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VIA IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
Attn: International Bureau

Re: File No. SCL-MOD-20210928-00039
ARCOS-1 USA, Inc. and A.SurNet, Inc. Application for a Modification to Cable Landing License

SUPPLEMENT

Dear Ms. Dortch:

ARCOS-1 USA, Inc and A.SurNet, Inc. (together, the "Licensees") supplement the above-referenced Application for a Modification to Cable Landing License with the following information in response to requests from FCC staff:

- On the Cuba spur, the ARCOS-1 Segment #26 will have two (2) Fiber Pairs and will be unrepeated.
- A list of foreign affiliated carriers and required certifications and demonstrations by the Licensees as required by 47 C.F.R. Section 1.767(a)(8)(ii)-(iv) is included in **Attachment A** to this Supplement.

This letter is being filed electronically via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Ulises R. Pin



Andrew D. Lipman
Ulises R. Pin

Counsel for Licensees

cc (via e-mail): Troy Tanner, Denise Coca, David Krech, Jodi Cooper

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ATTACHMENT A
TO THE SUPPLEMENT

Section 1.767(a)(8)(ii) - Certification Regarding Foreign Carrier Status and Foreign Affiliation:

Licensees are affiliated with the following foreign carriers, through their affiliation with CWIGroup Limited, and its subsidiaries ("C&W").

Carrier	Country
Cable and Wireless (Anguilla) Limited	Anguilla
Cable & Wireless Antigua & Barbuda Limited	Antigua and Barbuda
The Bahamas Telecommunications Company Limited	The Bahamas
Cable & Wireless (Barbados) Limited	Barbados
Cable and Wireless (BVI) Limited	British Virgin Islands
Cable and Wireless (Cayman Islands) Limited	Cayman Islands
Cable & Wireless Dominica Limited	Dominica
CWC Cable & Wireless Communications Dominican Republic, S.A. ¹	Dominican Republic
Cable and Wireless Grenada Limited	Grenada
Cable & Wireless Jamaica Limited	Jamaica
Cable and Wireless (West Indies) Limited	England and Wales
Cable & Wireless Panama S.A.	Panama
Cable and Wireless (St. Lucia) Limited	St. Lucia
Cable & Wireless St. Kitts & Nevis Limited	St. Kitts and Nevis
Cable & Wireless St. Vincent and the Grenadines Limited	St. Vincent and the Grenadines
Cable and Wireless (TCI) Limited	Turks and Caicos Islands
Telecommunications Services of Trinidad and Tobago Limited	Trinidad and Tobago

Licensees are affiliated with the following foreign carriers, through their affiliation with Columbus International Inc.²

Foreign Carrier	Country
Antelecom N.V.	Curacao
Kelcom International (Antigua & Barbuda) Ltd.	Antigua & Barbuda
Columbus Communications Limited	The Bahamas
Columbus Antilles (Barbados) Limited	Barbados
Columbus Telecommunications (Barbados) Limited	Barbados
Karib Cable Inc.	Barbados
Columbus Networks de Colombia, S.A.S.	Colombia
Columbus Networks El Salvador S.A. de C.V.	El Salvador

¹ CWC Cable & Wireless Communications Dominican Republic, S.A., an affiliate of C&W, owns and controls a cable landing station in the Dominican Republic for the East-West Cable System.

² None of the carriers listed in this table is listed in the Commission's List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets. In addition, these foreign carriers offer services in competition with dominant foreign carriers and others. These foreign carriers each hold significantly less than a 50% market share in the international transport market between the U.S. and their home markets in the local access markets in the countries where they operate. Moreover, these foreign carriers do not have the ability to discriminate against unaffiliated U.S. international carriers through the control of bottleneck services or facilities to exercise market power in the countries where they operate.

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Foreign Carrier	Country
Columbus Networks de Costa Rica S.R.L.	Costa Rica
Columbus Communications Curacao N.V.	Curacao
Columbus Networks Netherlands Antilles, N.V.	Curacao
Columbus Networks Dominicana, S.A.	Dominican Republic
Columbus Networks de Ecuador S.A.	Ecuador
Columbus Communications (Grenada) Limited	Grenada
Columbus Networks de Guatemala Limitada	Guatemala
Columbus Networks de Honduras, S. de R.L.	Honduras
Columbus Communications Jamaica Limited	Jamaica
Columbus Networks Jamaica Limited	Jamaica
Columbus Networks de México S. de R.L. de C.V.	Mexico
Columbus Networks Nicaragua y Compañía Limitada	Nicaragua
Columbus Networks de Panamá S.R.L.	Panama
Lazus Peru S.A.C.	Peru
Columbus Communications (St. Lucia) Limited	St. Lucia
Tele (St. Lucia) Inc.	St. Lucia
Columbus Networks International (Trinidad) Limited	Trinidad & Tobago
Columbus Communications Trinidad Limited	Trinidad & Tobago
Columbus Networks Venezuela, S.A.	Venezuela
Columbus Communications St. Vincent and the Grenadines Limited	St. Vincent & The Grenadines

Section 1.767(a)(8)(iii) – Certification Regarding Destination Markets:

Licensees certify that one or more affiliates provides international telecommunications services in the following destination markets of the ARCOS-1 Cable: The Bahamas, the Turks and Caicos Islands, the Dominican Republic, Curacao, Venezuela, Colombia, Panama, Puerto Rico, Costa Rica, Nicaragua, Honduras, Guatemala, Belize and Mexico.

Section 1.767(a)(8)(iv) – Demonstration Regarding WTO Status and Market Power:

One ARCOS-1 destination market where a C&W affiliate currently provides and will continue to provide international telecommunications services is not a WTO member:³ C&W has a 49% stake in The Bahamas Telecommunications Company Limited ("BTC"), which is 2% owned by The BTC

³ The FCC has treated the British Overseas Territories as WTO Members. See, e.g., Letter from Robert E. Dalton, Assistant Legal Adviser for Treaty Affairs, United States Department of State, to Rebecca Arbogast, Chief, Telecommunications Division, International Bureau, Federal Communications Commission (Feb. 16, 2000), at 1, cited in *In the Matter of Cable & Wireless USA, Inc.*, Order, Authorization and Certificate, File No. ITC-214-19990709-00412, rel. Feb. 18, 2000, at ¶ 7, n.14. Thus, Turks and Caicos should be treated as a WTO Member for purposes of this application.

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Foundation and 49% owned by The Government of The Bahamas.⁴ BTC appears on the FCC's "List of Foreign Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets," DA 07-233, January 26, 2007.

Licensees certify that they will continue to comply with the dominant carrier safeguards of Sections 63.10(c) and (e) of the Commission's Rules in the provision of international services to The Bahamas, a destination market where BTC has dominant status.

⁴ Although The Bahamas is not a Member of the WTO, it has applied for membership status, currently has observer status, and its application is pending. See http://www.wto.org/english/thewto_e/acc_e/a1_bahamas_e.htm.