

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

*In the Matter of*

RTI SOLUTIONS, INC.,  
RTI JGA PTE. LTD., AND  
RTI CONNECTIVITY PTE. LTD.,

Application for a License to Land and Operate  
a Private Fiber-Optic Submarine Cable System  
Connecting Guam and Japan,

THE JGA NORTH SYSTEM

File No. SCL-LIC-2018-\_\_\_\_\_

**JOINT 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. § 1.767, RTI Solutions, Inc. (“RTI Solutions”), RTI JGA Pte. Ltd. (“RTI JGA”), and RTI Connectivity Pte. Ltd. (“RTI Connectivity”) (collectively, “Applicants”) hereby apply for a license to land and operate within the United States a private fiber-optic submarine cable network connecting Guam and Japan. The system will be known as the Japan-Guam-Australia (“JGA”) North system. The Applicants will operate JGA North on a non-common-carrier basis, 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 Guam-Japan route obviates any need for common-carrier regulation of the system on public-interest grounds.

The Applicants intend to commence commercial operation of JGA North in the fourth calendar quarter of 2019. The Applicants therefore seek timely grant of a cable landing license by the Commission no later than July 2019, in order to permit construction activities to proceed

on schedule. An expeditious grant of this application will significantly advance the public interest.

*First*, JGA North will provide critical new and replacement capacity on routes where capacity demand is increasing substantially each year and where a number of existing systems are nearing the ends of their useful lives. JGA North will consist of two fiber pairs with a design capacity of a minimum of 12 Tbps per fiber pair using current technology. The system's initial lit capacity has not yet been determined. It will offer capacity in large increments until the year 2045, far beyond the useful life of most existing systems serving the Guam-Japan route.

*Second*, JGA North will compete vigorously with established submarine cable operators on the U.S.-Japan route—particularly Tata Communications and AT&T. None of the Applicants is affiliated with a foreign carrier in Japan.

*Third*, JGA North's landing at Minami-Boso will provide additional geographic diversity for U.S.-Japan traffic. The new Minami-Boso cable landing station is diverse from KDDI's Chikura cable landing station (where both Unity and FASTER land) and SoftBank's Maruyama cable landing station (where the Japan-U.S. Cable Network and Australia-Japan Cable land and where JUPITER will soon land).

This application raises no public-interest concerns. The Applicants request streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1), as none is affiliated with any foreign carriers in Japan. Below, the Applicants provide information required by 47 C.F.R. § 1.767.

**A. Applicant Identifying Information<sup>1</sup>**

In Table 1, the Applicants provide their names, addresses, telephone numbers, and FCC registration numbers.

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<sup>1</sup> See 47 C.F.R. § 1.767(a)(1).

**Table 1: Applicant Identifying Information**

<b>Name, Address, and Telephone Number</b>	<b>FRN</b>
RTI Solutions, Inc. 268 Bush Street #77 San Francisco, California 94194 +1 619 888 7166	0027052489
RTI JGA Pte. Ltd. 4 Robinson Road #05-01 The House of Eden Singapore 048543 +65 6438 4307	0027759299
RTI Connectivity Pte. Ltd. 8 Eu Tong Sen Street #14-94 The Central Singapore 059818 +65 6438 4307	0027759307

**B. Applicant Places of Incorporation<sup>2</sup>**

RTI Solutions is a California corporation. RTI JGA is a Singapore private limited company. RTI Connectivity is a Singapore limited company.

**C. Contact Information for the Applicants<sup>3</sup>**

Russell Matulich  
Chief Executive Officer  
RTI Solutions, Inc.  
RTI Connectivity Pte. Ltd.  
268 Bush Street #77  
San Francisco, California 94104  
+1 415 837 3511  
russ.matulich@rticable.com

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<sup>2</sup> See *id.* § 1.767(a)(2).

<sup>3</sup> See *id.* § 1.767(a)(3).

*with a copy to:*

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*Counsel for RTI Solutions, Inc. RTI JGA Pte. Ltd., and RTI Connectivity Pte. Ltd.*

**D. System Description<sup>4</sup>**

JGA North will consist of a single Guam-Japan segment with a total length of approximately 2,600 kilometers. JGA North will consist of two fiber pairs with a design capacity of a minimum of 12 Tbps per fiber pair using current technology. The system will have an initial lit capacity of 24 Tbps.

The Applicants expect JGA North to enter into commercial service in the fourth calendar quarter of 2019. In Appendix A, the Applicants provide a route map for the system.

JGA North will be separately owned and operated from the planned JGA South system, a consortium system between Guam and Australia to be owned and operated jointly by RTI Connectivity, Google Infrastructure Bermuda Limited, and AARNet Pty Ltd. The owners of JGA South will seek a separate cable landing license from the Commission with respect to JGA South.

**E. Landing Points<sup>5</sup>**

The Applicants provide specific landing point information (including geographic coordinates and street addresses, where available, for beach manholes and cable landing stations) in the following appendices:

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<sup>4</sup> See *id.* § 1.767(a)(4).

<sup>5</sup> See *id.* § 1.767(a)(5).

- Appendix B: Piti, Guam, Landing Point Information
- Appendix C: Minami-Boso, Japan, Landing Point Information

#### **F. Regulatory Classification<sup>6</sup>**

The Applicants will operate JGA North 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 Commission should not subject JGA North to common-carrier regulation because it will not operate on a common-carrier basis as defined in *NARUC I*.<sup>7</sup> The 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.’”<sup>8</sup> On JGA North, however, the Applicants will not sell capacity indifferently to the user public. Instead, the Applicants will sell bulk capacity to particular carrier and enterprise customers 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 purchaser.

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<sup>6</sup> *See id.* § 1.767(a)(6).

<sup>7</sup> *See Nat’l Ass’n of Regulatory Utility 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 the Commission’s use of the *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

<sup>8</sup> *Nat’l Ass’n of Regulatory Utility Comm’rs v. FCC*, 533 F.2d 601, 608 (D.C. Cir. 1976) (emphasis added) (quoting *Semon v. Royal Indemnity Co.*, 279 F.2d 737, 739 (5th Cir. 1960)).

The Commission has consistently found that such offerings do not make an applicant a common carrier.<sup>9</sup>

*Second*, the Commission should not subject JGA North to common-carrier regulation because there is no legal compulsion or other public-interest reason for the Applicants to operate the system in such a manner. Under the *NARUC I* test, the Commission must determine whether the public interest requires common-carrier operation of the cable system.<sup>10</sup> Traditionally, the Commission has focused on whether the applicant has sufficient market power to warrant common-carrier regulation,<sup>11</sup> 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.<sup>12</sup> JGA North poses no such competitive or other public-interest concerns.

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<sup>9</sup> 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 carriage), *aff’d* 13 FCC Rcd. 21,585 (1998), *aff’d sub nom. Virgin Islands Telephone Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

<sup>10</sup> *NARUC I*, 525 F.2d at 642 (stating that the court must inquire “whether there will be any legal compulsion . . . to serve [the public] indifferently”).

<sup>11</sup> See *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,893 ¶ 30.

<sup>12</sup> See *AT&T Corp. et al.*, Cable Landing License, 14 FCC Rcd. 13,066, 13,080 ¶ 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. 24,057, 24,062 ¶ 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. 14,915, 14,920 ¶ 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”).

JGA North will enhance competition by competing vigorously with other submarine cable systems on the Guam-Japan route, including TGN Pacific (owned by Tata Communications), the Guam-Okinawa-Kyushu-Incheon (“GOKI”) system (owned by AT&T), and the Australia-Japan Cable (owned by AT&T, NTT Communications, SoftBank, Telstra, and Verizon).

The existence of ample competing submarine cable facilities providing Guam-Japan connectivity will ensure that JGA North would not function as a bottleneck facility on those routes. The Applicants’ intended operation of JGA North 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.<sup>13</sup>

**G. Cable Ownership Information<sup>14</sup>**

The Applicants will own JGA North as follows:

- RTI Solutions will serve as the U.S. landing party and control the Piti, Guam, landing arrangements under a contract with the cable landing station owner, Gateway Network Connections, Inc. (“GNC”), a Guam corporation 51 percent will be owned by Asia Connectivity Elements Pte. Ltd. (“ACE”) and 49 percent of which will be owned by Teleguam Holdings, LLC (“GTA”). ACE is owned 50 percent by Russell Matulich and 50 percent by Choo Wee Tiong, a Singapore citizen and Senior Vice President of RTI Solutions.
- RTI JGA will own the wet segment of JGA North.

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<sup>13</sup> See *Tel-Optik Ltd.*, Memorandum Opinion and Order, 100 FCC.2d 1033, 1041 (1985).

<sup>14</sup> See 47 C.F.R. § 1.767(a)(7).

- RTI Connectivity will control the wet segment of JGA North in its role as Asset Manager of RTI JGA. RTI Connectivity was appointed RTI JGA’s Asset Manager through an Asset Management Agreement by and between the two companies. RTI Connectivity may not be removed as Asset Manager except for cause or in the event RTI Connectivity’s majority shareholder, Russ Matulich, holds less than a 50-percent interest in RTI Connectivity.
- NTT Communications will own and control the cable landing station at Minami-Boso, Japan.

JGA North will land at the U.S. and foreign cable landing stations identified in Table 2 below.

**Table 2: Ownership and Control of Cable Landing Stations**

<b>Cable Landing Station</b>	<b>New or Existing Facility</b>	<b>Ownership/Control</b>
Piti, Guam	Existing	GNC (ownership); RTI Solutions (control)
Minami-Boso, Japan	New	NTT Communications (ownership and control)

**H. Certifications Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates<sup>15</sup>**

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

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<sup>15</sup> See *id.* §§ 1.767(a)(8)(i), 63.18(h).



**Russell Alan Matulich**

*Address:* 955 Serendipity Way, Napa, California 94558

*Citizenship:* USA

*Principal Business:* telecommunications

*Relationship:* Mr. Matulich holds a 16.4-percent voting and economic interest in RTI Solutions.

**Brian Scott Mass**

*Address:* 7 Turtleback Lane, Westport, Connecticut 06880

*Citizenship:* USA

*Principal Business:* development and operation of subsea cable infrastructure

*Relationship:* Mr. Mass holds a 14.5-percent voting and economic interest in RTI Solutions.

**Christopher Michael Brungardt**

*Address:* 3130 Ryer Island Street, West Sacramento, California 95691

*Citizenship:* USA

*Principal Business:* development and operation of subsea cable infrastructure

*Relationship:* Mr. Brungardt holds a 10.0-percent voting and economic interest in RTI Solutions.

**LSF Capital Pte Ltd**

*Address:* 438 Alexandra Road #04-02, Alexandra Point, Singapore 199958

*Place of Organization:* Singapore

*Principal Business:* investments

*Relationship:* LSF Capital Pte Ltd holds a 35.0-percent voting and economic interest in RTI Solutions.

**Datuk Lim Soon Foo**

*Address:* No. 1 JLN Kelab Golf 13/10C, Seksyen 13, Kelab Golf Saas 40100 Shah Alam, Selangor, Malaysia

*Citizenship:* Malaysian

*Principal Business:* investments

*Relationship:* Datuk Lim Soon Foo holds a 75-percent voting and economic interest in LSF Capital Pte. Ltd.

The remaining voting and economic interests in RTI Solutions are held by individuals, none of whom has a 10-percent-or-greater interest.

RTI JGA certifies that it has the following 10-percent or greater direct or indirect interest holders, as illustrated on the attached Appendix D:

**Fund Corporation for the Overseas Development of Japan's ICT and Postal Services, Inc. ("JICT")**

*Address:* 1-2-1, Uchisaiwai-cho, Chiyoda-ku, Tokyo

*Place of Organization:* Japan

*Principal Business:* investments

*Relationship:* JICT holds a 37.5-percent economic interest in RTI JGA through its ownership of 100 percent of JGA Class A Preferred Shares. The Japanese Ministry of Finance holds a 50-percent voting-and-equity interest in JICT. The remaining voting and economic interests of JICT are held by 21 Japanese corporations, none of which has a ten-percent-or-greater voting or economic interest in RTI JGA.

**NEC Corporation ("NEC")**

*Address:* 7-1, Shiba 5-chome, Minato-ku, Tokyo 108-8001, Japan

*Place of Organization:* Japan

*Principal Business:* information technology

*Relationship:* NEC holds a 37.5-percent economic interest in RTI JGA through its ownership of 100 percent of JGA Class B Preference Shares. NEC is a publicly traded corporation with no 10-percent or greater shareholders.

**Russell Alan Matulich**

*Address:* 955 Serendipity Way, Napa, California 94558

*Citizenship:* USA

*Principal Business:* telecommunications

*Relationship:* Mr. Matulich holds a 16.7-percent economic interest in RTI JGA through his ownership of 51 percent of JGA Class C shares.

**The RTI JGA Share Trust ("RTI JGA Trust")**

*Address:* 4 Robinson Road #05-01, Singapore 048543

*Place of Organization:* Singapore

*Principal Business:* investments

*Relationship:* RTI JGA Trust holds all of the shares of RTI JGA in trust for the economic interest holders. It owns one ordinary share of RTI JGA.

**Singapore Trust Company Pte. Ltd. ("STC")**

*Address:* 4 Robinson Road #05-01, Singapore 048543

*Place of Organization:* Singapore

*Principal Business:* regulated trust company in Singapore

*Relationship:* STC serves as the Trustee of the RTI JGA Trust.

**STC Group Ltd. (“STC Group”)**

*Address:* Vistra Corporate Services Centre, Wickhams Cay II, Road Town, Tortola, VG1110, British Virgin Islands

*Place of Organization:* British Virgin Islands

*Principal Business:* holding company

*Relationship:* STC Group holds a 100-percent voting and economic interest in STC.

**Tan Boon Aun Rudy**

*Address:* 4 Robinson Road #05-01, Singapore 048543

*Place of Citizenship:* Singapore

*Principal Business:* Managing Director, STC

*Relationship:* Mr. Tan holds a 20-percent voting and economic interest in STC Group.

**Ocorian Limited (“Ocorian”)**

*Address:* 26 New Street, St Helier, Jersey JE2 3RA

*Place of Organization:* Bailiwick of Jersey

*Principal Business:* trust administration

*Relationship:* Ocorian holds a 80-percent voting and economic interest in STC.

**Inflexion Supplemental Fund IV (No. 1) LP (“Inflexion Supplemental”)**

*Address:* Third Floor, La Plaiderie Chambers, La Plaiderie, St. Peter Port, Guernsey GY1 WG

*Place of Organization:* Guernsey

*Principal Business:* investments

*Relationship:* Inflexion Supplemental holds a 16-percent voting and economic interest in Ocorian. Inflexion Supplemental has no controlling interest holder.

**Inflexion Buyout Fund IV (No. 1) LP (“Inflexion No. 1”)**

*Address:* Third Floor, La Plaiderie Chambers, La Plaiderie, St. Peter Port, Guernsey GY1 WG

*Place of Organization:* Guernsey

*Principal Business:* investments

*Relationship:* Inflexion Buyout holds a 29-percent voting and economic interest in Ocorian. Inflexion Buyout has no controlling interest holder.

Other than the entities listed above, no entity holds a 10-percent-or-greater voting or economic interest in RTI JGA.

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

**Russell Matulich**

*Address:* 955 Serendipity Way, Napa, California 94558

*Citizenship:* USA

*Principal Business:* telecommunications

*Relationship:* Mr. Matulich holds a 99-percent voting and economic interest in RTI Connectivity.

None of the Applicants has any interlocking directorates with foreign carriers.

**I. Certification Regarding the Anti-Drug Abuse Act of 1988<sup>16</sup>**

The Applicants certify 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.<sup>17</sup>

**J. Certification Regarding Foreign Carrier Status and Foreign Affiliations<sup>18</sup>**

The Applicants certify that: (A) none is a foreign carrier in any foreign country; (B) none owns or controls a cable landing station in any foreign country; and (C) none is a foreign carrier in any foreign country.

**K. Certification Regarding Destination Countries<sup>19</sup>**

The Applicants certify to the following:

(A) none is a foreign carrier in Japan, the sole foreign destination market in which JGA

North will land;

(B) none controls a foreign carrier in Japan;

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<sup>16</sup> See *id.* §§ 1.767(a)(8)(i), 63.18(o).

<sup>17</sup> 21 U.S.C. § 862(a). The Anti-Drug Abuse Act of 1988, Pub. L. No. 100-690, title V, § 5301, 102 Stat. 4181, 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 the Crime Control Act of 1991, Pub. L. No. 101-647, title X, § 1002(d)(1), 104 Stat. 4789, 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.

<sup>18</sup> See 47 C.F.R. § 1.767(a)(8)(ii).

<sup>19</sup> See *id.* § 1.767(a)(8)(iii).

- (C) no entity owning more than 25 percent of RTI Solutions, RTI JGA, or RTI Connectivity, or controlling any of those three entities, controls a foreign carrier in Japan; and
- (D) no grouping of two or more foreign carriers in Japan (or parties that control foreign carriers in Japan) 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 JGA North in the United States.

**L. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets<sup>20</sup>**

No response is required, as the Applicants did not identify any non-WTO markets in response to 47 C.F.R. § 1.767(a)(8)(iii).

**M. Certifications Regarding Routine Conditions<sup>21</sup>**

The Applicants certify that they accept and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

**N. Streamlining—Market Power<sup>22</sup>**

The Applicants request streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1). The Applicants are not affiliated with foreign carriers in any foreign countries.

**O. Streamlining—CZMA<sup>23</sup>**

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<sup>20</sup> See *id.* § 1.767(a)(8)(iv).

<sup>21</sup> See *id.* § 1.767(a)(9).

<sup>22</sup> See *id.* § 1.767(j), (k).

<sup>23</sup> See *id.*

The Applicants 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). Guam does not list—and has never proposed to list—a cable landing license as a federal activity requiring a consistency certification.<sup>24</sup>

**P. Certification Regarding Service to Executive Branch Agencies<sup>25</sup>**

The Applicants have sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense. The Applicants' counsel has certified such service in the certificate of service attached to this application.

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

The Applicants request a waiver of 47 C.F.R. § 1.767(h)(1) rules so that GNC—the owner of the Piti, Guam, cable landing station—need not be a joint applicant for the JGA North 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.”<sup>26</sup> GNC, the owner of the Piti, Guam, cable landing station, will not have any ability to affect significantly JGA North's operation. Inclusion of GNC as a joint applicant is not necessary to ensure compliance by the Applicants with the Cable Landing License Act, the Commission's cable landing license rules, or

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<sup>24</sup> See *Guam's Listed Federal Actions*, National Oceanic and Atmospheric Administration, Office for Coastal Management, <https://coast.noaa.gov/czm/consistency/media/guam.pdf>.

<sup>25</sup> See 47 C.F.R. § 1.767(j).

<sup>26</sup> See *Actions Taken Under 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)).

the terms of any cable landing license. Grant of the waiver is therefore consistent with longstanding Commission precedent.<sup>27</sup>

For the Guam landing, RTI Solutions will contract with GNC for the provision of certain limited services that would not provide it with any ability to affect significantly JGA North's operation. RTI Solutions will enter into long-term leases for collocation space for power feed equipment for the Piti, Guam, cable landing station and will retain operational authority over the JGA North landing facilities and provide direction to GNC in all matters relating to JGA North. RTI Solutions will seek to ensure that all IRU and lease agreements will have initial terms, with extension options at RTI Solutions' sole discretion, for a total of 25 years each, coextensive with the term of the cable landing license.

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<sup>27</sup> See, e.g., *Actions Taken Under Cable Landing License Act*, Public Notice, 32 FCC Rcd. 1436, 1438 (Int'l Bur. 2017) (accepting the applicant's representations that 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 Communications (US) Inc.—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. at 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").

**CONCLUSION**

For the foregoing reasons, the Applicants request that the Commission expeditiously grant a cable landing license for JGA North pursuant to streamlined processing.

Respectfully submitted,

**RTI CONNECTIVITY PTE. LTD.  
RTI SOLUTIONS, INC.**

  
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Inc.*

**RTI JGA PTE LTD.**

  
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Director

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The House of Eden  
Singapore 048543

November 5, 2018

Attachments



## **LIST OF APPENDICES**

Appendix A: JGA North Route Map

Appendix B: Piti, Guam, Landing Point Information

Appendix C: Minami-Boso, Japan, Landing Point Information

Appendix D: Ownership and Control of RTI JGA Pte. Ltd.

Certificate of Service

**APPENDIX A:**  
**JGA NORTH ROUTE MAP**



**APPENDIX B:**  
**PITI, GUAM, LANDING POINT INFORMATION**



Beach manhole geographic coordinates: 13°27'55.01"N, 144°41'35.04"E  
Cable station geographic coordinates: 13°27'49.20"N, 144°41'34.49"E  
Cable landing station street address: 115 Route 1, Piti, Guam 96925

## APPENDIX C:

### MINAMI-BOSO, JAPAN, LANDING POINT INFORMATION

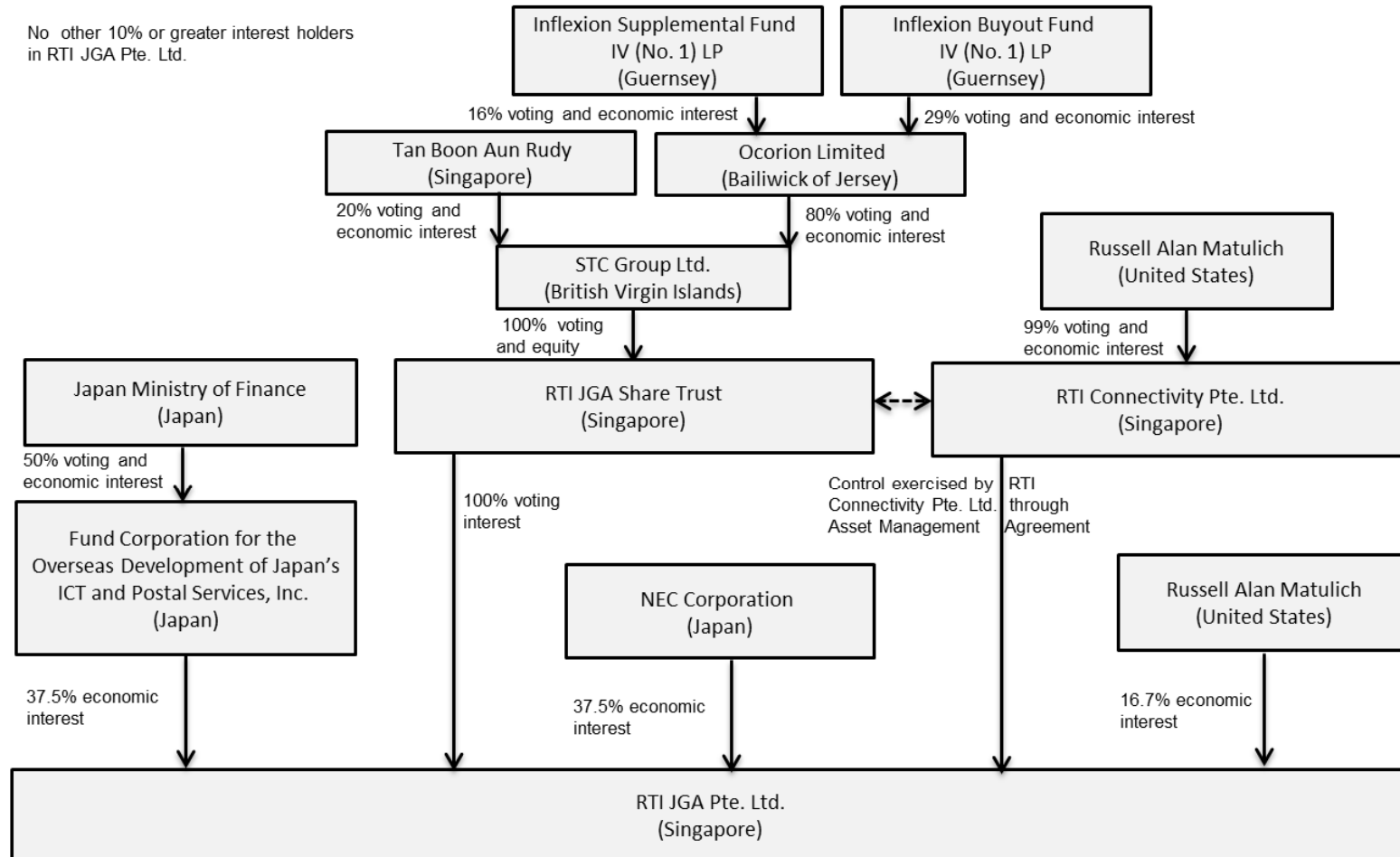


Beach manhole geographic coordinates:	34°58'24"N, 139°57'45"E
Cable station geographic coordinates:	34°58'25"N, 139°57'38"E
Cable landing station street address:	2705-34 Aza-Yamada, Setout, Chikura-Cho, Minami-Boso-Shi, Tokyo, Japan

**APPENDIX D:**

**OWNERSHIP AND CONTROL OF RTI JGA PTE. LTD.**

No other 10% or greater interest holders in RTI JGA Pte. Ltd.



←--> Asset Management Agreement

## CERTIFICATE OF SERVICE

I, Kent Bressie, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing application for a cable landing license for the JGA North submarine cable system, by hand delivery or electronic mail this 5th day of November, 2018, to the following:

Robert L. Strayer  
Deputy Assistant Secretary of State for Cyber and  
International Communications and Information Policy  
Bureau of Economic and Business Affairs  
U.S. DEPARTMENT OF STATE  
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