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

In the Matter of GU HOLDINGS INC. Application for a License to Construct, Land, and Operate a Submarine Cable Connecting the United States to Taiwan and the Philippines, to be Known as THE TPU CABLE SYSTEM	File No. SCL-LIC-2023__________

APPLICATION FOR A CABLE LANDING LICENSE

GU Holdings Inc. ("GU Holdings"), 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, requests a license to construct, land, and operate a private, non-common carrier fiber-optic submarine cable system connecting the United States with Taiwan and the Philippines. The cable system is named TPU after the three landing countries.

GU Holdings will operate the system on a non-common-carrier basis, by using system capacity as an input for services offered by its affiliates or by providing bulk capacity to wholesale and enterprise customers on particularized terms and conditions pursuant to individualized negotiations.

Grant of the license will serve the public interest, convenience, and necessity. The system will compete with new and existing systems and provide much needed additional connectivity between the U.S. and the Asia-Pacific region. Unlike the traditional route between the West Coast of the U.S. and Japan, this system provides diversity by going through Guam and directly landing in Taiwan and the Philippines, two important interconnection points in Asia. The system will thus further strengthen the redundancy and resilience of transpacific telecommunications.

GU Holdings respectfully requests a timely license grant following national security review, in order to facilitate construction and testing of the system starting in March 2024. Subject to authorization, GU Holdings intends to commence commercial operation of the system in May 2025.

I. COMPLIANCE WITH 47 C.F.R. § 1.767

A. Applicant Information: 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k)

Appendix A provides the information about GU Holdings required by 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k).

B. Description of the System: 47 C.F.R. § 1.767(a)(4)

The system will consist of the following segments:

- The Transpacific Segment between California and a branching unit (BU1) in the Philippine Sea between Taiwan and the Philippines.[1] The Transpacific Segment has 16 fiber pairs and a length of approximately 12,500 kilometers.
- The Taiwan Segment will connect Taiwan with BU1 on the Transpacific Segment. The Taiwan Segment will have the equivalent of 20 fiber pairs[2] and a length of approximately 320 kilometers. 16 fiber pairs will connect Taiwan to the

[1] GU Holdings uses "segments" instead of "trunk" and "branch" terminology to better describe the system because optical fiber switching technology in the branching units will allow capacity add/drop, enabling "on-demand" capacity optimization between California-Guam-Taiwan-Philippines, meaning there is no single "trunk route." Additionally, the power feeding will have a power drop at Guam, so there will not be double-end feeding between California and either Taiwan or the Philippines.

[2] There will be 12 standard fiber pairs along with 4 fiber pairs that are made of 2-core fiber, a new technology that carries 2 cores, for an equivalent of 8 fiber pairs.

Transpacific Segment and 4 fiber pairs will connect Taiwan to the Philippines. These four fiber pairs are not connected to the 16 Transpacific Segment fiber pairs.

- The Philippines Segment will connect the Philippines with BU1 on the Transpacific Segment. The Philippines Segment will have the equivalent of 20 fiber pairs[3] and a length of approximately 520 kilometers. 16 fiber pairs will connect the Philippines with the Transpacific Segment and four fiber pairs will connect the Philippines with Taiwan. These 4 fiber pairs are not connected to the 16 Transpacific Segment fiber pairs.
- The Guam Segment will connect Guam with another branching unit (BU4) on the Transpacific Segment. The Guam Segment will have 16 fiber pairs and a length of approximately 130 kilometers.

The branching units feature optical fiber switching technology that allows the capacity from California to be remotely reconfigured by the system network operations center ("NOC") to add/drop the capacity at Guam, Taiwan, and the Philippines.

The system will also be constructed with five unused branching units (BU2, BU3, BU5, BU6, and BU7) on the Transpacific Segment. At this time, there are no specific plans regarding build-out of these branches. If required, GU Holdings will request any necessary modification to the submarine cable landing license to add new landing points.

Each fiber pair on the system will have a total design capacity of approximately 13 Tbps (for a total of approximately 260 Tbps for the system as a whole). GU Holdings provides a route map for the system in Appendix B.

[3] *Id.*

C. Description of Cable Landing Stations: 47 C.F.R. § 1.767(a)(5)

GU Holdings provides details regarding cable landing station ownership and control in Section 1.E. below. Consistent with 47 C.F.R. § 1.767(a)(5), GU Holdings will file a more specific description of each landing point no later than ninety (90) days prior to construction.

D. Regulatory Classification: 47 C.F.R. § 1.767(a)(6)

GU Holdings will operate the system on a non-common carrier basis. Non-common-carrier classification is consistent with established Commission policy and judicial precedent.

First, the system will not operate on a common-carrier basis as defined in *NARUC I*.[4] The courts have stated that "the primary sine qua non of common carrier status is a quasi-public character, which arises out of the undertaking 'to carry for all people indifferently.'"[5] On this system, however, capacity will either be used by GU Holdings and its affiliates to meet their own internal needs for bandwidth, or made available to third parties pursuant to individually-negotiated indefeasible rights of use ("IRUs") and capacity leases, the terms of which will vary depending on the characteristics and needs of the particular capacity purchase. The Commission has consistently found that such offerings do not make an applicant a common carrier.[6]

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[4] *See Nat'l Ass'n of Regulatory Utility Comm'rs v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) ("*NARUC I*") (court must inquire "whether there are reasons implicit in the nature of [the] operations to expect an indifferent holding out to the eligible user public"), *cert. denied*, 425 U.S. 992 (1976); *see also Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999) (affirming FCC's use of *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

[5] *Nat'l Ass'n of Regulatory Utility Comm'rs v. FCC*, 533 F.2d 601, 608 (D.C. Cir. 1976) (quoting *Semon v. Royal Indemnity Co.*, 279 F.2d 737, 739 (5th Cir. 1960)).

[6] *See AT&T Corp. et al.*, Cable Landing License, 13 FCC Rcd. 16,232, 16,238 (Int'l Bur. 1998) (finding that individualized decisions concerning the sale or lease of capacity on the China-U.S. Cable Network would not constitute the effective provision of a service to the public so as to make the applicant a common carrier); *AT&T Submarine Systems, Inc.*, Cable Landing License, 11 FCC Rcd. 14,885, 14,904 ¶ 64 (Int'l Bur. 1996) ("*St. Thomas-St. Croix Cable Order*") (finding that an "offer of access, nondiscriminatory terms and conditions and market pricing of IRUs does not rise to the level of an 'indiscriminate' offering" so as to constitute common

Second, under the *NARUC I* test, the Commission must determine whether the public interest requires common-carrier operation of the submarine cable system.[7] Traditionally, the Commission has focused on whether an applicant has sufficient market power to warrant common-carrier regulation,[8] although the Commission "is not limited to that reasoning" and has looked more broadly to determine whether common-carrier regulation is in the public interest.[9] The system poses no such competitive or other public interest concerns.

On the U.S.-Philippines or U.S.-Taiwan routes, the system will compete directly with a variety of systems including Apricot (planned), Asia-America Gateway, Asia Connect Cable-1 (ACC-1), Bifrost (planned), FASTER, Jupiter, Pacific Light Cable Network (PLCN), and SEA-US and indirectly with a variety of other systems that connect the United States with the Asia-Pacific region. The Commission has found that facilities need not be identical in order to offer pro-competitive benefits.[10] There are thus sufficient alternative facilities providing transpacific

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carriage), *aff'd* 13 FCC Rcd. 21,585 (1998), *aff'd sub nom. Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

[7] *NARUC I* at 642 (court must inquire "whether there will be any legal compulsion . . . to serve [the public] indifferently").

[8] *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,893 ¶ 30.

[9] *See AT&T Corp. et al.*, Cable Landing License, 14 FCC Rcd. 13,066, 13,080 ¶ 39 (1999) ("Although this public interest analysis has generally focused on the availability of alternative facilities, we are not limited to that reasoning"); *Australia-Japan Cable (Guam) Limited*, Cable Landing License, 15 FCC Rcd. 24,057, 24,062 ¶ 13 (Int'l Bur. 2000) ("This public interest analysis generally has focused on whether an applicant will be able to exercise market power because of the lack of alternative facilities, although the Commission has not limited itself to that reasoning"); *Telefonica SAM USA, Inc. et al.*, Cable Landing License, 15 FCC Rcd. 14,915, 14,920 ¶ 11 (Int'l Bur. 2000) ("This public interest analysis has focused on the availability of alternative facilities, although the Commission has stated it is not limited to that reasoning").

[10] *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,898 ¶ 44 ("requiring current identical substitute common carrier facilities before non-common carrier facilities will be authorized would serve as a disincentive for entities to take risks and expend capital to expand and upgrade facilities").

connectivity to preclude the system from becoming a bottleneck facility on that route. GU Holdings' intended operation of the system will therefore serve the Commission's long-standing policy to encourage competition through private submarine cable transmission, pursuant to which the Commission has granted numerous cable landing licenses.[11]

For these reasons, the Commission should grant a cable landing license for the system on a non-common carrier basis.

E. System Ownership: 47 C.F.R. § 1.767(a)(7)

GU Holdings and its affiliates will own and control the system as shown in Table 1. The percentage interest represents both a voting and economic interest.

Table 1: Main Trunk and Branches

Party	Portion in U.S. Territory	Portion in International Waters	Portion in Taiwan Territory	Portion in Philippines Territory
GU Holdings	100%	--	--	--
Google Singapore Pte. Ltd. ("GSPL")	--	100%	--	100%
Google Taiwan Limited ("GTL")	--	--	100%	--

GU Holdings, GSPL, and GTL are all indirect, wholly-owned subsidiaries of Google LLC. As GSPL and GTL will not use the U.S. endpoint of the system, none of these entities is required by 47 C.F.R. § 1.767(h)(2) to be an applicant for the cable landing license.

GSPL has contracted with Innove Communications, Inc. ("Innove") to be the landing party in the Philippines. A landing party agreement governs the relationship between GSPL and Innove and provides that, upon completion of TPU, Innove will own the portion of the system

[11] *See Tel-Optik Ltd.*, Memorandum Opinion and Order, 100 FCC.2d 1033, 1040-41 (1985).

that extends 12 nautical miles from the shores of the Philippines. Innove will grant GSPL an IRU for the same portion of the system.

Similarly, GTL has contracted with Chunghwa Telecom Co., Ltd. ("CHT") to be the landing party in Taiwan. A landing party agreement governs the relationship between GTL and CHT and provides that, upon completion of the system, CHT will own the portion of the system that extends 12 nautical miles from the shores of Taiwan. CHT will grant GTL an IRU for the same portion of the system.

GU Holdings and its affiliates will maintain control of the system in U.S. territory and international waters. Because Innove and CHT will neither (1) own or control a cable landing station in the U.S. nor (2) own or control a five percent or greater ownership interest in the system, neither is required by 47 C.F.R. § 1.767(h) to be an applicant for the cable landing license.

The cable landing station ("CLS") arrangements are shown in Table 2 below.

Table 2: Cable Landing Stations

Landing	New or Existing Facility?	Owner	Landing Party
Eureka, California	Existing	EdgeConnex Arcata Holdings, LLC ("EdgeConnex")	GU Holdings
Tanguisson, Guam	Existing	AT&T Corp.	GU Holdings
Dawu, Taiwan	New	CHT	CHT
Claveria, Philippines	New	Innove	Innove

II. REQUESTS FOR WAIVER OF 47 C.F.R. § 1.767(h)(1)

GU Holdings requests a waiver of 47 § C.F.R. 1.767(h)(1) rules so that neither of the U.S. CLS owners is required to be an applicant for a U.S. cable landing license for the system. "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."[12] The U.S. CLS owners will have no independent ability to affect the system's operation. Including the U.S. CLS owners as applicants is also not necessary to ensure compliance by GU Holdings with the Cable Landing License Act, the Commission's cable landing license rules, or the terms of any cable landing license. Moreover, grant of the waiver will be consistent with Commission precedent.[13]

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[12] *See Actions Taken Under the Cable Landing License Act*, 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. 22,167, 22,194-95 ¶¶ 53-54 (2001)).

[13] *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 that 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 Cable 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

In U.S. territory, the applicable CLS owner is expected to provide certain limited services that would not enable the CLS owner to significantly affect the system's operation, as all these services will be provided at GU Holdings' direction and under its supervision. GU Holdings intends to contract with each U.S. CLS owner for the right to use separately-caged collocation space in each CLS. GU Holdings also intends to contract with each U.S. CLS owner for certain operation and maintenance services at its respective CLS. No U.S. CLS owner is expected to have access to GU Holdings' space, except: (i) to perform certain operation and maintenance services as per GU Holdings' direction and instructions; (ii) to conduct work in the space unrelated to the system, after providing GU Holdings advance notice and opportunity to supervise any such work; or (iii) in cases of emergency. Each agreement with a U.S. CLS owner is expected to have an initial term of 15 years that could be extended by GU Holdings to 25 years. GU Holdings is thus expected to retain full operational authority over each of the U.S. landings, and provide direction to the U.S. CLS owners in all matters relating to the system.

TPE Network. Verizon will retain effective operational authority and provide direction to WCIC in all matters relating to the TPE Network").

III. CONCLUSION

For the reasons set forth above, the Commission should grant this application for a license to construct, land, and operate the TPU system between the U.S., Taiwan, and the Philippines.

Respectfully submitted,

/s/ *Ulises R. Pin*

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Counsel for GU Holdings Inc.

Dated: May 11, 2023

LIST OF APPENDICES

APPENDIX A

GU Holdings Inc.

GU Holdings Inc. ("GU Holdings," FRN 0017777483), a Delaware corporation with its principal place of business in Mountain View, California, will—with its affiliates—hold the participation (i.e., economic) and voting interests in the system as described in the main narrative application.

GU Holdings is an indirect, wholly-owned subsidiary of Google LLC ("Google"), whose innovative search technologies and other Internet applications connect people around the world with information every day.

GU Holdings currently holds FCC cable landing licenses for the systems as noted in Table 1 below.

Table 1: Cable Landing Licenses

System Name	File No.
Unity	SCL-LIC-20080516-00010
Monet	SCL-LIC-20150408-00008
FASTER	SCL-LIC-20150626-00015
Havfrue	SCL-LIC-20180511-00010
Curie	SCL-LIC-20181008-00034 & SCL-MOD-20191223-00039
Dunant	SCL-LIC-20190410-00015
JGA South	SCL-LIC-20190502-00016
PLCN	SCL-LIC-20200827-00038
Grace Hopper	SCL-LIC-20210225-00014
Echo	SCL-LIC-20210329-00020
Firmina	SCL-LIC-20220422-00015

In addition, GU Holdings is currently an applicant for a cable landing license for the Apricot system (SCL-LIC-20220715-00024).

COMPLIANCE WITH 47 C.F.R. § 1.767

Below, GU Holdings provides information required by 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8)-(a)(10), (j), and (k).

(1) Applicant's Name, Address, and Telephone Number: 47 C.F.R. § 1.767(a)(1)

GU Holdings Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043
650-253-0000

(2) Applicant's Place of Incorporation: 47 C.F.R. § 1.767(a)(2)

GU Holdings is a Delaware corporation.

(3) Contact Information: 47 C.F.R. § 1.767(a)(3)

Correspondence concerning the application should be sent to the following:

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(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(h)

GU Holdings certifies that it has the following 10-percent-or-greater direct or indirect interest holders, based on the publicly available data as of March 31, 2023.

Table 2: Direct or Indirect Interest Holders

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.
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.
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.
Alphabet Inc. ("Alphabet")	
Address	1600 Amphitheatre Parkway, Mountain View, CA 94043
Citizenship	Delaware
Principal Business	Holding company
Relationship	Alphabet holds 100 percent of XXVI Holdings's common stock, giving it a more than 99 percent voting interest in XXVI Holdings.
Larry Page	
Address	1600 Amphitheatre Parkway, Mountain View, CA 94043
Citizenship	USA
Principal Business	Co-Founder and Director of Alphabet
Relationship	Mr. Page holds 44.1 percent of Alphabet's Class B common stock, giving him a 26.3-percent voting interest in Alphabet.

Sergey Brin	
Address	1600 Amphitheatre Parkway, Mountain View, CA 94043
Citizenship	USA
Principal Business	Co-Founder and Director of Alphabet
Relationship	Mr. Brin holds 41.8 percent of Alphabet's Class B common stock, giving him a 25.0-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 and based on publicly available data as of March 31, 2023, Alphabet has no 10-percent-or-greater direct or indirect shareholders other than those identified in Table 2 above.

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

(5) Certification Regarding the Anti-Drug Abuse Act of 1988: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(o)

GU Holdings certifies that it is not subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.[1]

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations: 47 C.F.R. § 1.767(a)(8)(ii)

GU Holdings certifies that it:

(A) is not a foreign carrier in any foreign country;

(B) does not own or control a cable landing station in any foreign country;

(C) is affiliated with foreign carriers as noted in Table 3 below; and

[1] 21 U.S.C. § 862(a). Pub. L. No. 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.

Table 3: Affiliated Foreign Carriers

Country	Entity
Belgium	Google Voice Ltd.
Brazil	Google Infraestrutura Brasil Ltda.
Canada	Google Voice Canada Corporation
Chile	Inversiones y Servicios Dataluna Limitada
Denmark	Google Voice Ltd.
France	Google Voice Ltd.
Germany	Google Voice Ltd.
Hong Kong	Infraco (Hong Kong) Limited
Ireland	Google Voice Ltd.
Italy	Google Voice Ltd.
Japan	Asa G.K. Google LLC Google Cable Japan G.K. Google Connect Asia Pacific Pte. Ltd. Jibe Mobile, Inc.
Korea	Google Cloud Korea LLC Google Korea, LLC.
Netherlands	Google Voice Ltd.
Portugal	Google Voice Ltd.
Singapore	Google Singapore Pte. Ltd.
Spain	Google Voice Ltd. Yeso Computing, S.L.U.
Sweden	Google Voice Ltd.
Switzerland	Google Voice Ltd.
United Kingdom	Google Voice Ltd.

(D) is affiliated with the entities owning or controlling cable landing stations in Table 4 below:

Table 4: Affiliated Entities Owning Cable Landing Stations

Entity	Location	Ownership
Google Infraestrutura Brasil Ltda.	Santos, Brazil (Monet cable)	100% ownership interest
Dapsi International ApS	Blaaberg, Denmark (Havfrue cable)	Non-controlling ownership interest of 25%

(7) Certification Regarding Destination Countries: 47 C.F.R. § 1.767(a)(8)(iii)

GU Holdings certifies to the following:

(A) GU Holdings is not a foreign carrier in Taiwan or the Philippines, the only foreign destination markets in which the TPU system will land.

(B) GU Holdings does not control a foreign carrier in Taiwan or the Philippines.

(C) GU Holdings' ultimate parent company, Alphabet Inc., does not control a foreign carrier in Taiwan or the Philippines.

(D) No grouping of two or more foreign carriers in Taiwan or the Philippines (or parties that control foreign carriers in Taiwan or the Philippines) own, in aggregate, more than 25 percent of GU Holdings and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the system in the United States.

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets: 47 C.F.R. § 1.767(a)(8)(iv)

Taiwan and the Philippines are members of the WTO.

(9) Certification Regarding Routine Conditions: 47 C.F.R. § 1.767(a)(9)

GU Holdings certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining - Market Power: 47 C.F.R. § 1.767(j), (k)

GU Holdings requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(2). GU Holdings qualifies for streamlining because: (a) GU Holdings is not a foreign carrier and(b) GU Holdings is not affiliated with a foreign carrier in Taiwan or the Philippines.

(11) Streamlining - Coastal Zone Management Act: 47 C.F.R. § 1.767(a)(10), (j), (k)

GU Holdings is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act (CZMA), codified at 16 U.S.C. § 1456(c)(3)(A). California and Guam, the only U.S. state and territory in which the TPU system will land, do not list, and have never proposed to list, a cable landing license as a federal activity requiring a consistency certification.[2]

[2] *See* https://coast.noaa.gov/data/czm/consistency/media/ccc.pdf and https://coast.noaa.gov/data/czm/consistency/media/guam.pdf.

CERTIFICATION

On behalf of GU Holdings, I certify that all of the information contained in this application and Appendix A is true and correct to the best of my knowledge and belief.

DocuSigned by:
Brian Quigley
0E638CF0586244A...

Brian Quigley
Authorized Signatory[3]

Dated: May 8, 2023

[3] Brian Quigley is the Sr. Director for Global Network Solutions at Google LLC. He is authorized to sign regulatory applications of GU Holdings pursuant to a Power of Attorney granted to Mr. Quigley by GU Holdings.

APPENDIX B

System Route Map