

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
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| GU HOLDINGS INC., CHINA MOBILE |) | |
| INTERNATIONAL LIMITED, CHINA |) | |
| TELECOM GLOBAL LIMITED, GLOBAL |) | |
| TRANSIT 2 LIMITED, KDDI CORPORATION, |) | File No. SCL-LIC-20150626-00015 |
| and SINGAPORE TELECOM USA INC. |) | |
| |) | |
| Application for a License to Construct, Land, |) | |
| and Operate an Undersea Fiber Optic Cable |) | |
| Connecting the U.S., Japan, and Taiwan |) | |

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

GU Holdings Inc. (“GU Holdings”),¹ China Mobile International Limited (“CMI”), China Telecom Global Limited (“CTG”), Global Transit 2 Limited (“GT2L”), KDDI Corporation (“KDDI”), and Singapore Telecom USA Inc. (“Singtel USA”)² (collectively, the “Parties” or the “Applicants”), pursuant to 47 U.S.C. §§ 34-39 and 47 C.F.R. § 63.25, hereby request an extension of the Special Temporary Authority (“STA”) granted on August 12, 2015, to begin constructing and testing the FASTER cable system (“FASTER”) during the Commission’s consideration of the above captioned pending application for a license to construct, land, and operate FASTER. Specifically, the Parties seek a 180-day STA extension commencing on February 9, 2016. The Parties acknowledge that the cable will not be put into commercial service until all necessary authorizations have been received and that grant of this extension request will not prejudice action by the Commission on the underlying application and that any authority granted pursuant to this request is subject to cancellation or modification upon

¹ GU Holdings is an indirect, wholly-owned subsidiary of Alphabet Inc.

² Singtel USA is the U.S. operating subsidiary of Singapore Telecommunications Limited (“Singtel”).

notice. The Commission has authority to issue the STA³ and has previously granted STAs seeking similar relief.⁴

I. BACKGROUND

On June 26, 2015, the Parties filed an application (the “Application”) for authority to construct, land, and operate FASTER, a high-capacity fiber optic that will link the U.S., Japan, and Taiwan.⁵ On July 29, 2015, the Commission placed the Application on public notice.⁶ On August 12, 2015, the Commission granted the Parties’ STA request for 180 days.⁷

Construction of FASTER has been progressing since receipt of the STA. The Parties are also engaged in the governmental and commercial discussions necessary for the operation of FASTER’s facilities in the United States. The Department of Justice, Department of Defense, and Department of Homeland Security (collectively, “Team Telecom”) continue to consider the underlying application but otherwise support the grant of the requested STA extension.

II. GRANT OF A STA EXTENSION WILL SERVE THE PUBLIC INTEREST

Upon deployment, FASTER will help connect U.S. Internet users and businesses to Asia, the world’s biggest Internet market, increase competition on the trans-Pacific route, and enhance

³ The Parties note that the Commission has the authority to issue an STA to begin the testing and operation of a submarine cable prior to the grant of an FCC license. Neither the Cable Landing License Act (47 U.S.C. §§ 34-39) nor Executive Order 10,520 (delegating submarine cable licensing authority from the President to the FCC) limits the FCC’s ability to issue an STA to permit construction, testing, and operation prior to the grant of a cable landing license.

⁴ See, e.g., Application for Special Temporary Authority, *GU Holdings Inc.*, File No. SCL-STA-20090401-00007 (granted Apr. 16, 2009); Application for Special Temporary Authority, *Cedar Cable Ltd.*, File No. SCL-STA-20081209-00020 (granted Dec. 18, 2008); Application for Special Temporary Authority, *Asia America Gateway Consortium*, File No. SCL-STA-20080509-00213 (granted May 16, 2008); Application for Special Temporary Authority, *Trans-Pacific Express Cable Network Consortium*, File No. SCL-STA-20070906-00016 (granted Sep. 19, 2007).

⁵ File No. SCL-LIC-20150626-00015.

⁶ Public Notice, Streamlined Submarine Cable Landing License Applications Accepted for Filing, Report No. SCL-00166S (rel. July 29, 2015).

⁷ File No. SCL-LIC-20150626-00015.

the service quality, redundancy, and resilience of communications systems used by U.S. businesses and consumers. The FASTER project, moreover, provides opportunities for both short-term job creation and long-term employment in this country.

Delaying construction for FASTER would (i) delay the availability of the substantial transmission capacity of FASTER, (ii) impose significant economic costs on the Parties, and (iii) possibly interfere with the fishing season around the Oregon coast which is highly regulated and permits certain marine life to be harvested only during prescribed times of the year. Depending on the length of the delay, the financial viability of the project could be at risk. Conversely, grant of the requested extension would help ensure realization of the project's public benefits.

III. CONCLUSION

The public interest, convenience, and necessity will be served by a grant of this request for an extension of Special Temporary Authority to construct and test the FASTER cable system between the U.S., Japan, and Taiwan. The Parties respectfully requests that the Commission grant this request as expeditiously as possible, and in any event no later than February 9, 2016.

Respectfully submitted,

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Counsel for GU Holdings Inc.

Dated: February 4, 2016

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served this date upon the following:

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| Marlene Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via first class U.S. mail, postage prepaid) | U.S. Coordinator EB/CIP U.S. Department of State 2201 C Street NW Washington, D.C. 20520-5818 (via first class U.S. mail, postage prepaid) |
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/s/ Renee Britt

M. Renee Britt
February 4, 2016