

Streamlined

SCL-STA-20160914-00018

IB2016002059

GTI Corporation

SEP 26 2016

Policy Division  
International Bureau  
Before the

FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

**Granted**

**date:** September 26, 2016

**authorized by:** Chief, Telecommunications  
and Analysis Division, International Bureau

**signature:** Maui Cota

**Expires:** March 24, 2017

Re: SCL-LIC-20150626-00016

*In the Matter of*

GLOBE TELECOM, INC.,  
GTI CORPORATION,  
HAWAIIAN TELCOM SERVICES COMPANY, INC.  
RAM TELECOM INTERNATIONAL, INC.  
TELEGUAM HOLDINGS, LLC, D/B/A  
GTA TELEGUAM,  
PT TELEKOMUNIKASI INDONESIA INTERNATIONAL,  
AND  
TELEKOMUNIKASI INDONESIA INTERNATIONAL  
(USA) INC.,

Application for a License to Land and Operate  
a Private Fiber-Optic Cable System Connecting  
Indonesia, the Philippines, Guam, Hawaii, and  
California,

THE SOUTHEAST ASIA-US ("SEA-US") SYSTEM

File Nos. SCL-LIC-20150626-00016  
SCL-STA-2016-\_\_\_\_\_

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

Pursuant to 47 U.S.C. § 34, Executive Order No. 10,530, and 47 C.F.R. § 1.767, Globe Telecom, Inc. ("Globe," FRN 0024614257), GTI Corporation ("GTI," FRN 0019062181), Hawaiian Telcom Services Company, Inc. ("HTSC," FRN 0013077250), RAM Telecom International, LLC ("RTI," FRN 0024562621), TeleGuam Holdings, LLC, d/b/a GTA TeleGuam ("GTA," FRN 0011458999), PT Telekomunikasi Indonesia International ("Telin," FRN 0024562688), and Telekomunikasi Indonesia International (USA) Inc. ("Telkom USA," FRN 0023747660) (collectively, "Applicants"), hereby jointly request special temporary authority ("STA") to construct, connect the U.S. end points of, and test at their own risk those portions of the Southeast Asia-US ("SEA-US") system in U.S. territory prior to the Commission's grant of

the Applicants' pending cable landing license application.<sup>1</sup> Without such authority, construction of SEA-US might be delayed, and any delay would impose significant costs on the Applicants and thereby delay the benefits of new, geographically-diverse capacity on U.S.-Southeast Asia routes. The Applicants therefore seek STA beginning no later than October 1, 2016, and ending 180 days from grant. The Applicants have notified the Team Telecom agencies of this request.

The Applicants each acknowledge that grant of such STA will not prejudice action by the Commission on the underlying application and that such STA is subject to cancellation or modification upon notice. Further, the Applicants each acknowledge that such STA can be revoked by the Commission on its own motion without a hearing.

#### **I. THE GRANT OF AN STA WILL SERVE THE PUBLIC INTEREST**

The Applicants respectfully submit that grant of this STA request will serve the public interest, convenience, and necessity and otherwise comply with U.S. law and Commission regulations. On June 26, 2015, the Applicants applied for authority to land and operate the new SEA-US submarine cable system connecting Indonesia, the Philippines, Guam, Hawaii, and California. SEA-US will avoid the disaster-prone Luzon Strait, offer much-needed competition on U.S.-Southeast Asia routes, and help to satisfy burgeoning demand for Internet connectivity in Indonesia and Philippines. The Commission placed the application on streamlined public notice on July 24, 2015.<sup>2</sup> The Team Telecom agencies later requested that the application be processed on a non-streamlined basis pending completion of a national-security review. No party has opposed the grant of the cable landing license application.

---

<sup>1</sup> FCC File No. SCL-LIC-20150626-00016.

<sup>2</sup> *Streamlined Submarine Cable Landing License Applications Accepted for Filing*, Public Notice, Report No. TEL-00165S (rel. July 24, 2015).

The Applicants believe that they are nearing completion of the national security review conducted by the Team Telecom agencies. Nevertheless, the Applicants cannot be certain that the Team Telecom review will be completed and the cable landing license granted by early October 2016, when the system—which has already been manufactured in its entirety—will be loaded on cable ships for commencement of marine installation. System loading sets in motion a series of interrelated processes the delay or rescheduling of which would impose substantial costs on the Applicants and raise concerns about continuing cable ship availability. Consequently, the Applicants seek STA now in order to ensure that construction and testing in U.S. territory may proceed on schedule.

Grant of the Applicants' STA request will serve the public interest in two particular ways. *First*, it will ensure the timely construction and commencement of operations of SEA-US, bringing much-needed, geographically diverse capacity to U.S.-Southeast Asia routes. *Second*, it would avoid imposing needless and avoidable costs on the Applicants.

## **II. THE FCC HAS AUTHORITY TO GRANT THE STA**

The Commission has ample authority to issue an STA for construction and testing prior to the grant of a cable landing license. Neither the Cable Landing License Act nor Executive Order 10,520 (delegating submarine cable licensing authority from the President to the Commission, subject to Executive Branch review) limits the Commission's ability to issue an STA for construction, testing, and/or operational authority prior to grant of a cable landing license.<sup>3</sup>

---

<sup>3</sup> See 47 U.S.C. §§ 34-39; Executive Order 10,520.

To the contrary, the Commission has exercised such authority on numerous occasions and should also do so in this case. Most recently, the Commission has granted upon a showing of good cause STA for purposes of construction in U.S. territory, connection of a system's end points, and testing in U.S. territory prior to the issuance of a cable landing license for the Monet, FASTER, and Unity systems.<sup>4</sup> The Applicants seeks the same authority here to construct, connect the U.S. end points, and test the SEA-US system in U.S. territory.

---

<sup>4</sup> See, e.g., GU Holdings, Inc., Application for Special Temporary Authority, FCC File No. SCL-STA-20160630-00014 (granted July 11, 2016) (granting STA to construct and test U.S.-territory facilities for the Monet submarine cable system prior to the grant of a cable landing license); GU Holdings, Inc., Application to Extend Special Temporary Authority, FCC File No. SCL-STA-20160204-00006 (granted Feb. 17, 2016) (granting request to extend STA to construct and test U.S.-territory facilities for the FASTER submarine cable system prior to the grant of a cable landing license); GU Holdings, Inc., Application for Special Temporary Authority, FCC File No. SCL-STA-20150804-00025 (granted Aug. 12, 2015) (granting STA to construct and test U.S.-territory facilities for the FASTER submarine cable system prior to the grant of a cable landing license); Bharti Airtel Limited *et al.*, Application for Special Temporary Authority, FCC File No. SCL-STA-20090401-00007 (granted Apr. 16, 2009) (granting STA to construct U.S.-territory facilities for the Unity submarine cable system prior to the grant of a cable landing license).

## CONCLUSION

For the foregoing reasons, the Commission should expeditiously grant this STA request.

Respectfully submitted,

Kent Bressie  
Susannah Larson  
HARRIS, WILTSHIRE & GRANNIS LLP  
1919 M Street, N.W., Suite 800  
Washington, D.C. 20036-3537  
+1 202 730 1337 tel  
*kbressie@hwglaw.com*

*Counsel for the Applicants*

GLOBE TELECOM, INC.  
GTI CORPORATION  
HAWAIIAN TELCOM SERVICES COMPANY, INC.  
RAM TELECOM INTERNATIONAL, INC.  
TELEGUAM HOLDINGS, LLC, D/B/A  
GTA TELEGUAM  
PT TELEKOMUNIKASI INDONESIA INTERNATIONAL  
TELEKOMUNIKASI INDONESIA INTERNATIONAL  
(USA) INC.

12 September 2016

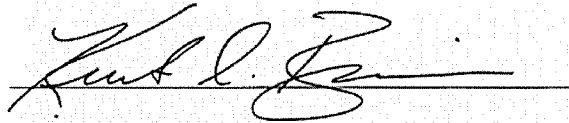
**CERTIFICATE OF SERVICE**

I, Kent Bressie, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing request for special temporary authority for the SEA-US submarine cable system, by hand delivery or electronic mail this 12th day of September, 2016, to the following:

Ambassador Daniel Sepulveda  
U.S. Coordinator and Deputy Assistant Secretary of State  
Int'l Communications & Information Policy  
Bureau of Economic and Business Affairs  
U.S. DEPARTMENT OF STATE  
EB/CIP : Room 4634  
2201 C Street, N.W.  
Washington, D.C. 20520-4634

Kathy Smith  
Chief Counsel  
U.S. DEPARTMENT OF COMMERCE/NTIA  
14th Street and Constitution Avenue, N.W.  
Room 4713  
Washington, D.C. 20230

Robert Gorman  
General Counsel  
DEFENSE INFORMATION SYSTEMS AGENCY  
6910 Cooper Avenue  
Fort Meade, Maryland 20755

A handwritten signature in black ink, appearing to read "Kent Bressie", is written over a horizontal line.

Kent Bressie