

**Before the  
FEDERAL COMMUNICATIONS COMMISSION**

*In the Matter of* )  
 )  
The Americas I Submarine Cable System ) File No. SCL-LIC-19921110-00002  
Operating Between the United States )  
Mainland and St. Thomas in the U.S. Virgin )  
Islands )

**APPLICATION FOR CABLE LANDING LICENSE**

The Americas I 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 Americas I 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 September 1, 2019.<sup>1</sup>

The Americas I 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 430 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

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<sup>1</sup> The Americas I Cable System commenced operation on September 1, 1994, pursuant to its original cable landing license granted on July 13, 1993. *See American Telephone & Telegraph Company, et al.*, 8 FCC. Rcd. 5041 (1993). The international segments of Americas I 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 Americas I, 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 Americas I submarine cable is therefore strongly in the U.S. public interest.

## **I. DESCRIPTION OF THE CABLE SYSTEM**

The Americas I 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 2,013 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 430 Gbps. The cable was upgraded from its original capacity of 5 Gbps to 430 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 Americas I consortium is comprised of 27 members who are parties to the Americas I 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 four parties with greater than 5% ownership interest, individually or through their wholly- owned affiliates, are: AT&T Corp.; MCI International, Inc.; and Servicio di Telecomunicacion di Aruba (SETAR) N.V.; and Sprint Communications Company L.P. All four parties with greater than 5% ownership interest, together with Atlantic Telecommunication Operating Company Limited, which currently holds an interest of 0.70329%, are parties to the instant application. Greater detail regarding each of these entities is provided in the attached individual appendices (A – E).

The Americas I Cable System has two landing stations, at Vero Beach, Florida, and Magens Bay, St. Thomas in the U.S. Virgin Islands. The Americas I parties jointly own landing

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.<sup>2</sup> AT&T Corp. owns the landing station in Vero 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 the Appendix G.

Any member of the consortium may enhance the capabilities of the Americas I 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 the 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 Americas I 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.

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<sup>2</sup>In 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 Americas I cable.

The reauthorization of the Americas I 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.<sup>3</sup> The Americas I 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,<sup>4</sup> 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 islands<sup>5</sup> and “catastrophic impact” caused by Hurricane Maria.<sup>6</sup> As the U.S. Virgin Islands continues to work

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<sup>3</sup> 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](https://cdn.prod.internetsociety.org/wp-content/uploads/2017/08/ISOC_Unleashing_Internet_in_Caribbean_20170221.pdf).

<sup>4</sup> The Americas I cable (via the St. Thomas-St. Croix cable) connects with the Americas II cable to Martinique, Curacao, Trinidad and Tobago, Venezuela, French Guyana and Brazil. The Americas I 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.

<sup>5</sup> *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).

<sup>6</sup> 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: Atlantic Telecommunication Operating Company Limited

APPENDIX C: MCI International, Inc.

APPENDIX D: Servicio di Telecommunicacion di Aruba (SETAR) N.V.

APPENDIX E: Sprint Communications Company L.P.

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 Americas I Cable System is included at Appendix F.

##### **(5) Landing Points**

Information about the two landing points of the Americas I Cable System is included as Appendix G as follows:

Tab 1: Vero Beach, FL.

Tab 2: Magens Bay, St. Thomas, VI

##### **(6) Common Carrier or Non-Common Carrier Status**

The Americas I 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 Americas I 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:

<b>Party</b>	<b>Ownership</b>	<b>Voting</b>
Administracion Nacional de Telecomunicaciones	0.04694%	0.04694%
Administracion Nacional de Telecomunicaciones Public Administration	0.08915%	0.08915%
Antelecom N.V.	4.66253%	4.66253%
A1 Telekom Austria AG	0.04694%	0.04694%
AT&T Corp.	49.58942%	49.58942%
Atlantic Teleconnection Operating Company, Limited	0.70329%	0.70329%
Cable & Wireless (Barbados) Limited	0.29717%	0.29717%
Cable & Wireless (BVI) Limited	0.93532%	0.93532%
Corporacion Nacional de Telecomunicaciones CNT E.P.	0.04694%	0.04694%
Compania Dominicana de Telefonos, S.A.	3.06090%	3.06090%
Empresa Nacional De Telecomunicaciones S.A.	0.71322%	0.71322%
Global Crossing Americas Solutions	0.04694%	0.04694%
Global Interlink, Ltd.	1.05419%	1.05419%
Empresa Guatemalteca de Telecomunicaciones	0.04694%	0.04694%
Telecomunicaciones IMPSAT S.A.	0.04694%	0.04694%
MCI International, Inc.	17.39646%	17.39646%
MCI International de Venezuela, S.A.	0.20802%	0.20802%
PREPA.Net International Wholesale Transport Inc.	0.51928%	0.51928%
Primus Telecommunications, Inc.	1.12926%	1.12926%
Rostelecom	0.08915%	0.08915%
Servicio di Telecomunicacion di	7.75315%	7.75315%

Aruba (SETAR) N.V.		
Sri Lanka Telecom	0.04694%	0.04694%
Sprint Communications Company L.P.	6.95388%	6.95388%
Enitel Nicaragua	0.05943%	0.05943%
Telefonica Larga Distancia De Puerto Rico, Inc.	4.19016%	4.19016%
Turk Telekomunikasyon A.S.	0.14859%	0.14859%
Verizon Hawaii International Inc.	0.11887%	0.11887%

The ownership of the landing stations is as follows:

Party	Landing Station
AT&T Corp.	Vero 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.”<sup>7</sup> 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

<sup>7</sup> 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).

subsidiary of AT&T Inc., the 100% parent of AT&T Corp.<sup>8</sup> 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 Americas I 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 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.<sup>9</sup>

*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

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<sup>8</sup> 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.

<sup>9</sup> 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.").



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).<sup>10</sup> Neither Florida nor the U.S. Virgin Islands, the state and territory in which the Americas I Cable System lands, lists a cable landing license as a federal activity requiring a consistency certification.<sup>11</sup>

*U.S. Departments of State, Commerce, and Defense.* The Applicants have sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense.<sup>12</sup> Such service is certified in the certificate of service attached to this application.

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<sup>10</sup> See 47 C.F.R. § 1.767(k)(4).

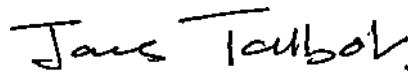
<sup>11</sup> See National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Florida's Listed Federal Actions, <https://coast.noaa.gov/czm/consistency/media/fl.pdf>; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, U.S. Virgin Island's Listed Federal Actions, <https://coast.noaa.gov/czm/consistency/media/usvi.pdf>.

<sup>12</sup> See 47 C.F.R. § 1.767(j).

## V. CONCLUSION

As demonstrated above, the public interest, convenience and necessity will be served by a grant of this application to authorize the continued landing and operation of the Americas I Cable System linking the U.S. Mainland with the U.S. Virgin Islands. The Americas I Consortium respectfully requests that the Commission grant this application.

Respectfully submitted,



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Washington, D.C. 20036  
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Dated: March 6, 2019

## **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](mailto: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](mailto: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 other than AT&T Inc. holds a 10 per cent or greater interest in AT&T Corp. No person or entity holds a ten percent or greater ownership interest in AT&T Inc.

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).**

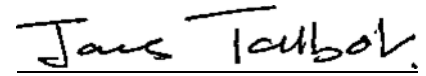
ATTC certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission’s rules, 47 C.F.R. § 1.767(g).

**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

A handwritten signature in black ink that reads "James Talbot". The signature is written in a cursive style and is underlined with a single horizontal line.

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

**APPENDIX B – ATLANTIC TELECONNECTION OPERATING  
COMPANY LIMITED**

ATOC (Atlantic Teleconnection Operating Company Limited) is a 100% indirectly owned subsidiary of GTT (Guyana Telephone and Telegraph Ltd). GTT provides wireless and wireline telecommunications to the nation of Guyana. GTT became a Member of the Americas 2 cable at the inception of the C&MA in 1998 and ATOC became a Member in 2010 in order to access international fiber capacity for voice and data communications.

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

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

Atlantic Teleconnection Operating Company Limited  
Commerce House, Wickhams Cay 1, POB 3140, Road Town  
Tortola, British Virgin Islands  
VG111TBC

**(2) Place of Formation**

British Virgin Islands

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

Christopher Pepper  
c/o ATOC  
500 Cummings Center, Suite 2450  
Beverly, MA 01915  
(561) 414-5543

With a copy to:

ATN International  
Attn: Mary Mabey, General Counsel  
500 Cummings Center, Suite 2450  
Beverly, MA 01915  
(978) 619-1300

**(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
Atlantic Teleconnection Holdings Company Limited (“ATHC”)	Commerce House, Wickhams Cay 1, POB 3140, Road Town, Tortola, British Virgin Islands, VG111TBC	British Virgin Islands	Telecom	100% of ATOC
GTT International Service SRL (“GTT SRL”)	79 Brickdam Georgetown, Guyana	Barbados	Telecom	100% of ATHC
Guyana Telephone and Telegraph Ltd	79 Brickdam Georgetown, Guyana	Guyana	Telecom	100% of GTT SRL
Hong Kong Golden Telecom Company Limited (“HKGT”)*	Room 2801A, Lippo Centre, Tower 1, 89 Queensway, Hong Kong	Hong Kong	Telecom	20% of GTT
ATN International, Inc. (“ATNI”)	500 Cummings Center, Suite 2450, Beverly, MA 01915	USA	Telecom	80% of GTT
Cornelius B. Prior Jr.	P.O. Box 12030 St. Thomas, U.S. Virgin Islands 00801	USA	Retired	27.4% of ATNI

\*ATOC was informed by representatives of HKGT in May 2018 that HKGT is 100% owned by Datang Telecom International Technology (Hong Kong) Co., Ltd. (“DTIT”) and that DTIT is indirectly controlled, but not wholly owned, by China Academy of Telecommunications Technology. ATOC does not have any additional information about HKGT’s ultimate ownership.

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

Interlocking directorates: See below.

<b>Director or Officer</b>	<b>Role w ATOC</b>	<b>Role w Other Foreign Carrier</b>
Brad Martin	Director & CEO	Director, Guyana Telephone & Telegraph Company, Ltd. (“GTT”) Vice President, One Communications, Ltd.
Mary Mabey	Director & Assistant Secretary	Director & Secretary, GTT
John Audet	Director	Director, GTT
Justin Nedd	CFO & Treasurer	President & CEO, GTT
Domenic Micale	Vice President & Asst. Treasurer	Vice President & Asst Treasurer, GTT
Michele Satrowsky	Vice President& Asst. Treasurer	Vice President & Asst Treasurer, GTT

***Information requested by Section 63.18(o):***

ATOC 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):**

<b>Name of the affiliated carrier</b>	<b>Countries in which carrier is authorized to provide telecommunications services to the public</b>
Bermuda Digital Communications Ltd.	Bermuda
Cable Co. Ltd.	Bermuda
Cedar Cable Ltd.	Bermuda
Guyana Telephone and Telegraph Ltd.	Guyana

One Communications Ltd.	Bermuda
WestTel Limited, d/b/a Logic	Cayman Islands

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

ATOC 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 Atlantic Teleconnection Operating Company Limited.

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



Dated: February 13, 2019

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Christopher Pepper  
c/o ATOC  
500 Cummings Center, Suite 2450  
Beverly, MA 01915  
(561) 414-5543

## **APPENDIX C – MCI INTERNATIONAL, INC.**

MCI International, Inc. is a Delaware corporation providing international telecommunications services and is an indirect wholly-owned subsidiary of Verizon Communications Inc. (Verizon). Verizon and its various subsidiaries and affiliates provide telecommunications services in the United States and in numerous countries around the globe. We also note that Verizon Hawaii International Inc., a Delaware corporation providing international telecommunications services and also an indirect wholly-owned subsidiary of Verizon, holds a *de minimis* percentage of capacity as a licensee on the same Americas-1 undersea cable. Additionally, Verizon Venezuela, S.A. (formerly named MCI International de Venezuela, S.A.), a Venezuelan corporation that is an indirect wholly-owned subsidiary of Verizon, also holds a *de minimis* percentage of capacity on this cable. Verizon, with its primary address at 1095 Avenue of the Americas, New York, NY 10036, is a publicly traded company with no person or entity known to own ten percent or more of the company's outstanding stock. Verizon has no interlocking directorates with a foreign carrier.

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

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

MCI International, Inc.  
One Verizon Way  
Basking Ridge, NJ 07920

#### **(2) Place of Formation**

Delaware, USA.

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

Katharine R. Saunders  
Verizon  
1300 I St., NW, Suite 500E



Washington, DC 20005  
 Telephone: 202-515-2462  
 Email: [katharine.saunders@verizon.com](mailto:katharine.saunders@verizon.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):***

The 10% or greater ownership interests held by persons or entities in the ownership chain of MCI International, Inc. are as follows: MCI International Inc. is wholly (100%) owned by Verizon Business Network Services, Inc.; which is wholly owned by MCI Communications Corporation; which is wholly owned by Verizon Business Global LLC; which is wholly owned by Verizon Communications Inc. – a widely-owned and publicly traded parent holding company. Further details of these entities are provided below.

Name	Address	Citizenship or Country	Principal Business	Percentage of Equity Held
Verizon Business Network Services Inc.	One Verizon Way Basking Ridge, New Jersey 07920	U.S.A.	Telecommunications	100% (direct)
MCI Communications Corporation	One Verizon Way Basking Ridge, New Jersey 07920	U.S.A.	Telecommunications	100% (indirect)
Verizon Business Global LLC	899 Heathrow Park Lane Lake Mary, Florida 32746	U.S.A.	Telecommunications	100% (indirect)

Verizon Communications Inc.	1095 Avenue of the Americas New York, New York 10036	U.S.A.	Holding company	100% (indirect)
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Except as stated above, no person or entity holds a ten percent or greater direct or indirect ownership and voting interest in MCI International, Inc.

No person or entity holds a ten percent or greater direct or indirect ownership and voting interest in Verizon Communications Inc.

Interlocking directorates: MCI International, Inc., Verizon Business Network Services Inc., Verizon Business Global LLC, and Verizon Communications Inc. have no interlocking directorates with any foreign carrier.

***Information requested by Section 63.18(o):***

MCI International, Inc. 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:
Verizon Argentina S.R.L.	Argentina
Verizon Australia Pty Limited	Australia
Verizon Austria GmbH	Austria
NV Verizon Belgium Luxembourg S.A.	Belgium, Luxembourg
Verizon Telecomunicações do Brazil Ltda	Brazil

Verizon Bulgaria EOOD	Bulgaria
Verizon Canada Ltd.	Canada
Verizon Chile S.A.	Chile
Verizon Colombia S.A.	Colombia
Verizon Costa Rica S.R.L.	Costa Rica
Verizon Croatia Limited	Croatia
Verizon Czech s.r.o.	Czech Republic
Verizon Denmark A/S	Denmark
Verizon Finland Oy	Finland
Verizon France SAS	France
Verizon Deutschland GmbH	Germany
Verizon Hellas Telecommunications Single Member LLC	Greece
Verizon Communications Guatemala Limitada	Guatemala
Verizon Hong Kong Limited	Hong Kong
Verizon Hungary Telecommunications LLC	Hungary
Verizon India Communications Private Limited	India
Verizon Ireland Limited	Ireland
Verizon Italia S.p.A.	Italy
Verizon Japan Limited	Japan
Verizon Korea Limited	Korea
Verizon Servicios Empresariales Mexico, S de R.L. de C.V.	Mexico
Verizon Nederland BV	Netherlands
Verizon New Zealand Limited	New Zealand
Verizon Norway AS	Norway
Verizon Panama S.A.	Panama
Verizon Peru SRL	Peru
Verizon Polska Sp. Z.o.o	Poland
Verizon Portugal Sociedade Unipessoal, LDA	Portugal
Verizon Romania SRL	Romania
Verizon Rus LLC	Russia
Verizon Communications Singapore Pte. Ltd.	Singapore
Verizon Communications Slovakia s.r.o	Slovakia
Verizon South Africa (Pty) Limited	South Africa
Verizon Spain S.L.	Spain
Verizon Sweden AB	Sweden
Verizon Switzerland AG	Switzerland
Verizon Taiwan Co. Limited	Taiwan (Chinese Taipei)
Verizon UK Limited	United Kingdom
Verizon Venezuela, S.A.	Venezuela

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

MCI International, Inc. 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 MCI International, Inc.

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

A handwritten signature in blue ink, appearing to read "William H. Johnson", is written over a horizontal line.

Dated: February 1, 2019

William H. Johnson  
Senior Vice President - Federal  
Regulatory & Legal Affairs  
1300 I St., NW, Suite 500E  
Washington, DC 20005  
Telephone: 202-515-2492

## **APPENDIX D – 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 System<sup>1</sup> and Americas-I Submarine Cable System<sup>2</sup> and Americas-II Submarine Cable System<sup>3</sup>, and also is a co-licensee for the Pacific Caribbean Cable System (“PCCS”).<sup>4</sup>

### **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](mailto:alvin.boekhoudt@setar.aw)

With a copy to:

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<sup>1</sup> See File No. SCL-LIC-19921110-00004.

<sup>2</sup> See File No. SCL-LIC-19921110-00002.

<sup>3</sup> See File No. SCL-LIC-19980429-00019.

<sup>4</sup> 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](mailto:ulises.pin@morganlewis.com)  
[patricia.cave@morganlewis.com](mailto: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 D is true and correct to the best of my knowledge and belief.

Dated: March 06, 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](mailto:roland.croes@setar.aw)

## **APPENDIX E**

### **– LANDING STATION INFORMATION**

- **TAB 1: VERO BEACH, FLORIDA LANDING STATION**
- **TAB 2: MAGENS BAY, VIRGIN ISLANDS LANDING STATION**

**TAB 1: VERO BEACH, FLORIDA LANDING STATION**

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

**Location of the Vero Beach, FL Landing Station:**

Vero Beach Cable Station  
1825 Old Dixie Highway  
Vero Beach, FL 32960

Latitude, Longitude: 27 38.10N, 80 23.9W

**Beach Manhole:**

Latitude, Longitude: 27 37.94N, 80 21.10W

**Vero Beach Cable Station**  
1825 Old Dixie Highway  
Vero Beach, FL 32960

27 38.10N  
80 23.9W

**Beach Manhole**  
27 37.94N  
80 21.10W

**AMERICAS-1**

## **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 F**

**MAP OF AMERICAS I CABLE SYSTEM**

# AMERICAS-1 Cable System



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**