

Cirion Technologies Solutions, LLC (“Cirion”) is requesting a of section 1.767(h) of the Commission's rules, where entities are required to be applicants for, and licensees on, a cable landing license include: (i) entities that own or control a cable landing station in the United States; and (ii) entities that own or control a five percent (5%) or greater interest in the submarine cable system and use the U.S. points of that system. Through this waiver request, Cirion is requesting a waiver for COLT Technology Services ("COLT") and Cirion St. Croix, Inc. (“Cirion St. Croix”) as both entities will not have any independent control to affect the operation of MAC submarine cable system (“MAC”).

COLT owns and operates the U.S. cable landing station located in Brookhaven, New York. However, COLT does not own, control, or hold any direct or indirect ownership interest in the MAC. COLT does not possess any rights that confer control over the submarine cable system, including its management, operation, maintenance, or governance. Rather, COLT's involvement with the MAC is limited to a contractual arrangement with Cirion Technologies Solutions, LLC, and any rights exercised by COLT with respect to the MAC are subject to direction, discretion, and supervision of Cirion. The MAC is owned and controlled by Cirion, and COLT does not hold any equity interest, voting rights, management rights, governance rights, or any other rights or interests evidencing ownership or control of the cable system.

The cable landing station located in the U.S. Virgin Islands (USVI) is licensed in the name of Cirion St. Croix; however, it is fully managed and controlled by Cirion, as Cirion St. Croix is a wholly owned subsidiary of Cirion. As a subsidiary, Cirion St. Croix does not operate as an independent entity responsible for managing the cable landing station. Rather, Cirion maintains full physical and logical control over both the cable landing station and the MAC cable

system. All operational and management decisions relating to the cable landing station in the USVI are made by Cirion.

Accordingly, neither COLT nor Cirion St. Croix qualifies as an applicant under Section 1.767(h), as neither owns nor controls any interest in the MAC submarine cable system. Cirion retains full physical and logical control over the MAC cable system.