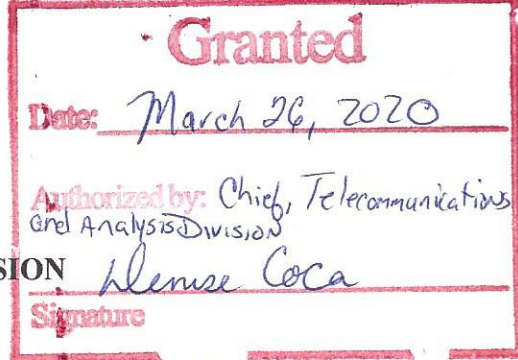


Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554



Expires 9/22/20

In the Matter of	)	
	)	
GU HOLDINGS INC., EDGE CABLE	)	File Nos. SCL-LIC-20170421-00012
HOLDINGS USA, LLC and PACIFIC LIGHT	)	SCL-AMD-20171227-00025
DATA COMMUNICATION CO. LTD.	)	SCL-STA-20180907-00033
	)	SCL-STA-20190327-00011
Application for a License to Construct, Land,	)	SCL-STA-20190906-00032
and Operate an Undersea Fiber Optic Cable	)	SCL-STA-2020_____
Connecting the United States, Hong Kong,	)	
Taiwan, and the Philippines	)	

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

Pursuant to 47 U.S.C. §§ 34-39, Executive Order 10530, and 47 C.F.R. § 1.767, GU Holdings Inc. ("GU Holdings"), Edge Cable Holdings USA, LLC ("Edge USA"), and Pacific Light Data Communication Co. Ltd. (collectively, the "Applicants"), hereby request an extension of the Special Temporary Authority ("STA") granted on October 5, 2018, and extended on April 3, 2019, and again on September 30, 2019, to construct, connect, and test the portion of the Pacific Light Cable Network ("PLCN") in U.S. territory during the Commission's consideration of the Applicants' pending cable landing license application.<sup>1</sup> Specifically, the Applicants seek a 180-day STA extension commencing at the expiration of the current STA on March 28, 2020. Without an STA extension, further construction and testing of PLCN would likely be delayed at significant cost to the Applicants and thereby delay the benefits of new trans-Pacific capacity

<sup>1</sup> See GU Holdings Inc., Edge Cable Holdings USA, LLC, and Pacific Light Data Communication Co. Ltd., Application for a License to Construct, Land, and Operate an Undersea Fiber Optic Cable Connecting the United States, Hong Kong, Taiwan, and the Philippines, FCC File No. SCL-LIC-20170421-00012 (filed Apr. 21, 2017) (*Original Application*).

agencies pending completion of the national security review. On September 7, 2018, the Applicants requested STA to construct, connect, and test the portion of PLCN in U.S. territory during the Commission's consideration of the Applicants' pending cable landing license application.<sup>6</sup> On October 5, 2018, the Commission granted the Applicants' STA request for 180 days.<sup>7</sup> On March 27, 2019, the Applicants requested an extension of the STA.<sup>8</sup> On April 3, 2019, the Commission granted the Applicants' request and extended the STA for another 180 days.<sup>9</sup> On September 6, 2019, the Applicants requested a second extension of the STA.<sup>10</sup> On September 30, 2019, the Commission granted the Applicants' request and extended the STA for another 180 days, through March 28, 2020.<sup>11</sup>

Since receipt of the STA, extensive investment has been made to construct PLCN, including the portion in U.S. territory. The Applicants are also actively engaged in the governmental and commercial discussions necessary for a national security review. However, the Applicants do not expect that those discussions will be concluded in time for the Commission to fully consider and grant the underlying application by March 28, 2020, the date on which the extended STA expires. The Applicants accordingly seek another STA extension in order to

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<sup>6</sup> See Request for Special Temporary Authority, FCC File No. SCL-STA-20180907-00033 (filed Sept. 7, 2018).

<sup>7</sup> See Special Temporary Authority Grant, FCC File No. SCL-STA-20180907-00033 (granted Oct. 5, 2018).

<sup>8</sup> See Request for Special Temporary Authority, FCC File No. SCL-STA-20190327-00011 (filed Mar. 27, 2019).

<sup>9</sup> See Special Temporary Authority Grant, FCC File No. SCL-STA-20190327-00011 (granted Apr. 3, 2019).

<sup>10</sup> See Request for Special Temporary Authority, FCC File No. SCL-STA-20190906-00032 (filed Sep. 6, 2019).

<sup>11</sup> See Special Temporary Authority Grant, FCC File No. SCL-STA-20190906-00032 (granted Sep. 30, 2019).

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served this date upon the following via first class U.S. mail, postage prepaid:

U.S. Coordinator  
EB/CIP  
U.S. Department of State  
2201 C Street NW  
EB/CIP: Room 4634  
Washington, DC 20520-4634

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

Defense Information Systems Agency  
ATTN: GC/DO1  
6910 Cooper Avenue  
Fort Meade, MD 20755-7088



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Stephanie Selmer  
March 13, 2020