

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)
)
The Columbus II Submarine Cable System) File No. SCL-LIC-19921110-00004
Operating Between the United States)
Mainland and St. Thomas in the U.S. Virgin)
Islands)

APPLICATION FOR CABLE LANDING LICENSE

The Columbus II Consortium, pursuant to 47 U.S.C. §§ 34-39, Executive Order 10,530, and 47 C.F.R. § 1.767, hereby applies for a cable landing license for the Columbus II Cable System to allow the continued operation of this domestic submarine cable for an additional 25-year term following the expiration of the existing cable landing license on October 1, 2019.¹

The Columbus II Cable System links the U.S. Mainland with the U.S. Virgin Islands and connects to other cables serving other Caribbean islands and Central and South America. The cable has operated successfully for 24 years pursuant to the cable landing license granted in 1992, has been upgraded six times between 2009 and 2018, currently provides more than 600 Gbps of available capacity, and has a design capacity of 800 Gbps. The continued operation of this cable will serve customers in the United States by providing bandwidth capacity for broadband traffic between the U.S. Mainland and the U.S. Virgin Islands with connections to

¹ The Columbus II Cable System commenced operation on October 1, 1994, pursuant to its original cable landing license granted on July 13, 1993. *See American Telephone & Telegraph Company, et al.*, 8 FCC. Rcd. 5038 (1993). The international segments of Columbus II were retired in June 2009. *See Public Notice, Actions Taken Under the Cable Landing License Act*, 24 FCC Rcd. 7051 (2009). Since that time, only the domestic segment of Columbus II, linking the U.S. Mainland and St. Thomas in the U.S. Virgin Islands, has continued in operation. *Id.* This application requests the continued operation of this domestic segment.

international routes serving the Caribbean and Central and South America. The reauthorization of the Columbus II submarine cable is therefore strongly in the U.S. public interest.

I. DESCRIPTION OF THE CABLE SYSTEM

The Columbus II Cable System is a common carrier submarine cable connecting the U.S. Mainland with St. Thomas in the U.S. Virgin Islands. The cable is 2,070 kilometers in length, consists of two fiber pairs, and has a current design capacity of 800 Gbps per second. The United States terminal points currently operate at up to 600 Gbps. The cable was upgraded from its original capacity of 5 Gbps to 600 Gbps. The upgraded cable provides a robust platform to support broadband traffic and interconnects with existing submarine cables serving points in the Caribbean and Central and South America, including the St. Thomas-St. Croix, Pan Am and Taino-Carib cables.

The Columbus II consortium is comprised of 21 members who are parties to the Columbus II Construction and Maintenance Agreement (“C&MA”). Each party has a varying degree of voting rights and ownership in the cable corresponding to its level of investment in the cable. The three parties with greater than 5% ownership interest, individually or through their wholly-owned affiliates, are: AT&T Corp.; Servicio di Telecomunicacia di Aruba (SETAR) N.V.; and Telefonica Larga Distancia De Puerto Rico, Inc.² Greater detail regarding each of these entities is provided in the attached individual appendices (A – C). All three parties with greater than 5% ownership interests are parties to the instant application.

The Columbus II Cable System has two landing stations, at West Palm Beach, Florida, and Magens Bay, St Thomas in the U.S. Virgin Islands. The Columbus II parties jointly own landing station equipment, including submarine line

² Antelecom N.V., which currently holds an interest of 5% or above, has informed AT&T that it will withdraw from the cable when the current license terminates.

terminal equipment and optical distribution frames, which collectively provide the interface between the submersible cable and each party's terrestrial network. The cable landing party owns the buildings housing the landing stations, its own network protection equipment and digital cross connects, and its share of the jointly-owned facilities.³ AT&T Corp. owns the landing station in West Palm Beach, Florida, and AT&T of the Virgin Islands, Inc., a wholly-owned subsidiary of AT&T Corp., owns the landing station in Magens Bay, St Thomas. Further details of the landing stations are in Appendix D.

Any member of the consortium may enhance the capabilities of the Columbus II Cable System by exercising the right to upgrade the system, as long as that party (and others that join in the expansion) covers the cost of the upgrade, and the upgrading parties have approval of the General Committee. Any member may transfer its right to use capacity to any of its subsidiaries or affiliates. In addition, there are no restrictions on the resale of capacity, which means that any member may sell private IRUs to any properly licensed non-member (either individually or through collaborative agreements).

II. PUBLIC INTEREST STATEMENT

The continued operation of the Columbus II Cable System is overwhelmingly in the public interest by continuing to help meet the demand for voice, data and Internet traffic on routes between the U.S. Mainland and the U.S. Virgin Islands, and between these points and various Caribbean islands, and Central and South America. The cable also will continue to provide important facilities-based competition on these routes and to enhance service quality, increase resiliency, and decrease latency in serving the above routes.

³In addition, the C&MA requires AT&T to provide other U.S. owners with colocation space, at or near such stations, to be used with their capacity on the Columbus II cable.

The reauthorization of the Columbus II Cable System will allow the continued operation of an upgraded network capable of handling the full range of emerging voice and data services and technologies, including multimedia and Internet services. The demand for communications services on these routes is increasing with the growth of broadband traffic, and the continued operation of the upgraded cable will provide facilities to meet this demand.⁴ The Columbus II Cable System also increases facilities-based competition on United States-Caribbean and United States-South American routes by providing an important connection for other cables,⁵ as well as an alternative to the Americas II and Columbus II cables in linking the U.S. Mainland with the U.S. Virgin Islands. The cable greatly improves service quality, adds capacity and diversity and provides increased resiliency to the above routes.

Maintaining reliable international communications facilities serving the U.S. Virgin Islands is particularly important following the “massive damage” to these islands⁶ and “catastrophic impact” caused by Hurricane Maria.⁷ As the U.S. Virgin Islands continues to work

⁴ See, e.g., *Unleashing the Internet in the Caribbean*, UNCTAD, Feb. 2017, at 6 (“Caribbean countries are increasingly looking to the internet to drive economic and social development.”) available at:

https://cdn.prod.internetsociety.org/wp-content/uploads/2017/08/ISOC_Unleashing_Internet_in_Caribbean_20170221.pdf.

⁵ The Columbus II cable (via the St. Thomas-St. Croix cable) connects with the Americas-2 cable to Martinique, Curacao, Trinidad and Tobago, Venezuela, French Guyana and Brazil. The Columbus II cable (via the Taino-Carib cable) also connects with the Eastern Caribbean Fiber System serving Montserrat, Dominica, St. Lucia, Barbados, Grenada, and Trinidad and Tobago, the Pan Am cable serving Aruba, Chile, Colombia, Ecuador, Panama, Peru, and Venezuela, and the Pacific Caribbean Cable System with landing points in Central and South America.

⁶ *Connect America Fund*, WC Docket No. 10-90, Order, 2017 WL 4479977, rel. Oct 4, 2017, ¶ 1. See also, *The Uniendo a Puerto Rico Fund and the Connect USVI Fund*, Order and Notice of Proposed Rulemaking, WC Docket No. 18-143, rel. May 29, 2018 (approving additional funding to restore communications networks in Puerto Rico and the Virgin Islands and seeking comment on almost \$900 million in long-term funding for network expansion).

⁷ Press Release, FCC, Chairman Pai Statement on Hurricane Maria (Sept. 21, 2017).

to overcome these major challenges, it is even more critical to avoid any diminution in the communications facilities that link consumers in this territory with the rest of the world.

III. INFORMATION REQUIRED BY 47 C.F.R. § 1.767

The information requested by 47 C.F.R. § 1.767(a)(1)-(3) and (8)-(9) of the Commission's rules for each of the applicants can be found in the attached appendices as follows:

APPENDIX A: AT&T Corp.

APPENDIX B: Servicio di Telecommunicacia di Aruba (SETAR) N.V.

APPENDIX C: Telefonica Larga Distancia De Puerto Rico, Inc.

The information required by Section 1.767(a)(4)-(7) is provided below.

Information Required by 47 C.F.R. § 1.767(a)(4) through (7):

(4) Description of the Cable

See Section I above. A map of the Columbus II Cable System is included at Appendix E.

(5) Landing Points

Information about the two landing points of the Columbus II Cable System is included as Appendix D as follows:

Tab 1: West Palm Beach, FL.

Tab 2: Magens Bay, St. Thomas, VI

(6) Common Carrier or Non-Common Carrier Status

The Columbus II Cable System will continue to be operated as a common carrier cable.

(7) A list of the proposed owners of the cable system, including each U.S. cable landing station, their respective voting and ownership interests in each U.S. cable landing station, their respective voting interests in the wet link portion of the cable system, and their respective ownership interests by segment in the cable

The ownership and voting interests of the Columbus II Cable System, including the jointly held equipment in the landing stations and the wet link portion of the single segment of the cable, are as follows:

| Party | Ownership | Voting |
|---|------------------|---------------|
| Administracion Nacional de Telecomunicaciones | 0.04656% | 0.04656% |
| Administracion Nacional de Telecomunicaciones Public Administration | 0.11968% | 0.11968% |
| Antelecom N.V. | 6.18850% | 6.18850% |
| A1 Telekom Austria AG | 0.04656% | 0.04656% |
| AT&T Corp. | 66.03614% | 66.03614% |
| Atlantic Teleconnection Operating Company, Limited | 0.79790% | 0.79790% |
| Cable & Wireless (Barbados) Limited | 0.39895% | 0.39895% |
| Cable & Wireless (BVI) Limited | 1.27903% | 1.27903% |
| Corporacion Nacional de Telecomunicaciones CNT E.P. | 0.04656% | 0.04656% |
| Compania Dominicana de Telefonos, S.A. | 4.10917% | 4.10917% |
| Empresa Nacional De Telecomunicaciones S.A. | 0.95748% | 0.95748% |
| Global Crossing Americas Solutions | 0.04656% | 0.04656% |
| Global Interlink, Ltd. | 1.39752% | 1.39752% |
| Empresa Guatemalteca de Telecomunicaciones | 0.04656% | 0.04656% |
| PREPA.Net International Wholesale Transport Inc. | 0.63832% | 0.63832% |
| Primus Telecommunications, Inc. | 1.51601% | 1.51601% |
| Rostelecom | 0.11968% | 0.11968% |
| Servicio di Telecomunicacion di Aruba (SETAR) N.V. | 10.33757% | 10.33757% |
| Sri Lanka Telecom | 0.04656% | 0.04656% |
| Telefonica Larga Distancia De Puerto Rico, Inc. | 5.62518% | 5.62518% |
| Turk Telekomunikasyon A.S. | 0.19947% | 0.19947% |

The ownership of the landing stations is as follows:

| Party | Landing Station |
|----------------------------------|---|
| AT&T Corp. | West Palm Beach, Florida |
| AT&T of the Virgin Islands, Inc. | Magens Bay, St. Thomas, U.S. Virgin Islands |

IV. ADDITIONAL MATTERS

Request for Waiver of Section 1.767(h)(1). The Applicants request a waiver of Section 1.767(h)(1) of the Commission’s rules, so that AT&T of the Virgin Islands, Inc. need not be a joint applicant for the Americas I 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.”⁸ AT&T of the Virgin Islands, Inc., which owns the Magens Bay, Virgin Islands cable landing station, will not have any ability to affect significantly the operation of the Americas I cable. AT&T of the Virgin Islands, Inc. is a 59.10% owned indirect subsidiary of AT&T Corp., one of the Applicants for this authorization, and a wholly owned indirect subsidiary of AT&T Inc., the 100% parent of AT&T Corp.⁹ Additionally, all personnel who operate this landing station are supervised, directly or indirectly, by AT&T Corp. personnel. AT&T Corp. has and will retain operational authority over the Magens Bay, Virgin Islands cable landing facilities and will continue to provide direction to AT&T of the Virgin Islands, Inc. in all matters relating to the Columbus II Cable System. Accordingly, the inclusion of AT&T of the Virgin Islands, Inc. as a joint applicant is not necessary to ensure compliance by the Applicants

⁸ See *Actions Taken Under the Cable Landing License Act*, 23 FCC Rcd. 227, 229 (2008) citing *Review of Commission Consideration of Applications under the Cable Landing License Act*, 16 FCC Rcd. 22,167, 22,194-95 ¶¶ 53-54 (2001).

⁹ AT&T of the Virgin Islands, Inc. is 100% owned by Beach Holding Corp, which is 40.90% owned by SBC Telecom, Inc., 29.48% owned by AT&T International Holdings, LLC, and 29.62% owned by AT&T Corp. SBC Telecom, Inc. is 100% owned by AT&T Teleholdings, Inc., which is 100% owned by AT&T Inc. AT&T International Holdings, LLC is 100% owned by AT&T Corp.

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.¹⁰

Section § 1.767(a)(8)(iii). Based on their understanding that the certification requested by 47 C.F.R. Sect. § 1.767(a)(8)(iii) refers only to applications to land or operate a submarine cable connecting the United States to a foreign country, and because this application seeks to renew the cable landing license for a cable connecting only U.S. points, the Applicants certify that they do not seek to land or operate a submarine cable connecting the United States to any country for which any of the statements listed in 47 C.F.R. Sect. § 1.767(a)(8)(iii) (A)-(D) is true. If the Applicants are mistaken in their understanding of the scope of this certification, they will amend this certification to any extent that may be necessary to reflect that different scope.

Coastal Zone Management Act: 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. Sect. 1456(c)(3)(A).¹¹ Neither Florida

¹⁰ See, e.g., *Actions Taken Under the Cable Landing License Act*, 32 FCC Rcd. 1436, 1437 (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 the Cable Landing License Act*, 24 FCC Rcd. 7828, 7829-30 (2009) (accepting the applicants’ representations that “Tata will not be able to affect significantly the operation of HANTRU-1” and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under the Cable Landing License Act*, Public Notice, 24 FCC Rcd. 226. 227-28 (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 the Cable Landing License Act*, 23 FCC Rcd. 13,419, 13,420 (2008) (declining to require that Tata Communications (US) Inc. 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.”).

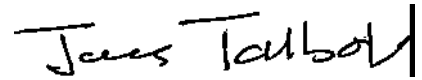
¹¹ See 47 C.F.R. § 1.767(k)(4).

CERTIFICATION

I am authorized to enter this certification on behalf of AT&T Corp.

All of the information contained in this application and Appendix A is true and correct to the best of my knowledge and belief.

Dated: March 6, 2019



James Talbot
AVP-Senior Legal Counsel,
AT&T Services, Inc. &
Assistant Secretary AT&T
Corp.
1120 20th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone: (202) 457-3048

APPENDIX A –AT&T CORP.

AT&T Corp. (“ATTC”) is a direct, wholly-owned subsidiary of AT&T Inc. (“AT&T”). AT&T, through its affiliates, operates an advanced global backbone network, serves millions of customers around the world, including residential, small-business, wholesale, enterprise, global and government customers, and delivers a portfolio of traditional and IP-based voice, broadband Internet, data transport, wireless and video services. As part of its provision of telecommunications services, AT&T, through ATTC and other wholly-owned subsidiaries, operates a number of submarine cables and cable landing facilities.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)

(1) Name, Address and Telephone Number of the Applicant

AT&T Corp.
One AT&T Way
Bedminster, New Jersey 07921
Telephone: (908) 532-1971

(2) Place of Formation

ATTC is a New York corporation.

(3) Correspondence concerning the application should be sent to the following:

James Talbot
AVP-Senior Legal Counsel
AT&T Services, Inc. &
Assistant Secretary
AT&T Corp.
1120 20th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone: (202) 457-3048
Email: jjtalbot@att.com

With a copy to:

Mark D. Schneider
Sidley Austin LLP
1501 K Street, N.W.
Washington, D.C. 20005
Telephone: (202) 736-8058
Email: mschneider@sidley.com

(8) Certification and Ownership Information Requested by Sections 63.18(h) and (o) of the Commission's Rules

Information requested by Section 63.18(h):

ATTC is a direct, wholly-owned subsidiary of AT&T Inc., which is a publicly traded corporation whose stock is widely held by the public. The address of AT&T Inc. is 208 S. Akart Street, Dallas, Texas 75202. AT&T Inc. is a telecommunications holding company incorporated under the laws of Delaware. No person or entity holds a ten percent or greater ownership interest in AT&T Inc. No other person or entity holds a ten percent or greater direct or indirect ownership and voting interest in ATTC.

ATTC has interlocking directorates with AT&T Chile Limitada, which is a carrier in Chile; AT&T Communications Services de Panama S. de R.L., which is a carrier in Panama; AT&T Global Network Services Colombia (Ltda.), which is a carrier in Columbia; AT&T Global Network Services International Inc., which is a carrier in Israel, New Zealand, and Pakistan; AT&T Global Network Services Mexico, S. de R.L. de C.V., which is a carrier in Mexico; AT&T Global Network Services Norge LLC, which is a carrier in Norway; AT&T Global Network Services del Peru S.R.L. , which is a carrier in Peru; AT&T Global Network Services Venezuela LLC, which is a carrier in Venezuela; AT&T Japan LLC, which is a carrier in Japan; AT&T Global Services Canada Co., AT&T Enterprises Canada Co., and BellSouth Long Distance, Inc., which are carriers in Canada.; and AT&T Servicios de Comunicaciones de Guatemala SA, which is a carrier in Guatemala.

Sherri L. Bazan is Assistant Treasurer of ATTC; and is also Assistant Treasurer of BellSouth Long Distance, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services International Inc., AT&T Global Network Services Venezuela LLC, and AT&T Japan LLC.

Teresa G. Blizzard is Director – Tax of ATTC; and is also Vice President – Taxes of BellSouth Long Distance, Inc.

Jeffrey M. Chambers is Director – Tax of ATTC; and is also Assistant Vice President – Taxes of AT&T Global Network Services Venezuela LLC, AT&T Global Network Services Norge LLC, and AT&T Global Network Services International Inc.

Karen M. Diorio is Director – Tax of ATTC; and is also Assistant Secretary of AT&T Global Network Services International Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC.

Linda A. Fisher is Director – Tax of ATTC; and is also Director – Tax of BellSouth Long Distance, Inc.

Julianne K. Galloway is Chief Financial Officer and Treasurer of ATTC; and is also Vice President and Treasurer of BellSouth Long Distance, Inc., Director and Treasurer of AT&T Global Network Services Venezuela LLC, AT&T Global Network Services International Inc., AT&T Global Network Services Norge LLC, and Treasurer of AT&T Japan LLC.

Gary E. Johnson is Assistant Vice President – Tax of ATTC; and is also Assistant Vice President – Tax of BellSouth Long Distance, Inc.

Elaine Lou is Assistant Treasurer of ATTC; and is also Assistant Treasurer of BellSouth Long Distance, Inc., AT&T Global Services International Inc., AT&T Global Network Services Venezuela LLC, AT&T Global Network Services Norge LLC and AT&T Japan LLC.

David Matsushima is Vice President and Assistant Secretary of ATTC; and is also President and Secretary of AT&T Global Services International Inc., AT&T Global Network Services Venezuela LLC, AT&T Global Network Services Norge LLC, Vice President of AT&T Japan LLC, Director of AT&T Chile Limitada, Second Alternative Manger of AT&T Global Network Services Colombia (Ltda.), Director and Vice President of AT&T Servicios de Comunicaciones de Guatemala SA, Director of AT&T Global Network Services Mexico, S. de R.L. de C.V., Administrator of AT&T Communications Services de Panama S. de R.L., and General Manager of AT&T Global Network Services del Peru S.R.L.

Barbara Monte is Director – Regulatory Accounting of ATTC; and is also Assistant Secretary – Regulatory Accounting of BellSouth Long Distance, Inc.

Robert J. Murphy, Jr. is Assistant Secretary of ATTC; and is also Director – Accounting of BellSouth Long Distance, Inc.

Brian Paperny is Vice President – Tax of ATTC; and is also Vice President – Tax of BellSouth Long Distance, Inc.

Stacy W. Roth is Assistant Treasurer of ATTC; and is also Assistant Treasurer of BellSouth Long Distance, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services International Inc., AT&T Global Network Services Venezuela LLC, and AT&T Japan LLC.

Steven Shashack is Assistant Vice President – Tax of ATTC; and is also Assistant Vice President – Tax of BellSouth Long Distance, Inc., AT&T Global Network Services Venezuela LLC, AT&T Global Network Services Norge LLC, AT&T Global Network Services International Inc. and AT&T Japan LLC.

Paul W. Stephens is Senior Vice President – Tax of ATTC; and is also Director of AT&T Global Network Services Norge LLC, AT&T Global Network Services Venezuela LLC, and AT&T Global Network Services International Inc.

Information requested by Section 63.18(o):

ATTC certifies pursuant to sections 1.2001 through 1.2003 of the Commission’s rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(8)(ii) Information on Affiliations with Foreign Carriers Requested by 47 C.F.R. § 1.767(a)(8)(ii):

ATTC is not a foreign carrier. ATTC is affiliated with the following foreign carriers authorized to provide telecommunications services to the public in the countries listed below:

| Name of the affiliated foreign carrier: | Countries in which the carrier is authorized to provide telecommunications services to the public: |
|--|--|
| AT&T Communications Services Argentina S.R.L. | Argentina |
| AT&T Global Network Services Australia Pty. Ltd. | Australia |
| AT&T Global Network Services Austria GmbH | Austria |
| AT&T Global Network Services Belgium Luxembourg S.P.R.L. | Belgium |
| AT&T Global Network Services Brazil Ltda. | Brazil |
| AT&T Global Network Services Bulgaria Ltd. | Bulgaria |
| AT&T Global Services Canada Co. | Canada |
| AT&T Enterprises Canada Co. | Canada |
| BellSouth Long Distance, Inc. | Canada |
| AT&T Chile Ltda. | Chile |
| AT&T Red Global Telecommunications Ltda. | Chile |
| AT&T Global Network Services Colombia (Ltda.) | Colombia |
| AT&T Global Network Services Hrvatska d.o.o. | Croatia |
| AT&T Global Network Services Czech Republic s.r.o. | Czech Republic |
| AT&T Global Network Services Ltd. | Cyprus |
| AT&T Global Network Services Danmark ApS | Denmark |
| AT&T Global Network Services Ecuador Cia. Ltda. | Ecuador |
| AT&T Global Network Services Estonia Ou | Estonia |
| AT&T Global Network Services Finland Oy | Finland |
| AT&T Global Network Services France SAS | France |

| | |
|---|-------------|
| AT&T Global Network Services Deutschland GmbH | Germany |
| AT&T Global Network Services (Hellas) E.P.E. (Limited) | Greece |
| AT&T Servicios de Comunicaciones de Guatemala SA | Guatemala |
| AT&T Global Network Services Hong Kong Limited | Hong Kong |
| AT&T Global Network Services Hungary Kft | Hungary |
| AT&T Global Network Services Private Limited | India |
| PT AT&T Global Network Services Indonesia | Indonesia |
| AT&T Global Network Services Ireland Limited | Ireland |
| AT&T Global Network Services International Inc. | Israel |
| AT&T Global Network Services Italia S.p.A. | Italy |
| AT&T Japan Ltd. | Japan |
| AT&T Japan KK | Japan |
| AT&T Communications Services (Japan) Ltd. | Japan |
| AT&T Japan LLC | Japan |
| AT&T GNS Korea Limited (Yuhan Hoesa) | Korea |
| AT&T Global Network Services Latvia SIA | Latvia |
| UAB AT&T Lietuva (Lithuania) | Lithuania |
| AT&T Global Network Services Belgium Luxembourg S.P.R.L. (Branch Office) | Luxembourg |
| AT&T Global Network Services Mexico, S. de R.L. de C.V. | Mexico |
| Operadora Unefon, S.A. de C.V. | Mexico |
| Iusacell PCS, S.A. de C.V. | Mexico |
| Iusacell PCS de Mexico, S.A. de C.V. | Mexico |
| Comunicaciones Celulares de Occidente, S.A. de C.V. | Mexico |
| Sistemas Telefonicos Portatiles, S.A. de C.V. | Mexico |
| Telecomunicaciones del Golfo, S.A. de C.V. | Mexico |
| Portatel del Sureste, S.A. de C.V. | Mexico |
| SOS Telecomunicaciones, S.A. de C.V. | Mexico |
| Unefrecuencias, S.A. de C.V. | Mexico |
| Frecuencia Movil Mexico, S.A. de C.V. | Mexico |
| Comunicaciones Nextel de Mexico, S.A. de C.V. | Mexico |
| NII Digital, S. de R.L. de C.V. | Mexico |
| NII Telecoms, S. de R.L. de C.V. | Mexico |
| Radiophone, S. de R.L. de C.V. | Mexico |
| AT&T Worldwide Network Services (Malaysia) Sdn. BHD. | Malaysia |
| AT&T Global Network Services Morocco sarl au | Morocco |
| AT&T Global Network Services Nederland B.V. | Netherlands |
| AGMS Netherlands | Netherlands |
| AT&T Global Network Services International Inc. | New Zealand |
| AT&T Global Network Services Norge LLC | Norway |
| AT&T Global Network Services International Inc. | Pakistan |
| AT&T Communications Services de Panama S. de R.L. | Panama |
| AT&T Global Network Services del Peru S.R.L. | Peru |
| AT&T Global Network Services Polska Sp. z.o.o. | Poland |
| AT&T Serviços de Telecomunicações, | Portugal |

| | |
|---|----------------|
| Sociedade Unipessoal, Lda. | |
| AT&T Global Network Services Romania S.R.L. | Romania |
| AT&T Global Network Services OOO | Russia |
| AT&T Worldwide Telecommunications Services Singapore Pte Ltd. | Singapore |
| AT&T Global Network Services Slovakia s.r.o. | Slovakia |
| AT&T Globalne Omrezne Storitve d.o.o. | Slovenia |
| AT&T South Africa (Proprietary) Limited | South Africa |
| AT&T Global Network Services Espana, S.L. | Spain |
| AT&T Global Network Services Sweden AB | Sweden |
| AT&T Global Network Services Switzerland GmbH | Switzerland |
| AT&T Global Network Services Taiwan Ltd. | Taiwan |
| AT&T Worldwide Services (Thailand) Limited | Thailand |
| AT&T Global Iletism Servisleri Limited Sirteki Ltd. STI | Turkey |
| AT&T Global Network Services (UK) B.V. | United Kingdom |
| AMSUK Limited | United Kingdom |
| AT&T Global Network Services Venezuela LLC | Venezuela |

(9) Routine Conditions Specified in Section 1.767(g) of the Commission’s Rules, 47 C.F.R. § 1.767(g).

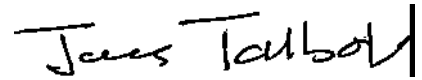
ATTC certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission’s rules, 47 C.F.R. § 1.767(g).

CERTIFICATION

I am authorized to enter this certification on behalf of AT&T Corp.

All of the information contained in this application and Appendix A is true and correct to the best of my knowledge and belief.

Dated: March 6, 2019



James Talbot
AVP-Senior Legal Counsel,
AT&T Services, Inc. &
Assistant Secretary AT&T
Corp.
1120 20th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone: (202) 457-3048

APPENDIX B – SERVICIO DI TELECOMUNICACION DI ARUBA (SETAR) N.V.

Servicio di Telecomunicacion di Aruba (SETAR) N.V. (“SETAR”) is the incumbent local exchange carrier in Aruba. SETAR is wholly-owned by the Government of Aruba and overseen by the Ministry of Telecommunications. SETAR provides a wide array of facilities-based wireline and wireless telecommunications services to end-users in Aruba, including residential and business customers. SETAR holds capacity in the Columbus-II Submarine Cable System¹ and Americas-I Submarine Cable System² and Americas-II Submarine Cable System³, and also is a co-licensee for the Pacific Caribbean Cable System (“PCCS”).⁴

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)

(1) Name, Address and Telephone Number of the Applicant

Servicio di Telecomunicacion di Aruba (SETAR) N.V.
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: +297 (525) 1000

(2) Place of Formation

SETAR is organized under the laws of Aruba.

(3) Correspondence concerning the application should be sent to the following:

Alvin Boekhoudt
Legal Counselor
Servicio Di Telecomunicacion Di Aruba N.V.
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: +297 (525) 1405
alvin.boekhoudt@setar.aw

With a copy to:

¹ See File No. SCL-LIC-19921110-00004.

² See File No. SCL-LIC-19921110-00002.

³ See File No. SCL-LIC-19980429-00019.

⁴ See File No. SCL- LIC-20130122-0001.

Ulises Pin
 Patricia Cave
 Morgan, Lewis & Bockius LLP
 1111 Pennsylvania Avenue, NW
 Washington, D.C. 20004
 Tel: (202) 739-3000
 Fax: (202) 739-3001
ulises.pin@morganlewis.com
patricia.cave@morganlewis.com

(8) Certification and Ownership Information Requested by Sections 63.18(h) and (o) of the Commission’s Rules

Information requested by Section 63.18(h):

Each person or entity that directly or indirectly owns 10% or more of the equity of the applicant:

| Name | Address | Citizenship or Country | Principal Business | Percentage of Equity Held |
|---------------------|---|----------------------------|--------------------|---------------------------|
| Government of Aruba | Smith Boulevard 72 Oranjestad, Aruba | Kingdom of the Netherlands | Government | 100% |

Except as stated above, no other person or entity holds a 10% or greater ownership or voting interest in SETAR.

Interlocking directorates: Z. Roland Croes, a Director of SETAR, is also a Director of TA Resources N.V., which is authorized to provide telecommunications services to the public in Aruba and the United States.

Information requested by Section 63.18(o):

SETAR certifies pursuant to sections 1.2001 through 1.2003 of the Commission’s rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(8)(ii) Information on Affiliations with Foreign Carriers Requested by 47 C.F.R. § 1.767(a)(8)(ii):

| | |
|---------------------------------|--|
| Name of the affiliated carrier: | Countries in which carrier is authorized to provide telecommunications services to the public: |
| TA Resources N.V. | Aruba, United States |

TA Resources N.V. holds an international Section 214 authorization pursuant to authority granted in File No. ITC-214-20100107-00010.

(9) Routine Conditions Specified in Section 1.767(g) of the Commission’s Rules, 47 C.F.R. § 1.767(g).

SETAR certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission’s rules, 47 C.F.R. § 1.767(g).

CERTIFICATION

I am authorized to enter this certification on behalf of Servicio di Telecomunicacion di Aruba (SETAR) N.V.

All of the information contained in this application and Appendix B is true and correct to the best of my knowledge and belief.

Dated: March 6, 2019



Z. Roland Croes
Director
Servicio di Telecomunicacion di
Aruba (SETAR) N.V.
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: +297 (525) 1000
roland.croes@setar.aw

APPENDIX C - TELEFONICA LARGE DISTANCIA DE PUERTO RICO, INC.

Telefonica Larga Distancia de Puerto Rico, Inc. ("TLD") is a telecommunications services carrier providing local services originating and ending in Puerto Rico, and interstate and international services. The services are offered in Puerto Rico.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)

(1) Name, Address and Telephone Number of the Applicant

Telefonica Larga Distancia de Puerto Rico, Inc.
2423 Loiza Street
Santurce PR 00913
Telephone: 787-774-6822

(2) Place of Formation

TLD is organized under the laws of Puerto Rico.

(3) Correspondence concerning the application should be sent to the following:

Carlos Feliciano
2423 Loiza Street
Santurce, PR 00913
Email: carlos.feliciano@telefonica.com
Telephone: 787-774-6868; 786-351-2615

With a copy to:

Joanna Romano
800 Waterford Way
Suite 300
Miami, FL 33126
Email: joanna.romano@telefonica.com
Telephone: 305-333-2136

(8) Certification and Ownership Information Requested by Sections 63.18(h) and (o) of the Commission's Rules

Information requested by Section 63.18(II):

The 10% or greater ownership interests held by persons or entities in the ownership chain of Telefonica Larga Distancia de Puerto Rico are as follows: Telefonica International Holding B.V. holds a 100% ownership and voting interest in Telefonica Larga Distancia de Puerto Rico, Inc. Telefonica Latinoamerica Holding S.L. holds a 100% ownership and voting interest in Telefonica International Holding B.V. Telefonica S.A. holds a 100% ownership and voting interest in Telefonica Latinoamerica Holding S.L. Further details of these entities are provided below.

| Name | Address | Citizenship or Country | Principal Business | Percentage. of Equity Held |
|--|---|----------------------------------|---|----------------------------|
| Telefonica Internacional Holding B.V. | Zuidplein 112 1077XV Amsterdam, the Netherlands | Amsterdam, the Netherlands | To acquire, hold and dispose of participations in other companies and enterprises | 100% |
| Telefonica Latinoamerica Holding, S.L. | Edificio Central Pl 2• C/Ronda de la Comunicación sin, Madrid, Spain | Spain | To administer and manage businesses in the telecommunications industry | 100% |
| Telefonica S.A. | Edificio Central Pl 2• C/Ronda de la Comunicación s/n, Madrid, Spain | Spain | Telecommunications | 100% |

Except as stated above, no person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Telefonica Larga Distancia de Puerto Rico.

No person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Telefonica S.A.

Interlocking directorates: Jose Luis Garno and Jose Juan Cerdan Ibanez are directors of Telefonica Larga Distancia de Puerto Rico, Inc. and also directors of Telefonica USA, Inc. and Telefonica International Wholesales Services II, S.L.U. Joanna Romano and Juan Colio are officers of Telefonica Larga Distancia de Puerto Rico, Inc. and Telefonica USA, Inc.

Information requested by Section 63.1S(o):

TLD certifies pursuant to sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(8)(ii) Information on Affiliations with Foreign Carriers Requested by 47 C.F.R. § 1.767(a)(8)(ii):

| Name of the affiliated carrier | Countries in which carrier is authorized to provide telecommunications services to the public |
|--------------------------------------|---|
| Telxius Cable Brazil Ltda. | Brazil |
| Telxius Cable Bolivia S.A | Bolivia |
| Telxius Cable Chile S.A | Chile |
| Telxius Cable Colombia S.A. | Colombia |
| Telxius Cable Ecuador S.A. | Ecuador |
| Telxius Cable Espana S.L.U | Spain |
| Telxius Cable Guatemala S.A. | Guatemala |
| Telxius Cable Panama S.A. | Panama |
| Telxius Cable Peru S.A.C. | Peru |
| Telxius Cable Puerto Rico, Inc. | Puerto Rico |
| Telxius Cable USA, Inc. | USA |
| Republica Dorninicana S.A.S. | Dominican Republic |
| Telefonica Argentina S.A. | Argentina (Atlantis -2) |
| Telefonica Empresas Chile S.A. | Chile (PanAm) |
| Telefonica de! Peru S.A.A | Peru (PanAm) |
| Colombia Telecomunicaciones S.A. ESP | Colombia (PanAm) |

| | |
|--|---|
| Telefonica de Espana S.A.U. | Spain (PENBAL-5; PENBAL-4SG 1; PENBAL-4SG2; PENCAN-6; PENCAN-7, PENCAN-8 (intra insular cables) |
| Telefonica Moviles Espana S.A.U | Spain |
| Telefonica Germany GmbH & Co. OHG | Germany |
| Telefonica UK, Ltd. | United Kingdom |
| Telefonica Moviles de Argentina | Argentina |
| Telefonica Brasil, S.A | Brazil |
| Telefonica Moviles Chile, S.A | Chile |
| Empresa de Telecomunicaciones de Bucaramanga S.A. E.S.P | Colombia |
| Metropolitana de Telecomunicaciones S.A E.S.P | Colombia |
| Operaciones Tecnologicas y Comerciales S.A.S | Colombia |
| Telefonica de Costa Rica TC, S.A. | Costa Rica |
| Ocetel S.A. | Ecuador |
| Telefonica Moviles El Salvador, S.A. de C.V. | El Salvador |
| Pegaso PCS S.A de C.V | Mexico |
| Telefonia Celular de Nicaragua, S.A. | Nicaragua |
| Telefonica Moviles Panama, S.A | Panama |
| Telefonica USA, Inc. | United States and Puerto Rico |
| Telefonica Moviles de! Uruguay, S.A. | Uruguay |
| Telefonica Venezolana, C.A. | Venezuela |
| Telefonica International Wholesale Services II, S.L.U. | Spain |
| TIWS Argentina II, S.A. | Argentina |
| Telefonica International Wholesale Services II, S.L. Unipersonal (Austrian Branch) | Austria |
| Telefonica International Wholesale Services II, S.L. Unipersonal, Succursale en Belgique | Belgium |
| TIWS Chile II, S.p.A. | Chile |
| TIWS Colombia II, S.A.S. | Colombia |
| Telefonica International Wholesale Services II, S.L. Unipersonal, branch in Cyprus | Cyprus |
| Telefonica International Wholesale Services II, S.L. Unipersonal Spanien | Denmark |
| TIWS Ecuador II, S.A. | Ecuador |
| Telefonica International Wholesale Services II, S.L. Unipersonal Suomen sivuliike | Finland |
| Telefonica International Wholesale Services France SAS | France |
| TIWS Greece Telecommunications Services Company Limited Liability | Greece |
| Telefonica International Wholesale Services | Hungary |

| | |
|--|-------------|
| Hungary Korlatolt Felelőségi Társaság | |
| Telefonica International Wholesale Services II, S.L. Unipersonal, filiale italiana | Italy |
| Telefonica International Wholesale Services, Latvia Sabiedriba ar ierobezotu atbildību | Latvia |
| TIWS Luxembourg Branch, Succursale de la société mere Telefonica International Wholesale Services II, S.L. Unipersonal | Luxembourg |
| TIWS Mexico, S.A. de C.V. | Mexico |
| Telefonica International Wholesale Services II, S.L., TIWS NETHERLANDS | Netherlands |
| Telefonica International Wholesale Services II, unipersonal, Branch in Norway | Norway |
| Telefonica Servicios TIWS, S.A.C. | Peru |
| Telefonica International Wholesale Services II, S.L. Unipersonal, (Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce | Poland |
| Telefonica International Wholesale Services II, S.L. Unipersonal sucursal em Portugal | Portugal |
| Telefonica International Wholesale Services II, Sociedad Limitada Unipersonal, Madrid - Sucursala Bucaresti | Romania |
| Telefonica Global Solutions, Singapore PTE. LTD.) | Singapore |
| Telefonica International Wholesale Services II, S.L. | Spain |
| Telefonica International Wholesale Services Sweden AB | Sweden |
| Telefonica International Wholesale Services II, S.L Unipersonal, Madrid, Swiss branch Zurich | Switzerland |

The group of Telxius Cable companies listed above own or control a cable landing station related to:

- SAm-1: Argentina, Brasil, Chile, Colombia, Ecuador, Guatemala, Peru, USA.
- Unisur: Argentina
- PCCS: Colombia, Panama, Puerto Rico, USA.
- MAREA: Spain, USA.
- BRUSA(RFS 3Q2018): Brasil, USA.
- Estepona-Tetuan: Spain.
- Alpal 2: Spain.
- Columbus 3: Spain.
- Atlantis 2: Spain.
- Sat 3: Spain.

(9) Routine Conditions Specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

TLD certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

CERTIFICATION

I am authorized to enter this certification on behalf of Telefonica Larga Distancia de Puerto Rico, Inc.

All of the information contained in this application and Appendix C is true and correct to the best of my knowledge and belief.

Dated: February 14, 2019

A handwritten signature in black ink, appearing to read "Joanna Romano", written over a horizontal line.

Joanna Romano
800 Waterford Way
Suite 300
Miami, FL 33126

APPENDIX D – LANDING STATION INFORMATION

- TAB 1: WEST PALM BEACH, FLORIDA LANDING STATION
- TAB 2: MAGENS BAY, VIRGIN ISLANDS LANDING STATION

TAB 1: WEST PALM BEACH, FLORIDA LANDING STATION

The West Palm Beach, FL Landing Station is owned and operated by AT&T Corp.

Location of the Vero Beach, FL Landing Station:

West Palm Beach Cable Station
325 Gardenia Street
West Palm Beach, FL 33401

Latitude, Longitude: 26 42.58N, 80 03.21W

Beach Manhole:

Latitude, Longitude: 26 42.57N, 80 02.03W

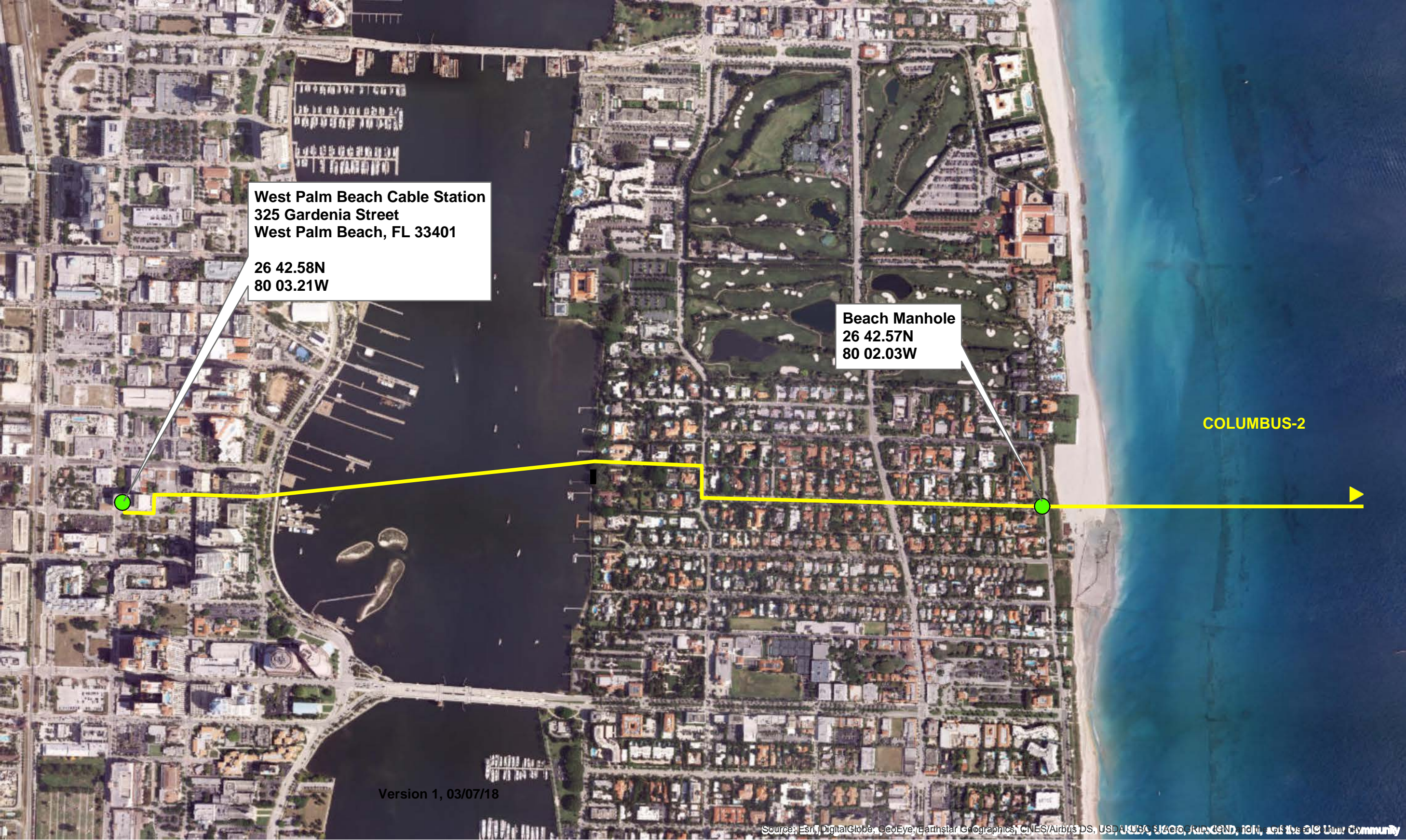
West Palm Beach Cable Station
325 Gardenia Street
West Palm Beach, FL 33401

26 42.58N
80 03.21W

Beach Manhole
26 42.57N
80 02.03W

COLUMBUS-2

Version 1, 03/07/18



TAB 2: MAGENS BAY, VIRGIN ISLANDS LANDING STATION

The Magens Bay, Virgin Islands Landing Station is owned and operated by AT&T of the Virgin Islands, Inc.

Location of the Magens Bay, Virgin Islands Landing Station:

Magens Bay Cable Station
1 Peterborg Estate,
St. Thomas, VI 00802

Latitude, Longitude: 18 22.43N, 64 55.67W

Beach Joint:

Latitude, Longitude: 18 22.32N, 64 55.70W

**TAINO CARIB
Seg. E3**

**TAINO CARIB
Seg. E4**

**Magens Bay Cable Station
1 Peterborg Estate,
St. Thomas, VI 00802**

**18 22.43N
64 55.67W**

**Beach Splice
18 22.32N
64 55.70W**

APPENDIX E

MAP OF THE COLUMBUS II CABLE SYSTEM

COLUMBUS-2 Cable System



West Palm Beach, FL

La Habana (Havana)

Mogens Bay, St. Thomas, U.S.V.I

Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC-USGS, NASA, ESA, METI, NRCAN, NRCAN, GEBCO, NOAA, increment P Corp.

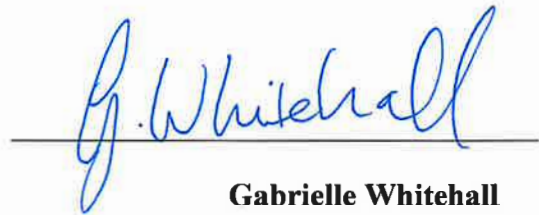
CERTIFICATE OF SERVICE

I hereby certify that the foregoing application and attachments were served on the following by first-class mail on March 6, 2019:

U.S. Coordinator, EB/CIP
U.S. Department of State
2201 C Street, NW
Washington, DC 20520-5818

Office of Chief Counsel/NTIA
U.S. Department of Commerce
14th St., NW and Constitution Ave., NW
Washington, DC 20230

Defense Information Systems Agency
ATTN: GC/DOI
6910 Cooper Avenue
Fort Meade, MD 20755-7088



Gabrielle Whitehall