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October 22, 2021

VIA IBFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
ATT: International Bureau

**Re: Neutral Networks USA LLC, Application for a License to Construct, Land and Operate a Private Fiber-Optic Submarine Cable System
File No. SCL-LIC-20210930-00042**

Dear Ms. Dortch:

On behalf of Neutral Networks USA LLC, enclosed please find a Restated Application for a License to Construct, Land and Operate a Private Fiber-Optic Submarine Cable System ("Restated Application"). The Restated Application supplements and provides clarifying information regarding the submarine cable landing license application filed by Neutral Networks USA LLC on September 30, 2021 in File No. SCL-LIC-20210930-00042 consistent with conversations with International Bureau staff.

Please direct any questions regarding this filing to the undersigned

Respectfully submitted,

/s/ Edgar Class

Edgar Class
Counsel for Neutral Networks USA LLC

Attachment

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

In the Matter of)	
)	
Neutral Networks USA LLC)	File No. SCL-LIC-20210930-00042
)	
Application for a License to Construct, Land)	
and Operate a Private Fiber-Optic Submarine)	
Cable System Connecting Laredo, Texas, and)	
Nuevo Laredo, Tamaulipas, Mexico)	

**RESTATED APPLICATION FOR SUBMARINE CABLE LANDING LICENSE –
STREAMLINED PROCESSING REQUESTED**

Neutral Networks USA LLC (“Neutral Networks” or “Applicant”) pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (the “Cable Landing License Act”), Executive Order 10,530, and Section 1.767 of the Federal Communications Commission’s (“Commission” or “FCC”) rules, 47 C.F.R. § 1.767, hereby applies for a license to construct, land, and operate within the United States a private fiber-optic submarine cable network connecting Laredo, Texas and Nuevo Laredo, Tamaulipas. The system will be known as the Neutral Networks Laredo Cable (“NNLC”).

Neutral Networks will operate NNLC on a non-common-carrier basis, providing fiber optic-related solutions to carrier and enterprise customers on particularized terms and conditions pursuant to individualized negotiation. Neutral Networks intends to commence commercial operation of the NNLC system no later than in January 2022. Neutral Networks seeks timely action by the Commission to permit construction activities to proceed on schedule.

On August 6, 2019, the Commission granted Neutral Networks international Section 214 authority to provide global facilities-based and resale services in accordance with sections

63.18(e)(1) and 63.18(e)(2) of the Commission's rules, respectively.¹ As a condition to grant of Section 214 authority, Neutral Networks entered into a Letter of Agreement with the U.S. Department of Justice.² In order to meet construction and potential customer expectations and utilize investment to date and other regulatory approvals already obtained, Neutral Networks also requests special temporary authority from the Commission to construct, connect, and test the portion of the NNLC in U.S. territory prior to the Commission's grant of the Applicant's submarine cable landing license application filed concurrently.

I. CABLE DESIGN AND CAPACITY

The NNLC will consist of three high-capacity, digital fiber-optic cables in a three-duct conduit encased in a pipe located beneath the riverbed of the Rio Grande between Laredo, Texas (USA) and Nuevo Laredo, Tamaulipas (Mexico). Each of the three cables will consist of 48 fiber pairs for a system total of 144 fiber pairs with a system design capacity of a total of 28.8 Tbps if fully equipped, based on current technology. The initial cable design will be one fiber pair activated to support two circuits of 100 Gbps each.

In Appendix 1, Neutral Networks provides a map for the system and its landing points. This cable is proposed to be deployed through horizontal drilling 15 feet below the riverbed for a distance of 251 feet. Neither the conduit for the cable nor any equipment used for the cable will touch the river or the riverbed. The crossing will be a fiber-optic cable (or cables) wholly encased in a pipe that has sufficient space to contain Neutral Networks' cable(s) and no other items.

¹ See International Authorizations Granted, ITC-214-20180314-00054, Public Notice, Report No. TEL-01973, DA 19-749, 34 FCC Rcd 7026 (IB 2019).

² See U.S. Department of Justice, Petition to Adopt Conditions to Authorizations and Licenses, FCC File No. ITC-214-20180314-00054 (Aug. 2, 2019) (enclosing July 30, 2019 Letter of Agreement).

Appendix 2 is a drawing of the conduit (a three-way duct) and fiber-optic cable sections. The buried pipe will end in an underground pull box on each side of the Rio Grande river. The pull box is constructed of high-strength polymers and is closed with a security lid (manhole). Appendix 3 is a diagram that shows the underground installation of the flexible pipe under the Rio Grande river. From the manhole, cable facilities will extend via terrestrial facilities to landing stations in Laredo, Texas and in Monterrey, Nuevo León, Mexico, where interconnection with carrier customers will occur.

II. PUBLIC INTEREST STATEMENT

Grant of this application will advance the public interest, convenience, and necessity because it will expand services and competitive options on the very important U.S.-Mexico route by deploying terrestrial fiber-optic facilities between the two countries. The NNLC cable system will also increase availability of cross-border broadband on the route, enhance service quality, and increase the resilience and redundancy of communications between the two countries.

III. INFORMATION REQUIRED BY 47 C.F.R. § 1.767

(1) Applicant Name, Address, and Telephone Number³

Neutral Networks USA LLC
3411 Silverside Road
Tatnall Building #104
Wilmington, DE 18810 USA

(2) Applicant Place of Incorporation⁴

Neutral Networks USA LLC is an LLC organized under the laws of the State of Delaware.

³ See 47 C.F.R. § 1.767(a)(1).

⁴ *Id.* § 1.767(a)(2).

(3) Applicant Contact Information⁵

Gabriel Navarro
Neutral Networks USA LLC
3411 Silverside Road
Tatnall Building #104
Wilmington, DE 18810 USA
Tel: +52 (81) 1969 6670
gabriel.navarro@evengroup.mx

with a copy to:

Edgar Class, Esq.
Jacquelynn Ruff, Esq.
Wiley Rein LLP
1776 K Street, NW
Washington DC 20006
Tel: (202) 719-7504

Counsel for Neutral Networks USA LLC

(4) Description of the Cable⁶

See Section I above.

(5) Landing Points⁷

The fiber-optic cable border crossing will extend from Laredo, Webb County, Texas to Nuevo Laredo, state of Tamaulipas, Mexico. The coordinates of these locations as shown in Appendix 1 are: Point A Laredo: (27°30'5.31"N, 99°30'2.90"W), Point B Nuevo Laredo: (27°29'55.16"N, 99°30'2.99"W). At Points A and B, the cable will be deployed through a pull box (manhole) and will connect with cable facilities to points of presence (POPs) where interconnection to carrier customers will occur, thereby serving as landing stations for the cable.

⁵ *Id.* § 1.767(a)(3).

⁶ *Id.* § 1.767(a)(4).

⁷ *Id.* § 1.767(a)(5).

On the U.S. side, the landing station will be at VTX1, 520 Matamoros Street, Laredo, Texas 78040 (27°30'23.41"N, -99°30'5.68"W), a data center owned by VTX Communications, LLC (“VTXC”). At this data center, Neutral Networks leases space for its exclusive use for the installation of its transmission equipment and interconnection with carrier customers’ facilities. On the Mexico side, the landing station will be located at Calle Benito Juárez 1102, Col. Centro, E3 Level, Monterrey, state of Nuevo León, Mexico 64000 (25°39'55.03"N, -100°19'2.29"W) at a data center owned by Inmobiliaria Torre M S.A. de C.V. At this data center, Neutral Networks leases space for installation of its equipment and interconnection with carrier customers. Appendix 1 contains maps with coordinates for the landing stations and the manholes on each side of the Rio Grande international border.

Request for Waiver of 47 C.F.R. § 1.767(h)(1)

The Applicant requests a waiver of 47 C.F.R. § 1.767(h)(1) rules so that VTXC—the owner of the Laredo cable landing station—need not be a joint applicant for the NNLC cable landing license. “The purpose of [Section 1.767(h)(1)] is to ensure that entities having a significant ability to affect the operation of the cable system become licensees so that they are subject to the conditions and responsibilities associated with the license.”⁸ As explained below, VTXC, the owner of the Laredo landing station, will not have any ability to affect significantly the NNLC system’s operation. Inclusion of VTXC as a joint applicant is not necessary to ensure compliance by the Applicant with the Cable Landing License Act, the Commission’s cable

⁸ See *Actions Taken Under the Cable Landing License Act*, Report No. SCL-00052, DA No. 08-66, Public Notice, 23 FCC Rcd 227, 229 (Int’l Bur. 2008) (“*TPE Cable Landing License*”) (citing *Review of Commission Consideration of Applications under the Cable Landing License Act*, Report and Order, 16 FCC Rcd 22167, 22194-95, ¶¶ 53-54 (2001)).

landing license rules, or the terms of any cable landing license. Grant of the waiver is therefore consistent with longstanding Commission precedent and in the public interest.⁹

Neutral Networks has contracted with VTXC for the provision of certain limited operation and maintenance services that will not provide VTXC any ability to affect significantly the NNLC system. The colocation agreement permits Neutral Networks to install its fiber-optic power feed and transmission equipment and to connect with other carriers. Neutral Networks will retain operational authority over the NNLC system landing facilities and provide direction to VTXC in all matters relating to the NNLC system. The term of the agreement with VTXC has a total term of twenty-five years.

(6) Regulatory Classification¹⁰

The NNLC cable system will be operated on a non-common carrier basis. Non-common carrier status of the proposed system is consistent with established Commission policy and will advance the public interest. The Commission has authorized non-common carrier cables where: (1) there is no legal compulsion to serve the public indifferently; and (2) there are

⁹ See, e.g., *Actions Taken Under Cable Landing License Act*, Public Notice, 32 FCC Rcd 1436, 1437-38 (Int'l Bur. 2017) (accepting the applicant's representations that Tata Communications (US) Inc. (Tata) "will not have the ability to affect significantly Atisa's operation" and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under Cable Landing License Act*, Public Notice, 24 FCC Rcd 7828, 7829-30 (Int'l Bur. 2009) (accepting the Applicants' representations that "Tata will not be able to affect significantly the operation of HANTRU1" and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under Cable Landing License Act*, Public Notice, 24 FCC Rcd. 226, 227-28 (Int'l Bur. 2009) (noting that "Applicants will retain operational authority over their ASHC System facilities and provide direction to AT&T in all matters relating to the ASHC System"); *Actions Taken Under Cable Landing License Act*, Public Notice, 23 FCC Rcd. 13,419, 13,420 (Int'l Bur. 2008) (declining to require that Tata—which owns the existing cable station at Piti, Guam, where the PPC 1 System will land—be a joint applicant or licensee for the PPC 1 System, noting that "Applicants will retain operational authority over PPC 1 System facilities and provide direction to [Tata] in all matters relating to the PPC 1 System."); *TPE Cable Landing License*, 23 FCC Rcd 227, 229 (declining to require that WCI Cable, Inc. ("WCIC")—which owns an existing cable station at Nedonna Beach, Oregon—be a joint applicant or licensee for the Trans-Pacific Express Network ("TPE"), which will land at WCIC's Nedonna Beach cable station, finding that "WCIC will not have the ability to affect the operation of the TPE Network. Verizon will retain effective operational authority and provide direction to WCIC in all matters relating to the TPE Network").

¹⁰ 47 C.F.R. § 1.767(a)(6).

no reasons implicit in the nature of the operations to expect that the applicants would make capacity available to the public indifferently and indiscriminately.¹¹

In applying the first prong of this test to submarine cable authorizations, the Commission has stated that there will be no legal compulsion to serve the public indifferently where there is no public interest reason to require facilities to be offered on a common carrier basis.¹² The Commission has focused this public interest analysis on whether an applicant will be able to exercise market power because of the lack of alternative facilities.¹³ In this case, there are numerous alternative facilities on existing terrestrial fiber-optic cable facilities between the United States and Mexico. These facilities provide a variety of choices for routing telecommunications traffic between the United States and Mexico. All of these routing options will continue to be available when the Applicant's proposed NNLC cable system is placed in operation. The availability of multiple competitive alternatives to the proposed NNLC cable system means that the Applicant would be unable to restrict output or raise prices without losing customers. Therefore, the Commission need not require the Applicant to serve the public indiscriminately.

In the second prong of the test, the Commission considers whether there is any reason implicit in the nature of the operations that the Applicant would make capacity on this fiber-optic

¹¹ See *Cable & Wireless PLC, Application for a License to Land and Operate in the United States a Private Submarine Fiber Optic Cable Extending Between the United States and the United Kingdom*, File No. SCL-96-005, 12 FCC Rcd 8516, 8520-23 (¶¶ 11-17) (1997) ("Cable & Wireless Order"); see also *Optel Communications, Inc., Application for a License to Land and Operate in the United States a Submarine Cable Extending Between Canada and the United States*, File No. SCL-92-004, Conditional Cable Landing License, 8 FCC Rcd 2267 (1993); *National Association of Regulatory Utility Commissioners v. FCC*, 525 F.2d 630, 642 (D.C. Cir.) (*NARUC I*), cert. denied, 425 U.S. 992 (1976).

¹² See *Cable & Wireless Order*, 12 FCC Rcd at 8522 (¶¶ 14-15).

¹³ *Id.*

facility available to the public indifferently.¹⁴ Here, the Applicant will make fiber-optic capacity available to carriers on terms and conditions tailored to their particular needs, pursuant to individually negotiated indefeasible right of use (IRU) agreements and capacity leases. As such, the fiber-optic facilities will not be operated on a common carrier basis, and other users and carriers will not have any expectation that the NNLC system is a common carrier cable system.

(7) Cable Ownership Information¹⁵

Neutral Networks is a wholly owned subsidiary of Neutral Networks, S. de R.L. de C.V., which is a corporation (*sociedad de responsabilidad limitada de capital variable*) organized under the laws of Mexico. Neutral Networks, S. de R.L. de C.V. has its principal place of business in Monterrey, Mexico, and provides telecommunications infrastructure services to enterprise customers and carriers.

Neutral Networks will own and control 100 percent of the NNLC system in the United States, and Neutral Networks, S. de R.L. de C.V. will own and control 100 percent of the NNLC system in Mexico.

(8) Certification Regarding Ownership, Citizenship, Principal Business and Interlocking Directorates¹⁶

Neutral Network certifies that it has the following 10-percent-or-greater direct or indirect interest holders:

Neutral Networks, S. de R.L. de C.V.

Address: S. de R.L. de C.V., Jiménez 490, Colonia Centro, 64000, Monterrey, Nuevo Leon, Mexico

Place of Organization: Mexico

Principal Business: Telecommunications Infrastructure

¹⁴ *Cable & Wireless Order*, 12 FCC Rcd 8522, ¶ 14.

¹⁵ *See* 47 C.F.R. § 1.767(a)(7).

¹⁶ *See id.* §§ 1.767(a)(8)(i), 63.18(h).

Relationship: Neutral Networks, S. de R.L. de C.V. holds a 100% voting and economic interest in Neutral Networks USA LLC.

Grupo Even Telecom S.A. de C.V.

Address: Jiménez 490, Colonia Centro, 64000, Monterrey, Nuevo Leon, Mexico

Place of Organization: Mexico

Principal Business: Telecommunications Infrastructure¹⁷

Relationship: Grupo Even Telecom, S.A. de C.V. holds a 99.9% voting and economic interest in Neutral Networks, S. de R.L. de C.V.

LatAm Investments FV B.V.

Address: Zuidplein, WTC Tower H, Floor 1, Amsterdam, The Netherlands

Place of Organization: The Netherlands

Principal Business: Investments

Relationship: Latam Investments FV B.V holds a 64.94% voting and economic interest in Grupo Even Telecom S.A. de C.V.

CIBANCO SA IBM FIDEICOMISO

Address: CIB/2643, Av de los Andes 265, Colonia Bosques de las Lomas, Delegación Miguel Hidalgo, 11700 Mexico City, Mexico

Place of Organization: Mexico

Principal Business: Mexican Trust

Relationship: CIBANCO SA IBM FIDEICOMISO holds a 29.64% voting and economic interest in Grupo Even Telecom S.A. de C.V.

LatAm Investments S.a.r.l.

Address: 8-10 Avenue de la Gare, Luxembourg

Place of Organization: Luxembourg

Principal Business: Investments

Relationship: LatAm Investments S.a.r.l. holds a 100% voting and economic interest in LatAm Investments FV B.V.

Southern Cross Latin America Private Equity Fund V, L.P.

Address: c/o Blakes Extra-Provincial Services Inc., 199 Bay Street, Suite 4000, Toronto, Ontario, M5L1A9, Canada

Place of Organization: Canada

Principal Business: Investments

Relationship: Southern Cross Latin America Private Equity Fund V, L.P. holds a 100% voting and economic interest in LatAm Investments S.a.r.l.

¹⁷ Although the Applicant's indirect parent is named Grupo Even Telecom, that company does not provide telecommunications services. Rather, it is a holding company with subsidiaries that build and operate telecommunications towers, deploy fiber-optic cables, lease dark fiber, and provide maintenance and other services to carriers and tower operators.

Ruhr Valley Investment Pte. Ltd.

Address: 168 Robinson Road, #37-01 Capital Tower, Singapore

Place of Organization: Singapore

Principal Business: Investments

Relationship: Ruhr Valley Investment Pte. Ltd. holds a 12.71% economic interest in Southern Cross Latin America Private Equity Fund V, L.P. Ruhr Valley Investment Pte. Ltd. does not have a voting interest in Southern Cross Latin America Private Equity Fund V, L.P.

Employee Retirement System of Texas

Address: P.O. Box 13207, Austin, TX, 78711-3207

Place of Organization: United States

Principal Business: Investments

Relationship: Employee Retirement System of Texas holds a 11.1% economic interest in Southern Cross Latin America Private Equity Fund V, L.P. Employee Retirement System of Texas does not have a voting interest in Southern Cross Latin America Private Equity Fund V, L.P.

Afore Banamex, S.A. de C.V

Address: Paseo de la Reforma 390, 12th floor Colonia Juárez Delegación Cuauhtémoc, 06600 Mexico City, Mexico

Place of Organization: Mexico

Principal Business: Mexican Pension Fund

Relationship: Afore Banamex, S.A. de C.V holds a 64.82% voting and economic interest in CIBANCO SA IBM FIDEICOMISO.

Profuturo GNP, S.A. de C.V.

Address: Blvd. Adolfo López Mateos, 2009 Colonia Los Alpes, Delegación Álvaro Obregón, 01010 Mexico City, Mexico

Place of Organization: Mexico

Principal Business: Mexican Pension Fund

Relationship: Profuturo GNP, S.A. de C.V. holds a 25% voting and economic interest in CIBANCO SA IBM FIDEICOMISO.

Metlife Afore, S.A. de C.V.

Address: Blvd. Manuel Ávila Camacho 32, 17th floor, Colonia Lomas de Chapultepec, Delegación Miguel Hidalgo 11000 Mexico City, Mexico

Place of Organization: Mexico

Principal Business: Mexican Pension Fund

Relationship: Metlife Afore, S.A. de C.V. a holds 10.18% voting and economic interest in CIBANCO SA IBM FIDEICOMISO.

No other entity or individual holds a 10-percent-or-greater direct or indirect voting or economic interest in Neutral Networks. For a graphic representation of Neutral Networks' corporate

structure with respect to its ownership, please see Appendix 4. Neutral Networks further certifies that no corporate officer or director of Neutral Networks is also an officer or director of any foreign carrier.

(9) Certification Regarding the Anti-Drug Abuse Act of 1988¹⁸

Neutral Networks certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.¹⁹

(10) Certification Regarding Foreign Carrier Status and Foreign Affiliations²⁰

Neutral Networks certifies that it is not a foreign carrier, does not own or control a cable landing station in any foreign country, and is not affiliated with a foreign carrier. Neutral Networks, S. de R.L. de C.V., the entity that will own and control the foreign landing point in Mexico, is a telecommunications infrastructure provider.

(11) Certification Regarding Destination Countries²¹

Neutral Networks certifies the following: (1) it is not a foreign carrier in Mexico; (2) it does not control a foreign carrier in Mexico; (3) it is 100% owned and controlled by Neutral Networks, S. de R.L. de C.V., a corporation established under the laws of Mexico, and (4) no grouping of two or more foreign carriers (or parties that control foreign carriers) owns, in the aggregate, more than 25% of Neutral Networks USA LLC and are parties to, or the beneficiaries of, a contractual relation (*e.g.*, a joint venture or market alliance) affecting the provision or

¹⁸ See 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(o).

¹⁹ 21 U.S.C. § 862(a). Pub. L.100-690, title V, § 5301, 102 Stat. 4310 (1988), which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, § 1002(d)(1), 104 Stat. 4827 (1990), and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

²⁰ See 47 C.F.R. § 1.767(a)(8)(ii).

²¹ See 47 C.F.R. § 1.767(a)(8)(iii).

marketing of arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the cable in the United States.

(12) Certification Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets²²

No response is required, as no non-WTO-member country was identified in response to 47 C.F.R. § 1.767(a)(8)(iii) (item 13, above).

(13) Certifications Regarding Routine Conditions²³

Neutral Networks certifies that it accepts and will abide by the routine conditions specified in section 1.767(g) of the Commission’s rules, 47 C.F.R. § 1.767(g).

(14) Eligibility for Streamlined Processing²⁴

Neutral Networks requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(2). This application qualifies for streamlined processing because Neutral Networks is not a foreign carrier and is not affiliated with a foreign carrier in Mexico. Neutral Networks is affiliated with Neutral Networks, S. de R.L. de C.V., located in Mexico, which is not a carrier.

(15) Streamlining—Coastal Zone Management Act²⁵

By its signature below, Neutral Networks certifies that it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Texas does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency

²² See 47 C.F.R. § 1.767(a)(8)(iv).

²³ See 47 C.F.R. § 1.767(a)(9).

²⁴ See 47 C.F.R. § 1.767(j), (k).

²⁵ See *id.*

certification.²⁶

(16) Certification Regarding Service to Executive Branch Agencies²⁷

Neutral Networks has sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense. Neutral Networks's counsel has certified such service in the certificate of service attached to this Application.

IV. CONCLUSION

As demonstrated above, the public interest, convenience and necessity will be served by a grant of this application to construct, land, and operate a private fiber-optic submarine cable system. The Applicant respectfully requests that the Commission expeditiously grant this application pursuant to streamlined processing.

Respectfully submitted,

Neutral Networks USA LLC

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Washington, DC 20006
Tel: +1 (202) 719-7504

Counsel for Neutral Networks USA LLC

October 22, 2021

Attachments

/s/ Gabriel Navarro
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²⁶ See National Oceanic and Atmospheric Administration, Coastal Zone Management Program, *Texas's Listed Federal Actions*, available at: <https://coast.noaa.gov/data/czm/consistency/media/tx.pdf>.

²⁷ See 47 C.F.R. § 1.767(j).

LIST OF APPENDICES

Appendix 1 – Map and Landing Points

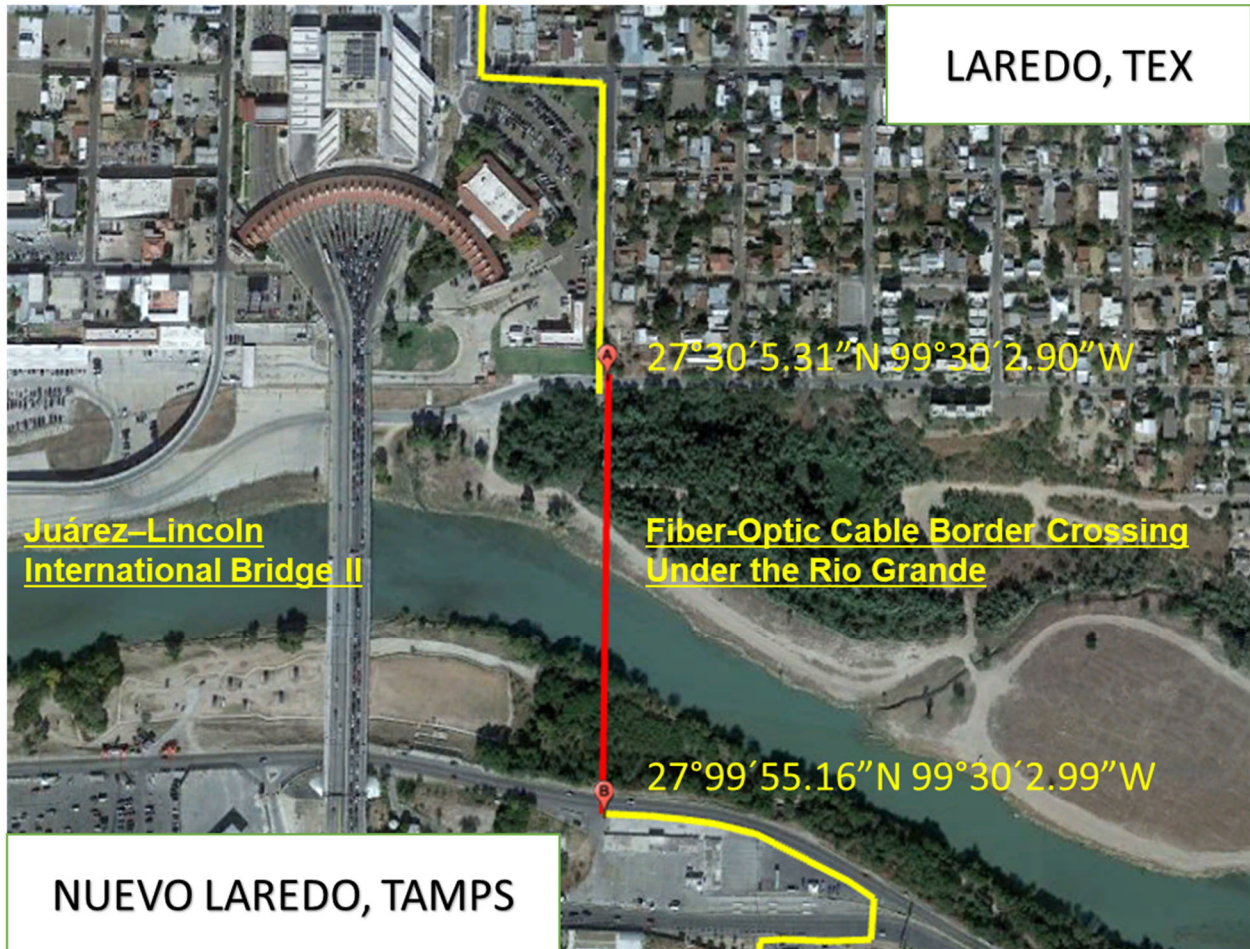
Appendix 2 – Conduit and Cable Sections

Appendix 3 – Underground Installation of the Cable Conduit Pipe Under the Rio Grande River

Appendix 4 – Neutral Networks Ownership Chart

APPENDIX 1 – MAP AND LANDING POINTS

Map A: Location of proposed fiber-optic cable crossing



Point A, Mini Manhole A (Laredo, TX) geographic coordinates: 27°30'5.31"N, 99°30'2.90"W

Point B, Mini Manhole B (Nuevo Laredo, Tamaulipas) geographic coordinates: 27°29'55.16"N, 99°30'2.99"W

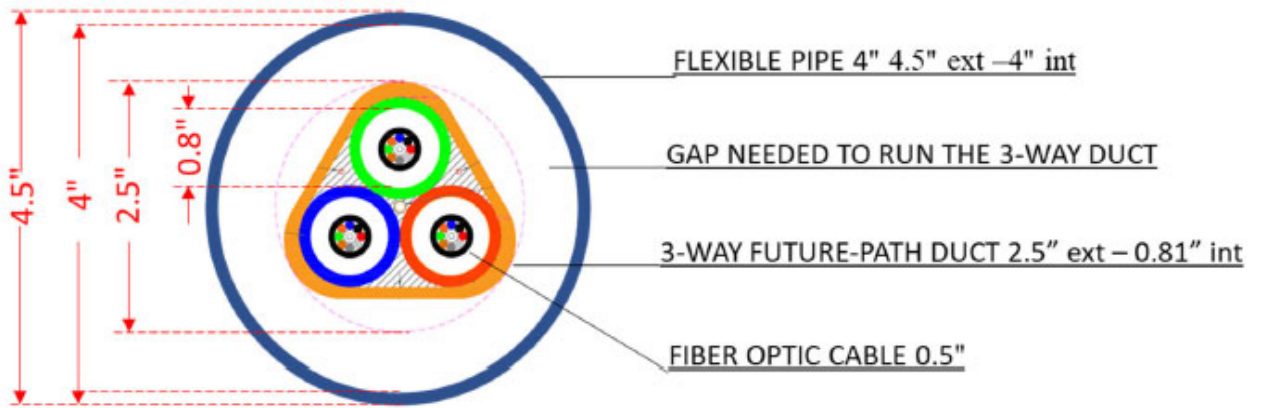
Map B: Fiber route from Mini Manhole A (Laredo, TX) to landing station at 520 Matamoros Street, Laredo, Texas 78040 (27°30'23.41"N, -99°30'5.68"W)



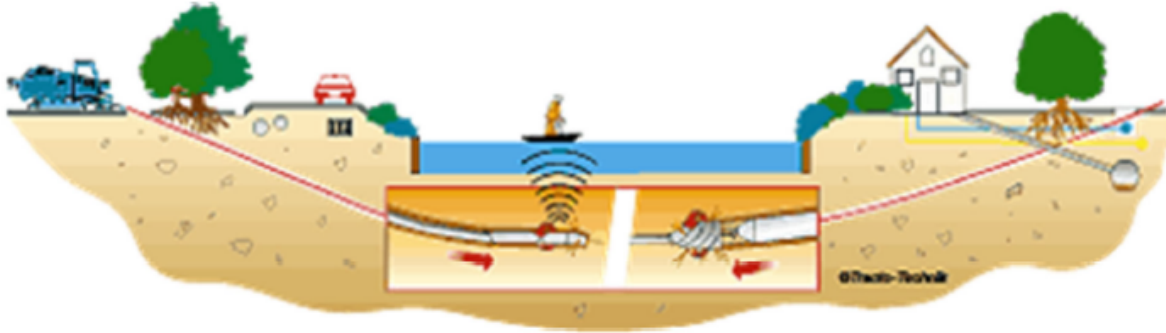
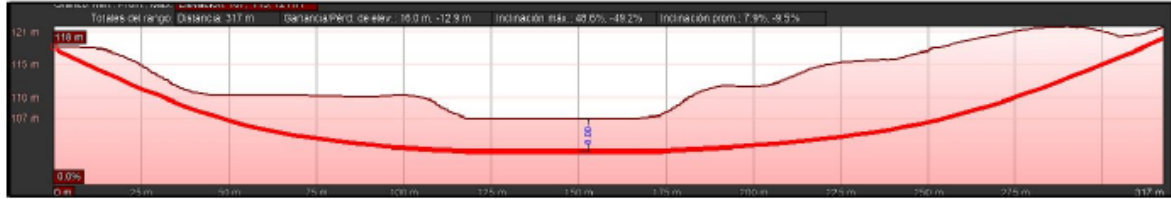
Map C: Fiber route from Mini Manhole B (Nuevo Laredo, Tamaulipas) to landing station at Calle Benito Juárez 1102, Col. Centro, E3 Level, Monterrey, state of Nuevo León, Mexico 64000 (25°39'55.03"N, -100°19'2.29"W)



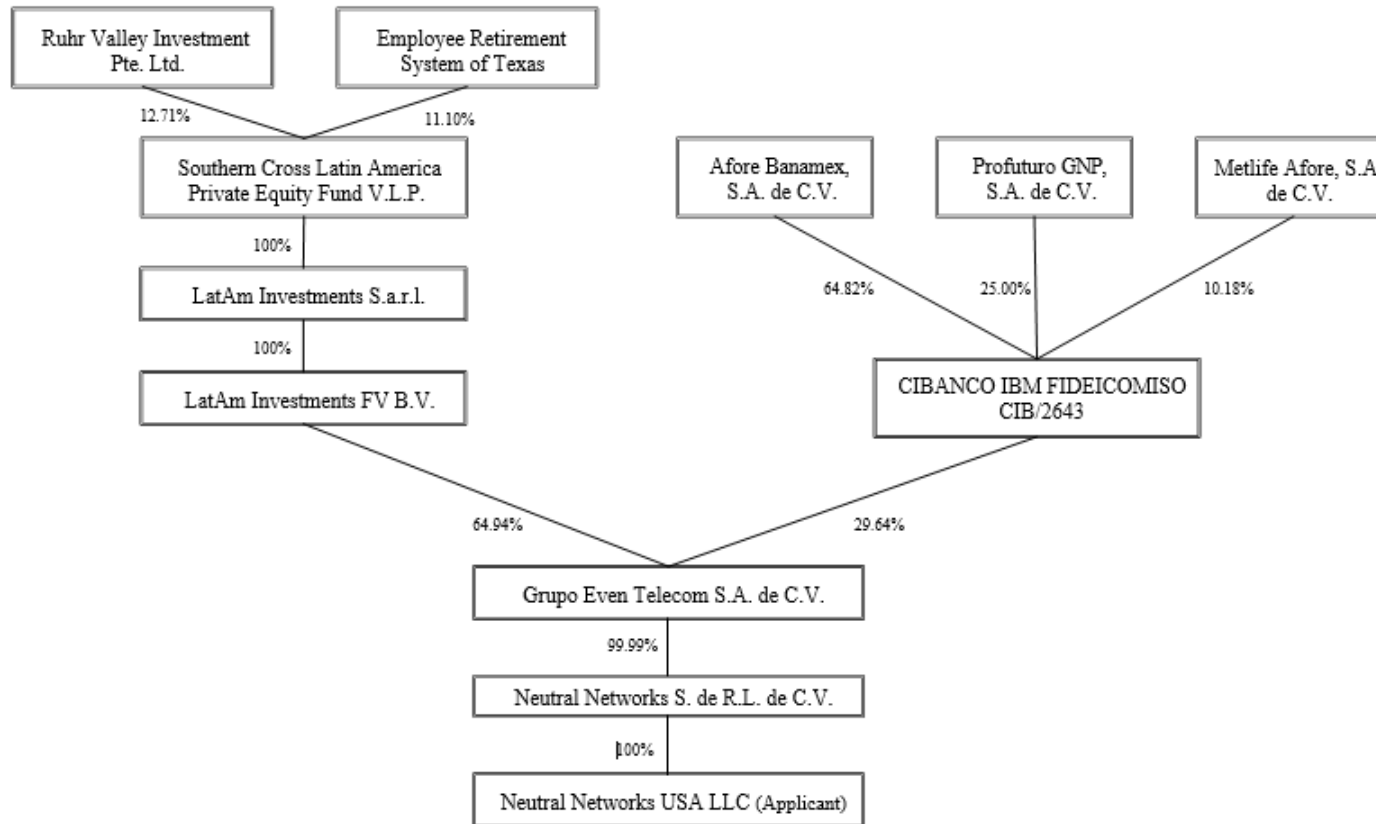
APPENDIX 2 – CONDUIT AND CABLE SECTIONS



APPENDIX 3 – UNDERGROUND INSTALLATION OF THE FLEXIBLE PIPE UNDER THE RIO GRANDE RIVER



APPENDIX 4 – NEUTRAL NETWORKS OWNERSHIP CHART



CERTIFICATE OF SERVICE

I, Edgar Class, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing Restated Application for a License to Construct, Land and Operate a Private Fiber-Optic Submarine Cable System for Neutral Networks USA LLC, via first class U.S. mail, postage prepaid, this 22nd day of October 2021, to the following:

U.S. Coordinator
EB/CIP
U.S. Department of State
Mail Code: EB/CIP
2201 C St., NW, Room 4634
Washington, D.C. 20520-4634

Kathy Smith
Office of Chief Counsel
U.S. Department of Commerce/NTIA
14th Street and Constitution Ave., NW
Room 4713
Washington, D.C. 20230

Defense Information Systems Agency
ATT: GC/DO1
6910 Cooper Avenue
Fort Meade, MD 20755-7088

/s/ Edgar Class