

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

|                                               |   |                                 |
|-----------------------------------------------|---|---------------------------------|
| In the Matter of                              | ) |                                 |
|                                               | ) |                                 |
| GU HOLDINGS INC. and EDGE CABLE               | ) | File No. SCL-LIC-20200827-00038 |
| HOLDINGS USA, LLC                             | ) |                                 |
|                                               | ) |                                 |
| Application for a License to Construct, Land, | ) |                                 |
| and Operate the Pacific Light Cable Network   | ) |                                 |
| to Connect the United States to Taiwan and    | ) |                                 |
| the Philippines                               | ) |                                 |

**SUPPLEMENT TO APPLICATION FOR A CABLE LANDING LICENSE**  
**(STREAMLINED PROCESSING REQUESTED)**

GU Holdings Inc. (“GU Holdings”) and Edge Cable Holdings USA, LLC (“Edge USA”) (together, the “Applicants”) submit this supplement to their application filed August 27, 2020, pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39, Executive Order 10,530, and 47 C.F.R. § 1.767 (the “2020 Application”). The 2020 Application requests a license to construct, land, and operate a high-capacity fiber-optic submarine cable system connecting the United States to Taiwan and the Philippines. The submarine cable system is referred to in the 2020 Application as the Pacific Light Cable Network (“PLCN”).<sup>1</sup>

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<sup>1</sup> On August 27, 2020, GU Holdings requested special temporary authority for commercial operation of the U.S.-Taiwan portions of PLCN during the Commission’s consideration of the 2020 Application. *See* Request for Special Temporary Authority, FCC File No. SCL-STA-20200827-00037 (filed Aug. 27, 2020). On August 28, 2020, GU Holdings and Edge USA requested continued special temporary authority to construct, connect, and test the portion of PLCN in U.S. territory during the Commission’s consideration of the 2020 Application. *See* Request for Special Temporary Authority, FCC File No. SCL-STA-20200828-00039 (filed Aug. 28, 2020).

## **I. FOREIGN LANDING ARRANGEMENTS**

### **A. Toucheng, Taiwan**

The branch to Toucheng, Taiwan is wholly-owned and controlled by affiliates of GU Holdings. The portion in international waters is owned by Google Cable Bermuda Ltd. and the portion in Taiwan waters is owned by Google Taiwan Limited (“GTL”). GTL has contracted with Chunghwa Telecom Co., Ltd. (“CHT”), a telecommunications operator in Taiwan, to be the landing party in Taiwan.<sup>2</sup> GTL has acquired from CHT space located at the cable landing station in Toucheng, Taiwan, an existing facility the location details of which are provided in Appendix F of the 2020 Application. In accordance with 47 CFR § 1.767(g)(5), the Applicants have not accepted or agreed to accept special concessions directly or indirectly from CHT.

### **B. Baler, Philippines**

The branch to Baler, Philippines is wholly-owned and controlled by Edge Network Services Limited (“Edge”), an affiliate of Edge USA. To facilitate the Philippines landing activities, Edge has contracted with the Bases Development Conversion Authority (“BCDA”), a Philippines government instrumentality vested with corporate powers, and the Department of Information and Communications Technology (“DICT”), the administrative entity of the Executive Branch of the Philippine Government that will plan, develop, and promote the Philippines’ national information and communications technology development agenda. The BCDA and DICT, together, will act as the landing parties. Edge has acquired from BCDA space in a newly-built cable landing station in Baler, Philippines, the location details of which are

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<sup>2</sup> A landing party agreement governs the relationship between GTL and CHT and anticipates that GTL may convey to CHT ownership of the portion of PLCN that extends 12 nautical miles from the shores of Taiwan, with CHT then granting GTL an indefeasible right of use for the same portion of PLCN.

provided in Appendix G of the 2020 Application.

## **II. CONCLUSION**

For the reasons set forth in the 2020 Application, and the supplementation above, the Commission should grant the requested license to construct, land, and operate a submarine cable between the United States, Taiwan, and the Philippines pursuant to streamlined processing.

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Respectfully submitted,



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Michael L. Johnson  
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Dated: September 9, 2020

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served this date upon the following via electronic mail:

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/DO1



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Stephanie Selmer  
September 9, 2020