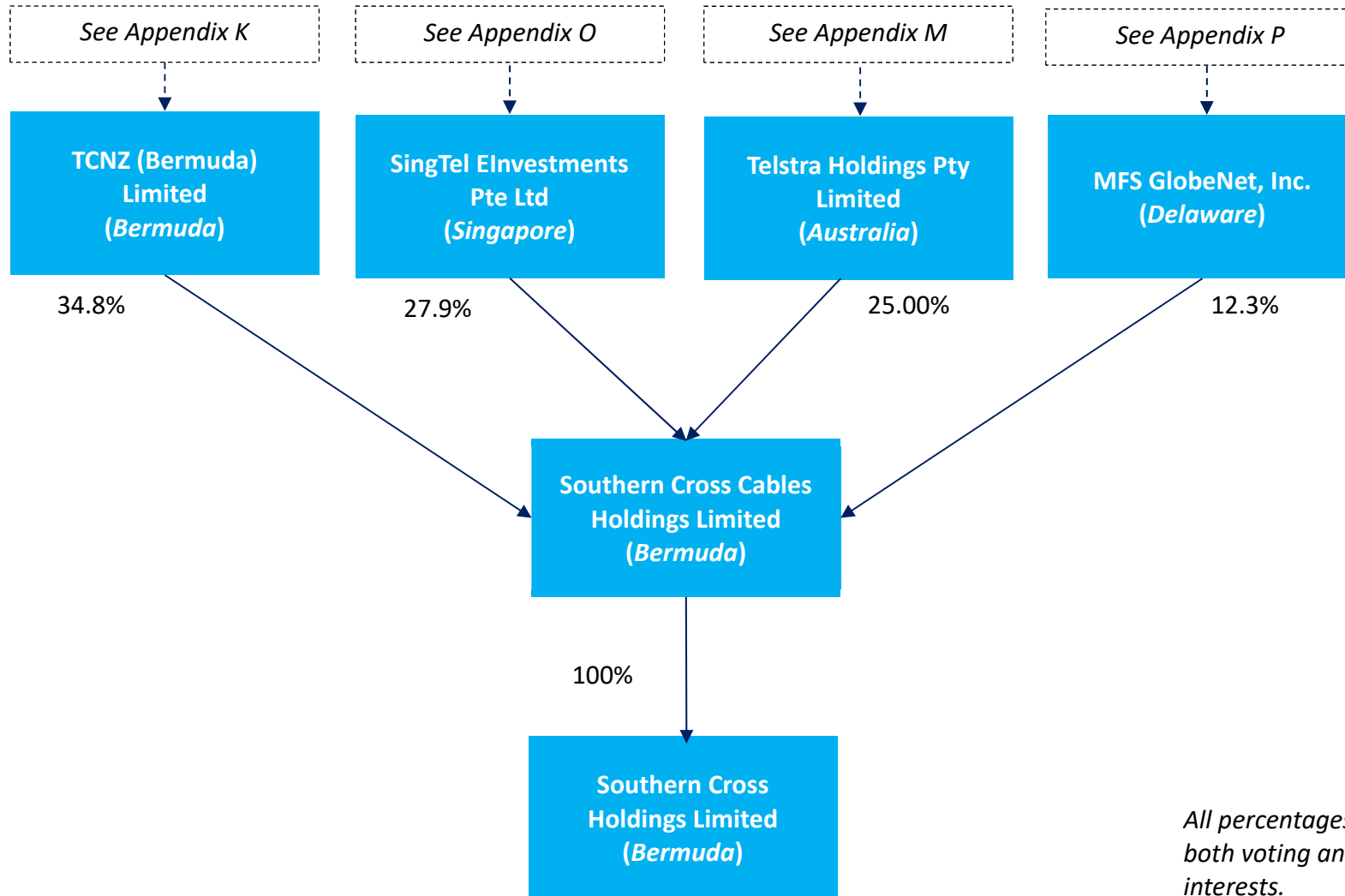
APPENDIX J:
OWNERSHIP DIAGRAM FOR PACIFIC CARRIAGE LIMITED INC.



All percentages reflect both voting and economic interests.

APPENDIX N:

OWNERSHIP DIAGRAM FOR SOUTHERN CROSS CABLES LIMITED



All percentages reflect both voting and economic interests.

APPENDIX P:
OWNERSHIP OF MFS GLOBENET, INC.

MFS Globenet, Inc. (“MFS”) has the following interest holders with a 10-percent-or-greater direct or indirect interest in PCLI:

MCI International Services, Inc. (“MCIS”)

Address: 22001 Loudoun County Pkwy, Ashburn, Virginia 20147-6105

Place of Organization: Delaware

Principal Business: telecommunications

Relationship: MCIS holds a 100-percent voting and economic interest in MFS.

MCI International, Inc. (“MCII”)

Address: 22001 Loudoun County Pkwy, Ashburn, Virginia 20147-6105

Organization: Delaware

Principal Business: telecommunications

Relationship: MCII holds a 100-percent voting and economic interest in MCIS.

MCI Communications Corporation (“MCI”)

Address: 22001 Loudoun County Pkwy, Ashburn, Virginia 20147-6105

Place of Organization: Delaware

Principal Business: telecommunications

Relationship: MCI holds a 100-percent voting and economic interest in MCII.

Verizon Business Global LLC (“Verizon Business”)

Address: 22001 Loudoun County Pkwy, Ashburn, Virginia 20147-6105

Place of Organization: Delaware

Principal Business: telecommunications

Relationship: Verizon Business holds a 100-percent voting and economic interest in MCI.

Verizon Communications Inc. (“Verizon”)

Address: 22001 Loudoun County Pkwy, Ashburn, Virginia 20147-6105

Place of Organization: Delaware

Principal Business: telecommunications

Relationship: Verizon holds a 100-percent voting and economic interest in Verizon Business.

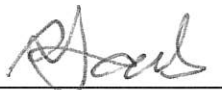
Verizon is a publicly-traded corporation. No other party holding a direct or indirect voting or economic interest in Verizon holds a 10-percent-or-greater direct or indirect voting or economic interest in PCLI.

**PACIFIC CARRIAGE LIMITED INC.
SOUTHERN CROSS CABLES LIMITED**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14th day of October, year of 2019.

X



Rebecca Jacob, General Counsel