

**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.<sup>1</sup>

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

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<sup>1</sup> 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.<sup>2</sup> 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

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<sup>2</sup> 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.<sup>3</sup> 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.

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<sup>3</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 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.<sup>4</sup> 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,<sup>5</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>6</sup> and “catastrophic impact” caused by Hurricane Maria.<sup>7</sup> As the U.S. Virgin Islands continues to work

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<sup>4</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>5</sup> 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.

<sup>6</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>7</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: 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:

<b>Party</b>	<b>Ownership</b>	<b>Voting</b>
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:

<b>Party</b>	<b>Landing Station</b>
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.”<sup>8</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 subsidiary of AT&T Inc., the 100% parent of AT&T Corp.<sup>9</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 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

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<sup>8</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).

<sup>9</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.

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>10</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 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>11</sup> Neither Florida

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<sup>10</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.").

<sup>11</sup> See 47 C.F.R. § 1.767(k)(4).

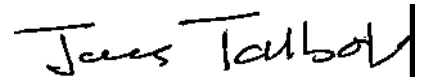


**CERTIFICATION**

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



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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 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 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).

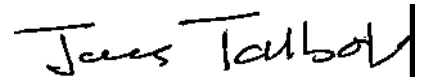


**CERTIFICATION**

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



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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 – 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:

---

<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 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](mailto: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](mailto: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



**COLUMBUS-2**

**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.

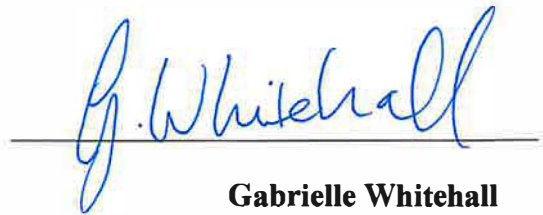
## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing application and attachments were served on the following by first-class mail on March 25, 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**