

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
PTI Pacifica Inc.)	
Application re the MTC Interisland)	IBFS File No. SCL-LIC-19921015-00007
Submarine Cable)	(formerly IBFS File No. SCL-92-003)
)	
)	

**PTI PACIFICA INC.
APPLICATION FOR CABLE LANDING LICENSE (RENEWAL)**

PTI Pacifica Inc. (“PTI Pacifica” or “Applicant”), dba as IT&E, pursuant to 47 U.S.C. §§ 34-39, Executive Order 10,530, and 47 C.F.R. § 1.767(e), hereby applies to renew the cable landing license for the MTC Interisland Cable System (“MICS” or “MICS Cable”) to authorize the continued operation of this existing, purely U.S. domestic submarine cable for an additional 25-year term following the expiration date of the current license on February 13, 2022.

I. DESCRIPTION OF THE MICS CABLE AND LICENSEE PTI PACIFICA

The MICS Cable, located in the Pacific Ocean approximately 6,300 miles west of Los Angeles, links the three most populated islands of the Commonwealth of the Northern Mariana Islands (“CNMI”),¹ Saipan, Tinian, and Rota, with each other and with the nearby U.S. Territory of Guam. The populated CNMI islands span approximately 95 miles from the southern tip of Rota to the northern tip of Saipan, and the channel between Rota and the northern tip of Guam is approximately 40 miles wide. MICS is a high capacity, fiber optic system approximately 166.3 miles in length. MICS consists of 12 strands, *i.e.*, 6 pairs of fiber, on all segments; and system capacity has been upgraded three times since the cable went in service, with a current cumulative

¹ The CNMI is a self-governing commonwealth in political union with and under the sovereignty of the United States.

design capacity of 150 gigabits per second. The MICS Cable, including each of its CNMI cable landing points, is wholly-owned by PTI Pacifica.

MICS initially was licensed in 1993 to the Micronesian Telecommunications Corporation (“MTC”) when MTC was ultimately owned by GTE Corporation, for a 25 year period from the date on which the cable was placed in service.² The FCC granted the pro forma assignment of the submarine cable license from MTC to its wholly-owned subsidiary GTE Pacifica Inc. on December 18, 1997. Control of MTC and GTE Pacifica was transferred after the FCC approved of Verizon’s acquisition of GTE in 2000.³ The FCC subsequently approved the transfer of control of MTC and GTE Pacifica from Verizon subsidiary Bell Atlantic New Zealand Holdings, Inc. to Pacifica Telecom Inc. in 2003.⁴ GTE Pacifica subsequently changed its name to PTI Pacifica.

The FCC most recently reaffirmed its approval of PTI Pacifica’s 100 percent foreign ownership in 2020 after the concurrence of Federal Executive Branch agencies upon the agencies’ review of all PTI Pacifica facilities, including the MICS Cable.⁵ The FCC’s 2020 Approval was conditioned on PTI Pacifica’s continued compliance with the network security agreement dated October 6, 2003 (“2003 NSA”), among PTI Pacifica’s parent companies (Pacific Telecom Inc. and The Micronesian Telecommunications Corporation), on the one hand, and the Department of

² *Micronesian Telecommunications Corporation*, 8 FCC Rcd. 748 (1993). The MICS Cable commenced operation on February 13, 1997. The 1997 in-service date was due to delays in acquiring necessary permits.

³ In re Application of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee; For Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License, *Memorandum Opinion and Order*, 15 FCC Rcd 14032 (2000).

⁴ *Bell Atlantic New Zealand Holdings, Inc.*, Order and Authorization, 18 FCC Rcd 23140 (2003) (“2003 Acquisition Order”).

⁵ See IBFS File No. ISP-PDR-20200302-00001; *International Authorizations Granted*, Public Notice, 35 FCC Rcd 6777, 6778 (2020) (“2020 Approval”).

Justice, the Federal Bureau of Investigation, the Department of Homeland Security and Department of Defense, on the other hand. PTI Pacifica confirms that there has been no change in its ownership since the issuance of the 2020 Approval.

In accordance with the 2020 Approval, PTI Pacifica requests that grant of the instant application be conditioned on the continued compliance by PTI Pacifica, its parents and subsidiaries, with the terms of the 2003 NSA, pursuant to Section 7.2 of the 2003 NSA.

II. PUBLIC INTEREST STATEMENT

Grant of the instant application will serve the public interest because it will permit the continued provision of telecommunications, video, and broadband services to customers of PTI Pacifica and its affiliates to meet the increasing demand for such services in remote insular territories. In addition to PTI Pacifica's own services, traffic on the cable includes broadband internet connectivity and backhaul traffic for other providers between CNMI and Guam. MICS is essential to providing capacity for broadband growth and diversity to interisland links connecting the islands and is used to support telecommunications services for economic growth, education, health, and safety services to remote areas of the CNMI, including emergency services. The Federal government also depends on this facility to transport interisland communications in support of military and other national security operations.

It would be extremely disruptive to all of PTI Pacifica's end-user and wholesale customers that rely on the MICS Cable if the license is not renewed. Moreover, the MICS Cable should not reach the end of its technological life within the next 25 years because all of the electronics associated with the cable are located above ground at the cable stations (there are no undersea repeaters). The system capacity has been upgraded three times already since the cable went in service, and additional significant upgrades in capacity are possible in the future.

Finally, the MICS Cable provides a competitive alternative to the more recently

constructed Atisa submarine cable system that also provides service between CNMI and Guam.

III. INFORMATION REQUIRED BY SECTION 1.767 OF THE FCC'S RULES

The following information is provided in accordance with Section 1.767(a) of the Commission's Rules, 47 C.F.R. § 1.767(a):

(1) 1.767(a)(1): Name, address and telephone number of Applicant:

Licensee/Applicant: PTI Pacifica Inc.
PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950⁶
Contact: Steven Carrara, General Counsel
Telephone: 670-682-0744
Fax: 670-235-4932
Email: Steven.Carrara@itehq.net
FRN: 0004339933

(2) 1.767(a)(2): Place of Formation:

Licensee PTI Pacifica is a corporation organized under the laws of the CNMI.

(3) 1.767(a)(3): Correspondence concerning this Application should be sent to:

Steven Carrara
General Counsel
PTI Pacifica Inc.
122 W. Harmon Industrial Park Rd, Suite 103
Tamuning, GUAM 96913-4113
Steven.Carrara@itehq.net

and

Timothy J. Cooney
Jennifer L. Kostyu
Wilkinson Barker Knauer, LLP
1800 M Street, N.W., Suite 800N
Washington, D.C. 20036
202.783.4141
tcooney@wbklaw.com
jkostyu@wbklaw.com

⁶ Note that, as of this date, no addresses in the CNMI islands have street numbers.

(4) 1.767(a)(4): Description of the Cable

The existing MICS system consists of three segments:

- **Segment 1** connects the Tanguison, Guam cable landing station to the Sinapalo, Rota cable landing station.
- **Segment 2** connects the Sinapalo, Rota cable landing station to the San Jose, Tinian cable landing station.
- **Segment 3** connects the San Jose, Tinian cable landing station to the Susupe, Saipan cable landing station.

See Appendix A for an overall system map. The configuration is point to point. Each segment has 12 strands, *i.e.*, 6 pairs of fiber. MICS has no undersea repeaters. All optical fiber driving equipment is located ashore at the cable stations.

(5) 1.767(a)(5): Landing Points

Maps and the geographic coordinates of the cable landing stations for the MICS Cable are provided in Appendix A.

(6) 1.767(a)(6): Request to Change to Non-Common Carrier Status

PTI Pacifica proposes to change the status of the MICS Cable to non-common carrier after grant of this Application. As discussed below, a competing submarine cable system also serves the same route on a non-common carrier basis. The operation of this competitive cable system demonstrates that the MICS Cable is not a bottleneck and that there are other routing options and competitive alternatives to the MICS system for interisland traffic.

In accordance with the decision of the United States Court of Appeals for the District of Columbia Circuit in *NARUC I*,⁷ the Commission has authorized submarine cables on a non-common carrier basis where: 1) there is no legal compulsion to serve the public indifferently; and

⁷ *Nat'l Ass'n of Regulatory Utility Comm'rs v. FCC*, 525 F.2d. 630, 642 (D.C. Cir. 1976) (*NARUC I*), *cert. denied*, 425 U.S. 992 (1976).

2) there are no reasons implicit in the nature of the operations of the submarine cable system to expect an indifferent holding-out to the eligible user public.⁸ The MICS Cable satisfies both of these tests.

First, there is no policy basis or legal compulsion to require the MICS Cable to serve the public indifferently.⁹ The Commission has consistently found that existing, competing submarine cable facilities ensure that an applicant's submarine cable on the same route would not function as a bottleneck facility requiring common carrier regulation.¹⁰ Non-common carrier status is appropriate here because the Atisa submarine cable system, owned by a competitor, currently provides service to each of the same islands, Saipan, Tinian, and Rota in the CNMI, and Guam, on a non-common carrier basis.¹¹ This demonstrates that there are other routing options and competitive alternatives to the MICS Cable.

The MICS Cable also satisfies the second prong of the Commission's test because there is no reason implicit in the nature of the cable's operations that would require PTI Pacifica to make

⁸ See, e.g., *Australia-Japan Cable (Guam) Limited*, 15 FCC Rcd 24057, 24062 ¶ 12 (IB 2000).

⁹ There is no legal compulsion to serve the public indifferently where there is no public interest reason to require facilities to be offered on a common carrier basis. See, e.g., *Cable & Wireless Order*, 12 FCC Rcd 8516, 8522 ¶¶ 14-15 (1997).

¹⁰ See, e.g., *RTI Solutions, Inc.*, File No. SCL-LIC-20181106-00035, Actions Taken Under Cable Landing License Act, Public Notice, 35 FCC Rcd 7904, 7906 (IB 2020) (non-common carrier status granted where cable system will provide additional geographic diversity for U.S.-Japan traffic); *GU Holdings Inc.*, File No. SCL-LIC-20190502-00016, Actions Taken Under Cable Landing License Act, Public Notice, 35 FCC Rcd 7948, 7950 (IB 2020) (non-common carrier status granted where new cable system to directly connect Guam to Australia will provide critical new and replacement capacity); *ATN Undersea Cable Corporation*, File No. SCL-LIC-20180417-0008, Actions Taken Under Cable Landing License Act, Public Notice, 34 FCC Rcd 6196, 6197 (IB 2019) (non-common carrier status granted for cable extending between the islands of St. Thomas and St. Croix in the United States Virgin Islands where other submarine cable systems serve the same route).

¹¹ See IBFS File No. SCL-LIC-20160314-00008. Public Notice: Actions Taken Under Cable Landing License Act, 32 FCC Rcd 1436 (2017).

capacity available to the public indifferently.¹² PTI Pacifica does not intend to operate the MICS cable on a common carrier basis to serve the public on an indifferent basis.¹³ Instead, PTI Pacifica will use MICS capacity for backhaul of its own wireless traffic and to provide services to enterprise and government customers pursuant to contracts that are negotiated on an individual case basis. PTI Pacifica may also sell excess capacity on a wholesale basis to other carriers pursuant to individually negotiated rates, terms, and conditions tailored to their particular needs.

In light of the robust competition provided by the Atisa cable that operates on a non-common carrier basis, PTI Pacifica needs to respond to the competition and make individualized decisions with regard to the rates, terms, and conditions pursuant to which it will offer capacity. In order to compete, PTI Pacifica will tailor its capacity offerings to the special requirements of individual customers and will separately negotiate these customer contracts. Because of the robust competition from the Atisa cable operating among the same four islands on a non-common carrier basis, customers have no expectation that the MICS Cable System will be operated on a common carrier basis.

(7) 1.767(a)(8): Ownership

PTI Pacifica is the only owner of the MICS Cable, including all three CNMI cable landing stations.

¹² See *NARUC I*, 525 F.2d at 642 (stating that the court must inquire “whether there are reasons implicit in the nature of [the] operations to expect an indifferent holding out to the eligible user public”); see also *Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999) (affirming FCC’s use of *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

¹³ See *AT&T Submarine Systems, Inc.*, Cable Landing License, 11 FCC Rcd. 14,885, 14,904 ¶ 64 (Int’l Bur. 1996) (finding that the “offer of access, nondiscriminatory terms and conditions and market pricing of IRUs does not rise to the level of an ‘indiscriminate’ offering.”), *aff’d AT&T Submarine Systems, Inc.*, Memorandum Opinion and Order, 13 FCC Rcd. 21,585 (1998), *aff’d sub nom. Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

1.767(8)(i) Certification and Ownership Information Required by Sections 63.18(h) and (o) of the Commission’s Rules, including Anti-Drug Certification, 47 C.F.R. §§ 63.18(h), (o):

A. Direct Ownership

The following U.S. entity holds a 100 percent direct ownership in applicant PTI Pacifica:

Name: **The Micronesian Telecommunications Corporation (MTC)**
FRN: 0004350252
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950
Telephone: 670-682-0744
Fax: 670-235-4932
Citizenship: CNMI
Entity Type: Corporation
Type of Business: Incumbent Local Exchange Carrier
Percent Held: 100 percent equity/100 percent voting (direct) in PTI Pacifica

B. Indirect Ownership

The following individuals and entities hold indirect ownership interests in PTI Pacifica. See Appendix B for a diagram of the ownership chain.

Name: **Pacific Telecom Inc.**
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950
Citizenship: CNMI
Entity Type: Corporation
Type of Business: Holding Company
Percent Held: 100 percent direct equity/voting in The Micronesian Telecommunications Corporation and 100 percent indirect equity/voting in PTI Pacifica Inc.

Name: **Prospector Pacific Investments Inc. (“PPI”)**
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950
Citizenship: CNMI
Entity Type: Corporation
Type of Business: Holding Company
Percent Held: 85 percent direct equity/voting in Pacific Telecom Inc.

Name: **SK Telecom Co. Ltd.**
Address: SK T-Tower, 65 Eulji-ro, Jung-gu
Seoul, South Korea 100999
Citizenship: South Korea
Principal Business: Wireless telecommunications operator
Entity Type: Corporation
Percentage Held: 15 percent direct equity/voting in Pacific Telecom Inc.

Name: **Citadel Pacific Ltd.**
Address: c/o Trident Trust (Cayman) Ltd. One Capitol Place P.O. Box 847
Grand Cayman, KY11103
Citizenship: Cayman Islands
Principal Business: Holding Company
Entity Type: Corporation
Percentage Held: 100 percent direct equity and voting in Prospector Pacific
Investments Inc.

Name: **Ricardo C. Delgado**
Address: 6758 Ayala Ave. 4/F SGV II Building
Makati City, 1200
Citizenship: Philippines
Principal Business: Business Owner
Entity Type: Individual
Percentage Held: 53.99 percent direct equity/voting in Citadel Pacific Ltd.

Name: **Jose Ricardo Delgado**
Address: 6758 Ayala Ave. 4/F SGV II Building
Makati City, 1200
Citizenship: Philippines
Principal Business: Business Owner
Entity Type: Individual
Percentage Held: 36.25 percent direct equity/voting in Citadel Pacific Ltd.

Name: **Classroom Investments Inc.**
Address: 5650 Yonge Street, Suite 300
Toronto, A6 M2M 4H5
Citizenship: Canada
Principal Business: Investment Company
Entity Type: Corporation
Percentage Held: 9.76 percent direct equity/voting in Citadel Pacific Ltd.

Name: **Ontario Teachers' Pension Plan**
Address: 5650 Yonge Street, Suite 300
Toronto, A6 M2M 4H5
Citizenship: Canada
Principal Business: Pension Plan

Entity Type: Pension Plan
Percentage Held: 100 percent direct interest in Classroom Investments Inc.

Applicant certifies that no party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

1.767(8)(ii): Certification Regarding Foreign Carrier Status and Foreign Affiliation:

PTI Pacifica certifies that it:

- (A) is not a foreign carrier in any foreign country;
- (B) does not own or control a cable station in any foreign country; and
- (C) is not affiliated with any foreign carriers, including foreign carriers that control cable landing stations in foreign countries, within the meaning of 47 C.F.R. § 63.09(e).

1.767(a)(8)(iii) Certification Regarding Foreign Destination Markets:

The MICS Cable is a purely U.S. domestic submarine cable system and does not land in any foreign destination country. Consequently, PTI Pacifica certifies that it does not seek to land and operate a submarine cable connecting to any foreign country, including any foreign country in which: (A) PTI Pacifica is a foreign carrier; (B) PTI Pacifica controls a foreign carrier; (C) there exists any entity that owns more than 25 percent of PTI Pacifica, or controls PTI Pacifica, or controls a foreign carrier in such a country; or (D) a grouping of two or more foreign carriers in such a country (or parties that control foreign carriers in such a country) own, in aggregate, more than 25 percent of PTI Pacifica and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the cable in the U.S.

1.767(a)(8)(iv) Certification Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Market:

No response is required because PTI Pacifica did not identify any non-WTO markets in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

1.767(a)(9) Certification of Compliance:

PTI Pacifica certifies that it accepts and will abide by the routine conditions set forth in Section 1.767(g) of the Commission’s Rules, 47 C.F.R. § 1.767(g).

1.767(a)(10) Other Information (Coastal Zone Management):

PTI Pacifica is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). This is because neither Guam nor the CNMI, the only U.S. states or territories in which the MICS Cable operates or proposes to operate, has listed, or ever proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁴

IV. REQUEST FOR WAIVER OF SECTION 1.767(H)(1)

PTI Pacifica requests a waiver of 47 C.F.R. §1.767(h)(1) rules so that AT&T Corp., which owns the cable landing station in Tanguisson, Guam, need not be a joint applicant for renewal of the MICS cable landing license. “The purpose of the 1.767(h)(1) requirement is to ensure that entities having a significant ability to affect the operation of the cable system become licensees so that they are subject to the conditions and responsibilities associated with the license.”¹⁵ AT&T, however, will not have the ability to affect significantly the operation of the MICS Cable. Inclusion of AT&T as a joint applicant is also not necessary to ensure compliance by Applicant

¹⁴ See Guam’s Listed Federal Actions, National Oceanic and Atmospheric Administration, Office for Coastal Management, <https://coast.noaa.gov/data/czm/consistency/media/guam.pdf> (last accessed May 5, 2021); Northern Mariana Island’s Listed Federal Actions, National Oceanic and Atmospheric Administration, Office for Coastal Management, <https://coast.noaa.gov/data/czm/consistency/media/cnmi.pdf> (last accessed May 5, 2021).

¹⁵ See *Actions Taken Under the Cable Landing License Act*, Public Notice, DA 21-498 (Int. Bureau Apr. 15, 2021) at 4 (citing Review of Commission Consideration of Applications under the Cable Landing License Act, 16 FCC Rcd 22167 at 22194-95, paras. 53-54 (2001)).

with the Cable Landing License Act, the Commission’s cable landing license rules, or the terms of the cable landing license.

For the Guam landing station, PTI Pacifica has an existing agreement with AT&T that does not provide AT&T with any ability to affect significantly the operation of the MICS Cable. The agreement with AT&T provides PTI Pacifica a long-term lease for collocation space in the cable landing station—space for which PTI Pacifica has exclusive access and control. The term of PTI Pacifica’s leasehold lasts until the Cable System is retired from service. Grant of the waiver is therefore consistent with Commission precedent.¹⁶

V. STREAMLINED PROCESSING REQUEST

PTI Pacifica requests streamlined processing under Section 1.767(k) of the Commission’s rules, 47 C.F.R. § 1.767(k). Consistent with Subsections 1.767(k)(1-3), PTI Pacifica certifies that the existing MICS Cable has no foreign country destination markets and therefore that PTI Pacifica has no affiliation with a foreign carrier in any of the MICS Cable’s destination markets. Thus, WTO status is not applicable.

PTI Pacifica also certifies that Section 1.767(k)(4) does not apply because the instant application for the renewal of an existing license is not an “application[] for a license to construct and operate a submarine cable system or to modify the construction of a previously approved submarine cable system.” Moreover, PTI Pacifica would not be required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A) because neither Guam nor the CNMI, the only U.S. territories in which the MICS Cable operates or proposes to operate, has listed, or ever proposed to list, a cable landing license as a federal activity requiring a consistency certification.

¹⁶ *Id.*

Consistent with Section 1.767(j), PTI Pacifica certifies that on the date of filing with the Commission, it caused a complete copy of the application to be sent to: 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. and Constitution Ave., NW., Washington, DC 20230; and Defense Information Systems Agency, ATTN: GC/DO1, 6910 Cooper Avenue, Fort Meade, MD 20755-7088.

VI. CONCLUSION

The continued operation of the MICS Cable will serve customers in CNMI by continuing to provide connectivity to the United States and the world through the multiple submarine cables that connect in Guam. In particular, the Federal government depends on this facility to transport interisland communications in support of military and other national security operations. The cable also will continue to provide important facilities-based competition on these routes.

PTI Pacifica requests streamlined processing of this Application and submits that the public interest, convenience, and necessity would be furthered by an expeditious grant of this Application.

Respectfully submitted,

Timothy J. Cooney
Jennifer L. Kostyu
Wilkinson Barker Knauer, LLP
1800 M Street, N.W., Suite 800N
Washington, D.C. 20036
202.783.4141
tcooney@wbklaw.com
jkostyu@wbklaw.com

/s/ Steven Carrara
Steven Carrara
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PTI Pacifica Inc.
122 W. Harmon Industrial Park Rd, Suite 103
Tamuning, Guam 96913-4113
Steven.Carrara@itehq.net

October 13, 2021

Appendix A

Appendix A

MTC INTERISLAND CABLE SYSTEM (MICS) CABLE

LANDING STATION INFORMATION

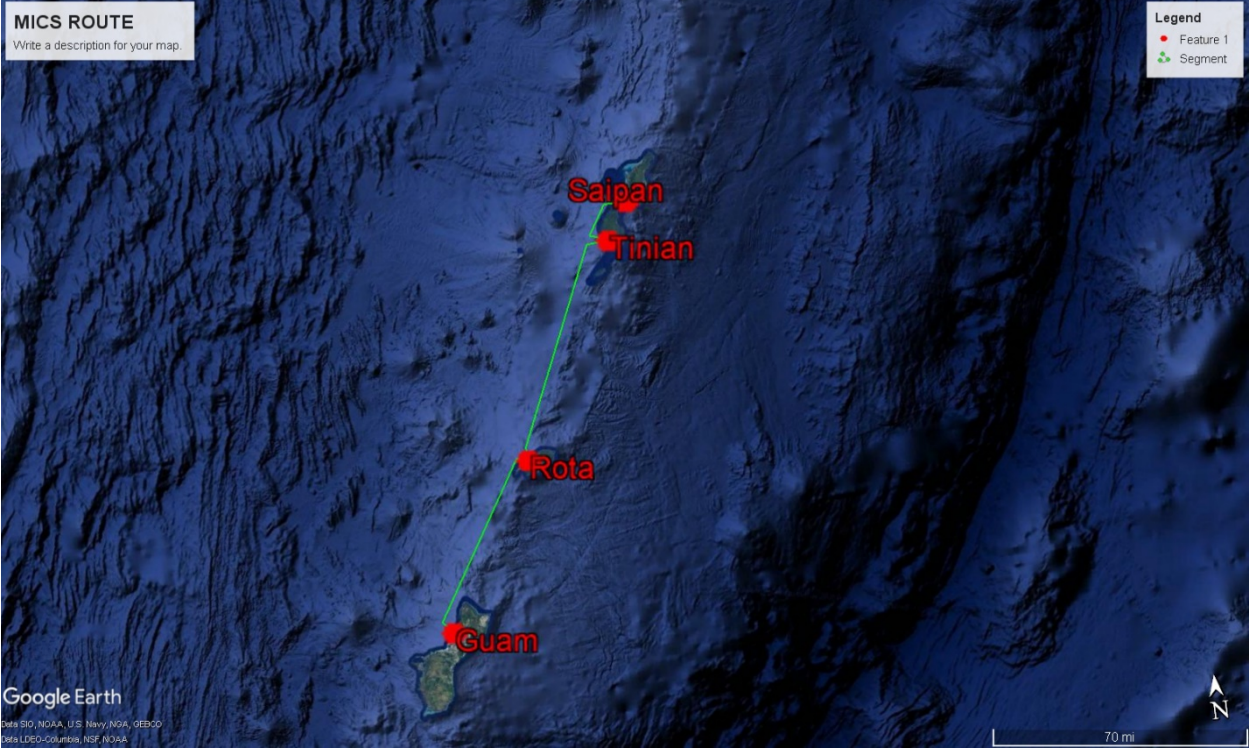
Station Location	Owner	Cable Landing Point (Beach Manhole)	Equipment Location (Cable Landing Station)
Saipan (CNMI)	PTI Pacifica Inc.	Coral Ocean Point 15° 06' 54" N 145° 42' 06" E	Susupe Central Office Tekken Street Saipan 15° 09' 30" N 145° 42' 30" E
Tinian (CNMI)	PTI Pacifica Inc.	14° 58' 28.5" N 145° 36' 46" E	Tinian Remote Broadway San Jose 14° 58' 18" N 145° 37' 53" E
Rota (CNMI)	PTI Pacifica Inc.	14° 10' 19" N 145° 11' 21" E ¹	Sinapalo Remote 14° 10' 06" N 145° 13' 59" E
Guam Tanguisson	AT&T Transoceanic Communications	Tanguisson Cable Splice Pit 13° 32' 42" N 144° 48' 33" E	Tanguisson Cable Station 13° 32' 37" N 144° 48' 45" E

¹ The values listed above for the Rota cable landing point (manhole) differ from those filed in IBFS by letter dated April 9, 2020. The values listed above are correct.

MICS ROUTE
Write a description for your map.

Legend

- Feature 1
- Segment



Google Earth
Data: SIO, NOAA, U.S. Navy, NGA, GEBCO
Data: LDEO-Columbia, NSF, NOAA

70 mi

Guam Cable Landing Site

13.545044°
144.810194°

Tanguisson Cable Station

13.543631°
144.812444°

Image © 2021 Maxar Technologies

Google Earth

1985

Imagery Date: 2/17/2020 13°32'37.40" N 144°48'37.40" E elev 0 ft eye alt 2320 ft

Rota Cable Landing Site



Image © 2021 CNES / Airbus
Data NOAA

Google Earth

1985

Imagery Date: 11/25/2020 14°10'12.73" N 145°12'39.32" E elev 0 ft eye alt 18978 ft

Saipan Cable Landing Site

Susupe Central Office

15.158373°

145.708429°

Beach Manhole

15.115036°

145.701678

Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Image © 2021 CNES / Airbus
Image © 2021 Maxar Technologies

Google Earth

1985

Imagery Date: 3/19/2019 15°08'16.91" N 145°43'28.35" E elev 0 ft eye alt 33606 ft

Tinian Cable Landing Site



14.974513°
145.612808°
Beach Manhole

Tinian Remote
14.971665°
145.631253°

Image © 2021 CNES / Airbus

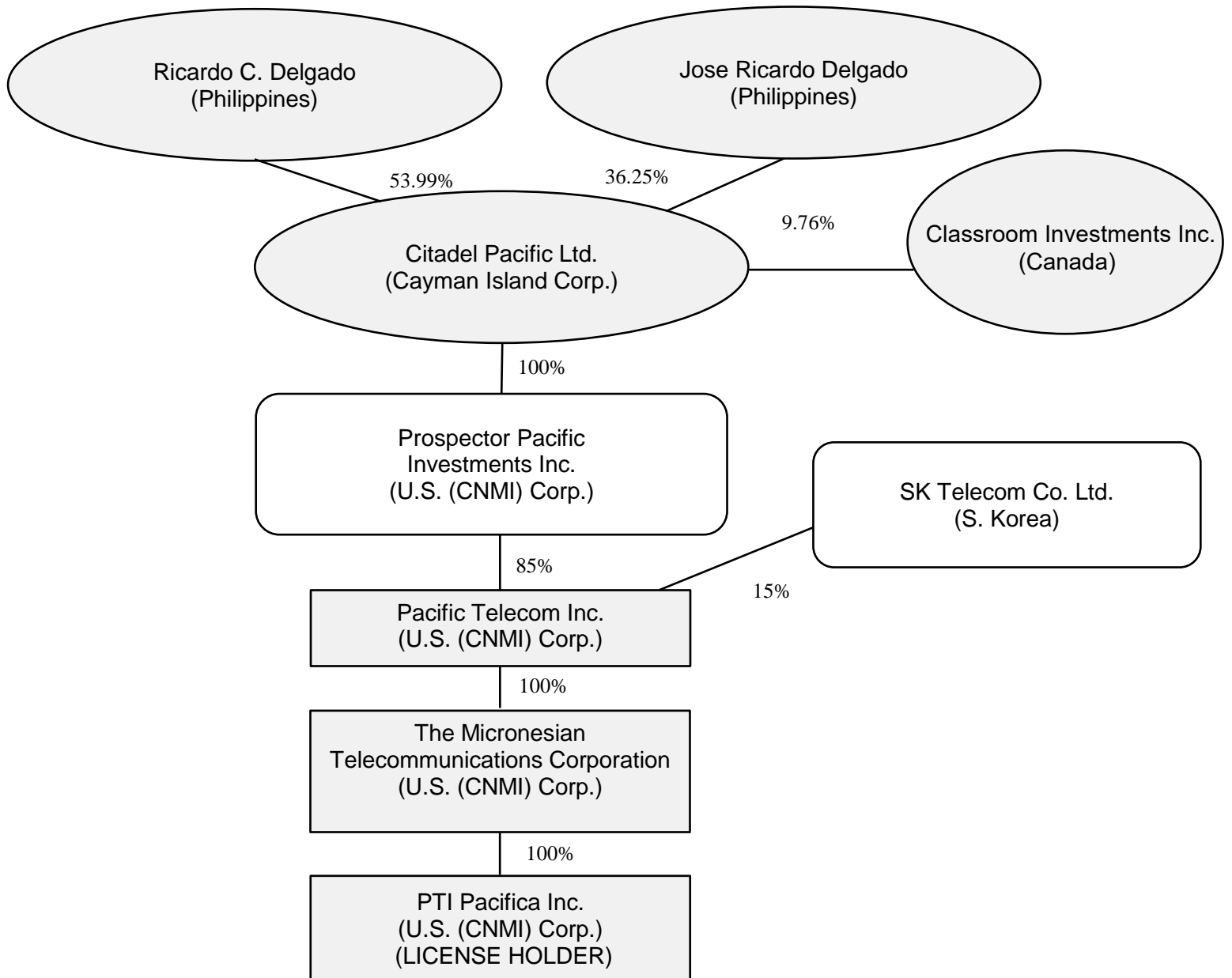
Google Earth

1985

Imagery Date: 11/4/2018 14°58'18.17" N 145°37'19.44" E elev 0 ft eye alt 7521 ft

Appendix B

PTI Pacifica Inc. Ownership Structure



CERTIFICATE OF SERVICE

I, Timothy J. Cooney, hereby certify that consistent with 47 C.F.R. § 1.767(j), that I have caused service of copies of the foregoing application for renewal of a cable landing license by U.S. mail first class this 13th day of October 2021, to the following:

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. and Constitution Ave., NW.
Washington, DC 20230

Defense Information Systems Agency
ATTN: GC/DO1
6910 Cooper Avenue
Fort Meade, MD 20755-7088

/s/ Timothy J. Cooney
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