

APPENDIX A:

Telxius Cable USA, Inc., Telxius Cable Puerto Rico, Inc., and Telxius Cable América, S.A., Disclosures and Certifications

1. Applicants' Names, Addresses, Telephone Numbers, and Places of Organization²³

In Table A-1 below, Telxius Cable USA, Inc. ("Telxius Cable USA"), Telxius Cable Puerto Rico, Inc. ("Telxius Cable Puerto Rico"), and Telxius Cable América, S.A. ("Telxius Cable América"), provide their addresses, telephone numbers, places of organization, and FCC Registration Numbers ("FRNs").

Table A-1: Applicant Information

Name, Address, Telephone Number	Place of Organization	FRN
Telxius Cable USA, Inc. 1111 Brickell Avenue, Suite 1800 Miami, Florida 33131-3122 +1 305 925 5256	Florida	0006650618
Telxius Cable Puerto Rico, Inc. 1111 Brickell Avenue, Suite 1800 Miami, Florida 33131-3122 +1 305 925 5256	Puerto Rico	0022340921
Telxius Cable América, S.A. Av. Luis Alberto de Herrera 1248, piso 4 11300 Montevideo, Uruguay +598 2 628 00 20	Uruguay	0022340871

B. Contact Information²⁴

The Commission should address correspondence regarding this application to the persons noted in Table A-2 below:

²³ 47 C.F.R. § 1.767(a)(1), (2).

²⁴ *Id.* § 1.767(a)(3).

Table A-2: Applicant Contact Information

Party	Company Officer Contact	Counsel Contact
Telxius Cable USA, Inc. and Telxius Cable Puerto Rico, Inc.	Guillermo Cañete President Telxius Cable USA, Inc. Telxius Cable Puerto Rico, Inc. 1111 Brickell Avenue, Suite 1800 Miami, Florida 33131-3122	Kent Bressie HWG LLP 1919 M Street, N.W., Suite 800 Washington, D.C. 20036-3537 +1 202 730 1337 kbressie@hwglaw.com
Telxius Cable América, S.A.	Juan Pablo Rosati Abogado Telxius Cable América S.A. Avenida Luis Alberto de Herrera 1248, piso 4 11300 Montevideo Uruguay	

2. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates²⁵

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they have the following 10-percent-or-greater interest holders:

Telxius Cable América, S.A. (“Telxius Cable América”)

Address: Avenida Luis Alberto de Herrera 1248, piso 4, 11300 Montevideo, Uruguay

Place of Organization: Uruguay

Principal Business: telecommunications

Interest Held: Telxius Cable América holds a 100-percent voting-and-equity interest in Telxius Cable Puerto Rico.

Telxius Telecom, S.A. (“Telxius Parent”)

Address: Distrito C, Calle Ronda de la Comunicación s/n, Edificio Sur 3, 28050 Madrid, Spain

Place of Organization: Spain

Principal Business: telecommunications

Interest Held: Telxius Parent holds a 100-percent voting-and-equity interest in Telxius Cable USA and Telxius Cable América.

Telefónica S.A. (“Telefónica”)

Address: Distrito C, Calle Ronda de la Comunicación s/n, Edificio Central, 28050 Madrid, Spain

²⁵ *Id.* §§ 1.767(a)(8)(i), 63.18(h).

Place of Organization: Spain

Principal Business: telecommunications

Interest Held: Telefónica holds a 70-percent voting-and-equity interest in Telxius Parent, giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 70-percent equity interests and 100-percent voting equity interest in Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América. Telefónica’s shares trade publicly on the four Spanish stock exchanges (the Madrid Barcelona, Valencia, and Bilbao Stock Exchange), as well as on the New York Stock Exchange and the Lima Stock Exchange, on these two exchanges through American Depositary Shares (“ADSs”), each ADS representing one share. As there is an active market in Telefónica’s shares, Telefónica’s share ownership is always fluid. Moreover, the Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América can ascertain significant shareholders only on the basis of Telefónica’s records and may not know of possibly related or affiliated shareholders that are not disclosed to Telefónica. Recognizing these limitations, as of the most recent measurable date, July 21, 2025, no Telefónica shareholder holds an interest sufficient to give it a 10-percent-or-greater direct or indirect interest in Telxius Cable USA, Telxius Cable Puerto Rico, or Telxius Cable América.

Sociedad Estatal de Participaciones Industriales (“SEPI”)

Address: Calle Velázquez, 134, Madrid

Place of Organization: Spain

Principal Business: sovereign wealth fund

Interest Held: SEPI holds a 10-percent voting and equity interest in Telefónica, S.A., giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect, 10-percent voting interest in each of Telxius Cable USA, Telxius Cable Puerto Rico and Telxius Cable América and an indirect 7-percent equity interest in each of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América.

Pontegadea Inversiones, S.L. (“Pontegadea”)

Address: Cantón Grande, 4, 15003 A Coruña, Spain

Place of Organization: Spain

Principal Business: investment holding company

Interest Held: Pontegadea holds a 30-percent voting-and-equity interest in Telxius Parent and certain negative control rights granted pursuant to a Shareholders Agreement imposing supermajority voting requirements for certain reserved matters, requirements for resolving deadlocks, management limitations, and restrictions on certain related-party transactions. These arrangements, which the Commission has previously reviewed, are detailed at length in FCC File Nos. SCL-T/C-20220222-00006, SCL-T/C-20220222-00007, SCL-T/C-20220222-00008, and SCL-T/C-20220222-00009. Pontegadea therefore holds (according to the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 30-percent voting-and-equity interest in, and the aforementioned negative control rights over, Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América.

Mr. Amancio Ortega Gaona

Address: Cantón Grande, 4, 15003 A Coruña, Spain

Citizenship: Spain

Principal Business: investments

Interest Held: Mr. Ortega holds 99.99-percent voting and equity interest in Pontegadea, giving him (under the Commission's ownership calculation rules in 47 C.F.R. § 63.18(h)) an approximate indirect 30-percent voting-and-equity interest in, and the aforementioned negative control rights over, Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América.

Other than the entities and persons noted above, no entity or person holds a 10-percent-or-greater direct or indirect voting or equity interest in either of Telxius Cable USA, Telxius Cable Puerto Rico, or Telxius Cable América. The ownership structure of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América is shown in Exhibit A-1.

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they have no interlocking directorates with foreign carriers.

3. Anti-Drug Abuse Act Certification²⁶

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they are not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.²⁷

4. Law Enforcement Certifications²⁸

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they will:

²⁶ *Id.* § 1.767(a)(8)(i), 63.18(o).

²⁷ *Id.* § 63.18(o) does not reflect the renumbering and recodification of this statutory provision as Section 421 of the Controlled Substances Act, 21 U.S.C. § 862(a).

²⁸ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q).

- Ensure compliance with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations (of which there should be none given that CELIA system will operate on a non-common carrier basis);²⁹
- Ensure availability of communications to, from, or within the United States, as well as records thereof, in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to the authorities set forth in 47 C.F.R. § 63.18(q)(1)(ii);³⁰
- Designate the following points of contact who are located in the United States and are U.S. citizens or lawful U.S. permanent residents, for the execution of lawful requests and as an agent for legal service of process:

Guillermo Cañete
 President
 Telxius Cable USA, Inc.
 Telxius Cable Puerto Rico, Inc.
 1111 Brickell Avenue, Suite 1800
 Miami, Florida 33131-3122
 +1 305 925 5433
 guillermo.canete@telxius.com

- Ensure the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or Team Telecom request, as required by 47 C.F.R. § 1.65(a), and inform the Commission and Team Telecom of any substantial and significant changes while an application is pending;³¹

²⁹ *Id.* § 63.18(q)(1)(i).

³⁰ *Id.* § 63.18(q)(1)(ii).

³¹ *Id.* § 63.18(q)(1)(iv)(B).

- After the application is no longer pending for purposes of 47 C.F.R. § 1.65, notify the Commission and Team Telecom of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days;³² and
- Acknowledge that if they fail to fulfill any of the conditions and obligations set forth in the certifications set out in 47 C.F.R. § 63.18(q), or in the grant of an application or authorization, and/or that if the information provided to the U.S. Government is materially false, fictitious, or fraudulent, that it may be subject to all remedies available to the U.S. Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.³³

5. Certification Regarding Foreign Carrier Status and Foreign Affiliations³⁴

Each of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certifies that it (A) is not a foreign carrier in any foreign destination country; (B) does not own or control a CLS in any foreign destination country; and (C) is affiliated with foreign carriers, including foreign carriers that own or control CLSs identified in Table A-3 below where the CELIA system will land. None of the CLSs noted below are in a foreign destination country for the CELIA system.

³² *Id.* § 63.18(q)(v).

³³ *Id.* § 63.18(q)(iv)(A).

³⁴ *Id.* § 1.767(a)(8)(ii).

**Table A-3:
Affiliated Foreign Carriers and CLS Interests**

Country	Entity	Owns/ Controls CLS
Argentina	Telefónica Global Solutions Argentina, S.A.	N
	Telxius Cable Argentina S.A.	Y
Austria	Telefónica Global Solutions S.L. Unipersonal, Austrian Branch	N
Belgium	Telefónica Global Solutions, S.L.	N
Brazil	Telefónica Global Solutions Brasil Ltda.	N
	Telefónica Brasil, S.A.	N
	Telxius Cable Brasil Limitada	Y
Chile	Telefónica Chile, S.A.	N
	Telxius Cable Chile S.A.	Y
	Telefónica Móviles Chile, S.A.	N
	Telefónica Global Solutions Chile S.p.A.	N
Colombia	Colombia Telecomunicaciones, S.A. ESP BIC ³⁵	Y
	Telxius Cable Colombia S.A.	Y
	Telefónica Global Solutions Colombia, S.A.S. (fka TIWS Colombia II S.A.S.)	N
Denmark	Telefónica Global Solutions Denmark, Branch of Telefónica Global Solutions, S.L.U. Spain	N
Dominican Republic	Telxius Cable República Dominicana S.A.S.	Y
Ecuador	Otecel, S.A. ³⁶	N
	Telxius Cable Ecuador S.A. (fka Telefónica International Wholesale Services Ecuador S.A.)	Y
	Telefónica Global Solutions Ecuador TGSE, S.A.	N
France	Telefónica Global Solutions France II, S.A.S.	N
	Telefónica Global Solutions France, S.A.S.	N
Germany	E-Plus Mobilfunk GmbH	N
	Telefónica Germany GmbH & Co. OHG	N
	Telefónica Global Solutions Germany GmbH	N
Greece	Telefónica Global Solutions Greece Ltd.	N
Guatemala	Telxius Cable Guatemala, S.A.	Y
Hong Kong	Telefónica Global Solutions, S.L.	N
Ireland	Virgin Media Wholesale Limited	Y
Italy	Telefónica Global Solutions, S.L.	N

³⁵ Telefónica has entered into a transaction to divest this entity, but the transaction has not yet closed.

³⁶ Telefónica has entered into a transaction to divest this entity, but the transaction has not yet closed.

Country	Entity	Owns/ Controls CLS
Mexico	Pegaso PCS, S.A. de C.V.	N
	Telefónica Global Solutions México, S.A. de C.V.	N
	Telxius México, S. de R.L. de C.V. ³⁷	Y
Netherlands	Telefónica Global Solutions Netherlands	N
Panama	Telxius Cable Panamá S.A.	Y
Peru	Telxius Cable Perú, S.A.C.	Y
	Telefónica Global Solutions Perú, S.A.C.	N
Poland	Telefónica Global Solutions, S.L. Jednoosobowa (Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce	N
Portugal	Telefónica Global Solutions, S.L.U. Sucursal em Portugal	N
Singapore	Telefónica Global Solutions, Singapore Pte. Ltd.	N
Spain	Telefónica de España S.A.U.	Y
	Telefónica Global Solutions, S.L.U.	N
	Telefónica Móviles España S.A.U.	N
	Telxius Cable España S.L.	Y
	Telefónica IoT, Big Data Tech SAU	N
Sweden	Telefónica Global Solutions Sweden AB	N
Switzerland	Telefónica International Wholesale Services II, S.L.U, Madrid, Swiss Branch Zurich	N
United Kingdom	Telefónica UK, Ltd.	N
	Virgin Media Wholesale Limited	Y
	VMED O2 UK Limited d/b/a Virgin Media O2	N
Uruguay	Telefónica Móviles del Uruguay, S.A. ³⁸	N
Venezuela	Telefónica Venezolana, C.A.	N

6. Certification Regarding Foreign Destination Countries³⁹

Each of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certifies that: (A) it is not a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire, the six foreign destination countries in which the

³⁷ Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América are identifying this affiliate prospectively.

³⁸ Telefónica has entered into a transaction to divest this entity, but the transaction has not yet closed.

³⁹ 47 C.F.R. § 1.767(a)(8)(iii).

Applicants seek to land and operate the CELIA system; (B) it does not control a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; (C) no entity owning more than 25 percent of it or controlling it controls foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; and (D) no grouping of two or more foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire (or parties that control foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire) own, in aggregate, more than 25 percent of it 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 CELIA system in the United States.

7. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries⁴⁰

No response is required, as neither Telxius Cable USA nor Telxius Cable Puerto Rico nor Telxius Cable América identified any non-WTO member countries in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

8. Certification Regarding Routine Conditions⁴¹

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they accept and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

9. Streamlining⁴²

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they qualify for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1), as they are not

⁴⁰ *Id.* § 1.767(a)(8)(iv).

⁴¹ *Id.* § 1.767(a)(9).

⁴² *Id.* § 1.767(k).

affiliated with foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire.

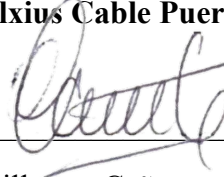
Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that the application qualifies for streamlined processing under 47 C.F.R. § 1.767(k)(4) and certify that they are not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Florida—the only state in which the CELIA system will land and in which new wet-segment construction will occur (as the facilities in Puerto Rico territory have already been constructed)—does not list a cable landing license as a federal activity requiring a consistency certification.⁴³

[Signatures on following page]

⁴³ See Florida’s Federal Listed Actions, <https://coast.noaa.gov/data/czm/consistency/media/fl.pdf>.

Respectfully submitted,

Telxius Cable USA, Inc.
Telxius Cable Puerto Rico, Inc.

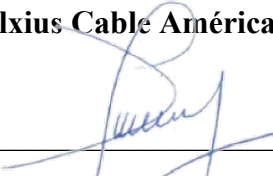


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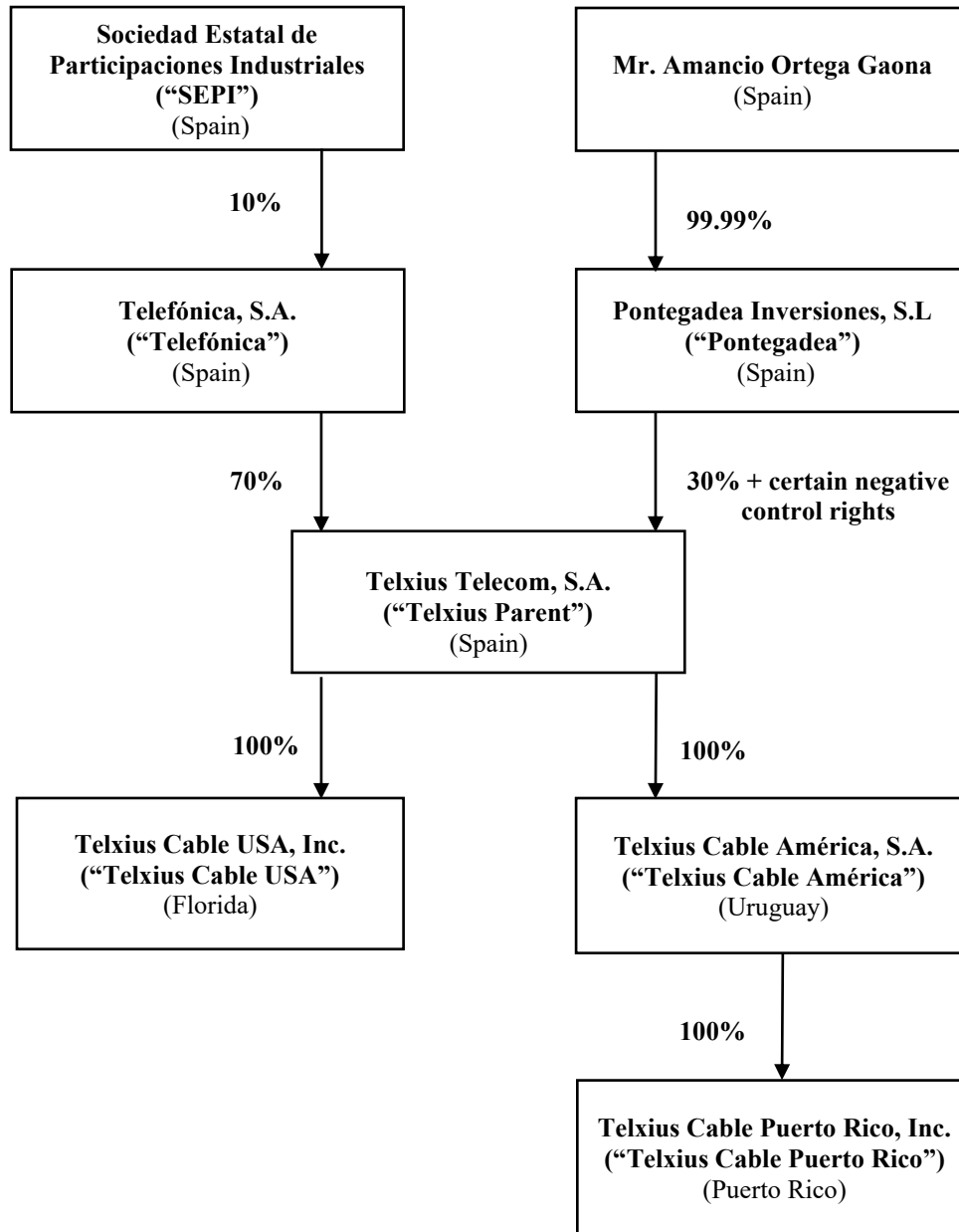


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July 25, 2025

EXHIBIT A-1:

Ownership Structure of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América



Note: Unless otherwise indicated, percentages represent both voting and equity interests