

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

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In the Matter of )  
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**Primus Telecommunications, Inc.** ) File No. SCL-MOD-2013\_\_\_\_\_ )  
 )  
Cable Landing License Modification )  
Request to Relinquish Interest in Cable Landing License )  
\_\_\_\_\_ )

**CABLE LANDING LICENSE MODIFICATION  
REQUEST TO RELINQUISH INTEREST IN CABLE LANDING LICENSE**

Primus Telecommunications, Inc. (“Primus”), by its undersigned counsel, hereby respectfully requests that the Commission modify the Japan-US cable landing license (“License”) issued by the Commission on July 9, 1999, in FCC File No. SCL-LIC-19981117-00025, to remove Primus as a licensee pursuant to Section 1.767(m)(2) of the Commission’s Rules, 47 C.F.R. § 1.767(m)(2), and the Commission’s *Submarine Cable Report and Order*.<sup>1</sup> The Japan-US Cable Network (“Japan-US CN”) extends between the U.S. and Japan.<sup>2</sup> Primus’ voting interest and ownership interest in Japan-US CN are both 0.18692%. Primus does not own or control any of the U.S. cable landing stations for Japan-US CN. In addition, Primus understands that the owners of the U.S. cable landing stations for Japan-US CN will not change as a result of this request. Given Primus’ minimal investment in Japan-US CN, Primus does not

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<sup>1</sup> *Review of Commission Consideration of Applications under the Cable Landing License Act, Report and Order*, 16 FCC Rcd 22167, ¶ 59 (2001) (“*Submarine Cable Report and Order*”).

<sup>2</sup> *See AT&T et al., Joint Application for a License to Land and Operate a Submarine Cable Network System Between the United States and Japan*, File No. SCL-LIC-19981117-00025, Cable Landing License, 14 FCC Rcd 13066 (1999).

have the ability to affect the operation of Japan-US CN. Accordingly, even after Primus relinquishes its U.S. license, the remaining Japan-US CN licensees will retain collectively *de jure* and *de facto* control of the U.S. portion of Japan-US CN sufficient to comply with the requirements of the Commission's rules and any specific conditions of the License.

In addition, Primus respectfully requests streamlined processing of this application in accordance with Sections 1.767(j)-(k) of the Commission's Rules, 47 C.F.R. § 1.767(j)-(k). Primus hereby certifies that it is not a foreign carrier and that it is not affiliated with a foreign carrier in Japan.

As required by the Commission's Rules and the *Submarine Cable Report and Order*, concurrent with this filing, Primus is serving a copy of this Application to the governmental agencies listed in Section 1.767(j) and to each of the other joint U.S. licensees of the License using the address on file with the Commission.

For the foregoing reasons, Primus respectfully requests that the License be modified as described herein.

Respectfully submitted,

/s/ Danielle Burt  
Catherine Wang  
Danielle Burt  
Bingham McCutchen LLP  
2020 K Street, N.W.  
Washington, D.C. 20006  
Tel: (202) 373-6000  
Fax: (202) 373-6001

Counsel for Primus Telecommunications, Inc.

Dated: February 27, 2013

## VERIFICATION

I, John Coltman, state that I am Director -- Wholesale US Domestic Services of Primus Telecommunications Group, Inc., the ultimate parent of Primus Telecommunications, Inc.; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed this 26<sup>th</sup> day of February, 2013.



John Coltman  
Director -- Wholesale US Domestic Services  
Primus Telecommunications Group, Inc.

**CERTIFICATE OF SERVICE**

I, Danielle Burt, hereby certify that on this the 27th day of February 2013, I served a copy of the foregoing document via First Class Mail, postage pre-paid, to the following:

/s/ Danielle Burt

U.S. Coordinator  
EB/CIP  
Department of State  
2201 C Street, N.W.  
Washington, D.C. 20520-5818

Office of the Chief Counsel/NTIA  
U.S. Department of Commerce  
14th Street and Constitution Avenue, N.W.  
Washington, D.C. 20230

Defense Information Systems Agency  
Code RGC  
701 S. Courthouse Road  
Arlington, VA 22204

AT&T Corp.  
1120 20th Street, NW  
Suite 1000  
Washington, DC 20036

Verizon Hawaii International, Inc. f/k/a GTE  
Hawaiian Tel International Incorporated  
1 Verizon Way  
Basking Ridge, NJ 07920

Verizon Business Global LLC f/k/a MCI, Inc.  
22001 Loudon County Parkway  
Ashburn, VA 20147

Qwest Communications Company, LLC  
850 Broadway Suite 800  
Vancouver, WA 98660

Sprint Communications Company, L.P.  
12502 Sunrise Valley Drive  
Reston, VA 20196

Global Crossing Telecommunications, Inc. f/k/a  
Frontier Communications Services, Inc.  
225 Kenneth Drive  
Rochester, NY 14623

Tata Communications (America), Inc. f/k/a  
Teleglobe America, Inc.  
2355 Dulles Corner Boulevard  
Suite 700  
Herndon, VA 20171

Reach Global Networks Limited  
c/o Pacific Networks Limited  
20th Floor, Telecom House  
3 Gloucester Road  
Wan Chai, Hong Kong

Com Tech International Corporation  
2001 Sixth Avenue, Suite 3201  
Seattle, WA 98121

Pacific Gateway Exchange (Bermuda), Ltd.  
500 Airport Boulevard, Suite 340  
Burlingame, CA 94010

PSINet, Inc.  
510 Huntmar Park Drive  
Herndon, VA 20170

RSL Com U.S.A., Inc.  
5550 Topanga Canyon Blvd  
Suite 250  
Woodland Hills, CA 91307

Telegroup, Inc.  
209 Nutmeg Avenue  
Fairfield, Iowa 52556