

Attachment A

Telefonica Larga Distancia de Puerto Rico, Inc. (“TLDI”) hereby requests that the Commission modify the submarine cable landing license for the Columbus II Cable System (“Columbus II”) to relinquish TLDI’s interest in this license pursuant to Section 1.767(m)(2) of the Commission’s rules.¹ TLDI currently appears in the International Bureau Filing System (“IBFS”) as a licensee for Columbus II, along with AT&T Corp. and Servicio di Telecomunicacion di Aruba (SETAR) N.V.²

Effective August 8, 2020, TLDI withdrew its participation in the Columbus II Construction and Maintenance Agreement pursuant to an agreement with the remaining participants. As a consequence of its withdrawal, TLDI’s voting and ownership interest of 6.52626% in Columbus II was reallocated to other consortium members, and these remaining consortium members retain collective control of the license. The following reflects the change in ownership interests following TLDI’s withdrawal:

| Party | Previous Ownership³ | Current Ownership⁴ |
|---|---------------------------------------|--------------------------------------|
| Administracion Nacional de Telecomunicaciones | 0.05402% | 0.05415% ⁵ |
| Administracion Nacional de Telecomunicaciones Public Administration | 0.13886% | 0.13917% |
| AT&T Corp. | 70.03004% | 76.45657% |
| Atlantic Teleconnection Operating Company, Limited | 0.92571% | 0.92782% |
| Cable & Wireless (Barbados) Limited | 0.46286% | 0.46391% |
| Cable & Wireless (BVI) Limited | 1.38857% | 1.47121% |
| Compania Dominicana de Telefonos, C. Por A. | 4.76741% | 4.77829% |
| Empresa Nacional De Telecomunicaciones S.A. | 1.11085% | 1.11339% |
| Global Crossing Americas Solutions | 0.05402% | 0.05415% |
| Global Interlink, LTD. | 1.57371% | 1.61704% |
| Empresa Guatemalteca de Telecomunicaciones | 0.05402% | 0.05415% |
| PREPA.Net International Wholesale Transport Inc. | 0.74057% | 0.74226% ⁶ |

¹ See 47 C.F.R. § 1.767(m)(2).

² See IBFS File No. SCL-LIC-20190326-00010.

³ To the extent these interests differ from those submitted with the application for the Columbus II license, that is due to certain intervening changes in ownership since the July 7, 2020, grant of the license. These changes did not result in any owner newly acquiring a five percent or greater voting or equity interest in Columbus II.

⁴ These interests reflect the ownership of Columbus II following TLDI’s withdrawal from the consortium on August 8, 2020.

⁵ It is our understanding that this interest has since been acquired by Altice Dominicana, S.A.

⁶ It is our understanding that this interest has since been acquired by HUB Advanced Networks, LLC.

| Party | Previous Ownership³ | Current Ownership⁴ |
|--|---------------------------------------|--------------------------------------|
| Rostelecom | 0.13886% | 0.13917% |
| Servicio di Telecomunicacion di Aruba (SETAR) N.V. | 11.80282% | 11.98871% |
| TLDI | 6.52626% | 0.0000% |
| Turk Telekomunikasyon A.S. | 0.23143% | 0.0000% |
| Total | 100.00% | 100.00% |

In light of the above information, this modification application satisfies the two tests for approval set forth in Section 1.767(m)(2) of the Commission’s rules.⁷ *First*, because TLDI no longer has any equity or voting interest in Columbus II, TLDI is not required to be a licensee under Section 1.767(h).⁸ *Second*, because TLDI’s withdrawal dispersed its interest among existing consortium members, there has been no change in the remaining licensees’ collective ability to exercise *de jure* and *de facto* control of the U.S. portion of the Columbus II system sufficient to comply with the Commission’s rules and any specific conditions of the license. Accordingly, TLDI respectfully requests prompt Commission approval of this modification application.

⁷ See 47 C.F.R. § 1.767(m)(2).

⁸ See *id.* § 1.767(h) (stating that “entities owning or controlling a five percent (5%) or greater interest in the cable system and using the U.S. points of the cable system” must appear as licensees for a submarine cable landing license).

CERTIFICATE OF SERVICE

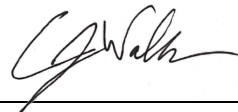
I, Corey Walker, hereby certify that, on this 1st day of July, 2021, I caused a copy of the foregoing to be served on the following via certified U.S. mail:

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