

February 5, 2020

**VIA IBFS**

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: File No. SCL-MOD-20191202-00038

Dear Ms. Dortch:

On December 2, 2019, AT&T Mobility Puerto Rico Inc. (“AMPR”) filed an application seeking Commission approval to modify the submarine cable landing license for the Americas-II cable system<sup>1</sup> to relinquish its interest in this license pursuant to Section 1.767(m)(2) of the Commission’s rules.<sup>2</sup> The application was given File No. SCL-MOD-20191202-00038.

Section 1.767(m)(2) requires the party seeking to relinquish its interest to serve the modification application on each other licensee of the cable system. To identify the licensees to be served, AMPR used the list of Americas-II licensees the Commission released in connection with FY 2016 regulatory fees.<sup>3</sup> As reflected in the Certificate of Service for the modification application, AMPR served those entities through the contact people listed for their FCC Registration Numbers in the Commission’s CORES database, except that IMPSAT USA, Inc. was served through the offices of CenturyLink, its current corporate parent.<sup>4</sup>

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<sup>1</sup> File No. SCL-LIC-19980429-00019.

<sup>2</sup> 47 C.F.R. § 1.767(m)(2).

<sup>3</sup> *FY 2016 Regulatory Fees: Listing of Submarine Cable System Owners*, Public Notice, Attachment at 2 (rel. Sept. 7, 2016).

<sup>4</sup> The service copy for Sprint Communications Company L.P. was returned as undeliverable. Counsel for Sprint has supplied an updated contact person and address, which we are serving.

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International Bureau staff subsequently informed me that their records indicate that seven additional entities still might be co-licensees of Americas-II and asked that AT&T research their status. AT&T found the following information from Americas-II consortium records, corporate records in the seven entities' jurisdictions of formation, and other sources:

- *IDB Worldcom Services, Inc.* – Between May and June 2007, consortium records indicate that IDB's interests were combined with those of MCI International, Inc.'s. Pat Merrick of Verizon, whom AMPR served originally for MCI International, Inc., advises that IDB was merged into MCI Communications Corporation. Mr. Merrick says he can accept service for MCI Communications Corporation too.
- *IDT Corporation* – Between June and December 2008, consortium records indicate that IDT defaulted on its payments to the consortium, which reclaimed IDT's capacity. Consortium member Compañía Dominicana de Teléfonos, C. por A. ("CODETEL"), which is now a part of América Móvil (d/b/a Claro), acquired IDT's capacity by paying IDT's debt to the consortium.
- *LC Communications* – According to the order granting the submarine cable landing license, LC was a trade name for International Telecom, Inc.<sup>5</sup> Between October 1999 and April 2000, consortium records indicate that LC transferred its capacity to consortium member Centennial (which subsequently was acquired by AT&T). As explained in the relinquishment filing, Centennial's interests in Americas-II were assigned to AT&T Mobility Puerto Rico Inc., which has conveyed its rights and obligations under the Americas-II cable System Construction and Maintenance Agreement to consortium member AT&T Corp. Consortium records also indicate that LC officially exited the consortium between December 2008 and January 2009. The Delaware Secretary of State already had voided International Telecom, Inc.'s corporate status on March 1, 2008.<sup>6</sup>
- *Pacific Gateway Exchange (Bermuda) Limited* – Between July and November 2000, consortium records indicate that Pacific Gateway's capacity was reallocated

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<sup>5</sup> See Joint Application for a License To Land and Operate a Digital Submarine Cable System Among Florida, Puerto Rico, the U.S. Virgin Islands, Martinique, Curacao, Trinidad, Venezuela, French Guiana and Brazil, the AMERICAS-II Cable System, Cable Landing License, 13 FCC Rcd 22540, 22542 ¶ 2 (Telecomms. Div., IB 1998).

<sup>6</sup> See Del. Sec'y of State, Entity File No. 3907519 (Dec. 16, 2019) (printout attached).

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to various other consortium members: AT&T; Telecommunicaciones Ultramarinas de Puerto Rico (“ULTRACOM”), which is now part of PREPA Networks, LLC; multiple Cable & Wireless entities; Guyana Telephone and Telegraph Company (now Atlantic Teleconnection); and Embratel, which is now part of América Móvil (d/b/a Claro). The consortium records AT&T has reviewed do not indicate whether Pacific Gateway defaulted on payments to the consortium or simply returned its capacity to the consortium. Consortium records also indicate that Pacific Gateway officially exited the consortium between July 2003 and October 2004. Pacific Gateway already had been struck off the Bermuda Companies Register on September 23, 2002.<sup>7</sup>

- *STAR Telecommunications, Inc.* – Between August 2002 and January 2003, consortium records indicate that STAR’s capacity was transferred to a Cable & Wireless entity that belonged to the consortium. Consortium records also indicate that STAR officially exited the consortium between July 2002 and July 2003. Delaware Secretary of State records show that STAR forfeited its corporate status on December 31, 2006.<sup>8</sup>
- *Telia Carrier United States Inc.* – Consortium records indicate that Telia transferred its ownership interest to France Telecom, now Orange, in December 2003 and officially exited the consortium between November 2005 and November 2006.
- *WorldXchange Communications, Inc.* – Consortium records indicate that the consortium reclaimed WorldXchange’s capacity between July and October 2003 due to WorldXchange’s default on payments to the consortium; the capacity has not been distributed to another member. Consortium records also indicate that WorldXchange officially exited the consortium between July 2003 and October 2004. WorldXchange’s corporate status was voided by the Delaware Secretary of State on March 1, 2017.<sup>9</sup>

As requested by the staff, AMPR is filing this letter in IBFS as a supplement to its modification application. The attached certificate of service provides proof that this supplement is being served on each of the parties on whom AMPR served the modification application on December 2, 2019 and that the modification and this

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<sup>7</sup> See Fax from Zulema R. Burchall, Office of the Bermuda Registrar of Companies, to Julia Coto, Cogency Global Inc. (Dec. 17, 2019) (attached).

<sup>8</sup> See Del. Sec’y of State, Entity File No. 2663119 (Dec. 16, 2019) (printout attached).

<sup>9</sup> See Del. Sec’y of State, Entity File No. 3171244 (Dec. 16, 2019) (printout attached).

# Arnold & Porter

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supplement are being served on MCI Communications Corporation and Sprint Communications Company L.P.

Please contact me with any further questions regarding AMPR's modification application.

Respectfully submitted,



Peter J. Schildkraut  
Counsel for AT&T Mobility Puerto Rico  
Inc.

cc (via email): David Krech, Esq.  
Arthur Lechtman, Esq.

# State Of Delaware

## Entity Details

12/16/2019 2:27:27PM

File Number: 3907519

Incorporation Date / Formation Date: 1/5/2005

Entity Name: INTERNATIONAL TELECOM, INC.

Entity Kind: Corporation

Entity Type: General

Residency: Domestic

State: DELAWARE

Status: Void, AR's or Tax Delinquent

Status Date: 3/1/2008

## Registered Agent Information

Name: THE COMPANY CORPORATION

Address: 251 LITTLE FALLS DRIVE

City: WILMINGTON

Country:

State: DE

Postal Code: 19808

Phone: 302-636-5440

## Tax Information

Last Annual Report Filed: 2006

Tax Due: \$ 525

Annual Tax Assessment: \$525

Total Authorized Shares: 1500

## Filing History (Last 5 Filings)

| Seq | Description       | No of Pages | Filing Date<br>mm/dd/yyyy | Filing Time | Effective Date<br>mm/dd/yyyy |
|-----|-------------------|-------------|---------------------------|-------------|------------------------------|
| 1   | Stock Corporation | 1           | 1/5/2005                  | 10:53 AM    | 1/5/2005                     |

**FAX TRANSMITTAL COVER SHEET**



**REGISTRAR OF COMPANIES**  
GOVERNMENT ADMINISTRATION BUILDING  
30 PARLIAMENT STREET  
HAMILTON HM 12, BERMUDA

**Fax Number/Email:** jcoto@cogencyglobal.com

**COMPANY:** COGENCY GLOBAL INC

**ATTENTION:** Julia Coto

**Sender:** Zulema R Burchall

**Date:** 12/17/2019

**Ref:** 328761

**Registration Number:** 23438

**Name:** Pacific Gateway Exchange (Bermuda) Limited

**Registered Agent Name:** Conyers Dill & Pearman  
Claredon House  
2 Church St.  
Hamilton HM 11  
Bermuda  
441-295-1422 /

**Telephone/Fax:**

**Date of Incorporation:** June 9, 1997

**Minimum: (Expressed in US\$)** \$12,000.00 / Original Currency

**Authorized: (Expressed in US\$)** \$24,000 .00/ Original Currency

**Status:** Stuck Off ( September 23, 2002)

**Change of Name Date/Name:**

**Local/Overseas/Exempted:** Exempted

**\*\*Note: Directors and Shareholders information may be obtained from the registered office.\*\***

# State Of Delaware

## Entity Details

12/16/2019 2:37:19PM

File Number: 2663119

Incorporation Date / Formation Date: 9/13/1996

Entity Name: STAR TELECOMMUNICATIONS, INC.

Entity Kind: Corporation

Entity Type: General

Residency: Domestic

State: DELAWARE

Status: Forfeited, Failure to appoint a R/A

Status Date: 12/31/2006

## Registered Agent Information

Name: UNASSIGNED AGENT

Address:

City:

Country:

State: NullValue

Postal Code: 95050

Phone:

## Tax Information

Last Annual Report Filed: 1999

Tax Due: \$ 600000

Annual Tax Assessment: \$600000

Total Authorized Shares: 105000000

## Filing History (Last 5 Filings)

| Seq | Description                                      | No of Pages | Filing Date<br>mm/dd/yyyy | Filing Time | Effective Date<br>mm/dd/yyyy |
|-----|--|-------------|---------------------------|-------------|------------------------------|
| 1   | Agent Resignation w/o Apt<BR>9000010 - THE CORPC | 1           | 12/1/2006                 | 1:41 PM     | 12/1/2006                    |
| 2   | Merger [Survivor]                                | 1           | 4/7/1999                  | 3:30 PM     | 4/7/1999                     |
| 3   | Amendment Stock                                  | 2           | 7/10/1998                 | 12:00 PM    | 7/10/1998                    |
| 4   | Restated; Domestic                               | 5           | 6/17/1997                 | 9:00 AM     | 6/17/1997                    |
| 5   | Correction, Amendment                            | 1           | 6/13/1997                 | 9:00 AM     | 6/13/1997                    |

# State Of Delaware

## Entity Details

12/16/2019 2:28:56PM

File Number: 3171244

Incorporation Date / Formation Date: 2/4/2000

Entity Name: WORLDXCHANGE COMMUNICATIONS, INC.

Entity Kind: Corporation

Entity Type: General

Residency: Domestic

State: DELAWARE

Status: Void, AR's or Tax Delinquent

Status Date: 3/1/2017

## Registered Agent Information

Name: THE CORPORATION TRUST COMPANY

Address: CORPORATION TRUST CENTER 1209 ORANGE ST

City: WILMINGTON

Country:

State: DE

Postal Code: 19801

Phone: 302-658-7581

## Tax Information

Last Annual Report Filed: 0

Tax Due: \$ 0

Annual Tax Assessment: \$175

Total Authorized Shares: 1000

## Filing History (Last 5 Filings)

| Seq | Description                 | No of Pages | Filing Date<br>mm/dd/yyyy | Filing Time | Effective Date<br>mm/dd/yyyy |
|-----|-----------------------------|-------------|---------------------------|-------------|------------------------------|
| 1   | Merger [Survivor]           | 3           | 2/20/2001                 | 4:01 PM     | 2/20/2001                    |
| 2   | Merger [Survivor]           | 3           | 12/29/2000                | 4:03 PM     | 12/29/2000                   |
| 3   | Merger [Survivor]           | 2           | 12/18/2000                | 2:00 PM     | 12/18/2000                   |
| 4   | Amendment<BR>CTI MERGER CO. | 1           | 3/1/2000                  | 1:30 PM     | 3/1/2000                     |
| 5   | Stock Corporation           | 2           | 2/4/2000                  | 3:30 PM     | 2/4/2000                     |

## **CERTIFICATE OF SERVICE**

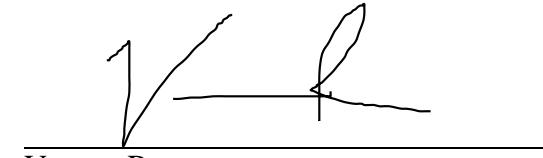
I, Vernon Ross, hereby certify that on February 5, 2020, I caused true and correct copies of the foregoing to be served by first-class mail, postage prepaid upon the following:

- **IMPSAT USA, Inc.**  
ATTN: Randy Clarke, VP, Federal Regulatory Affairs  
CenturyLink, Inc.  
1099 New York Ave NW, Ste. 250  
Washington, DC 20001
- **MCI Communications Corporation**  
MCI International, Inc.  
ATTN: Patrick Merrick  
22001 Loudoun County Parkway  
Ashburn, VA 20147
- **Primus Telecommunications, Inc., Debtor-in-Possession**  
ATTN: Doris Koch  
7901 Jones Branch Drive, Suite 900  
McLean, VA 22102
- **Sprint Communications Company L.P.**  
c/o Garrie C. Losee  
Sprint Corporation  
12502 Sunrise Valley Drive M/S: VARESA0209  
Reston, VA 20196
- **Tata Communications (America) Inc.**  
ATTN: Diana M. Peneva  
2355 Dulles Corner Blvd., Suite 700  
Herndon, VA 20171
- **PREPA Networks, LLC**  
ATTN: Jose D. Aponte-Casillas  
PO Box 195600  
San Juan, PR 00919
- **Telefonica Larga Distancia de Puerto Rico, Inc.**  
ATTN: Elizabeth Bustamante  
1111 Brickell Avenue, 10<sup>th</sup> floor  
Miami, Florida 33131

In addition, I caused true and correct copies of the Modification Application submitted by AT&T Mobility Puerto Rico Inc. on December 2, 2019 (IBFS File No. SCL-MOD-20191202-00038) to be served by first-class mail, postage prepaid upon the following:

- MCI Communications Corporation  
ATTN: Patrick Merrick  
22001 Loudoun County Parkway  
Ashburn, VA 20147
- Sprint Communications Company L.P.  
c/o Garrie C. Losee  
Sprint Corporation  
12502 Sunrise Valley Drive M/S: VARESA0209  
Reston, VA 20196

Sincerely,



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Vernon Ross  
Arnold & Porter Kaye Scholer LLP