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**FILED/ACCEPTED**

**NOV 30 2007**

Federal Communications Commission  
Office of the Secretary

November 30, 2007

**DATE STAMP & RETURN**

**VIA HAND DELIVERY**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20054

Re: Consolidated Application to Modify the Japan-U.S. Cable License, File No. SCL-LIC-19981117-00025, to Add *Pro Forma* Condition and Modify "No Exclusive Arrangements" Condition

Dear Madam Secretary:

Transmitted herewith is the consolidated application to modify the above-referenced cable landing license to: (1) add a condition allowing for post-transaction modification of pro forma transactions; and (2) to modify the "no exclusive arrangements" condition and substitute for it a "no special concessions" condition. The undersigned counsel represents licensee Reach Global Networks Limited in this matter, but is filing the application on behalf of all of the cable licensees.

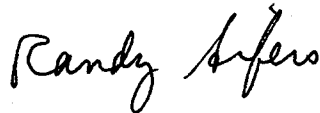
KELLEY DRYE & WARREN LLP

Marlene Dortch  
November 30, 2007  
Page Two

Please contact the undersigned with any questions.

Very truly yours,

Kelley Drye & Warren LLP

A handwritten signature in cursive script that reads "Randy Sifers".

Robert J. Aamoth  
Randall W. Sifers  
Counsel to  
Reach Global Networks Limited

Enclosure

cc: David Krech  
Paige Anderson

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

*In the Matter of* )  
 )  
AT&T Corp. )  
Qwest Communications Corporation )  
Reach Global Networks Limited )  
Sprint Communications Company L.P. )  
Teleglobe America Inc. )  
Verizon Business Global LLC )  
Verizon Hawaii International Inc. )  
  
Cable Landing License Modification – ) File No. SCL-MOD-2007 \_\_\_\_\_  
Request to Add *Pro Forma* Condition, )  
 )  
Cable Landing License Modification – )  
Request to Modify “No Exclusive )  
Arrangements” Condition, )  
 )  
for the Japan-U.S. Cable Network )

**CONSOLIDATED APPLICATION**

Pursuant to the Commission’s instructions for modifying cable landing licenses to take advantage of certain rule changes,<sup>1</sup> the above-captioned Licensees<sup>2</sup> (hereinafter, “Applicants” or “Licensees”) of the Japan-U.S. cable network,<sup>3</sup> a non-common carrier submarine cable system between the United States and Japan, through the undersigned counsel, hereby apply to modify the Japan-U.S. cable landing license (1) to add a condition allowing for post-transaction

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<sup>1</sup> *Public Notice: New Submarine Cable Landing License Rules Scheduled to Take Effect March 15, DA 02-598* (released Mar. 13, 2002) (“*Public Notice*”); *Review of Commission Consideration of Applications Under the Cable Landing License Act, Report and Order*, 16 FCC Rcd. 22167 (2001) (“*Submarine Cable Streamlining Order*”).

<sup>2</sup> The entities listed in the caption represent current licensees of the Japan-U.S. cable network.

<sup>3</sup> *See AT&T Corp. et al., Cable Landing License*, File No. SCL-LIC-19981117-00025, 14 FCC Rcd. 13066 (1999) (“*Japan-U.S. Cable License*”).

notification of *pro forma* transactions; and (2) to modify the “no exclusive arrangements” condition and substitute for it a “no special concessions” condition.

**I. Pro Forma Authority**

The Applicants request that the Commission modify the Japan-U.S. cable landing license to add a condition allowing for post-transaction notification of *pro forma* transactions.<sup>4</sup> The text of the *pro forma* transactions rule is set forth in Section 1.767(g)(7) of the Commission’s rules.<sup>5</sup> By the signatures below, each licensee certifies that it accepts and will abide by the *pro forma* transactions rule.

**II. Substitution of the “No Special Concessions” Condition**

The Applicants further request that the Commission modify the Japan-U.S. cable landing license to modify the “no exclusive arrangements” condition and substitute for it a “no special concessions” condition.<sup>6</sup> The text of this condition is set forth in Section 1.767(g)(5) of the Commission’s rules.<sup>7</sup> By the signatures below, each licensee certifies that it accepts and will abide by this “no special concessions” condition.<sup>8</sup>

Correspondence related to this application should be sent to:

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Kelley Drye & Warren LLP  
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Tel: (202) 342-8620

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<sup>4</sup> See *Public Notice*, at 2-3; *Submarine Cable Streamlining Order*, 16 FCC Rcd. at 22201 (¶ 63).

<sup>5</sup> See 47 C.F.R. § 1.767(g)(7).

<sup>6</sup> See *Public Notice*, at 3-4; *Submarine Cable Streamlining Order*, 16 FCC Rcd. at 22185 (¶ 33).

<sup>7</sup> See 47 C.F.R. § 1.767(g)(5).

<sup>8</sup> See *Public Notice*, at 4.

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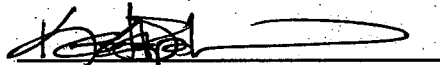
**III. Conclusion**

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by the grant of this Application.

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Counsel to Applicants  
for this Application

Respectfully submitted,

**AT&T Corp.**



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**Qwest Communications Corporation**

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**Reach Global Networks Limited**

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### III. Conclusion

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by the grant of this Application.

Respectfully submitted,

**AT&T Corp.**

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### III. Conclusion

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by the grant of this Application.

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on behalf of Reach Global Networks Limited

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**Verizon Business Global LLC**

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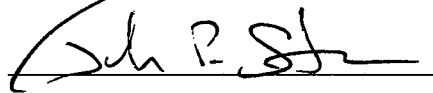
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Dated: November **30**, 2007

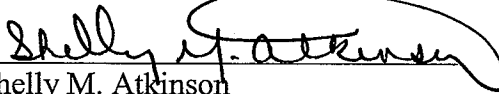
## CERTIFICATE OF SERVICE

I, Shelly Atkinson, hereby certify that copies of the foregoing Consolidated Application for modification of the Japan-U.S. cable landing license have been sent by first class mail on this 30 day of November 2007, to the following:

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U.S. Coordinator  
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