

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

|                                         |   |                                 |
|-----------------------------------------|---|---------------------------------|
| <i>In the Matter of</i>                 | ) |                                 |
|                                         | ) |                                 |
| PUERTO RICO TELEPHONE COMPANY,          | ) | File No. SCL-MOD-2022-_____     |
| INC. AND LATAM                          | ) | File No. SCL-LIC-20120330-00002 |
| TELECOMUNICATIONS, LLC                  | ) |                                 |
|                                         | ) |                                 |
| Application to Modify the Cable Landing | ) |                                 |
| License for                             | ) |                                 |
|                                         | ) |                                 |
| América Móvil Submarine Cable System    | ) |                                 |
| ("AMX1 System")                         | ) |                                 |

**APPLICATION TO MODIFY SUBMARINE CABLE LANDING LICENSE –  
STREAMLINED PROCESSING REQUESTED**

Puerto Rico Telephone Company, Inc. ("PRTC," FRN 0001731470) and LATAM Telecommunications, LLC ("LATAM," FRN 0021426093) (together, the "Applicants"), pursuant to Section 1.767 of the Commission's rules, 47 C.F.R. § 1.767, hereby apply to modify the cable landing license for the América Móvil Submarine Cable System ("AMX1 System"), to authorize a new segment directly connecting Ponce (Puerto Rico) and Santo Domingo (Dominican Republic), as well as additional landing points in Isla San Andrés (Colombia) and Puerto Limón (Costa Rica). Applicants request streamlined processing for this application pursuant to 47 C.F.R. § 1.767(k)(3) because the destination markets where the Applicants have an affiliation with a foreign carrier are World Trade Organization (WTO) Members, and pursuant to 47 C.F.R. § 1.767(k)(4), because Applicants are not required to submit a consistency certification to any state or territory under the Coastal Zone Management Act with respect to a cable landing license.

The AMX1 System is a non-common carrier fiber-optic cable system linking the Continental United States, the Dominican Republic, Puerto Rico, Brazil, Colombia, Guatemala, and Mexico. The Commission granted a cable landing license for the AMX1 System on January 31, 2013,<sup>1</sup> and the AMX1 System entered commercial service on June 23, 2014.

Ponce-Santo Domingo Segment. PRTC will be responsible for operating the landing terminal equipment for the new segment in Ponce, Puerto Rico, and Applicants' affiliate, Compañía Dominicana de Teléfonos, S.A. d/b/a Claro Dominicana ("Claro Dominicana"), will be responsible for operating the landing terminal equipment for the New Segment in Santo Domingo, Dominican Republic. PRTC will construct backhaul facilities between the existing landing station in San Juan, Puerto Rico, and the proposed new landing station in Ponce, Puerto Rico. In the event of an outage on the existing segment between San Juan, Puerto Rico, and Puerto Plata, Dominican Republic, including due to hurricanes and other natural disasters, the new segment will permit complete geographic diversity and network resilience between Puerto Rico and the Dominican Republic. In addition, the new segment will help meet the growth in IP, data, and voice traffic between Puerto Rico and the Dominican Republic. The landing party in each jurisdiction will seek all required government approvals, permits, and licenses for the new landing stations and operations from the relevant authorities. The Applicants intend to commence commercial operation of the Ponce-Santo Domingo segment by the second calendar quarter of 2025. Therefore, the Applicants seek the timely grant of the modified a cable landing license no later than December 31, 2023, in order to permit construction activities to proceed on

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<sup>1</sup> Public Notice, Actions Taken Under Cable Landing License Act, Section 1.767(a) Cable Landing Licenses, Modifications, and Assignments or Transfers of Control of Interests in Cable Landing Licenses (47 C.F.R. § 1.767(a)), Report No. SCL-00137, DA No. 13-247 (rel. Feb. 21, 2013) (granting File No. SCL-LIC-20120330-00002) ("AMX1 Grant Public Notice"). The initial licensees on the AMX1 System were PRTC, LATAM, and Claro Chile, S.A. ("Claro Chile"), all of which are controlled by América Móvil, S.A.B. de C.V. On December 13, 2018, in a *pro forma* transaction, Claro Chile assigned its ownership interest in the AMX1 System to PRTC. Actions Taken Under Cable Landing License Act, Public Notice, Report No. SCL-00235, DA 19-200, File No. SCL-ASG-20190128-00003 (Mar. 21, 2019).

schedule.

Isla San Andrés and Puerto Limón Landing Points. Upon further review of the licensing history for the AMX1 System, the Applicants discovered that no request had been filed with the Commission seeking modification of the AMX1 System Landing License to add the foreign landing points in Isla San Andrés, Colombia, and Puerto Limón, Costa Rica, to the scope of the license. The landing stations in Isla San Andrés and Puerto Limón were place into operation in December 2022. This omission was inadvertent, and the Applicants seek to remedy it in filing this license modification request and associated request for special temporary authority.

**I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767**

**A. Information Required by 47 C.F.R. § 1.767(a)(1)-(3), (a)(8), (a)(9), (j), and (k)**

The Applicants provide company-specific responses to and certifications required by 47 C.F.R. § 1.767(a)(1)-(3), (a)(8), (a)(9), (j), and (k) in the following appendices:

- Appendix A: PRTC
- Appendix B: LATAM

**B. System Description<sup>2</sup>**

Ponce-Santo Domingo Segment. The segment will directly link Ponce, Puerto Rico, with Santo Domingo, Dominican Republic and connect it to the rest of AMX-1 Cable System as described in Diagram 1 in Appendix C. The Ponce-Santo Domingo segment will have 1,081.68 km with the following sub-segments:

| Name      | Description                                 | Distance (km) | Fiber Pairs |
|-----------|---------------------------------------------|---------------|-------------|
| S.2.4.1.1 | From Branching Unit 5 (“BU05”) to ROADM 05  | 51.247        | 2           |
| S.2.4.1.2 | From ROADM 05 to ROADM 13                   | 455.750       | 4           |
| S.2.4.1.3 | From ROADM 13 to Branching Unit 13 (“BU13”) | 57.872        | 6           |

<sup>2</sup> See 47 C.F.R. § 1.767(a)(4).

| Name    | Description                                    | Distance (km) | Fiber Pairs |
|---------|------------------------------------------------|---------------|-------------|
| S.2.4.2 | From BU13 to Santo Domingo, Dominican Republic | 108.581       | 4           |
| S.2.4.3 | From BU13 to Ponce, Puerto Rico                | 408.233       | 2           |

Each fiber pair has a design capacity of 10 Tbps using current technology. The Applicants expect the new segment to commence commercial service during the second quarter of 2025. In Appendix C, the Applicants provide a route map for the AMX-1 Cable system in the Caribbean Region (Diagram 3).

Isla San Andrés – Puerto Limón Segment. The segment will directly link Puerto Limón, Costa Rica, with Isla San Andrés, Colombia and connect it to the rest of AMX-1 Cable System on the west path of the Caribbean region as described in Diagram 2 in Appendix C. The Puerto Limón-Isla San Andrés segment will have 747.19 km with the following sub-segments:

| Name    | Description                                                   | Distance (km) | Fiber Pairs |
|---------|---------------------------------------------------------------|---------------|-------------|
| S.4.6.1 | From Branching Unit 11 (“BU11”) to Branching Unit 12 (“BU12”) | 380.67        | 2           |
| S.4.6.2 | From BU12 to Isla San Andrés, Colombia                        | 12.71         | 2           |
| S.4.6.3 | From BU12 to Puerto Limón, Costa Rica                         | 353.81        | 2           |

Each fiber pair has a design capacity of 10 Tbps using current technology.

### C. Landing Points<sup>3</sup>

The Applicants provide specific landing point information (including geographic coordinates and street addresses, where available, for beach manholes and cable landing stations) in the following appendices:

- Appendix D: Ponce, Puerto Rico Landing Station
- Appendix E: Santo Domingo, Dominican Republic Landing Station

<sup>3</sup> See 47 C.F.R. § 1.767(a)(5).

- Appendix F: Isla San Andrés, Colombia Landing Station
- Appendix G: Puerto Limón, Costa Rica Landing Station

#### **D. Regulatory Classification<sup>4</sup>**

With the addition of the Isla San Andrés and Puerto Limón landing stations, the AMX1 System has continued to operate on a non-common-carrier basis. Similarly, the new segment between Ponce and Santo Domingo will be operated on a non-common carrier basis in the same manner as the existing operating segments of the AMX1 System. The underlying facts supporting the AMX1 System’s non-common-carrier status have not changed since the Commission first licensed the submarine cable system in 2013.<sup>5</sup>

#### **E. Cable Ownership Information<sup>6</sup>**

Ponce-Santo Domingo Segment. PRTC will own the proposed new landing station in Ponce, Puerto Rico, and the wet infrastructure in Puerto Rican and international waters. Claro Dominicana owns the landing station in Santo Domingo, Dominican Republic, and the wet infrastructure in Dominican Republic waters. Because Claro Dominicana does not and will not use any U.S. endpoint, it is not required by 47 C.F.R. § 1.767(h)(2) to be an applicant in the instant application.

Isla San Andrés, Colombia. Comunicación Celular S.A. (“Comcel”) owns the landing station in Isla San Andrés, Colombia, as well as the wet infrastructure in Colombian waters. PRTC owns the wet infrastructure in international waters. Because Comcel does not and will not use any U.S. endpoint, it is not required by 47 C.F.R. § 1.767(h)(2) to be an applicant to the

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<sup>4</sup> See 47 C.F.R. § 1.767(a)(6).

<sup>5</sup> See AMX1 Grant Public Notice (granting a cable landing license “for the purpose of landing a non-common carrier fiber-optic cable system, the AMX1 System, linking the Continental United States, the Dominican Republic, Puerto Rico, Brazil, Colombia, Guatemala, and Mexico.”).

<sup>6</sup> See 47 C.F.R. § 1.767(a)(7).

instant application.

Puerto Limón, Costa Rica. Claro CR Telecomunicaciones S.A. (“Claro Costa Rica”) owns the landing station in Puerto Limón, Costa Rica, as well as the wet infrastructure in Costa Rican waters. PRTC owns the wet infrastructure in international waters. Because Claro Costa Rica does not and will not use any U.S. endpoint, it is not required by 47 C.F.R. § 1.767(h)(2) to be an applicant to the instant application.

Table 1 below indicates the ownership interests of the Applicants and their affiliates in the AMX1 System consistent with the instant with the instant modification application.

| <b>Table 1: Ownership of Wet Infrastructure and Common Infrastructure</b> |                                                                                                                                     |                                                                                                                               |
|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Party</b>                                                              | <b>Landing Station(s)</b>                                                                                                           | <b>Voting and Ownership<sup>7</sup></b>                                                                                       |
| Puerto Rico Telephone Company, Inc. (PRTC)                                | Proposed new landing station in Ponce, Puerto Rico (USA)<br><br>Existing Landing Station in San Juan, Puerto Rico (USA)             | Portion in Puerto Rico (USA): 100%<br>Portion in International Waters: 100%<br>Portion of entire AMX1 System: 82.454%         |
| LATAM Telecomunicaciones, LLC (LATAM)                                     | Existing landing stations in Jacksonville and Miami, Florida, USA                                                                   | Portion in the continental USA: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 4.127%          |
| Compañía Dominicana de Telefonos, S.A. (Claro Dominicana)                 | Proposed new landing station in Santo Domingo (Dominican Republic)<br>Existing Landing Station in Puerto Plata (Dominican Republic) | Portion in Dominican Republic Territory: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 2.818% |
| Claro CR Amx Argentina S.A. (Claro Argentina)                             |                                                                                                                                     | Portion in Argentinian Territory: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 0.024%        |
| Claro CR Telecomunicaciones S.A. (Claro Costa Rica)                       | Existing landing station in Puerto Limón (Costa Rica)                                                                               | Portion in Costa Rica Territory: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 1.06%          |
| Claro S.A. (Claro Brasil)                                                 | Existing landing stations in Fortaleza, Rio de Janeiro, and Salvador de Bahia, Brazil                                               | Portion in Brazilian Territory: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 3.634%          |

<sup>7</sup> Percentages reflect both voting and economic interests.

| <b>Table 1: Ownership of Wet Infrastructure and Common Infrastructure</b> |                                                                                     |                                                                                                                       |
|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| <b>Party</b>                                                              | <b>Landing Station(s)</b>                                                           | <b>Voting and Ownership<sup>7</sup></b>                                                                               |
| Comunicación Celular, S.A. (Comcel)                                       | Existing landing stations in Barranquilla, Cartagena and Isla San Andres (Colombia) | Portion in Colombian Territory: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 3.752%  |
| Telecomunicaciones de Guatemala, S.A. (Claro Guatemala)                   | Existing landing station in Puerto Barrios, Guatemala                               | Portion in Guatemalan Territory: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 1.078% |
| Teléfonos de México S.A.B. (Telmex)                                       | Existing landing station in Cancun, Mexico                                          | Portion in Mexican Territory: 100%<br>Portion in International Waters: 0%<br>Portion of entire AMX1 System: 1.044%    |

**F. Certification Regarding Service to Executive Branch Agencies<sup>8</sup>**

The Applicants have sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense. Counsel has certified such service in the certificate of service attached to this application.

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<sup>8</sup> See 47 C.F.R. § 1.767(j).

## II. CONCLUSION

As demonstrated above, the public interest, convenience and necessity will be served by a grant of the instant application to modify the AMX1 System. The Applicants respectfully request that the Commission grant this application.

Respectfully submitted,

By:



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Dated: April 11, 2023

Attachments

## LIST OF APPENDICES

|             |                                                                                                                             |
|-------------|-----------------------------------------------------------------------------------------------------------------------------|
| Appendix A: | Puerto Rico Telephone Company, Inc., Information Responsive to 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k) |
| Appendix B: | LATAM Telecommunications, LLC, Information Responsive to 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k)       |
| Appendix C: | AMX1 System New Segments Route Maps                                                                                         |
| Appendix D: | Ponce, Puerto Rico Landing Station                                                                                          |
| Appendix E: | Santo Domingo, Dominican Republic Landing Station                                                                           |
| Appendix F: | Isla San Andrés, Colombia Landing Station                                                                                   |
| Appendix G: | Puerto Limón, Costa Rica Landing Station                                                                                    |

**APPENDIX A**  
**Puerto Rico Telephone Company, Inc.**

**Information Required By 47 C.F.R. § 1.767(a)**

**(1) Applicant's Name, Address, and Telephone Number<sup>1</sup>**

Puerto Rico Telephone Company, Inc.  
1515 FD Roosevelt Avenue, 12th Floor  
Guaynabo, PR 00921  
Tel: (787) 792-9399

**(2) Applicant's Place of Incorporation<sup>2</sup>**

PRTC is a corporation organized under the laws of the Commonwealth of Puerto Rico.

**(3) Contact Information<sup>3</sup>**

Correspondence concerning the application should be sent to the following:

Company Contact:

Francisco J. Silva  
Secretary and General Counsel  
Puerto Rico Telephone Company, Inc.  
1515 FD Roosevelt Avenue, 10th Floor  
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<sup>1</sup> See 47 C.F.R. § 1.767(a)(1).

<sup>2</sup> See 47 C.F.R. § 1.767(a)(2).

<sup>3</sup> See 47 C.F.R. § 1.767(a)(3).

#### **(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates<sup>4</sup>**

PRTC certifies that it has the following ten percent or greater direct or indirect interest holders, based on the most current data as of December 31, 2022:

Name: Telecomunicaciones de Puerto Rico, Inc. (“TELPRI”)  
Address: 1515 FD Roosevelt Avenue, 12th Floor, Guaynabo, PR 00921  
Citizenship: United States (Puerto Rico)  
Principal Business: Holding company for telecommunications-related investments  
Ownership Interest: 100 percent direct equity and voting interest in PRTC

Name: Tenedora Telpri, S.A. de C.V. (“Tenedora”)  
Address: Lago Zürich No. 245, Plaza Carso / Edificio Telcel, Piso 4, Colonia Ampliación Granada, C.P. 11529, Ciudad de México  
Citizenship: México  
Principal Business: Holding company for telecommunications-related investments  
Ownership Interest: 100 percent direct equity and voting interest in TELPRI

Name: Radiomóvil Dipsa, S.A. de C.V. (“Telcel”)  
Address: Lago Zürich No. 245, Plaza Carso / Edificio Telcel, Piso 4, Colonia Ampliación Granada, C.P. 11529, Ciudad de México  
Citizenship: México  
Principal Business: Telecommunications Company  
Ownership Interest: 99.99 percent direct equity and voting interest in Tenedora

Name: Sercotel, S.A. de C.V. (“Sercotel”)  
Address: Lago Zürich No. 245, Plaza Carso / Edificio Telcel, Piso 4, Colonia Ampliación Granada, C.P. 11529, Ciudad de México  
Citizenship: México  
Principal Business: Holding company for telecommunications-related investments  
Ownership Interest: 99.99 percent direct equity and voting interest in Telcel

Name: América Móvil, S.A.B. de C.V.  
Address: Lago Zürich No. 245, Plaza Carso, Edificio Telcel, Piso 4, Colonia Ampliación Granada, C.P. 11529, Ciudad de México, México  
Citizenship: Mexico  
Principal Business: Holding company for telecommunications-related investments  
Ownership Interest: 99.99 percent direct equity and voting interest in Sercotel

Name: Trust No. F/0126 (“Family Trust”)  
Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México  
Citizenship: México

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<sup>4</sup> See 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(h).

Principal Business: Investments

Ownership Interest: Based upon public filings with the U.S. Securities and Exchange Commission (“SEC”), as of March 31, 2022, the Family Trust holds 28.02 percent direct equity in América Móvil (approximately 51.77 percent of the voting stock). The Family Trust is a Mexican trust that holds AA Shares and L Shares for the benefit of members of the Slim Family. The beneficiaries of the Family Trust are the children of Carlos Slim Helú: Carlos Slim Domit, Marco Antonio Slim Domit, Patrick Slim Domit, María Soumaya Slim Domit, Vanessa Paola Slim Domit, and Johanna Monique Slim Domit.

Name: Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, as Trustee for the Family Trust<sup>5</sup>

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Banking Institution / Financial Services

Ownership Interest: None.<sup>6</sup> The Trustee is the trust division of Banco Inbursa S.A., a Mexican banking institution headquartered in Mexico City, México. The Trustee holds no equity and/or voting interests in América Móvil. Furthermore, the Trustee implements investment decisions of a technical committee, which is composed of the children of Carlos Slim Helú, who are the beneficiaries of the Family Trust, and adopts its resolutions by the favorable vote of 80% of its members. Within the Family Trust documents there are no voting or joint action agreements between the settlors and/or the beneficiaries.

Name: Control Empresarial de Capitales, S.A. de C.V. (“Control Empresarial de Capitales”)

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investments

Ownership Interest: Based upon public filings with the SEC, as of December 31, 2022, Control Empresarial de Capitales holds 16.90 percent of the equity and approximately 20.82 percent of the voting stock in América Móvil. Control Empresarial de Capitales is a non-public company organized under the laws of México that is owned and controlled by the Slim Family through the Trust No. F/0125 (“Control Empresarial Trust”). At the time of the 2019 Declaratory Ruling, Control Empresarial de Capitales was a subsidiary of Inversora Carso, S.A. de C.V. (“Inversora Carso”) and it held 6.25% equity and approximately 0.56% voting interests in América Móvil.<sup>7</sup> Effective as of March 3, 2022,

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<sup>5</sup> As noted below, Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, is also the Trustee of the Control Empresarial Trust.

<sup>6</sup> PRTC does not believe that the Trustee is a disclosable interest holder under Section 63.18(h)(i) of the Commission’s rules as the Trustee does not have a 10 percent or more equity and/or voting or a controlling interest in PRTC’s controlling U.S. parent. However, out of an abundance of caution, PRTC discloses the Trustee.

<sup>7</sup> See PRTC Petition for Declaratory Ruling, ISP-PDR-20170823-00002 (filed Aug. 23, 2017) (“2017 Petition for Declaratory Ruling”); 2019 Declaratory Ruling at p.2.

Control Empresarial de Capitales merged with its former parent, Inversora Carso, as part of an internal *pro forma* restructure.

Name: Trust No. F/0125 (“Control Empresarial Trust”)

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investments

Ownership Interest: 99.99 percent direct equity and voting interest in Control Empresarial de Capitales. The Control Empresarial Trust is a Mexican trust that holds shares in Control Empresarial de Capitales for the benefit of members of the Slim Family. At the time of the 2017 Petition for Declaratory Ruling, the Control Empresarial Trust had a controlling interest in Inversora Carso which, at the time, was the parent company of Control Empresarial de Capitales. All beneficiaries of the Control Empresarial Trust are members of the Slim Family (Mr. Slim Helú, his sons, daughters, and some of his grandchildren). Beneficiaries with a five percent or more interest in Control Empresarial Trust are Carlos Slim Domit, Marco Antonio Slim Domit, María Soumaya Slim Domit, Vanessa Paola Slim Domit, and Johanna Monique Slim Domit.<sup>8</sup>

Name: Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, as Trustee for the Control Empresarial Trust<sup>9</sup>

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Banking Institution / Financial Services

Ownership Interest: None.<sup>10</sup> The Trustee is the trust division of Banco Inbursa S.A., a Mexican banking institution headquartered in Mexico City, México. The Trustee holds no equity and/or voting interests in América Móvil. The Trustee implements investment decisions of a technical committee. The technical committee adopts its resolutions by the favorable vote of 80% of its members and is composed of twenty-one (21) members of the Slim Family (including Carlos Slim Domit, Marco Antonio Slim Domit, Patrick Slim Domit, María Soumaya Slim Domit, Vanessa Paola Slim Domit, and Johanna Monique Slim Domit and some of their children). Within the Control Empresarial Trust documents there are no voting or joint action agreements between the settlors and/or the beneficiaries.

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<sup>8</sup> It should be noted that, at the time of the 2017 Petition for Declaratory Ruling, the Control Empresarial Trust held a controlling interest in Inversora Carso, S.A. de C.V. Since the March 3, 2022 merger of Control Empresarial with Inversora Carso, the Control Empresarial Trust holds the 99.99 percent interest in Control Empresarial.

<sup>9</sup> As noted above, Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, is also the Trustee of the Family Trust.

<sup>10</sup> PRTC does not believe that the Trustee is a disclosable interest holder under Section 63.18(h)(i) of the Commission’s rules as the Trustee does not have a 10 percent or more equity and/or voting or a controlling interest in PRTC’s controlling U.S. parent. However, out of an abundance of caution, PRTC discloses the Trustee.

Name: Carlos Slim Helú & Family (“Slim Family”)

Address: c/o Alejandro Cantú Jiménez, América Móvil, S.A.B. de C.V., Lago Zürich 245, Plaza Carso / Edificio Telcel, Piso 4, Colonia Ampliación Granada, 11529, Ciudad de México

Citizenship: México

Principal Business: Investors

Ownership Interest: Based upon public filings with the SEC, as of December 31, 2022, 66.68 percent equity interest in América Móvil. As of December 31, 2022, the Slim Family – through their beneficial ownership held by (i) the Family Trust; (ii) Control Empresarial de Capitales; and (iii) their direct ownership of shares – holds 66.68 percent of the equity and 89.50 percent of the voting stock in América Móvil.<sup>11</sup> Other Mexican and foreign investors hold the remaining equity and voting stock of América Móvil. Aside from the Slim Family, no other public investor holds more than 5 percent of the equity of América Móvil. Further, according to beneficial ownership reports filed with the SEC, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity, excluding Carlos Slim Helú, directly own five percent or more of the voting shares of América Móvil.<sup>12</sup>

Name: Carlos Slim Helú

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 8.3% equity and approximately 9% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests

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<sup>11</sup> Based upon public filings with the SEC, as of December 31, 2022: (i) 28.02 percent of the equity (approximately 51.77 percent of the voting stock) of América Móvil is owned directly and indirectly, including beneficially owned, through the Family Trust; and (ii) Control Empresarial de Capitales, S.A. de C.V. also owns shares of América Móvil that represent 16.90 percent of the equity (approximately 20.82 percent of the voting stock) of América Móvil. In addition, based upon public filings with the SEC, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity, excluding Carlos Slim Helú, directly own five percent or more of the voting shares of América Móvil. *See 2017 Petition for Declaratory Ruling* at 6 n.12. Collectively, members of the Slim Family, the Family Trust and Control Empresarial de Capitales hold approximately 66.68 percent of the equity and 89.50 percent of the voting stock in América Móvil. As of March 31, 2022, 12.2 percent of the outstanding L shares of América Móvil were represented by L Shares ADSs, each representing the right to receive 20 L shares, and 99.9 percent of the L Share ADSs were held by 6,246 registered holders with addresses in the United States. As of such date, 23.8 percent of the A shares were held in the form of A Share ADSs, each representing the right to receive 20 A shares, and 99.84 percent of the A Share ADSs were held by 3,113 registered holders with addresses in the United States.

When calculating voting shares for the beneficiaries of the Family Trust, the multiplier was not used because the Family Trust voting shares exceed 50 percent. Accordingly, the total voting interests held by the beneficiaries will exceed 100 percent of the vote, which would overstate their actual vote. If the Family Trust were deemed to have 100 percent of the vote, then the aggregate interest of the Slim Family in América Móvil would be 130.2 percent.

<sup>12</sup> This statement is consistent with PRTC’s prior petition for declaratory ruling. *See 2017 Petition for Declaratory Ruling* at 6 n.12, (“[b]ased on public filings with the SEC, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity, excluding Carlos Slim Helú, own five percent or more of the voting shares of América Móvil.”).

held indirectly through Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of December 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Carlos Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 11.7% equity and approximately 24.9% of voting stock in América Móvil. Interest is the aggregate of interests held in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust.<sup>13</sup> According to reports of beneficial ownership filed with the SEC as of December 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Marco Antonio Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 10.5% equity and approximately 23.4% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of December 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Patrick Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 5.2% equity and approximately 11.4% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

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<sup>13</sup>

Includes interests held through a trust where Carlos Slim Domit acts as settlor and beneficiary.

Name: María Soumaya Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 9.2% equity and approximately 21.6% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Vanessa Paola Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 9.5% equity and approximately 24.9% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Johanna Monique Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 6.3% equity and approximately 15.0% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Other than disclosed above, no other individual or entity holds indirectly a ten percent or greater equity or voting interest in PRTC.

**(5) Certification Regarding the Anti-Drug Abuse Act of 1988<sup>14</sup>**

PRTC certifies pursuant to sections 1.2001 through 1.2003 of the Commission’s Rules that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

**(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations<sup>15</sup>**

PRTC certifies that is not a foreign carrier. PRTC further certifies that through its ownership by América Móvil, S.A.B. de C.V. (“América Móvil”), it is affiliated with the following foreign carriers:

| <b>TABLE 1</b>                                              |                                                                                      |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------|
| <b>Name of the Affiliated Carrier</b>                       | <b>Country in Which Carrier is Authorized to Provide Telecommunications Services</b> |
| Telmex Argentina S.A.                                       | Argentina                                                                            |
| Ertach S.A.                                                 | Argentina                                                                            |
| Amx Argentina S.A.                                          | Argentina                                                                            |
| Empresa Brasileira de Telecomunicacoes S.A.                 | Brazil                                                                               |
| Americel, S.A.                                              | Brazil                                                                               |
| Claro, S.A.                                                 | Brazil                                                                               |
| Claro 155, S.A.                                             | Chile                                                                                |
| Claro Chile S.A.                                            | Chile                                                                                |
| Claro 110 S.A.                                              | Chile                                                                                |
| Telmex Colombia S.A.                                        | Colombia                                                                             |
| Infracel, S.A. E.S.P.                                       | Colombia                                                                             |
| Claro CR Telecomunicaciones S.A.                            | Costa Rica                                                                           |
| Compañía Dominicana de Telefonos S.A.                       | Dominican Republic                                                                   |
| Ecuador Telecom S.A.                                        | Ecuador                                                                              |
| Consorcio Ecuatoriano de Telecomunicaciones, S.A.           | Ecuador                                                                              |
| Compañía de Telecomunicaciones de El Salvador, S.A. de C.V. | El Salvador                                                                          |
| Publitel, S.A. de C.V.                                      | El Salvador                                                                          |

<sup>14</sup> 21 U.S.C. § 862(a). The Anti-Drug Abuse Act of 1988, Pub. L. No. 100-690, title V, § 5301, 102 Stat. 4181, 4310 (1988), which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by the Crime Control Act of 1991, Pub. L. No. 101-647, title X, § 1002(d)(1), 104 Stat. 4789, 4827 (1990), and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

<sup>15</sup> See 47 C.F.R. § 1.767(a)(8)(ii).

| <b>TABLE 1</b>                                        |                                                                                      |
|-------------------------------------------------------|--------------------------------------------------------------------------------------|
| <b>Name of the Affiliated Carrier</b>                 | <b>Country in Which Carrier is Authorized to Provide Telecommunications Services</b> |
| CTE Telecom Personal, S.A. de C.V.                    | El Salvador                                                                          |
| Telecomunicaciones De Guatemala, S.A.                 | Guatemala                                                                            |
| Cablenet, S.A. (Guatemala)                            | Guatemala                                                                            |
| Servicios De Comunicaciones de Honduras, S.A. de C.V. | Honduras                                                                             |
| AMOV Telecom, S.A. de C.V.                            | Honduras                                                                             |
| Radiomovil Dipsa, S.A DE C.V.                         | Mexico                                                                               |
| Empresa Nicaraguense de Telecomunicaciones, S.A.      | Nicaragua                                                                            |
| Telmex Perú, S.A.                                     | Peru                                                                                 |
| América Móvil Perú S.A.C.                             | Peru                                                                                 |
| Telstar S.A.                                          | Uruguay                                                                              |
| AM Wireless Uruguay S.A.                              | Uruguay                                                                              |
| A1 Telekom Austria AG                                 | Austria                                                                              |

## **(7) Certification Regarding Foreign Destination Markets<sup>16</sup>**

PRTC certifies to the following: (A) It is not a foreign carrier in Colombia, Costa Rica or the Dominican Republic, the only foreign destination markets in which the new segments will land; (B) It does not control a foreign carrier in Colombia, Costa Rica or the Dominican Republic; (C) an entity owning more than 25 percent of it or controlling it controls a foreign carrier in Colombia, Costa Rica and the Dominican Republic, as noted in Table 1 above; and (D) no grouping of two or more foreign carriers in Colombia, Costa Rica and the Dominican Republic (or parties that control foreign carriers in these countries) own, in aggregate more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the new segments in the United States.

<sup>16</sup> See 47 C.F.R. § 1.767(a)(8)(iii).

**(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets<sup>17</sup>**

No response is required.

**(9) Certification Regarding Routine Conditions<sup>18</sup>**

PRTC certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

**(10) Eligibility for Streamlined Processing<sup>19</sup>**

PRTC certifies that it is affiliated with a foreign carrier in each of the AMX1 System's destination markets that are the subject of the modification application: Colombia, Costa Rica, and the Dominican Republic. PRTC requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3) because the destination markets where the Applicant has an affiliation with a foreign carrier are World Trade Organization (WTO) Members, and PRTC agrees to accept and abide by the reporting requirements set out in Section 1.767(l) of the Commission's rules. In addition, pursuant to 47 C.F.R. § 1.767(k)(4), PRTC certifies that it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Puerto Rico, the only U.S. territory in which there will be a new landing station as result of the instant modification application, does not list nor has it ever proposed to list a cable landing license as a federal activity requiring a consistency certification.<sup>20</sup>

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<sup>17</sup> See 47 C.F.R. § 1.767(a)(8)(iv).

<sup>18</sup> See 47 C.F.R. § 1.767(a)(9).

<sup>19</sup> See 47 C.F.R. §§ 1.767(j), (k).

<sup>20</sup> National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Puerto Rico's Listed Federal Actions, available at: <https://coast.noaa.gov/data/czm/consistency/media/pr.pdf>.

## (11) Interlocking Directorates<sup>21</sup>

The following members of PRTC’s board of directors are also members of the board of directors of other subsidiaries of América Móvil that are foreign carriers: Daniel Hajj Aboumrad (“DHA”), Alejandro Cantú Jiménez (“ACJ”), and Carlos J. García Moreno (“CGM”). Specific information regarding the foreign carriers on which each of these individuals serves as a member of the board of directors is provided in the following chart:

| TABLE 2                                                           |                                                               |     |     |     |
|-------------------------------------------------------------------|---------------------------------------------------------------|-----|-----|-----|
| Foreign Carrier                                                   | Country in Which Carrier Provides Telecommunications Services | DHA | ACJ | CGM |
| AMX Argentina, S.A.                                               | Argentina                                                     |     | X   |     |
| Ertach, S.A.                                                      | Argentina                                                     |     | X   |     |
| Telmex Argentina, S.A.                                            | Argentina                                                     |     | X   |     |
| Americel, S.A.                                                    | Brazil                                                        | X   | X   | X   |
| Claro, S.A.                                                       | Brazil                                                        | X   | X   | X   |
| Claro Chile, S.A.                                                 | Chile                                                         | X   | X   | X   |
| Telmex Colombia S.A.                                              | Colombia                                                      |     | X   | X   |
| Infracel, S.A.                                                    | Colombia                                                      |     | X   | X   |
| Claro CR Telecomunicaciones, S.A.                                 | Costa Rica                                                    |     | X   |     |
| Compañía Dominicana de Teléfonos S.A.                             | Dominican Republic                                            | X   | X   |     |
| Consortio Ecuatoriano de Telecomunicaciones, S.A. (CONECEL)       | Ecuador                                                       |     | X   | X   |
| Compañía de Telecomunicaciones de El Salvador, S.A. de C.V. (CTE) | El Salvador                                                   | X   | X   | X   |
| CTE Telecom Personal, S.A. de C.V.                                | El Salvador                                                   |     | X   | X   |
| Telecomunicaciones de Guatemala, S.A.                             | Guatemala                                                     | X   | X   | X   |
| Servicios de Comunicaciones de Honduras, S.A. de C.V.             | Honduras                                                      | X   | X   | X   |
| Radiomóvil Dipsa, S.A. de C.V.                                    | México                                                        | X   | X   | X   |
| Empresa Nicaraguense de Telecomunicaciones, S.A. (ENITEL)         | Nicaragua                                                     | X   | X   |     |
|                                                                   |                                                               |     |     |     |
| América Móvil Perú, S.A.C.                                        | Perú                                                          | X   | X   | X   |
| AM Wireless Uruguay, S.A.                                         | Uruguay                                                       | X   |     |     |

<sup>21</sup> See 47 C.F.R. § 63.18(h)(3).

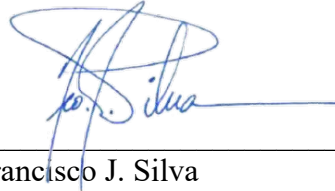
| <b>TABLE 2</b>         |                                                                      |            |            |            |
|------------------------|----------------------------------------------------------------------|------------|------------|------------|
| <b>Foreign Carrier</b> | <b>Country in Which Carrier Provides Telecommunications Services</b> | <b>DHA</b> | <b>ACJ</b> | <b>CGM</b> |
| Telstar, S.A.          | Uruguay                                                              | X          |            |            |
| A1 Telekom Austria AG  | Austria                                                              |            | X          | X          |

## CERTIFICATION

I am authorized to enter this certification on behalf of Puerto Rico Telephone Company, Inc.

All of the information contained in this application and Appendix A is true and correct to the best of my knowledge and belief.

By:



Francisco J. Silva  
Secretary and General Counsel  
Puerto Rico Telephone Company, Inc.  
1515 FD Roosevelt Avenue, 10th Floor  
Guaynabo, PR 00921  
Tel: (787) 793-8441  
Fax: (787) 783-1060  
Email: fsilva@claropr.com

Dated: April 11, 2023

*For and on behalf of Puerto Rico Telephone  
Company, Inc.*

**APPENDIX B**  
**LATAM Telecommunications, LLC**

**Information Required By 47 C.F.R. § 1.767(a)**

**(1) Applicant's Name, Address, and Telephone Number<sup>1</sup>**

LATAM Telecommunications, LLC  
3350 SW 148<sup>th</sup> Avenue, Suite 400  
Miramar, Florida 33027  
Business: 305-418-3484

**(2) Applicant's Place of Incorporation<sup>2</sup>**

LATAM is a corporation organized under the laws of the state of Delaware.

**(3) Contact Information<sup>3</sup>**

Correspondence concerning the application should be sent to the following:

Company Contact:

Arturo Pellerano  
3350 SW 148<sup>th</sup> Avenue, Suite 400  
Miramar, Florida 33027  
Tel: 305-418-3484  
Email: [apellerano@latamtelecomusa.com](mailto:apellerano@latamtelecomusa.com)

Legal Counsel:

Edgar Class  
Wiley Rein LLP  
2050 M Street, NW  
Washington, DC 20036  
Tel: (202) 719-7504  
Email: [eclass@wiley.law](mailto:eclass@wiley.law)

**(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates<sup>4</sup>**

LATAM certifies that it has the following ten percent or greater direct or indirect interest holders, based on the most current data as of December 31, 2022:

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<sup>1</sup> See 47 C.F.R. § 1.767(a)(1).

<sup>2</sup> See 47 C.F.R. § 1.767(a)(2).

<sup>3</sup> See 47 C.F.R. § 1.767(a)(3).

<sup>4</sup> See 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(h).

Name: Sercotel, S.A. de C.V. (“Sercotel”)

Address: Lago Zürich No. 245, Plaza Carso / Edificio Telcel, Piso 4, Colonia Ampliación Granada, C.P. 11529, Ciudad de México

Citizenship: México

Principal Business: Holding company for telecommunications-related investments

Ownership Interest: 100 percent direct equity and voting interest in LATAM

Name: América Móvil, S.A.B. de C.V.

Address: Lago Zürich No. 245, Plaza Carso, Edificio Telcel, Piso 4, Colonia Ampliación Granada, C.P. 11529, Ciudad de México, México

Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments

Ownership Interest: 100 percent direct equity and voting interest in Sercotel

Name: Trust No. F/0126 (“Family Trust”)

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investments

Ownership Interest: Based upon public filings with the U.S. Securities and Exchange Commission (“SEC”), as of December 31, 2022, the Family Trust holds 28.02 percent direct equity in América Móvil (approximately 51.77 percent of the voting stock). The Family Trust is a Mexican trust that holds AA Shares and L Shares for the benefit of members of the Slim Family. The beneficiaries of the Family Trust are the children of Carlos Slim Helú: Carlos Slim Domit, Marco Antonio Slim Domit, Patrick Slim Domit, María Soumaya Slim Domit, Vanessa Paola Slim Domit, and Johanna Monique Slim Domit.

Name: Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, as Trustee for the Family Trust<sup>5</sup>

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Banking Institution / Financial Services

Ownership Interest: None.<sup>6</sup> The Trustee is the trust division of Banco Inbursa S.A., a Mexican banking institution headquartered in Mexico City, México. The Trustee holds no equity and/or voting interests in América Móvil. Furthermore, the Trustee implements investment decisions of a technical committee, which is composed of the children of Carlos Slim Helú, who are the beneficiaries of the Family Trust, and adopts its

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<sup>5</sup> As noted below, Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, is also the Trustee of the Control Empresarial Trust.

<sup>6</sup> LATAM does not believe that the Trustee is a disclosable interest holder under Section 63.18(h)(i) of the Commission’s rules as the Trustee does not have a 10 percent or more equity and/or voting or a controlling interest in LATAM. However, out of an abundance of caution, LATAM discloses the Trustee.

resolutions by the favorable vote of 80% of its members. Within the Family Trust documents there are no voting or joint action agreements between the settlors and/or the beneficiaries.

Name: Control Empresarial de Capitales, S.A. de C.V. (“Control Empresarial de Capitales”)

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investments

Ownership Interest: Based upon public filings with the SEC, as of December 31, 2022, Control Empresarial de Capitales holds 16.90 percent of the equity and approximately 20.82 percent of the voting stock in América Móvil. Control Empresarial de Capitales is a non-public company organized under the laws of México that is owned and controlled by the Slim Family through the Trust No. F/0125 (“Control Empresarial Trust”). At the time of the 2019 Declaratory Ruling, Control Empresarial de Capitales was a subsidiary of Inversora Carso, S.A. de C.V. (“Inversora Carso”) and it held 6.25% equity and approximately 0.56% voting interests in América Móvil. Effective as of March 3, 2022, Control Empresarial de Capitales merged with its former parent, Inversora Carso, as part of an internal *pro forma* restructure.

Name: Trust No. F/0125 (“Control Empresarial Trust”)

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investments

Ownership Interest: 99.99 percent direct equity and voting interest in Control Empresarial de Capitales. The Control Empresarial Trust is a Mexican trust that holds shares in Control Empresarial de Capitales for the benefit of members of the Slim Family. All beneficiaries of the Control Empresarial Trust are members of the Slim Family (Mr. Slim Helú, his sons, daughters, and some of his grandchildren). Beneficiaries with a five percent or more interest in Control Empresarial Trust are Carlos Slim Domit, Marco Antonio Slim Domit, María Soumaya Slim Domit, Vanessa Paola Slim Domit, and Johanna Monique Slim Domit.

Name: Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, as Trustee for the Control Empresarial Trust<sup>7</sup>

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Banking Institution / Financial Services

Ownership Interest: None.<sup>8</sup> The Trustee is the trust division of Banco Inbursa S.A., a

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<sup>7</sup> As noted above, Banco Inbursa S.A., Institución de Banca Múltiple, Grupo Financiero Inbursa, División Fiduciaria, is also the Trustee of the Family Trust.

<sup>8</sup> LATAM does not believe that the Trustee is a disclosable interest holder under Section 63.18(h)(i) of the Commission’s rules as the Trustee does not have a 10 percent or more equity and/or voting or a controlling interest

Mexican banking institution headquartered in Mexico City, México. The Trustee holds no equity and/or voting interests in América Móvil. The Trustee implements investment decisions of a technical committee. The technical committee adopts its resolutions by the favorable vote of 80% of its members and is composed of twenty-one (21) members of the Slim Family (including Carlos Slim Domit, Marco Antonio Slim Domit, Patrick Slim Domit, María Soumaya Slim Domit, Vanessa Paola Slim Domit, and Johanna Monique Slim Domit and some of their children). Within the Control Empresarial Trust documents there are no voting or joint action agreements between the settlors and/or the beneficiaries.

Name: Carlos Slim Helú & Family (“Slim Family”)

Address: c/o Alejandro Cantú Jiménez, América Móvil, S.A.B. de C.V., Lago Zúrich 245, Plaza Carso / Edificio Telcel, Piso 4, Colonia Ampliación Granada, 11529, Ciudad de México

Citizenship: México

Principal Business: Investors

Ownership Interest: Based upon public filings with the SEC, as of December 31, 2022, 66.68 percent equity interest in América Móvil. As of March 31, 2022, the Slim Family – through their beneficial ownership held by (i) the Family Trust; (ii) Control Empresarial de Capitales; and (iii) their direct ownership of shares – holds 66.68 percent of the equity and 89.50 percent of the voting stock in América Móvil.<sup>9</sup> Other Mexican and foreign investors hold the remaining equity and voting stock of América Móvil. Aside from the Slim Family, no other public investor holds more than 5 percent of the equity of América Móvil. Further, according to beneficial ownership reports filed with the SEC, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity, excluding Carlos Slim Helú, directly own five percent or more of the voting shares of América Móvil.

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(Continued . . .)

in LATAM. However, out of an abundance of caution, LATAM discloses the Trustee.

<sup>9</sup> Based upon public filings with the SEC, as of December 31, 2022: (i) 28.02 percent of the equity (approximately 51.77 percent of the voting stock) of América Móvil is owned directly and indirectly, including beneficially owned, through the Family Trust; and (ii) Control Empresarial de Capitales, S.A. de C.V. also owns shares of América Móvil that represent 16.90 percent of the equity (approximately 20.82 percent of the voting stock) of América Móvil. In addition, based upon public filings with the SEC, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity, excluding Carlos Slim Helú, directly own five percent or more of the voting shares of América Móvil. *See 2017 Petition for Declaratory Ruling* at 6 n.12. Collectively, members of the Slim Family, the Family Trust and Control Empresarial de Capitales hold approximately 66.68 percent of the equity and 89.50 percent of the voting stock in América Móvil. As of March 31, 2022, 12.2 percent of the outstanding L shares of América Móvil were represented by L Share ADSs, each representing the right to receive 20 L shares, and 99.9 percent of the L Share ADSs were held by 6,246 registered holders with addresses in the United States. As of such date, 23.8 percent of the A shares were held in the form of A Share ADSs, each representing the right to receive 20 A shares, and 99.84 percent of the A Share ADSs were held by 3,113 registered holders with addresses in the United States.

When calculating voting shares for the beneficiaries of the Family Trust, the multiplier was not used because the Family Trust voting shares exceed 50 percent. Accordingly, the total voting interests held by the beneficiaries will exceed 100 percent of the vote, which would overstate their actual vote. If the Family Trust were deemed to have 100 percent of the vote, then the aggregate interest of the Slim Family in América Móvil would be 130.2 percent.

Name: Carlos Slim Helú

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 8.3% equity and approximately 9% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Carlos Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 11.7% equity and approximately 24.9% of voting stock in América Móvil. Interest is the aggregate of interests held in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust.<sup>10</sup> According to reports of beneficial ownership filed with the SEC as of December 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Marco Antonio Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 10.5% equity and approximately 23.4% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Patrick Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

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<sup>10</sup> Includes interests held through a trust where Carlos Slim Domit acts as settlor and beneficiary.

Principal Business: Investor

Ownership Interest: 5.2% equity and approximately 11.4% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: María Soumaya Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 9.2% equity and approximately 21.6% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Vanessa Paola Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 9.5% equity and approximately 24.9% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct ownership of shares.

Name: Johanna Monique Slim Domit

Address: Paseo de las Palmas 750, Lomas de Chapultepec, 11000, Alcaldía Miguel Hidalgo, Ciudad de México, México

Citizenship: México

Principal Business: Investor

Ownership Interest: 6.3% equity and approximately 15.0% of voting stock in América Móvil. Interest is the aggregate of interests held directly in América Móvil and interests held indirectly through the Family Trust and the Control Empresarial Trust. According to reports of beneficial ownership filed with the SEC as of March 31, 2022, the members of the Slim Family may be deemed to control América Móvil through their interests in the Family Trust, their interest in Control Empresarial de Capitales, and their direct

ownership of shares.

Other than disclosed above, no other individual or entity holds indirectly a ten percent or greater equity or voting interest in LATAM.

**(5) Certification Regarding the Anti-Drug Abuse Act of 1988<sup>11</sup>**

LATAM certifies pursuant to sections 1.2001 through 1.2003 of the Commission's Rules that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

**(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations<sup>12</sup>**

LATAM certifies that is not a foreign carrier. LATAM further certifies that through its ownership by América Móvil, S.A.B. de C.V. ("América Móvil"), it is affiliated with the following foreign carriers:

| <b>Name of the Affiliated Carrier</b>             | <b>Country in Which Carrier is Authorized to Provide Telecommunications Services</b> |
|---------------------------------------------------|--------------------------------------------------------------------------------------|
| Telmex Argentina S.A.                             | Argentina                                                                            |
| Ertach S.A.                                       | Argentina                                                                            |
| Amx Argentina S.A.                                | Argentina                                                                            |
| Empresa Brasileira de Telecomunicacoes S.A.       | Brazil                                                                               |
| Americel, S.A.                                    | Brazil                                                                               |
| Claro, S.A.                                       | Brazil                                                                               |
| Claro 155, S.A.                                   | Chile                                                                                |
| Claro Chile S.A.                                  | Chile                                                                                |
| Claro 110 S.A.                                    | Chile                                                                                |
| Telmex Colombia S.A.                              | Colombia                                                                             |
| Infracel, S.A. E.S.P.                             | Colombia                                                                             |
| Claro CR Telecomunicaciones S.A.                  | Costa Rica                                                                           |
| Compañía Dominicana de Telefonos S.A.             | Dominican Republic                                                                   |
| Ecuador Telecom S.A.                              | Ecuador                                                                              |
| Consorcio Ecuatoriano de Telecomunicaciones, S.A. | Ecuador                                                                              |

<sup>11</sup> 21 U.S.C. § 862(a). The Anti-Drug Abuse Act of 1988, Pub. L. No. 100-690, title V, § 5301, 102 Stat. 4181, 4310 (1988), which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by the Crime Control Act of 1991, Pub. L. No. 101-647, title X, § 1002(d)(1), 104 Stat. 4789, 4827 (1990), and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

<sup>12</sup> See 47 C.F.R. § 1.767(a)(8)(ii).

| <b>Name of the Affiliated Carrier</b>                       | <b>Country in Which Carrier is Authorized to Provide Telecommunications Services</b> |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Compañía de Telecomunicaciones de El Salvador, S.A. de C.V. | El Salvador                                                                          |
| Publitel, S.A. de C.V.                                      | El Salvador                                                                          |
| CTE Telecom Personal, S.A. de C.V.                          | El Salvador                                                                          |
| Telecomunicaciones De Guatemala, S.A.                       | Guatemala                                                                            |
| Cablenet, S.A. (Guatemala)                                  | Guatemala                                                                            |
| Servicios De Comunicaciones de Honduras, S.A. de C.V.       | Honduras                                                                             |
| AMOV Telecom, S.A. de C.V.                                  | Honduras                                                                             |
| Radiomovil Dipsa, S.A DE C.V.                               | Mexico                                                                               |
| Empresa Nicaraguense de Telecomunicaciones, S.A.            | Nicaragua                                                                            |
| Telmex Perú, S.A.                                           | Peru                                                                                 |
| América Móvil Perú S.A.C.                                   | Peru                                                                                 |
| Telstar S.A.                                                | Uruguay                                                                              |
| AM Wireless Uruguay S.A.                                    | Uruguay                                                                              |
| A1 Telekom Austria AG                                       | Austria                                                                              |

### **(7) Certification Regarding Foreign Destination Markets<sup>13</sup>**

LATAM certifies to the following: (A) It is not a foreign carrier in Colombia, Costa Rica or the Dominican Republic, the only foreign destination markets in which the new segments will land; (B) It does not control a foreign carrier in Colombia, Costa Rica or the Dominican Republic; (C) an entity owning more than 25 percent of it or controlling it controls a foreign carrier in Colombia, Costa Rica and the Dominican Republic, as noted in Table 1 above; and (D) no grouping of two or more foreign carriers in Colombia, Costa Rica and the Dominican Republic (or parties that control foreign carriers in these countries) own, in aggregate more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the new segments in the United States.

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<sup>13</sup> See 47 C.F.R. § 1.767(a)(8)(iii).

**(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets<sup>14</sup>**

No response is required.

**(9) Certification Regarding Routine Conditions<sup>15</sup>**

LATAM certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

**(10) Eligibility for Streamlined Processing<sup>16</sup>**

LATAM certifies that it is affiliated with a foreign carrier in each of the AMX1 System's destination markets that are the subject of the modification application: Colombia, Costa Rica, and the Dominican Republic. LATAM requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3) because the destination markets where the Applicant has an affiliation with a foreign carrier are World Trade Organization (WTO) Members, and LATAM agrees to accept and abide by the reporting requirements set out in Section 1.767(l) of the Commission's rules. In addition, pursuant to 47 C.F.R. § 1.767(k)(4), LATAM certifies that it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Puerto Rico, the only U.S. territory in which there will be a new landing station as result of the instant modification application, does not list nor has it ever proposed to list a cable landing license as a federal activity requiring a consistency certification.<sup>17</sup>

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<sup>14</sup> See 47 C.F.R. § 1.767(a)(8)(iv).

<sup>15</sup> See 47 C.F.R. § 1.767(a)(9).

<sup>16</sup> See 47 C.F.R. §§ 1.767(j), (k).

<sup>17</sup> National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Puerto Rico's Listed Federal Actions, available at: <https://coast.noaa.gov/data/czm/consistency/media/pr.pdf>.

**(11) Interlocking Directorates<sup>18</sup>**

LATAM has no interlocking directorates with a foreign carrier.

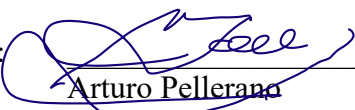
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<sup>18</sup> See 47 C.F.R. § 63.18(h)(3).

## CERTIFICATION

I am authorized to enter this certification on behalf of LATAM Telecommunications, LLC.

All of the information contained in this application and Appendix B is true and correct to the best of my knowledge and belief.

By:  \_\_\_\_\_  
Arturo Pellerano  
Treasurer  
LATAM Telecommunications, LLC  
3350 SW 148th Avenue, Suite 400  
Miramar, FL 33027  
Tel: (305) 418-3484  
Email: apellerano@latamtelecomusa.com

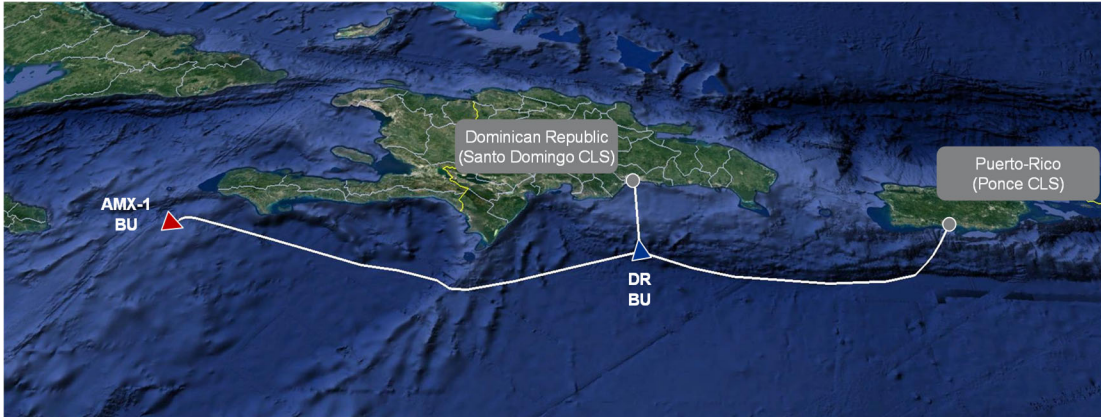
Dated: April 11, 2023

*For and on behalf of LATAM  
Telecommunications, LLC*

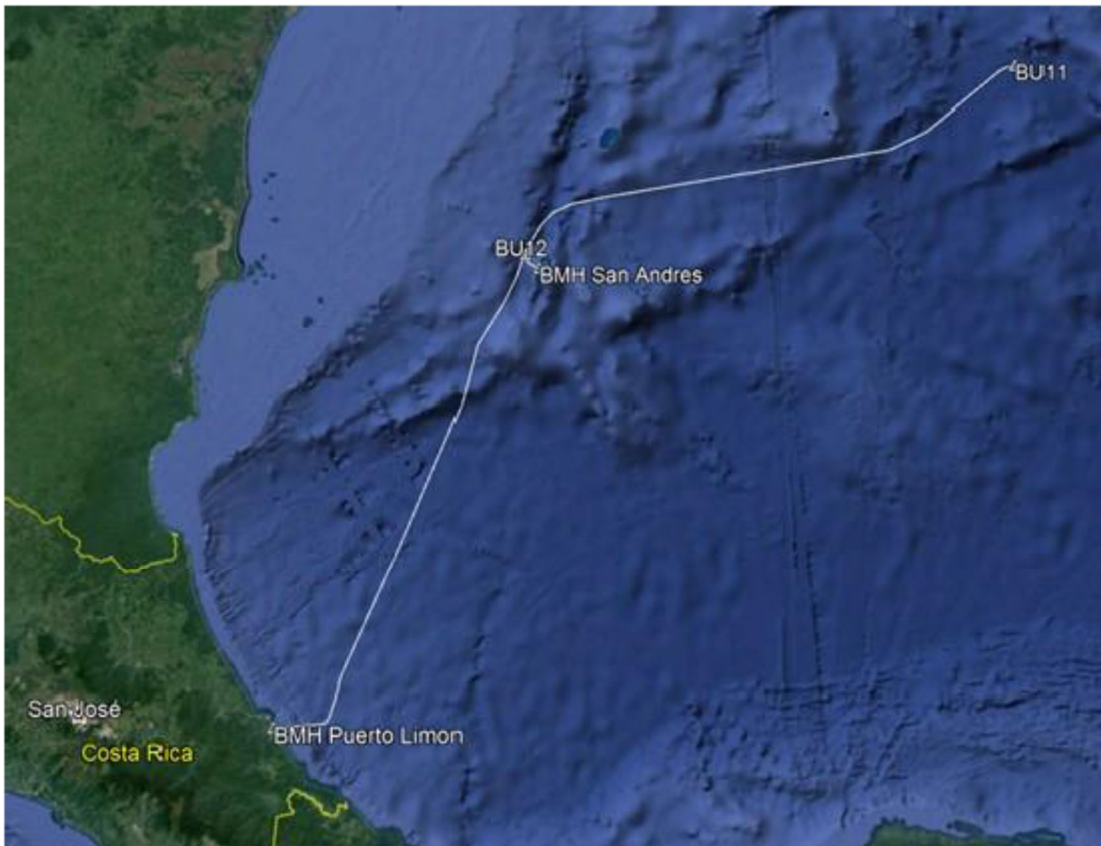
## APPENDIX C

### AMX1 System - New Segments Route Maps

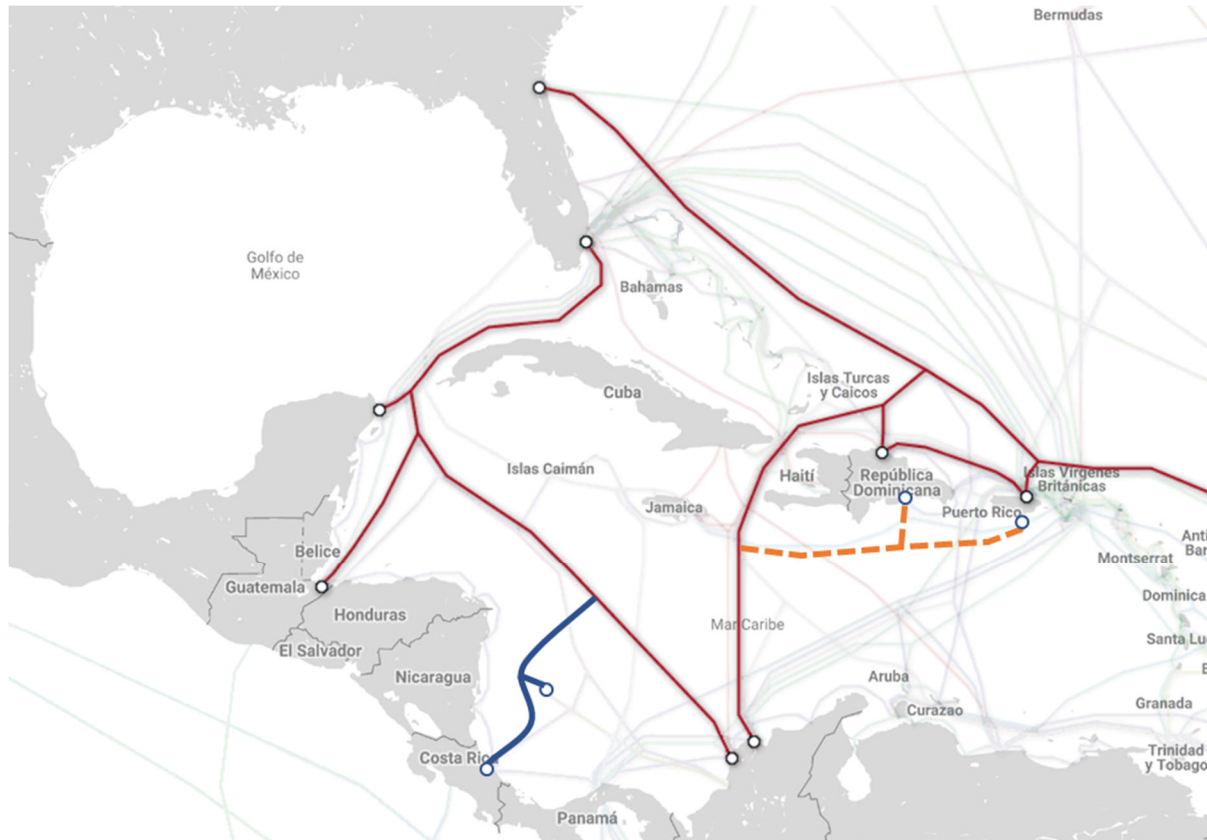
**Diagram 1 – Ponce - Santo Domingo Segment**



**Diagram 2 – Isla San Andrés - Puerto Limón Segment**



**Diagram 3 – AMX-1 Cable System (Caribbean Region)**



Blue = Isla San Andrés - Puerto Limón

## APPENDIX D

### Ponce, Puerto Rico Landing Station



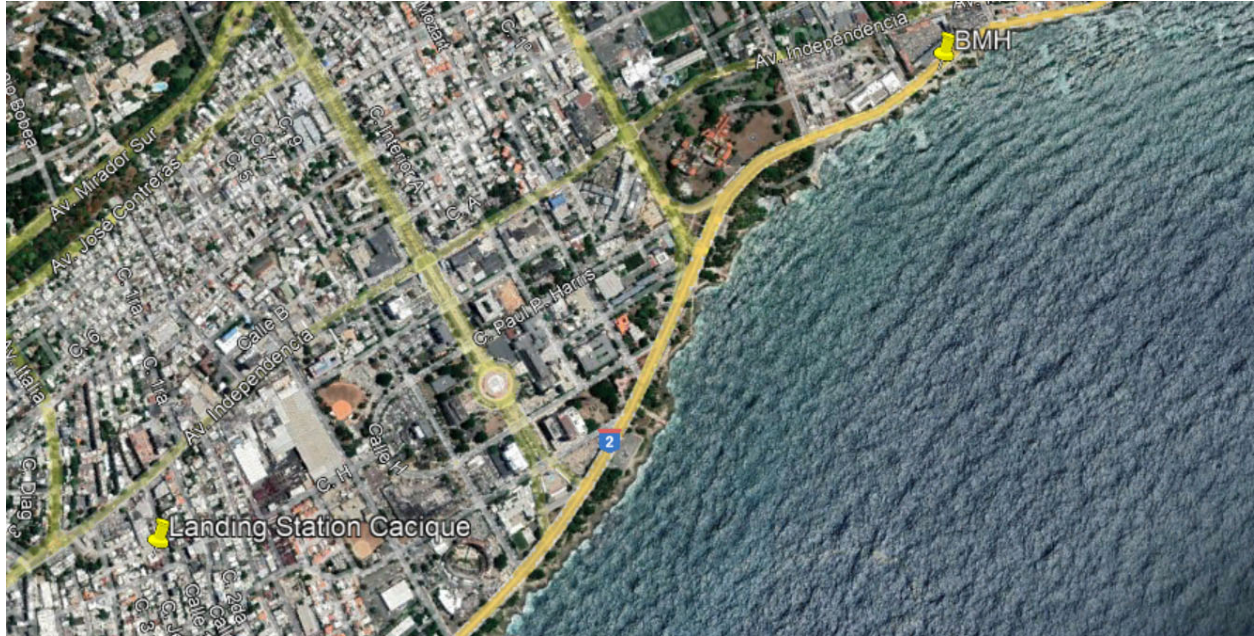
Beach manhole geographic coordinates: Lat 17°58'9.85" N, Long 66°36'2.30" W

Cable landing station geographic coordinates: Lat 18°0'16.35" N, Long 66°36'50.42" W

Cable landing station street address: Calle Ramon Power, Esq. Calle Concordia, Urb. Santa María, Ponce, Puerto Rico, Zip code 00717

## APPENDIX E

### Santo Domingo, Dominican Republic Landing Station



Beach manhole geographic coordinates: Lat 18°27'17.23" N, Long 69°55'2.12" W

Cable landing station geographic coordinates: Lat 18°26'44.01" N, Long 69°55'58.17" W

Cable landing station street address: Calle Independencia Esq. Calle 11 (Antigua Jesús de Piñeiro), El Cacique, Distrito Nacional, Republica Dominicana

## APPENDIX F

### Isla San Andrés Landing Station

Colombia  
San Andrés  
Segment 4.6.2



BMH SEG. 4.6.2

LATITUDE 12° 32.7971 N  
LENGTH 81° 43.7833 W

TS SEG. 4.6.2  
ADDRESS Schoonner Bight K.6+985

LATITUDE 12° 32.764 N  
LENGTH 81° 43.727 W

#### Terminology



Terminal Station



BMH



Land Route

## APPENDIX G

### Puerto Limón Landing Station

Costa Rica

Puerto Limón

Segment 4.6.3



BMH SEG. 4.6.3

LATITUDE 9° 55.958 N  
LENGTH 83° 0.2170 W

TS SEG. 4.6.3

ADDRESS Del hotel playa Westfalia  
600 mts sur, carretera hacia Beverly vía  
36, Westfalia, Limón, Limón, Costa Rica.

LATITUDE 9° 55.944 N  
LENGTH 83° 0.247 W

#### Terminology



Terminal Station



BMH



Land Route

## **CERTIFICATE OF SERVICE**

I, Edgar Class, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing application to modify the AMX1 Cable Landing License by hand delivery or electronic mail on this 11th day of April 2023, to the following:

U.S. Coordinator, EB/CIP  
U.S. Department of State  
2201 C Street, NW  
Washington, DC 20520-5818

Office of the Chief Counsel / NTIA  
U.S. Department of Commerce  
14th St., NW and Constitution Ave., NW  
Room 4713  
Washington, DC 20230

Defense Information Systems Agency  
ATTN: GC/DOI  
6910 Cooper Avenue  
Fort Meade, MD 20755-7088

/s/ Edgar Class  
Edgar Class