

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
The Americas I Submarine Cable System) File No. SCL-LIC-20190326-00009
Operating Between the United States)
Mainland and St. Thomas in the U.S. Virgin)
Islands)

APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

On behalf of the licensees of the Americas I submarine cable system,¹ SCL-LIC-19921110-00002, AT&T Corp. (“AT&T”), pursuant to 47 U.S.C. §§ 34-39, Executive Order 10,530, and 47 C.F.R. § 1.767, hereby requests that the Commission grant Special Temporary Authority (“STA”) to allow the continued operation of the Americas I cable following the expiration of the existing cable landing license on September 1, 2019, while the Commission considers the application for a new cable landing license for this cable filed on March 27, 2019.²

AT&T acknowledges, on behalf of the licensees, that the grant of this STA will not prejudice any action the Commission may take on the application for a new cable landing license, and that this STA can be modified or revoked by the Commission upon its own motion without a hearing. AT&T also acknowledges on behalf of the licensees that such continued operation of the cable would remain subject to the conditions set forth in the cable landing license released on July 13, 1993.

AT&T submits that the continued operation of the Americas I cable is overwhelmingly in the public interest in helping to meet the demand for voice, data, and internet services on routes

¹ The licensees include: AT&T Corp., MCI International Inc., Sprint Communications Company L.P., and Telefonica Larga Distancia De Puerto Rico, Inc.

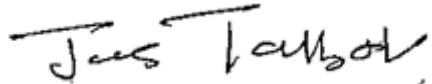
² See Application For Cable Landing License, File No. SCL-LIC-20190326-00009, filed March 27, 2019. See also, Public Notice, SCL-00241S, May 21, 2019. The application is currently under review by the “Team Telecom” Executive Branch agencies.

between the U.S. mainland and the U.S. Virgin Islands, and connecting to other cables extending to various Caribbean islands, and Central and South America, and that it would not serve the public interest to cease operation of this cable, even on a temporary basis. The cable has been operated successfully for 25 years, has a current design capacity of 800 Gbps per second, and the United States terminal points currently operate at up to 430 Gbps.

Maintaining reliable communications facilities serving the U.S. Virgin Islands is particularly important following the “massive damage” to these islands caused by Hurricane Maria.³ As the U.S. Virgin Islands continues to work to overcome these major challenges, it is even more critical to avoid any diminution in the communications facilities that link consumers in this territory with the rest of the world. AT&T therefore requests the grant of this request.

Respectfully submitted,

AT&T Corp.



Of Counsel:

Mark D. Schneider
Sidley Austin LLP
1501 K Street, NW
Washington, DC 20005
(202) 736-8058
mschneider@sidley.com

James Talbot
AVP- Senior Legal Counsel
AT&T Services, Inc. &
Assistant Secretary
AT&T Corp.
Suite 1000
1120 20th Street, N.W.
Washington, D.C. 20036
(202) 457-3048
jjtalbot@att.com

Dated: July 26, 2019

³ *Connect America Fund*, WC Docket No. 10-90, Order, 2017 WL 4479977, rel. Oct 4, 2017, ¶ 1. See also, *The Uniendo a Puerto Rico Fund and the Connect USVI Fund*, Order and Notice of Proposed Rulemaking, WC Docket No. 18-143, rel. May 29, 2018 (approving additional funding to restore communications networks in Puerto Rico and the Virgin Islands and seeking comment on almost \$900 million in long-term funding for network expansion).

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application was served on the following by first-class mail on July 26, 2019:

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

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

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



Gabrielle Whitehall