

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

EDGE CABLE HOLDINGS USA, LLC,

Application for a License to Land and Operate a
Private Fiber-Optic Submarine Cable System
Connecting the United States and Denmark,

THE AURORA SYSTEM

ICFS File No. SCL-LIC-2026-_____

**APPLICATION FOR CABLE LANDING LICENSE —
STREAMLINED PROCESSING REQUESTED**

Pursuant to 47 U.S.C. § 34, Executive Order No. 10,530, and 47 C.F.R. §§ 1.70001-24, Edge Cable Holdings USA, LLC (“Edge USA”) hereby applies for a license to land and operate within the United States a private fiber-optic submarine cable network connecting: Manasquan, New Jersey USA and Blaabyjerg, Denmark. This submarine cable system will be known as the Aurora system. Edge USA will operate the Aurora system on a non-common-carrier basis by using Aurora 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. The existence of robust competition on the U.S.-Denmark and broader trans-Atlantic routes obviates any need for common-carrier regulation on public-interest grounds. Furthermore, the grant of this application will serve the public interest because it will ensure (1) the addition of essential cable capacity to satisfy rising international data demand and ensure continuing seamless operation of the global Internet, and (2) ownership and operation of such facilities by a trusted U.S. party.

Edge USA intends to commence commercial operation of the Aurora system by January 15, 2028. Edge USA therefore seeks timely grant of a cable landing license by the Commission no later than November 2026 to permit construction activities to proceed on schedule.

Below, Edge USA provides a public interest statement in part I, information required by 47 C.F.R. § 1.70005 in part II, a streamlining justification in part III, and confirmation of provision of a questionnaire response to the Executive Branch agencies in part IV.

I. PUBLIC INTEREST STATEMENT¹

Edge USA states that an expeditious grant of this application will significantly advance the public interest. First, the Aurora system will provide significant new capacity on routes where capacity demand continues to increase substantially each year and further enhance the resilience of Edge USA's subsea connectivity. Edge USA may also provide dark fiber into the secondary market, providing additional support for advanced data-centric services in the United States and abroad.

Second, the Aurora system will enhance facilities-based competition on the U.S.-Denmark and broader trans-Atlantic routes. Notably, the system will compete directly with the AEC-1, Amitié, Apollo, Atlantic Crossing-1, Dunant, EXA North and South, FLAG Atlantic-1, Grace Hopper, MAREA, TGN Atlantic, and Yellow systems, as well as the planned Nuvem, Fastnet & Sol cable systems, which are currently under construction. This increased competition will: result in greater innovation; enhance service quality, redundancy, and resiliency of connectivity in the region; and ultimately lower prices for U.S. consumers of international communications services.²

¹ 47 C.F.R. § 1.70002.

² See Daniel F. Runde, *et al.*, *Safeguarding Subsea Cables: Protecting Cyber Infrastructure amid Great Power Competition*, Center for Strategic & International Studies (Aug. 16, 2024),

Third, the Aurora system will advance the public interest by furthering U.S. national security and economic security goals by enabling a U.S. company to land and operate a cable network connecting the U.S. to Western Europe.³ Threats to U.S. critical infrastructure and the telecommunications sector make it all the more important to promote U.S. companies' investment and ownership in submarine cable infrastructure that are vital to global commerce.

Fourth, the Aurora system will be deployed as an “open” cable – allowing Edge USA to ensure the security of the system aligned with U.S. Government requirements and independent of any other users of the system. Open cable systems allow different fiber owners or IRU holders to separately operate and control submarine line terminating equipment (“SLTE”) without impacting the operation or security of common equipment on the system (e.g., power-feed equipment). Edge USA is an investor in multiple U.S.-licensed submarine cable systems, and its operations and security program for submarine cable infrastructure is already subject to significant and ongoing oversight of the U.S. national security agencies.

This application raises no public-interest concerns and qualifies for streamlined processing pursuant to 47 C.F.R. § 1.70016(a)(1), (a) (4), and (a)(5), as Edge USA: (a) is not—and is not affiliated with—a foreign carrier in Denmark, the sole foreign destination country for the Aurora system; (b) has no reportable foreign ownership; and (c) is not required to submit a consistency certification pursuant to the Coastal Zone Management Act.

<https://www.csis.org/analysis/safeguarding-subsea-cables-protecting-cyber-infrastructure-amid-great-power-competition#:~:text=By%20prioritizing%20the%20protection%20of,backbone%20of%20the%20global%20economy> (“CSIS Report”).

³ See Dodge Billingsley, *China Creating Undersea Cable Network in Response to United States Isolation Efforts*, Foreign Military Studies Office (Oct. 11, 2024), https://fmso.tradoc.army.mil/2024/china-creating-undersea-cable-network-in-response-to-united-states-isolation-efforts/#_edn1.

II. INFORMATION REQUIRED BY 47 C.F.R. §§ 1.70005, 70014(b)

A. Licensee's Name, Address, Telephone Number, and Place of Organization⁴

Edge USA's full name, address, and telephone number are as follows:

Edge Cable Holdings USA, LLC
1 Meta Way
Menlo Park, California 94025-1452
+1 650 543 4800

Edge USA is a Delaware limited liability company.

B. Contact Information⁵

The Commission should address correspondence regarding this application to:

Raj Singh
Assistant Secretary
Edge Cable Holdings USA, LLC
1 Meta Way
Menlo Park, California 94025-1452
+1 650 543 4800
raj.singh@meta.com

with copies to:

Preston Johnson
Associate General Counsel
Infrastructure & Telecom Regulation
Meta Platforms, Inc.
1900 16th Street, Suite 600
Denver, Colorado 80302
+1 303 550 7628
pjjohnson@meta.com

⁴ 47 C.F.R. § 1.70005(a), (b).

⁵ *Id.* § 1.70005(c).

C. Name of the Submarine Cable System⁶

The system described in this application will be known as the Aurora submarine cable system.

D. System Description⁷

The Aurora system will connect Blaabjerg, Denmark with Manasquan, New Jersey, USA. It will consist of a single trunk segment with no branching units and a total length of 7,268 kilometers and twenty-four fiber pairs. Each fiber pair will have a total design capacity of 20.7 Tbps (for a total of 496.8 Tbps for the Aurora system as a whole) using current technology. Edge USA has not yet made decisions about the initial lit capacity of the system. For purposes of identifying ownership of the trunk segment, Edge USA has described it as consisting of three subsegments (as identified in Table 2 below): Subsegment T1 for the wet segment portion in the U.S. territorial sea; Subsegment T2 for the wet segment portion in international waters beyond the U.S. and Danish territorial seas; and Subsegment T3 for the wet segment portion in the Danish territorial sea. Edge USA expects the Aurora system to enter commercial service in the first calendar quarter of 2028.

E. Location Information for System Elements⁸

Edge USA provides specific location information for certain system elements, including beach manholes, cable landing stations, and power feed equipment and SLTE (including geographic coordinates and street addresses, where available) in the following appendices:

⁶ *Id.* § 1.70005(d).

⁷ *Id.* § 1.70005(e)(1)-(6).

⁸ *Id.* § 1.70005(e)(7), (f).

- Appendix A: Route Map
- Appendix B: Blaabyerg, Denmark Cable Landing Station (including power feed equipment)
- Appendix C: Esbjerg, Denmark Data Center PoP (SLTE)
- Appendix D: Manasquan, New Jersey, USA Cable Landing Station (including power feed equipment)
- Appendix E: Piscataway, New Jersey, USA Data Center PoP (SLTE)
- Appendix F: Route position list for the Aurora system's wet segment

The locations for the network operations center ("NOC") and security operations center ("SOC") facilities) have not yet been finalized. Edge USA will provide a specific, supplemental location notifications for those elements in compliance with 47 C.F.R. § 1.70005(f)(1).

F. Target In-Service Date⁹

Edge USA currently anticipates that the Aurora submarine cable system will enter commercial service by January 15, 2028.

G. Cable Landing Station Information¹⁰

The Aurora system's cable landing stations will be owned and controlled as shown in Table 1 below:

⁹ *Id.* § 1.70005(e)(8).

¹⁰ *Id.* § 1.70005(e)(9).

Table 1: Control and Ownership of Cable Landing Stations

Landing	New or Existing Facility?	Control	Ownership
Manasquan, New Jersey, USA	Existing	Edge USA	NJFX, LLC (“NJFX”)
Blaabjerg, Denmark	Existing	Edge Denmark	Arelion Denmark A/S (“Arelion”)

Neither NJFX nor Arelion will have the ability to significantly affect the operation of the submarine cable system. Edge USA will maintain *de jure* and *de facto* control of the U.S. portion of the cable system, including the Manasquan cable landing station, sufficient to comply with the requirements of the Commission's rules in this chapter and any specific conditions of the license.¹¹ Edge USA will also ensure the landing station lease agreements with NJFX and Arelion have initial terms, with extension options at Edge USA’s sole discretion, for a total of 25 years, coextensive with the term of the cable landing license.

H. Third-Party Provider Disclosures¹²

Edge USA states that it does not use, and will not use, the following third-party service providers, as defined in 47 C.F.R. § 1.70001(d), in the operation of the Aurora submarine cable system:

- (1) Any entity that is owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary, as defined in 47 C.F.R. § 1.70001(g);
- (2) Any entity identified on the Covered List that the Commission maintains on its website pursuant to the Secure Networks Act, 47 U.S.C. §§ 1601-09; and/or

¹¹ *Id.* § 1.70007(k).

¹² *Id.* § 1.70005(g).

- (3) Any entity that can access the submarine cable from a foreign adversary country, as defined in 47 C.F.R. § 1.70001(f), and to identify any such foreign adversary country.

I. Regulatory Classification¹³

Edge USA will operate the Aurora system on a non-common-carrier basis. Non-common-carrier classification of the proposed system is consistent with established Commission policy and precedent and with judicial precedent, and it will advance the public interest.

First, the Aurora system is not appropriate for common-carrier regulation because the system will not operate on a common-carrier basis as defined in *NARUC I*.¹⁴ Courts have stated that “[t]he 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[.]’”¹⁵ On the Aurora system, however, Edge USA will not sell capacity indifferently to the user public. Instead, Edge USA and its affiliates will use capacity on the Aurora system to support the global platform of Meta Platforms, Inc. (“Meta”) and potentially sell dark fiber to particular carrier and enterprise customers pursuant to individually-negotiated indefeasible rights of use (“IRUs”), the terms of which would vary depending on the characteristics and needs of the particular capacity

¹³ *Id.* § 1.70005(h).

¹⁴ *See Nat’l Ass’n of Regul. Util. Comm’rs v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) (“*NARUC I*”) (stating that the 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).

¹⁵ *Nat’l Ass’n of Regul. Util. 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)).

purchaser. The Commission has consistently found that such offerings do not make an applicant a common carrier.¹⁶

Second, the Aurora system is not properly subject to common-carrier regulation because there is no legal compulsion or other public-interest reason for Edge USA to operate the Aurora system in such a manner. Under the *NARUC I* test, the Commission must determine whether the public interest requires common-carrier operation of the submarine cable system.¹⁷

Traditionally, the Commission has focused on whether the applicant has sufficient market power to warrant common carrier regulation,¹⁸ although the Commission “is not limited to that reasoning” and has looked more broadly to determine whether common-carrier licensing is in the public interest.¹⁹ The Aurora system poses no such competitive or other public-interest concerns.

¹⁶ See *AT&T Corp. et al.*, Cable Landing License, 13 FCC Rcd. 16232, 16238 ¶ 16 (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. 14885, 14904 ¶ 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 carriage), *aff’d* 13 FCC Rcd. 21585 (1998), *aff’d sub nom. Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

¹⁷ *NARUC I*, 525 F.2d at 642 (stating that a reviewing court evaluating common carriage designation must inquire “whether there will be any legal compulsion . . . to serve [the public] indifferently”).

¹⁸ See *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14893 ¶ 30.

¹⁹ See *AT&T Corp. et al.*, Cable Landing License, 14 FCC Rcd. 13066, 13080 ¶ 39 (1999) (stating that “[a]lthough 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. 24057, 24062 ¶ 13 (Int’l Bur. 2000) (stating that “[t]his 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. 14915, 14920 ¶ 11 (Int’l Bur. 2000) (stating that “[t]his public interest analysis has focused on the availability of alternative facilities, although the Commission has stated it is not limited to that reasoning.”).

As indicated above, the Aurora system will enhance competition by competing vigorously with other submarine cable systems on the U.S.-Western Europe route, where it will compete directly with the existing AEC-1, Amitié, Apollo, Atlantic Crossing-1, Dunant, EXA North and South, FLAG Atlantic-1, Grace Hopper, MAREA, TGN Atlantic, and Yellow systems, as well as the planned Nuvem, Fastnet, and Sol cable systems. Furthermore, the submarine cable market has seen a considerable rise in international competition in recent years. The Department of Homeland Security’s recent policy priorities for subsea cables identified “continued U.S. leadership in the subsea cable industry” as its first priority.²⁰ The Aurora system would help to promote U.S. leadership in this space, which will be pivotal as data demand continues to grow from the proliferation of emerging technologies like artificial intelligence.²¹

In addition, the Commission has previously found that facilities need not be identical in order to offer pro-competitive benefits.²² The existence of ample competing submarine cable facilities providing U.S.-Western Europe connectivity ensures that the Aurora system would not function as a bottleneck facility on those routes. Edge USA’s intended operation of the Aurora system therefore serves the Commission’s long-standing policy to encourage competition through private submarine cable transmissions, pursuant to which the Commission has granted numerous cable landing licenses.²³

²⁰ See *Priorities for DHS Engagement on Subsea Cable Security & Resilience*, (Dec. 18, 2024).

²¹ See CSIS Report.

²² *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14898 ¶ 44 (stating that “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.”).

²³ See *Tel-Optik Ltd.*, Memorandum Opinion and Order, 100 FCC.2d 1033, 1041 (1985).

J. Cable Ownership Information²⁴

Edge USA and its affiliates will own and control the Aurora system as shown in Table 2 below.

Table 2: Ownership and Control of Aurora System

Party	Subsegment T1 - Portion of Wet Segment and SLTE in U.S. Territory (%)	Subsegment T2 - Portion of Wet Segment in International Waters (%)	Subsegment T3 - Portion of Wet Segment and SLTE in Denmark Territory (%)
Edge Network Services Limited (“Edge”)	0	100	0
Edge Cable Holdings USA, LLC (“Edge USA”)	100	0	0
Edge Network Services Denmark APS (“Edge Denmark”)	0	0	100

Because Edge USA’s affiliates – Edge and Edge Denmark – will not use the U.S. endpoint of the Aurora system, they are not required to be joint applicants for the cable landing license.²⁵

K. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates²⁶

Edge USA certifies that it has the following 10-percent-or-greater direct or indirect interest holders, based on Meta’s disclosures to the Securities Exchange Commission (“SEC”):

Meta Platforms, Inc. (“Meta”)

Address: 1 Meta Way, Menlo Park, California 94025

Place of Organization: Delaware

Principal Business: Software and technology

²⁴ 47 C.F.R. § 1.70005(i).

²⁵ *See id.* § 1.70003(b).

²⁶ *Id.* §§ 1.70005(j)(1), 63.18(h).

Relationship: Meta holds a direct 100-percent voting and economic interest in Edge USA.

CZI Holdings, LLC (“CZI”)²⁷

Address: 1 Meta Way, Menlo Park, California 94025

Place of Organization: Delaware

Principal Business: Philanthropy

Relationship: As of April 1, 2026, CZI holds 109,373,980 shares of Meta Class B common stock, giving it a direct 4.3-percent equity and a 19.5-percent voting interest in Meta and an indirect 4.3-percent equity and a 19.5-percent voting interest in Edge USA.

Mark Zuckerberg

Address: 1 Meta Way, Menlo Park, California 94025

Citizenship: USA

Principal Business: Software and technology

Relationship: As of April 1, 2026, Mr. Zuckerberg, who serves as Chairman of the board of directors and CEO of Meta, held a 60.8-percent voting interest in Meta based on shares in which he is deemed to have beneficial ownership and, on an as-converted to Class A common stock basis, held approximately a 13.5-percent equity interest in Meta, meaning that he holds an indirect 60.8-percent voting interest and 13.5 percent equity interest in Edge USA. Mr. Zuckerberg holds or exercises these interests in Meta:

- (a) As **Trustee of the Mark Zuckerberg Trust**, a California trust dated July 7, 2006 (the “2006 Trust”), holds 3,388,097 shares of Meta Class B common stock.
- (b) Through **Chan Zuckerberg Biohub, Inc.** (“CZ Biohub”), which held 639,347 shares of Meta Class A common stock. Mr. Zuckerberg has sole voting and investment power over the securities held by CZ Biohub, but no pecuniary interest in these securities.
- (c) Through **CZI Holdings**, as described above. The 2006 Trust is the sole member of CZI. Mr. Zuckerberg is the sole Trustee of the 2006 Trust and, therefore, is deemed to have sole voting and investment power over the securities held by CZI.
- (d) Through **Chan Zuckerberg Holdings LLC** (“CZ Holdings”), which holds 17,061,801 shares of Meta Class B common stock. CZ Holdings is beneficially owned by Mr. Zuckerberg, who is deemed to have sole voting and investment power over the securities held by CZ Holdings.

²⁷ The ownership disclosures for Mark Zuckerberg and CZI and the persons in the ownership chain above CZI are current as of April 1, 2026, and were determined in accordance with the rules of the U.S. Securities and Exchange Commission (the “SEC”), as reflected in Meta’s 2026 Proxy Statement filed with the SEC, <https://www.sec.gov/Archives/edgar/data/1326801/000162828026025532/meta-20260416.htm>. These disclosures are based on 2,196,045,588 shares of Class A common stock and 342,377,716 shares of Class B common stock outstanding as of April 1, 2026.

- (e) Through **Chan Zuckerberg Holdings II, LLC** (“CZ Holdings II”), which holds 50,000,000 shares of Meta Class B common stock. CZ Holdings II is beneficially owned by Mr. Zuckerberg, and he is deemed to have sole voting and investment power over the securities held by CZ Holdings II.
- (f) Through **Chan Zuckerberg Holdings III, LLC** (“CZ Holdings III”), which holds 50,000,000 shares of Meta Class B common stock. CZ Holdings III is beneficially owned by Mr. Zuckerberg, and he is deemed to have sole voting and investment power over the securities held by CZ Holdings III.
- (g) Through **Chan Zuckerberg Holdings IV, LLC** (“CZ Holdings IV”), which holds 50,000,000 shares of Meta Class B common stock. CZ Holdings IV is beneficially owned by Mr. Zuckerberg, and he is deemed to have sole voting and investment power over the securities held by CZ Holdings IV.
- (h) Through **Chan Zuckerberg Holdings V, LLC** (“CZ Holdings V”), which holds 50,000,000 shares of Meta Class B common stock. CZ Holdings V is beneficially owned by Mr. Zuckerberg, and he is deemed to have sole voting and investment power over the securities held by CZ Holdings V.
- (i) Through **CZI Holdings I, LLC** (“CZI I”), which holds 12,000,000 shares of Meta Class B common stock. CZI I is beneficially owned by Mr. Zuckerberg, and he is deemed to have sole voting and investment power over the securities held by CZI I.
- (j) Through **CZ Management, LLC** (“CZ Management”), which holds 100 shares of Meta Class B common stock. CZ Management is beneficially owned by Mr. Zuckerberg, and he is deemed to have sole voting and investment power over the securities held by CZ Management.

Meta’s Class A common stock trades publicly on the NASDAQ Stock Market under the symbol “META.” As there is an active market in Meta’s Class A common stock, Meta’s share ownership is always fluid. Moreover, Meta 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, as of April 1, 2026, to Meta’s knowledge, Meta has no 10-percent-or-greater direct or indirect shareholders, based on its outstanding Class A common stock and Class B common stock, other than those disclosed above. In Appendix G, Edge USA provides a chart illustrating its ownership structure.

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

L. Anti-Drug Abuse Act Certification²⁸

Edge USA certifies that no party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.²⁹

M. Law Enforcement Certifications³⁰

Edge USA certifies that it agrees to:

- Comply with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations;³¹
- Make available 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);³²
- Maintain the following point of contact who are located in the United States and are U.S. citizens, for the execution of lawful requests and an agent for legal service of process:

Preston Johnson
Associate General Counsel
Infrastructure & Telecom Regulation
Meta Platforms, Inc.
1900 16th Street, Suite 600
Denver, Colorado 80302
+1 303 550 7628
pjjohnson@meta.com

²⁸ *Id.* §§ 1.70007(j)(1), 63.18(o).

²⁹ *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). Edge USA makes this certification with regard to itself, its officers, Meta, and Meta's controlling shareholder (Mark Zuckerberg). Edge USA cannot certify as to other shareholders in Meta, as it is a publicly traded company.

³⁰ *Id.* §§ 1.70007(j)(1), 63.18(q).

³¹ *Id.* § 63.18(q)(1)(i).

³² *Id.* § 63.18(q)(1)(ii).

- 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;³³
- 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;³⁴ and
- Acknowledges that if it fails 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. § 1001.³⁵

N. Certification Regarding Foreign Carrier Status and Foreign Affiliations³⁶

Edge USA certifies that it:

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

³³ *Id.* § 63.18(q)(1)(iv)(A).

³⁴ *Id.* § 63.18(q)(iv)(B).

³⁵ *Id.* § 63.18(q)(v).

³⁶ *Id.* § 1.70005(j)(2).

- (B) does not own or control a cable landing station in any foreign country; and
- (C) is not affiliated with any foreign carriers.

Edge USA is affiliated with: Edge Network Services Limited (Ireland), which holds a 60-percent ownership interest in a cable landing station in Oldhead County Mayo, Ireland; Edge Network do Brasil Servicos em Tecnologia Ltda., which holds a 68.35-percent ownership interest in a cable landing station in Praia Grande, Brazil; Edge Network Services México, S. de R.L. de C.V., which holds a 100-percent ownership interest in a cable landing station in Rosarito, Mexico; and Edge Argentina SRL, which holds a 59.06-percent ownership interest in a cable landing station in Las Toninas, Argentina.

O. Certification Regarding Foreign Destination Countries³⁷

Edge USA certifies that: (A) it is not a foreign carrier in Denmark, the sole foreign destination country in which the Aurora system will land; (B) it does not control any foreign carrier in Denmark; (C) no entity owning more than 25 percent of, and controlling, Edge USA controls any foreign carrier in Denmark; and (D) no grouping of two or more foreign carriers in Denmark (or parties that control foreign carriers in those destination countries) 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 Aurora system in the United States.

P. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries³⁸

No response is required, as Edge USA did not identify any non-WTO member countries in response to 47 C.F.R. § 1.70005(j)(3) above.

³⁷ *Id.* § 1.70005(j)(3).

³⁸ *Id.* § 1.70005(j)(4).

Q. Certifications³⁹

Edge USA certifies that it:

- (a) Accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.70007;
- (b) Does not exhibit any of the criteria set out in the presumptive disqualifying conditions per 47 C.F.R. §§ 1.70002(c) and 1.70004(a) and (b), meaning that it:
 - (1) Has the requisite character qualifications as set out in 47 C.F.R. § 1.70002(c).
 - (2) Does not exhibit any of the criteria set out in the presumptive disqualifying condition under 47 C.F.R. § 1.70004(a); and
 - (3) Does not exhibit any of the criteria set out in the presumptive disqualifying condition under 47 C.F.R. § 1.70004(b).
- (c) It has created and will implement and update a cybersecurity and physical security risk management plan, and that:
 - (1) The plan describes how Edge USA will take reasonable measures to employ its organizational resources and processes to ensure the confidentiality, integrity, and availability of its systems and services that could affect its provision of communications services through the Aurora submarine cable system;
 - (2) The plan identifies the cybersecurity risks Edge USA faces, the controls it uses or plans to use to mitigate those risks, and how Edge USA will ensure that these controls are applied effectively to its operations;
 - (3) The plan addresses both logical and physical access risks, as well as supply chain risks;

³⁹ *Id.* § 1.70005(k), (m).

- (4) The plan has been signed by Edge USA’s Security Officer;
 - (5) Edge USA will submit cybersecurity and physical security risk management plans to the Commission upon request; and
 - (6) Edge USA will preserve data and records related to its cybersecurity and physical security risk management plans, including documentation necessary to demonstrate how those plans are implemented, for a period of two years from the date the related risk management plan certification is submitted to the Commission.
- (d) That the Aurora submarine cable system will not use equipment or services identified on the Covered List that the Commission maintains on its website pursuant to the Secure Networks Act, 47 U.S.C. §§ 1601-1609.

R. Coastal Zone Management Act⁴⁰

Edge USA 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). New Jersey—the only state in which the Aurora system will land—does not list a cable landing license as a federal activity requiring a consistency certification.⁴¹

S. Certification Regarding Service to Executive Branch Agencies⁴²

As indicated in the attached certificate of service, Edge USA has sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense.

⁴⁰ *Id.* § 1.70005(o).

⁴¹ *See* New Jersey Coastal Management Program Federal Consistency Listings – Federal Activities; Licenses, Permits and Other Regulatory Approvals; and Federal Financial Assistance Programs, <https://coast.noaa.gov/data/czm/consistency/media/nj.pdf>.

⁴² *Id.* § 1.70014.

III. REQUEST FOR STREAMLINING⁴³

This application qualifies for streamlined processing pursuant to 47 C.F.R. § 1.700016(a)(1). Edge USA has certified above that it is not affiliated with any foreign carrier in Denmark, the sole foreign destination country for the system. This application raises no other foreign ownership, competition, or public interest concerns that would merit consideration outside the Commission's streamlined review process.

Edge USA also qualifies for streamlined processing under 47 C.F.R. § 1.70016(a)(4), as it certifies that all individuals or entities that hold a ten percent or greater direct or indirect equity and/or voting interests, or a controlling interest, in Edge USA are U.S. citizens or entities organized in the United States.

Edge USA also qualifies for streamlined processing under 47 C.F.R. § 1.70016(a)(5) and 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). New Jersey—the only state in which the Aurora system will land—does not list a cable landing license as a federal activity requiring a consistency certification.

Edge USA urges the FCC to pursue streamlining to the maximum extent in order to promote the development and use of vital undersea cable infrastructure that U.S. companies need to support U.S. innovation and economic growth around the world.

⁴³ *Id.* § 1.70016).

IV. RESPONSE TO STANDARD QUESTIONS OF EXECUTIVE BRANCH AGENCIES⁴⁴

Edge USA has no reportable foreign ownership within the meaning of 47 C.F.R. §§ 1.70016(a)(4) and 1.40001(d) and is therefore not required to submit a response to the 2021 standard questions to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Team Telecom”).⁴⁵ Edge USA believes that there is no need to refer this application to Team Telecom given the lack of foreign ownership in Edge USA, but given recent FCC and Team Telecom practice, Edge USA expects that Team Telecom will request that the Commission refer the application to it. Edge USA has therefore submitted to Team Telecom in parallel with the filing of this application a questionnaire response that includes responses to the standard questions and provided it with a complete and unredacted copy of this application.

⁴⁴ 47 C.F.R. §§ 1.40003(a), 63.18(p); *Requirements for Applications and Petitions Subject to Executive Branch Review*, FCC, available at <https://www.fcc.gov/international-affairs/requirements-applications-and-petitions-subject-executive-branch-review> (last visited Dec. 21, 2024).

⁴⁵ See 47 C.F.R. §§ 1.40003, 63.18(p).

CONCLUSION

For the foregoing reasons, the Commission should expeditiously grant this cable landing license application for the Aurora system pursuant to streamlined processing.

Respectfully submitted,

EDGE CABLE HOLDINGS USA, LLC

Raj Singh

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Assistant Secretary
Edge Cable Holdings USA, LLC
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August 17, 2026

LIST OF APPENDICES

Appendix A: Aurora System Route Map

Appendix G: Edge USA Ownership Diagram

LIST OF CONFIDENTIAL APPENDICES

Appendix B: Blaabjerg, Denmark Cable Landing Station Location (Including PFE)

Appendix C: Esbjerg, Denmark Data Center PoP (SLTE)

Appendix D: Manasquan, New Jersey, USA Cable Landing Station Location (Including PFE)

Appendix E: Piscataway, New Jersey, USA Data Center PoP (SLTE)

Appendix F: Route Position List for the Aurora System's Wet Segment

APPENDIX A:

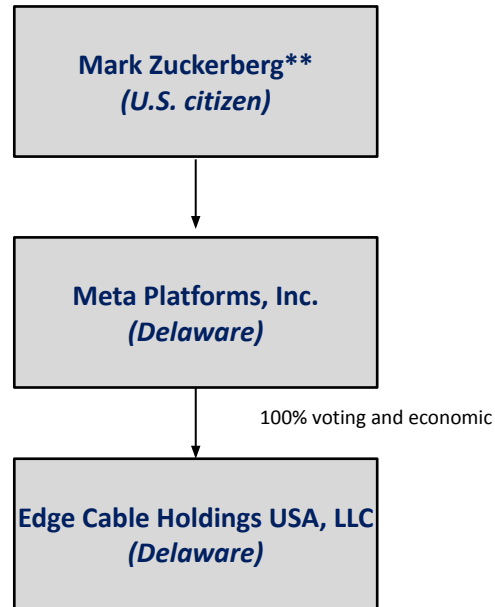
AURORA SYSTEM ROUTE MAP



APPENDIX G:

EDGE CABLE HOLDINGS USA, LLC OWNERSHIP STRUCTURE

Consists of (i) 639,347 shares of Class A common stock held of record by Chan Zuckerberg Biohub, Inc. (CZ Biohub); (ii) 3,388,097 shares of Class B common stock held of record by Mark Zuckerberg, Trustee of The Mark Zuckerberg Trust dated July 7, 2006 (2006 Trust); (iii) 109,373,980 shares of Class B common stock held of record by CZI Holdings, LLC (CZI); (iv) 17,061,801 shares of Class B common stock held of record by Chan Zuckerberg Holdings, LLC (CZ Holdings); (v) 12,000,000 shares of Class B common stock held of record by CZI Holdings I, LLC (CZI I); (vi) 50,000,000 shares of Class B common stock held of record by Chan Zuckerberg Holdings II, LLC (CZ Holdings II); (vii) 50,000,000 shares of Class B common stock held of record by Chan Zuckerberg Holdings III, LLC (CZ Holdings III); (viii) 50,000,000 shares of Class B common stock held of record by Chan Zuckerberg Holdings IV, LLC (CZ Holdings IV); (ix) 50,000,000 shares of Class B common stock held of record by Chan Zuckerberg Holdings V, LLC (CZ Holdings V); and (x) 100 shares of Class B common stock held of record by CZ Management, LLC (CZ Management).



CERTIFICATE OF SERVICE

I, Preston Johson, hereby certify that consistent with 47 C.F.R. § 1.70014(b), I have served copies of the foregoing application for a cable landing license for the Aurora submarine cable system, by hand delivery or electronic mail this August 17, 2026, to the following:

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