

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

*In the Matter of*

EDGE CABLE HOLDINGS USA, LLC, and  
GU HOLDINGS INC.,

Application for a License to Land and Operate  
a Private Fiber-Optic Submarine Cable System  
Connecting the United States, Singapore, and  
Indonesia, to be Known as

THE ECHO CABLE SYSTEM

File Nos. SCL-LIC-20210329-00020  
SCL-STA-2021-\_\_\_\_\_

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

Pursuant to 47 U.S.C. § 34, Executive Order No. 10,530, and 47 C.F.R. § 1.767, Edge Cable Holdings USA, LLC (“Edge USA”), and GU Holdings Inc. (“GU Holdings,” together with Edge USA, the “Applicants”), hereby request special temporary authority (“STA”) to construct, connect, and test at their own risk those portions of the Echo cable system in U.S. territory prior to the Commission’s grant of the Applicants’ pending cable landing license application.<sup>1</sup> The Applicants need immediate authority to ensure that cable-laying activities in U.S. territory may commence no later than September 20, 2021.

Absent such authority, connectivity on the Echo system would likely be delayed at significant cost to the Applicants. The Applicants therefore seek STA beginning no later than

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<sup>1</sup> Edge Cable Holdings USA, LLC, and GU Holdings Inc., Application for a License to Land and Operate a Private Fiber-Optic Submarine Cable System Connecting the United States, Singapore, and Indonesia, to be Known as the Echo Cable System, File No. SCL-LIC-20210329-00020 (filed Mar. 29, 2021) (“Application”).

September 20, 2021, and ending 180 days from grant. The Applicants have notified the Team Telecom agencies of this request.

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

**I. THE GRANT OF STA WILL SERVE THE PUBLIC INTEREST AND WILL NOT FRUSTRATE THE COMMISSION'S RULES**

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 March 29, 2021, the Applicants jointly applied for authority to land and operate the Echo system connecting the United States, Singapore, and Indonesia. The Echo system will offer capacity in large increments until the year 2048, far beyond the useful life of many existing systems serving U.S.-Southeast Asia routes where capacity demand continues to grow significantly.<sup>2</sup> It will also provide geographically-diverse data center connectivity for certain of the Echo system's owners.<sup>3</sup>

As noted above, grant of this STA will allow U.S.-end construction to proceed as scheduled. A delay of that construction would impose significant costs on the Applicants and would ultimately delay new U.S.-Southeast connectivity.

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<sup>2</sup> Application at 2.

<sup>3</sup> *Id.*

## II. THE FEDERAL COMMUNICATIONS COMMISSION HAS AUTHORITY TO GRANT THE STA REQUEST

The Commission has ample authority to issue STA for construction and testing prior to the grant of a cable landing license. Neither the Cable Landing License Act nor Executive Order 10,530 (delegating submarine cable licensing authority from the President to the Commission, subject to Executive Branch review) limits the Commission's ability to issue STA for construction, testing, and/or operational authority prior to grant of a cable landing license.<sup>4</sup>

To the contrary, the Commission has exercised such authority on numerous occasions and should also do so in this case. The Commission has previously granted, upon a showing of good cause, STA for purposes of construction in U.S. territory prior to the issuance of a cable landing license for the New PLCN, JUPITER, Crosslake Fibre, Marea, and BRUSA systems, among others.<sup>5</sup> The Applicants seek the same authority here to construct, connect, and test that portion of the Echo system in U.S. territory.

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<sup>4</sup> See 47 U.S.C. §§ 34-39; Executive Order 10,530.

<sup>5</sup> See e.g., GU Holdings Inc., *et al.*, Request to Extend Special Temporary Authority, FCC File No. SCL-STA-20210308-00016 (granted Mar. 19, 2021) (extending STA to construct, connect, and test U.S.-territory facilities for the New PLCN submarine cable system prior to the grant of a cable landing license); NTT America, Inc., *et al.*, Request for Special Temporary Authority, FCC File No. SCL-STA-20190730-00023 (granted Aug. 22, 2019) (granting STA to construct, connect, and test U.S.-territory facilities for the JUPITER submarine cable system prior to the grant of a cable landing license); Crosslake Fiber USA LP, Request for Special Temporary Authority, FCC File No. SCL-STA-20180606-00014 (granted June 18, 2018) (granting STA to construct, connect, and test U.S.-territory facilities for the Crosslake Fibre submarine cable system prior to the grant of a cable landing license); Telxius Cable USA, Inc., *et al.*, Request for Special Temporary Authority, FCC File No. SCL-STA-20170712-00017 (granted July 19, 2017) (granting STA to construct, connect, and test U.S.-territory facilities for the BRUSA submarine cable system prior to the grant of a cable landing license); Edge Cable Holdings USA, LLC, *et al.*, Request for Special Temporary Authority, FCC File No. SCL-STA-20170318-00007 (granted Mar. 24, 2017) (granting STA to construct, connect, and test U.S.-territory facilities for the Marea 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 for the Echo system.

Respectfully submitted,

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(as lead applicant)



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