

September 23, 2014

**Via IBFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Global Caribbean Network SAS  
File Nos. ITC-214-20050623-00237, ITC-214-20050621-00231, and SCL-LIC-  
20050418-00010  
Modification of License Request

Dear Ms. Dortch:

By its attorney, Global Caribbean Network SAS (“GCN”) hereby reports to the Commission that, effective September 8, 2014, together with its parent companies Global Caribbean Fiber SAS (“GCF”) and Auto-Guadeloupe Investissement, S.A. (“AGI”) (collectively, the “Loret Companies”), it entered into the attached Network Security Agreement with the U.S. Department of Homeland Security and the U.S. Department of Justice (the “U.S. Government Parties”). GCN requests that the Commission condition GCN’s above-captioned authorizations upon the compliance by the Loret Companies to the terms of the Network Security Agreement.

**Background.** The Loret Companies entered into the Network Security Agreement at the request of the U.S. Government Parties in connection with their review of the application for transfer of control of Antilles Crossing – St. Croix, Inc. (“ACSC”) from GCF to Fiber Investment Holdings Limited IBC (“FIHL”). By Public Notice, DA 14-1311, released September 10, 2014, the Commission announced its grant of that application subject to the compliance by ACSC and FIHL to the terms of the December 7, 2007 Agreement by and among ACSC, Leucadia National Corporation and AGI, as amended by the September 8, 2014 Amendment No. 1 to the December 7, 2007 Agreement. See SCL-T/C-20131219-00017. In conjunction with their review of the ACSC transfer of control application, the U.S. Government Parties also requested the Loret Companies to enter into a separate Network Security Agreement governing the GCN submarine fiber optic network, and that the above-captioned GCN authorizations be conditioned upon compliance by the Loret Companies with the terms of the Network Security Agreement.

Please direct any questions regarding this matter to the undersigned counsel.

Sincerely,



Eric Fishman  
Counsel to Global Caribbean Network SAS  
Global Caribbean Fiber SAS and  
Auto-Guadeloupe Investissement, S.A.

Enclosure

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