

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

EDGE CABLE HOLDINGS USA, LLC,
CHINA MOBILE INTERNATIONAL LIMITED, and
VADATA, INC.,

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

THE BAY TO BAY EXPRESS CABLE 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, Edge Cable Holdings USA, LLC (“Edge USA”), China Mobile International Limited (“CMI”), and Vadata, Inc. (“Vadata”) (collectively, the “Applicants”), hereby apply for a license to land and operate within the United States a private fiber-optic submarine cable network connecting: Grover Beach, California; Changi, Singapore; Chung Hom Kok, Hong Kong SAR; and Cherating, Malaysia. The submarine cable system will be known as the Bay to Bay Express Cable System (“BtoBE”). The Applicants will operate the BtoBE system on a non-common-carrier basis, either by using BtoBE capacity as an input for services offered by their 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.-Singapore, U.S.-Hong Kong, and U.S.-Malaysia routes obviates any need for common-carrier regulation on public-interest grounds.

The Applicants intend to commence commercial operation of the BtoBE system by the second calendar quarter of 2021. The Applicants therefore seek timely grant of a cable landing license by the Commission no later than May 2020 to permit construction activities to proceed on schedule. An expeditious grant of this application will significantly advance the public interest. BtoBE will provide significant new capacity on routes where capacity demand continues to increase substantially each year. It will also provide geographically-diverse data center connectivity for certain of BtoBE's owners.

This application raises no public-interest concerns. Edge USA and Vadata request streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1), as neither is or is affiliated with a foreign carrier in any of the BtoBE system's destination markets. CMI requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(2), as it is affiliated with non-dominant foreign carriers in Singapore, Hong Kong, and Malaysia. Below, the Applicants provide information required by 47 C.F.R. § 1.767.

I. COMPLIANCE WITH 47 C.F.R. § 1.767

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

The Applicants provide company-specific responses to and certifications for 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k) in the following appendices:

- Appendix A: Edge USA
- Appendix B: CMI
- Appendix C: Vadata

B. System Description¹

BtoBE will have six fiber pairs and consist of four segments:

- **Segment A.** Segment A will connect Grover Beach, California, with Branching Unit 1 off of Hong Kong. It will have a total length of 12,182 kilometers and consist of six fiber pairs.
- **Segment B.** Segment B will connect Branching Unit 1 with Changi, Singapore. It will have a total length of 2,236 kilometers and consist of five fiber pairs.
- **Segment C.** Segment C will connect Chung Hom Kok, Hong Kong, with Branching Unit 1. It will have a total length of 612 kilometers and consist of nine fiber pairs.
- **Segment D.** Segment D will connect Cherating, Malaysia, with Branching Unit 2. It will have a total length of 363 kilometers and consist of four fiber pairs.

Between California and Hong Kong, BtoBE will have a design capacity of 90 waves x 200 Gbps (or equivalent) per fiber pair using current technology, with an aggregate design capacity of 18 Tbps. Between California and Singapore, BtoBE will have a design capacity of 80 waves x 200 Gbps (or equivalent) per fiber pair using current technology, with an aggregate design capacity of 16 Tbps. Between California and Malaysia, BtoBE will have a design capacity of 80 waves x 200 Gbps (or equivalent) per fiber pair using current technology, with an aggregate design capacity of 16 Tbps. The Applicants have not yet made decisions about the initial lit capacity of the system's segments. In Appendix D, the Applicants provide a route map for the system. The Applicants expect the BtoBE system to enter into commercial service in the second calendar quarter of 2021.

¹ See 47 C.F.R. § 1.767(a)(4).

C. Landing Points²

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:

- Appendix E: Grover Beach, California
- Appendix F: Changi, Singapore
- Appendix G: Chung Hom Kok, Hong Kong SAR
- Appendix H: Cherating, Malaysia

D. Regulatory Classification³

The Applicants will operate the BtoBE 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 Commission should not subject the BtoBE system to common-carrier regulation because BtoBE will not operate on a common-carrier basis as defined in *NARUC I*.⁴ The courts have stated that “[t]he primary *sine qua non* of common carrier status is a quasi-public character,

² See *id.* § 1.767(a)(5).

³ See *id.* § 1.767(a)(6).

⁴ 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 FCC’s use of *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

which arises out of the undertaking ‘to carry for all people indifferently.’”⁵ On BtoBE, however, the Applicants will not sell capacity indifferently to the user public.

- BtoBE will provide Edge USA and its affiliates with capacity to support Facebook’s global platform to connect its users and data centers.
- BtoBE will provide CMI and its affiliates with capacity to support its wholesale capacity businesses in Asia and the Americas, offering bulk capacity to particular carrier, enterprise, and government customers pursuant to individually-negotiated infeasible rights of use (“IRUs”) and capacity leases, the terms of which will vary depending on the characteristics and needs of the particular capacity purchaser.
- BtoBE will provide Vadata and its affiliates with capacity to support Amazon’s cloud services offerings and connect its data centers.

The Commission has consistently found that such offerings do not make an applicant a common carrier.⁶

Second, the Commission should not subject the BtoBE system to common-carrier regulation because there is no legal compulsion or other public-interest reason for the Applicants to operate BtoBE in such a manner. Under the *NARUC I* test, the Commission must determine

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 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).

whether the public interest requires common-carrier operation of the submarine cable system.⁷

Traditionally, the Commission has focused on whether the 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 licensing is in the public interest.⁹ The BtoBE system poses no such competitive or other public-interest concerns.

The BtoBE system will enhance competition by competing vigorously with other submarine cable systems on the U.S.-Singapore, U.S.-Hong Kong, and U.S.-Malaysia routes.

- On the U.S.-Singapore route, the BtoBE system will compete directly with the Asia-America Gateway (“AAG”) system. It will also compete with the APCN-2, Asia Pacific Gateway (“APG”), Asia Submarine-cable Express (“ASE”), EAC/C2C, and Southeast Asia-Japan Cable (“SJC”) systems, which provide connectivity to both Hong Kong and Japan and onward connectivity to the United States via a variety of systems.
- On the U.S.-Hong Kong route, the BtoBE system will compete directly with the existing AAG system and with the planned Hong Kong Americas system and Pacific

⁷ *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”).

⁸ *See 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 (2000) (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”).

Light Cable Network (“PLCN”), which are currently under construction. It will also compete with the EAC/C2C and SJC systems, which provide connectivity to Japan and onward connectivity to the United States via the FASTER, Japan-U.S., Pacific Crossing-1, and Unity systems.

- On the U.S.-Malaysia route, the BtoBE system will compete directly with the existing AAG system. It will also compete with the APG and ASE systems, which provide connectivity to Hong Kong and Japan and onward connectivity to the United States via a variety of systems.

The Commission has previously found that facilities need not be identical in order to offer pro-competitive benefits.¹⁰ The existence of ample competing submarine cable facilities providing U.S.-Singapore, U.S.-Hong Kong, and U.S.-Malaysia connectivity ensures that the BtoBE system would not function as a bottleneck facility on those routes. The Applicants’ intended operation of the BtoBE 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.¹¹

E. Cable Ownership Information¹²

The Applicants and their affiliates will own and control the BtoBE system’s wet segment and common infrastructure as shown in the tables below. In Tables 1 through 4 below, the

¹⁰ *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,898 ¶ 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”).

¹¹ *See Tel-Optik Ltd.*, Memorandum Opinion and Order, 100 FCC.2d 1033, 1041 (1985).

¹² *See* 47 C.F.R. § 1.767(a)(7).

Applicants note the participation (*i.e.*, economic) interest and voting interest held by each owner for each segment of the BtoBE system.

Table 1: Ownership and Control of Segment A

Party	Participation Interest	Voting Interest
Facebook affiliates: <ul style="list-style-type: none"> Edge USA (portion within U.S. territory) Edge Network Services Limited (“Edge”) (portion beyond U.S. territory) 	41.6667%	50.0%
CMI	50.0%	42.8571%
Vadata	8.3333%	7.1429%

Table 2: Ownership and Control of Segment B

Party	Participation Interest	Voting Interest
Facebook affiliates: <ul style="list-style-type: none"> Kusu Pte. Ltd. (portion within Singapore territory) Edge (portion beyond Singapore territory) 	50.0%	50.0%
CMI	40.0%	40.0%
Vadata	10.0%	10.0%

Table 3: Ownership and Control of Segment C

Party	Participation Interest	Voting Interest
Facebook affiliates: <ul style="list-style-type: none"> Edge Network Services Hong Kong Limited (“Edge Hong Kong”) (portion within Hong Kong territory) Edge (portion beyond Hong Kong territory) 	33.3333%	33.3333%
CMI	55.5556%	55.5556%
Vadata	11.1111%	11.1111%

Table 4: Ownership and Control of Segment D

Party	Participation Interest	Voting Interest
Facebook affiliates: <ul style="list-style-type: none"> Edge Network Services Limited (Malaysia branch) (portion within Malaysian territory) Edge (portion beyond Malaysian territory) 	100%	100%

As none of Edge, Kusu Pte. Ltd., Edge Hong Kong, or Edge Network Services Limited (Malaysia branch) will use the U.S. endpoint of the BtoBE system, none is required to be a joint applicant for the cable landing license.¹³

The BtoBE system’s cable landing stations will be owned and controlled as shown in Table 5 below:

Table 5: Ownership and Control of Cable Landing Stations

Cable Landing Station	New or Existing Facility?	Ownership/Control
Grover Beach, California	Existing	Edge USA (control); PC Landing Corp. (ownership)
Singapore	Existing	CMI (control); Singapore Telecommunications Limited (ownership)
Chung Hom Kok, Hong Kong	Existing	CMI (control); GB21 (Hong Kong) Limited (ownership)
Cherating, Malaysia	Existing	Edge Network Services Limited (Malaysia branch) (control); TIME dotCom Berhad (ownership)

As noted in Table 5 above, in Grover Beach the BtoBE system will land at an existing cable landing station owned and operated by PC Landing Corp. under contract with Edge USA. As

¹³ *Id.* § 1.767(h).

stated in part II below, the Applicants seek a waiver of 47 C.F.R. § 1.767(h)(1), as PC Landing Corp. will have no ability to affect significantly the operation of the BtoBE system.

F. Certification Regarding Service to Executive Branch Agencies¹⁴

The Applicants have sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense. 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 PC Landing Corp. need not be a joint applicant for the BtoBE 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.”¹⁵ PC Landing Corp., however, will have no ability to affect significantly BtoBE’s operation. Inclusion of PC Landing Corp. as a joint applicant is also not necessary to ensure compliance by the Applicants collectively—or by Edge USA as the Grover Beach landing party controlling the landing arrangements—with the Cable Landing License Act, the Commission’s cable landing license rules, or the terms of any cable landing license. Grant of the waiver is therefore consistent with longstanding Commission precedent.¹⁶

¹⁴ See *id.* § 1.767(j).

¹⁵ 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)).

¹⁶ See, e.g., *Actions Taken Under Cable Landing License Act*, Public Notice, 32 FCC Rcd. 1436, 1437-1438 (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 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”

For BtoBE’s Grover Beach landing, PC Landing Corp. will provide limited services that would not provide it with any ability to affect significantly BtoBE’s operation. Edge USA will enter into an agreement with PC Landing Corp. granting them an IRU for PC Landing Corp.’s beach manhole and one of its bore pipes at Grover Beach and for a conduit connecting the beach manhole with PC Landing Corp.’s existing, highly-secure, and purpose-built cable landing station. Under the contemplated agreement, PC Landing Corp. will also grant to Edge USA a long-term lease for collocation space for power feed equipment in PC Landing Corp.’s cable landing station—space over which Edge USA, on behalf of the Applicants, will have exclusive control. Edge USA will seek to ensure that both the IRU and lease agreements will have initial 15-year terms, with the option of two five-year extensions that may be exercised at Edge USA’s sole discretion, for a maximum of 25 years each.

Edge USA, at the Applicants’ direction, will have exclusive control over the power feed equipment that they will locate in PC Landing Corp.’s cable landing station. Edge USA will retain operational authority over the BtoBE landing facilities at Grover Beach and provide

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”).

direction to PC Landing Corp. in all matters relating to the BtoBE system. The terminal equipment for all BtoBE's fiber pairs will be located within the Grover Beach cable landing station.

CONCLUSION

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

Respectfully submitted,

EDGE CABLE HOLDINGS USA, LLC
(as lead applicant)

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November 21, 2018

Attachments

LIST OF APPENDICES

Appendix A: Edge Cable Holdings USA, LLC, Information Responsive to 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k)

Appendix B: China Mobile International Limited Information Responsive to 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k)

Appendix C: Vadata, Inc., Information Responsive to 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k)

Appendix D: BtoBE Route Map

Appendix E: Grover Beach, California, Landing Point Information

Appendix F: Changi, Singapore, Landing Point Information

Appendix G: Chung Hom Kok, Hong Kong SAR, Landing Point Information

Appendix H: Cherating, Malaysia, Landing Point Information

APPENDIX A:

Edge Cable Holdings USA, LLC

Edge Cable Holdings USA, LLC (“Edge USA,” FRN 0025613159), a Delaware corporation with its principal place of business in Menlo Park California, will (together with its affiliates) hold participation and voting interests in the Bay-to-Bay Express (“BtoBE”) submarine cable system, as described in part I.E of the main narrative application. It will also contract with a third-party cable landing station owner for services pertaining to the Grover Beach, California landing, as described in part II of the main narrative application.

Edge USA is a wholly-owned, direct subsidiary of Facebook, Inc. (“Facebook”), a Delaware corporation with its principal place of business in Menlo Park, California. Edge USA provides connectivity exclusively to data centers and points of presence in the United States owned and operated by its affiliates. Edge USA currently holds a cable landing license for the Marea system,¹ and is a joint applicant for a cable landing license for the Hong Kong-Americas (“HKA”), Havfrue, Jupiter, and Pacific Light Communications Network (“PLCN”) systems.² Below, Edge USA provides information required by 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k).

(1) Applicant’s Name, Address, and Telephone Number³

Edge Cable Holdings USA, LLC
1601 Willow Road
Menlo Park, California 94025-1452
+1 650 543 4800

¹ File No. SCL-LIC-20160525-00012.

² File Nos. SCL-LIC-20180711-00018 (HKA), SCL-LIC-20180511-00010 (Havfrue), SCL-LIC-20180517-00012 (Jupiter), and SCL-LIC-20170421-00012 (PLCN).

³ See 47 C.F.R. § 1.767(a)(1).

(2) Applicant’s Place of Incorporation⁴

Edge USA is a Delaware limited liability company.

(3) Contact Information⁵

Correspondence concerning the application should be sent to the following:

Andrew Guhr
Associate General Counsel, Telecommunications
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and

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Counsel for Edge Cable Holdings USA, LLC

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁶

Edge USA certifies that it has the following 10-percent-or-greater direct or indirect interest holders, based on the most current data as of June 30, 2018:

- **Facebook, Inc. (“Facebook”)**
Address: 1601 Willow Road, Menlo Park, California 94025
Place of Organization: Delaware
Principal Business: software and technology
Relationship: Facebook holds a 100-percent voting and equity interest in Edge USA.

⁴ See *id.* § 1.767(a)(2).

⁵ See *id.* § 1.767(a)(3).

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

- **CZI Holdings, LLC (“CZI”)**

Address: 314 Lytton Avenue, Suite 200, Palo Alto, California 94301

Place of Organization: Delaware

Principal Business: philanthropy

Relationship: CZI owns 12.62 percent of Facebook’s outstanding shares and holds a 50.77-percent voting interest in Facebook.

- **Mark Zuckerberg**

Address: 1601 Willow Road, Menlo Park, California 94025

Citizenship: USA

Principal Business: software and technology

Relationship: Mr. Zuckerberg, who serves as Chairman and CEO of Facebook, owns all of CZI’s member interests and, together with his other ownership positions in Facebook, owns approximately 13.43-percent of Facebook’s outstanding shares and holds an approximate 58.84-percent voting interest in Facebook that includes (a) a 50.77-percent voting interest for shares he holds directly or controls through CZI; and (b) a 6.8-percent voting interest that he has authority to vote pursuant to voting agreements with (i) Dustin Moskovitz, Trustee of The Dustin Moskovitz 2008 Annuity Trust dated March 10, 2008, and (ii) Dustin Moskovitz, Trustee of The Dustin A. Moskovitz Trust dated December 27, 2005.

Facebook’s shares trade publicly on the NASDAQ Stock Market under the symbol “FB.”

As there is an active market in Facebook’s shares, Facebook’s share ownership is always fluid.

Moreover, Facebook 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 the most recent measurable date, June 30, 2018, Facebook has no 10-percent-or-greater direct or indirect shareholders other than CZI and Mr. Zuckerberg.

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

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁷

Edge USA certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁸

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁹

Edge USA certifies that it:

(A) is not a foreign carrier in any foreign destination market;

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

(C) is not affiliated with any foreign carrier and is not affiliated with any entity owning or controlling a cable landing station in any foreign destination market (although it is affiliated with Edge Network Holdings Limited, an entity that holds or will hold non-controlling ownership interests in cable landing stations in Blaabjerg, Denmark; Old Head Beach, Leckanvy, Ireland; and Bilbao, Spain).

(7) Certification Regarding Foreign Destination Markets¹⁰

Edge USA certifies to the following: (A) it is not a foreign carrier in Hong Kong, Malaysia, or Singapore, the three foreign destination markets in which the BtoBE cable system will land; (B) it does not control a foreign carrier in Hong Kong, Malaysia, or Singapore; (C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in Hong Kong, Malaysia, or Singapore; and (D) no grouping of two or more foreign carriers in Hong

⁷ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁸ 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.

⁹ See 47 C.F.R. § 1.767(a)(8)(ii).

¹⁰ See *id.* § 1.767(a)(8)(iii).

Kong, Malaysia, or Singapore (or parties that control foreign carriers in Hong Kong, Malaysia, or Singapore) 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 BtoBE cable system in the United States.

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹¹

No response is required.

(9) Certification Regarding Routine Conditions¹²

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

(10) Streamlining—Market Power¹³

Edge USA requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1). Edge USA certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in Singapore, Hong Kong, or Malaysia, the three foreign destination markets in which BtoBE will land.

(11) Streamlining—CZMA¹⁴

Edge USA certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). California, the only U.S. state in which the BtoBE system will land, does not

¹¹ See *id.* § 1.767(a)(8)(iv).

¹² See *id.* § 1.767(a)(9).

¹³ See *id.* § 1.767(j), (k).

¹⁴ See *id.*

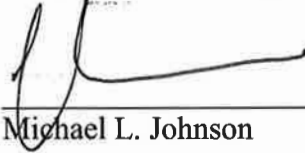
list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁵

¹⁵ See California Coastal Commission, California Coastal Management Program, List of Federal Licenses and Permits Subject to Certification for Consistency, <https://coast.noaa.gov/czm/consistency/media/ccc.pdf>.

CERTIFICATION

On behalf of Edge USA, 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.

Edge Cable Holdings USA, LLC



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November 20th, 2018

APPENDIX B:
CHINA MOBILE INTERNATIONAL LIMITED

China Mobile International Limited (“CMI,” FRN 0024510414), a Hong Kong limited company with its principal place of business in Hong Kong, will hold participation and voting interests in Segments A, B, and C of the Bay-to-Bay Express (“BtoBE”) submarine cable system, as described in part I.E of the main narrative application. CMI also owns and operates the Chung Hom Kok cable landing station in Hong Kong, where the BtoBE system will land. CMI will not participate in, or hold any capacity on, Segment D connecting to Malaysia.

CMI manages and operates the international businesses of China Mobile Limited (“CML”), of which it is a wholly-owned, indirect subsidiary. CMI provides voice, data, mobile, and value-added services. CMI is a joint cable landing licensee for the New Cross Pacific (“NCP”) and FASTER submarine cable systems.¹ Below, CMI provides information required by 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k).

(1) Applicant’s Name, Address, and Telephone Number²

China Mobile International Limited
Level 30, Tower 1, Kowloon Commerce Centre
No. 51 Kwai Cheong Road
Kwai Chung, New Territories
Hong Kong
+ 852 3975 6688

(2) Applicant’s Place of Incorporation³

CMI is a limited company organized under Hong Kong law.

¹ File Nos. SCL-LIC-20151104-00029 (NCP), SCL-LIC-20150626-00015 (FASTER).

² See 47 C.F.R. § 1.767(a)(1).

³ See *id.* § 1.767(a)(2).

(3) Contact Information⁴

Karen Lau
General Counsel
China Mobile International Limited
Level 30, Tower 1, Kowloon Commerce Centre
No. 51 Kwai Cheong Road
Kwai Chung, New Territories
Hong Kong SAR
+852 3975 6738
karenlau@cmi.chinamobile.com

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for China Mobile International Limited

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁵

CMI certifies to the following. CMI has the following 10-percent-or-greater direct or indirect interest holders:

China Mobile International Holdings Limited (“CMIHL”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong

Place of Organization: Hong Kong SAR

Principal Business: investment holding company

Relationship: CMIHL holds a 100-percent voting and equity interest in CMI.

China Mobile Limited (“CML”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong

Place of Organization: Hong Kong SAR

Principal Business: telecommunications

Relationship: CML holds a 100-percent voting and equity interest in CMIHL.

⁴ See *id.* § 1.767(a)(3).

⁵ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

China Mobile Hong Kong (BVI) Limited (“CMHK-BVI”)

Address: P.O. Box 957, Offshore Incorporations Center, Road Town, Tortola, British Virgin Islands

Place of Organization: British Virgin Islands

Principal Business: investment holding company

Relationship: CMHK-BVI holds a 72.72-percent voting and equity interest in CML.

China Mobile (Hong Kong) Group Limited (“CMHKG”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong

Place of Organization: Hong Kong SAR

Principal Business: investment holding company

Relationship: CMHKG holds a 100-percent voting and equity interest in CMHK-BVI.

China Mobile Communications Corporation (“CMCC”)

Address: 29 Jin Rong Avenue, Xicheng District, Beijing 100032, People’s Republic of China

Place of Organization: People’s Republic of China

Principal Business: investment holding company

Relationship: CMCC holds a 100-percent voting and equity interest in CMHKG.

CMCC is a state-owned enterprise subject to the supervision of the State-Owned Assets Supervision and Administration Commission (“SASAC”) of the State Council of the People’s Republic of China. SASAC is a government entity located at No. 26, Xidajie, Xuanwumen, Xicheng District, Beijing 100053, People’s Republic of China. The Chinese Government owns 100 percent of CMCC.

The following corporate officers and directors of CMI are also officers or directors of other foreign carriers:

- Li Feng, who is a director of CMI, is also a director of China Mobile International (UK) Limited and China Mobile International (Singapore) Pte. Ltd.
- Lei Liqun, who is a director of CMI, is also a director of China Mobile International (UK) Limited, China Mobile International (Singapore) Pte. Ltd., China Mobile International KK (a carrier in Japan), China Mobile International (Germany) GmbH

- Shen Weizhong, who is a director of CMI, is also a director of China Mobile International KK, China Mobile International (Germany) GmbH, and China Mobile International (Brazil) Holdings Ltda.

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁶

By its signature below, CMI certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁷

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁸

CMI certifies that it:

- (A) is a foreign carrier in Hong Kong;
- (B) owns or controls a cable station in Hong Kong; and
- (C) is affiliated with the foreign carriers listed in Table 1 below, including two that own or control cable landing stations.

TABLE 1: AFFILIATED FOREIGN CARRIERS

Entity	Destination Market	Owens/Controls Cable Landing Station? Y/N
China Mobile International (Australia) Pty Ltd	Australia	N
China Unicom (Australia) Operations Pty Limited	Australia	N
China Telecom BLR LLC	Belarus	N
China Mobile International (Brazil) Holdings Ltd	Brazil	N
China Telecom do Brasil Ltda.	Brazil	N
China Mobile International (Canada) Inc.	Canada	N
China Telecom (Canada) Corporation	Canada	N

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁷ 21 U.S.C. § 862(a). The Anti-Drug Abuse Act of 1988, Pub. L. 100-690, title V, § 5301, 102 Stat. 4181 (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 (1990), and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

⁸ See 47 C.F.R. § 1.767(a)(8)(ii).

Entity	Destination Market	Owns/Controls Cable Landing Station? Y/N
China Communications Services Corporation Limited	China	N
China Mobile Group Anhui Company Limited	China	N
China Mobile Group Beijing Company Limited	China	N
China Mobile Group Chongqing Company Limited	China	N
China Mobile Group Fujian Company Limited	China	N
China Mobile Group Gansu Company Limited	China	N
China Mobile Group Guangdong Company Limited	China	N
China Mobile Group Guangxi Company Limited	China	N
China Mobile Group Guizhou Company Limited	China	N
China Mobile Group Hainan Company Limited	China	N
China Mobile Group Hebei Company Limited	China	N
China Mobile Group Heilongjiang Company Limited	China	N
China Mobile Group Henan Company Limited	China	N
China Mobile Group Hubei Company Limited	China	N
China Mobile Group Hunan Company Limited	China	N
China Mobile Group Jiangsu Company Limited	China	N
China Mobile Group Jiangxi Company Limited	China	N
China Mobile Group Jilin Company Limited	China	N
China Mobile Group Liaoning Company Limited	China	N
China Mobile Group Neimenggu Company Limited	China	N
China Mobile Group Ningxia Company Limited	China	N
China Mobile Group Qinghai Company Limited	China	N
China Mobile Group Shaanxi Company Limited	China	N
China Mobile Group Shandong Company Limited	China	N
China Mobile Group Shanghai Company Limited	China	N
China Mobile Group Shanxi Company Limited	China	N
China Mobile Group Sichuan Company Limited	China	N
China Mobile Group Tianjin Company Limited	China	N
China Mobile Group Xinjiang Company Limited	China	N
China Mobile Group Xizang Company Limited	China	N
China Mobile Group Yunnan Company Limited	China	N
China Mobile Group Zhejiang Company Limited	China	N
China Satellite Communications Co. Ltd.	China	N
China Telecom Corporation Limited	China	N
China Unicom Broadband Online Limited Corporation	China	N
China Unicom Information Navigation Company Limited	China	N
China United Network Communications Corporation Limited	China	N
China United Telecommunications Corporation Ltd.	China	N

Entity	Destination Market	Owns/Controls Cable Landing Station? Y/N
Shenzhen Shekou Telecommunications Company Limited	China	N
Tianyi Telecom Terminals Company Limited	China	N
Unicom New Horizon Telecommunications Company Limited	China	N
Unicom New Horizon Telecommunications Company Limited	China	N
China Mobile International France	France	N
China Telecom (France) Limited	France	N
China Mobile International (Germany) GmbH	Germany	N
China Telecom (Deutschland) GmbH	Germany	N
China Mobile Hong Kong Company Limited	Hong Kong	N
China Mobile Hong Kong Limited	Hong Kong	N
China Telecom Global Limited	Hong Kong	Y
China Telecom India Private Limited	India	N
PT China Telecom Indonesia	Indonesia	N
China Mobile International K.K.	Japan	N
China Telecom Global Limited Japan Branch	Japan	N
China Telecom (Japan) K.K.	Japan	N
China Telecom (Kazakhstan) Limited Liability Partnership	Kazakhstan	N
China Telecom (Kenya) Limited	Kenya	N
China Mobile International Korea Limited	Korea	N
China Telecom Korea Co., Ltd.	Korea	N
China Telecom (Macau) Company Limited	Macau	N
China Mobile International (Malaysia) Sdn.Bhd.	Malaysia	N
China Telecom (Malaysia) Sdn Bhd	Malaysia	N
China Telecom (Africa and Middle East) Limited	Mauritius	N
China Telecom (Myanmar) Limited	Myanmar	N
China Mobile Pakistan Ltd d/b/a Zong	Pakistan	N
China Telecom Pakistan (PVT.) Limited	Pakistan	N
Limited Liability Company (LLC) "China Telecom"	Russia	N
China Mobile International (Singapore) Pte. Ltd.	Singapore	N
China Telecom (Singapore) Pte. Limited	Singapore	N
China Mobile International South Africa (Pty) Ltd	South Africa	N
China Telecom South Africa (Pty) Ltd.	South Africa	N
China Telecom Lanka (Private) Limited	Sri Lanka	N
China Telecom (Thailand) Ltd	Thailand	N
China Mobile International Middle East FZ-LLC	UAE	N
China Telecom Middle East FZ-LLC	UAE	N
China Mobile International (UK) Limited	United Kingdom	N
China Telecom (Europe) Limited	United Kingdom	N

Entity	Destination Market	Owns/Controls Cable Landing Station? Y/N
China Telecom Information Technology (Vietnam) Co., Ltd	Vietnam	N

Although CMI is (indirectly) under common control with China United Network Communications Group Co., Ltd. (“China Unicom”), China Telecommunications Corporation (“CTC”), and their subsidiaries due to their ultimate common ownership by the Chinese Government, these companies are structurally and legally separate and operate independently of each other. They have separate directors, management, and employees and deal with each other on a strictly arm’s length basis. Indeed, these companies and their operating subsidiaries compete vigorously with each other, and CMI enjoys no legal or practical advantage over other competitive carriers in obtaining interconnection and related services from China Unicom, CTC, or their subsidiaries. CMI has no first-hand knowledge of or access to information about the investments and operations of China Unicom, CTC, or their subsidiaries.

(7) Certification Regarding Foreign Destination Markets⁹

CMI certifies to the following:

- (A) it is a foreign carrier in Hong Kong, one of the three foreign destination markets in which the BtoBE system will land;
- (B) it controls foreign carriers in Singapore, Hong Kong, and Malaysia, as described in item 6 above;
- (C) an entity indirectly owning and controlling CMI, the SASAC, also owns and controls China Unicom and CTC and therefore indirectly owns and controls

⁹ See *id.* § 1.767(a)(8)(iii).

foreign carriers in Singapore, Hong Kong, and Malaysia, as noted item 6 above;
and

(D) no grouping of two or more foreign carriers in Singapore, Hong Kong, or Malaysia (or parties that control foreign carriers in Singapore, Hong Kong, or Malaysia) 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 BtoBE system in the United States.

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹⁰

By its signature below, CMI certifies that Singapore, Hong Kong, and Malaysia, the only destination markets identified above in response to 47 C.F.R. § 1.767(a)(8), are all members of the World Trade Organization.¹¹

(9) Certification Regarding Routine Conditions¹²

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

(10) Streamlining—Market Power¹³

CMI requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(2), based on affiliation with one or more non-dominant carriers in Hong Kong. CMI is affiliated with China

¹⁰ See *id.* § 1.767(a)(8)(iv).

¹¹ See World Trade Organization, Members and Observers as of July 29, 2016, https://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

¹² See 47 C.F.R. § 1.767(a)(9).

¹³ See *id.* § 1.767(j), (k).

Unicom, CTC, and their foreign carrier subsidiaries, some of which are foreign carriers in China having greater than fifty-percent market share in either the international-transport or local access markets of China.

(11) Streamlining—CZMA¹⁴

CMI certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). California, the only U.S. state in which the BtoBE system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁵

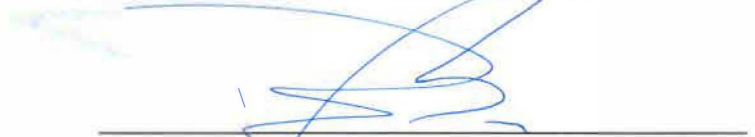
¹⁴ *See id.* § 1.767(k)(4).

¹⁵ *See* California Coastal Commission, California Coastal Management Program, List of Federal Licenses and Permits Subject to Certification for Consistency, <https://coast.noaa.gov/czm/consistency/media/ccc.pdf>.

CERTIFICATION

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

China Mobile International Limited



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November 20, 2018

APPENDIX C:
VADATA, INC.

Vadata, Inc. (“Vadata,” FRN 0022171425), a Delaware corporation with its principal place of business in Seattle, Washington, will hold participation and voting interests in Segments A, B, and C of the Bay-to-Bay Express (“BtoBE”) submarine cable system, as described in part I.E of the main narrative application. Vadata will not participate in, or hold any capacity on, Segment D connecting to Malaysia, nor will it have an ownership interest in any of the cable landing stations.

Vadata is a wholly-owned, indirect subsidiary of Amazon.com, Inc. (“Amazon”). Vadata holds from the Commission multiple universal radio licenses for private mobile communications and is a joint applicant for the cable landing license for the JUPITER submarine cable system.¹ Below, Vadata provides information required by 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k).

(1) Applicant’s Name, Address, and Telephone Number²

Vadata, Inc.
410 Terry Avenue North
Seattle, Washington 98109-5210
+1 206 266 1000

(2) Applicant’s Place of Incorporation³

Vadata is a corporation organized under Delaware law.

¹ File No. SCL-LIC-20180517-00012.

² See 47 C.F.R. § 1.767(a)(1).

³ See *id.* § 1.767(a)(2).

(3) Contact Information⁴

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 Amazon
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 tgaugler@amazon.com

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 Principal Technical Business Developer
 Amazon
 15 St. Botolph Street
 3rd Floor Beaufort House
 London, EC3A 7DT
 United Kingdom
 +44 (0) 2037534782
 tsk@amazon.co.uk

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁵

Vadata certifies to the following. Vadata has the following 10-percent-or-greater direct or indirect interest holders:

Amazon.com Services, Inc.

Address: 410 Terry Avenue North, Seattle, Washington 98109-5210

Citizenship: USA

Principal Business: electronic commerce and cloud computing

Relationship: Amazon.com Services, Inc. holds a 100-percent equity-and-voting interest in Vadata.

Amazon.com, Inc. (“Amazon”)

Address: 410 Terry Avenue North, Seattle, Washington 98109-5210

Citizenship: USA

Principal Business: electronic commerce and cloud computing

Relationship: Amazon holds a 100-percent equity-and-voting interest in Amazon.com Services, Inc.

⁴ See *id.* § 1.767(a)(3).

⁵ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

Jefferey P. Bezos

Address: 410 Terry Avenue North, Seattle, Washington 98109-5210

Citizenship: USA

Principal Business: electronic commerce and cloud computing

Relationship: Mr. Bezos, who serves as Chairman, President and CEO of Amazon, owned as of August 31, 2018 approximately 16.2 percent of Amazon's outstanding shares. Mr. Bezos held sole voting and investment power with respect to 78,885,140 shares and shared voting and investment power with respect to 6,822 shares.

Amazon's shares trade publicly on the NASDAQ Stock Market under the symbol "AMZN." As there is an active market in Amazon's shares, Amazon's share ownership is always fluid. Moreover, Amazon can only ascertain its significant shareholders on the basis of SEC filings that are required to be made by such shareholders pursuant to Sections 13 and 16 of the Securities Exchange Act of 1934 and may not know of possibly related or affiliated shareholders that are not disclosed to it. Recognizing these limitations, as of the most recent measurable date, August 31, 2017, Amazon has no 10-percent-or-greater direct or indirect shareholder other than Mr. Bezos.

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

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁶

Vadata certifies that Vadata is not subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁷

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁷ 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.

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁸

Vadata certifies that it:

(A) is not a foreign carrier in any foreign destination market;

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

(C) is not affiliated with any foreign carrier and is not affiliated with any entity owning or controlling a cable landing station in any foreign destination market.

(7) Certification Regarding Foreign Destination Markets⁹

Vadata certifies to the following: (A) it is not a foreign carrier in Singapore, Hong Kong, or Malaysia, the three foreign destination markets in which the BtoBE system will land; (B) it does not control a foreign carrier in Singapore, Hong Kong, or Malaysia; (C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in Singapore, Hong Kong, or Malaysia; and (D) no grouping of two or more foreign carriers in Singapore, Hong Kong, or Malaysia (or parties that control foreign carriers in Singapore, Hong Kong, or Malaysia) 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 BtoBE system in the United States.

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹⁰

No response is required, as Vadata did not identify any foreign carriers in response to 47 C.F.R. § 1.767(a)(8)(iii).

⁸ See 47 C.F.R. § 1.767(a)(8)(ii).

⁹ See *id.* § 1.767(a)(8)(iii).

¹⁰ See *id.* § 1.767(a)(8)(iv).

(9) Certification Regarding Routine Conditions¹¹

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

(10) Streamlining—Market Power¹²

Vadata requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1). Vadata certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in Singapore, Hong Kong, or Malaysia, the three foreign destination markets in which the BtoBE system will land.

(11) Streamlining—CZMA¹³

Vadata certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). California, the only U.S. state in which the BtoBE system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁴

¹¹ *See id.* § 1.767(a)(9).

¹² *See id.* § 1.767(j), (k).

¹³ *Id.*

¹⁴ *See* California Coastal Commission, California Coastal Management Program, List of Federal Licenses and Permits Subject to Certification for Consistency, https://www.coastal.ca.gov/fedcd/listlic_2015.pdf.

CERTIFICATION

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

Vadata, Inc.

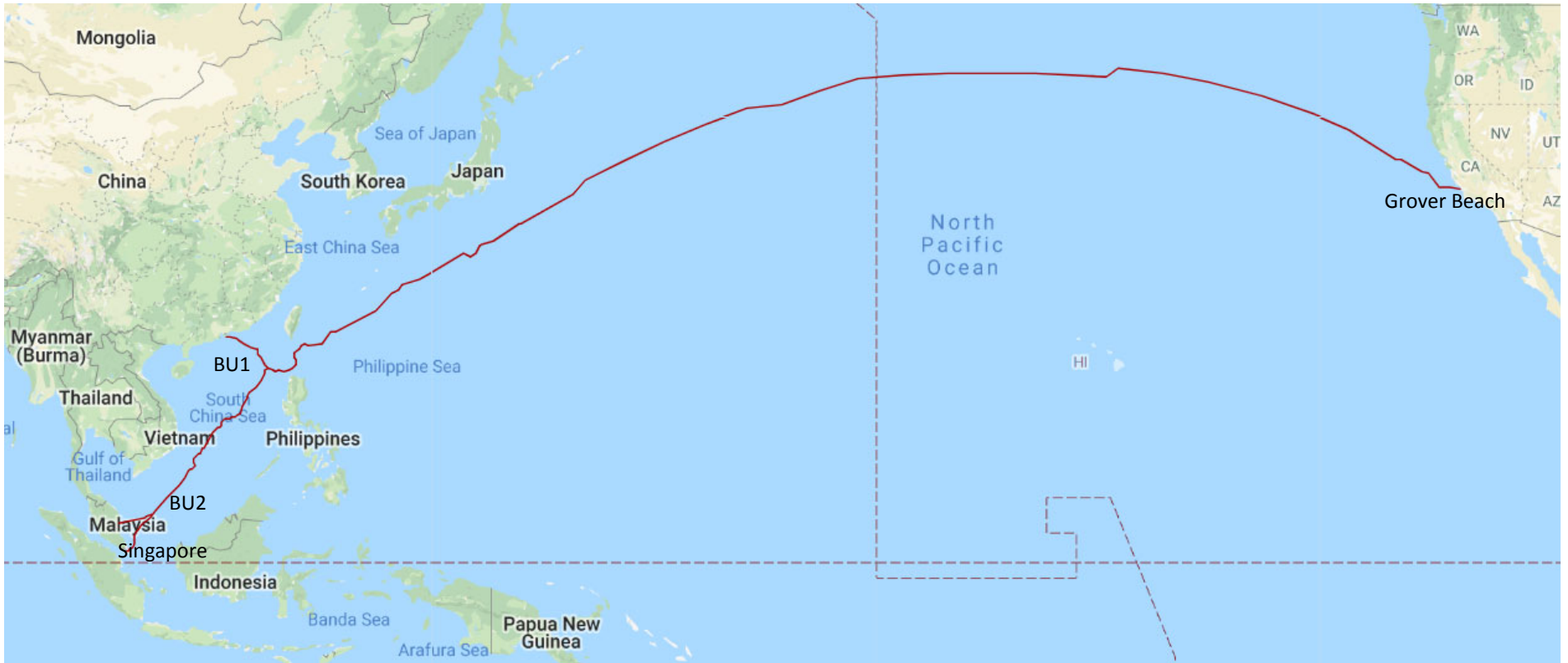
DocuSigned by:
Chris Vonderhaar
AC5CD5C76CB040A...

Chris Vonderhaar
VP, Infrastructure

410 Terry Avenue North
Seattle, Washington 98109-5210
+1 206 266 1000
vonder@amazon.com

November 16, 2018

**APPENDIX D:
BtoBE ROUTE MAP**



APPENDIX E:

GROVER BEACH, CALIFORNIA, LANDING POINT INFORMATION



Beach manhole geographic coordinates: 35° 7'20.83"N / 120°37'56.13"W
Cable landing station address: 948 Huber Street, Grover Beach, California 93433
Cable landing station geographic coordinates: 35° 6'43.36"N / 120°37'21.94"W

APPENDIX F:
CHANGI, SINGAPORE, LANDING POINT INFORMATION



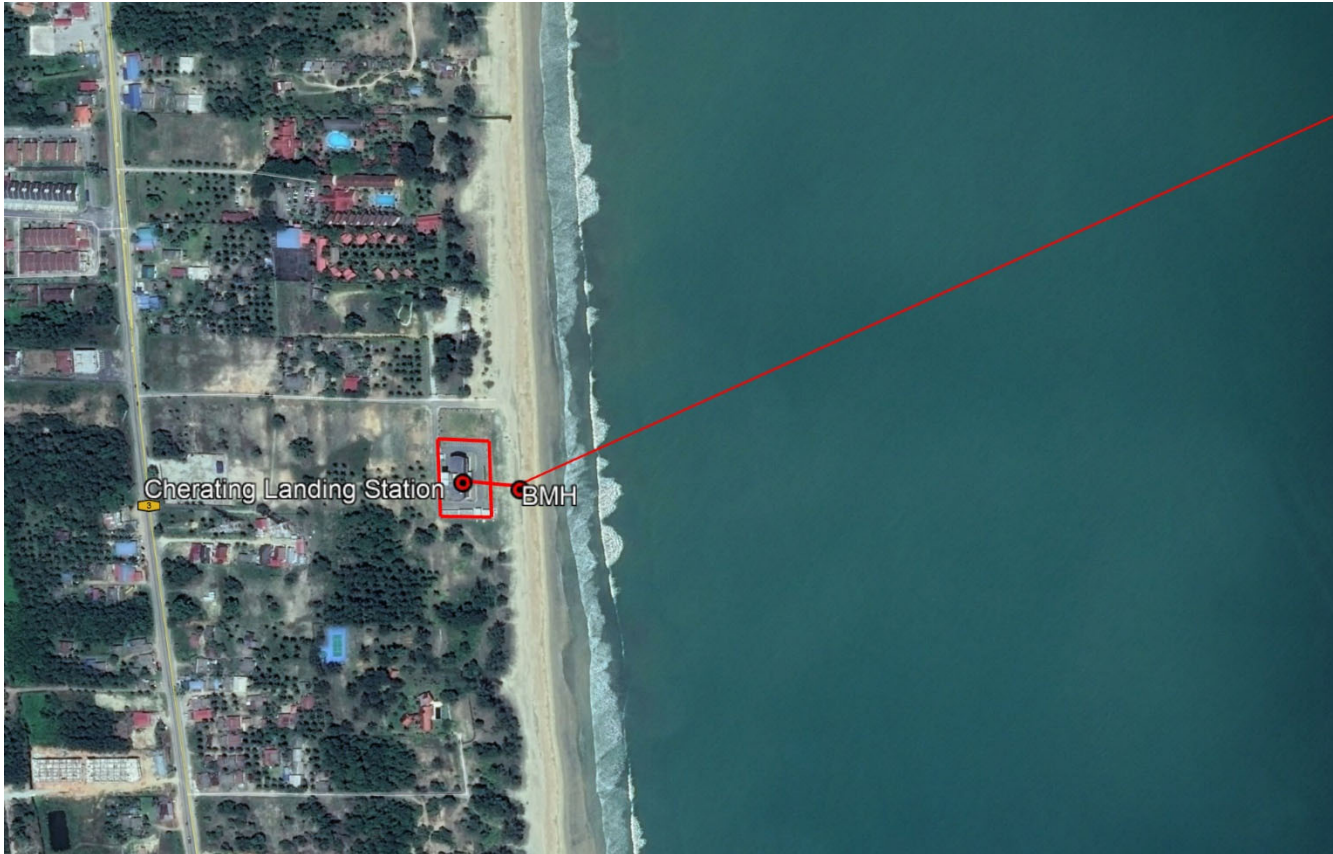
Beach manhole geographic coordinates: 1°22'18.86"N / 104° 0'22.09"E
Cable landing station address: 960 Upper Changi Road North, Singapore 507714
Cable landing station geographic coordinates: 1°21'35.38"N / 103°58'12.51"E

APPENDIX G:
CHUNG HOM KOK, HONG KONG SAR, LANDING POINT INFORMATION



Beach manhole geographic coordinates: 22°12'55.02"N / 114°12'22.46"E
Cable landing station address: RBL1154, Teleport, Chung Hom Kok, Hong Kong
Cable landing station geographic coordinates: 22°12'51.10"N / 114°12'21.05"E

APPENDIX H:
CHERATING, MALAYSIA, LANDING POINT INFORMATION



Beach manhole geographic coordinates: 4° 5'48.93"N / 103°23'5.65"E
Cable landing station geographic coordinates: 4° 5'48.69"N / 103°23'7.68"E

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 BtoBE submarine cable system, by hand delivery or electronic mail this 21st 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
EB/CIP : Room 4634
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Washington, D.C. 20520-4634

Kathy Smith
Chief Counsel
U.S. DEPARTMENT OF COMMERCE/NTIA
14th Street and Constitution Avenue, N.W.
Room 4713
Washington, D.C. 20230

William E. Brazis II
General Counsel
DEFENSE INFORMATION SYSTEMS AGENCY
6910 Cooper Avenue
Fort Meade, Maryland 20755



Kent Bressie