

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

In the Matter of

EDGE CABLE HOLDINGS USA, LLC,

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

THE ORCA SYSTEM

File Nos. SCL-LIC-20241224-00052
SCL-STA-20260313-00032
SCL-STA-2026_____

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”) hereby requests an extension of special temporary authority (“STA”) for a period of 180 days to construct, connect, and test at their own risk those portions of the ORCA System in U.S. territory prior to the Commission’s grant of the Applicant’s pending cable landing license application.¹ Edge USA requests an extension of special temporary authority for a period of 180 days, to ensure that cable-laying activities in U.S. territory may proceed on schedule.²

For reasons detailed below, denial of the requested extension of STA could impose significant economic costs on Edge USA and delay the public benefits of significant new U.S. capacity along the U.S.-Taiwan route. Edge USA therefore seeks STA beginning no later than

¹ Application for a License to Land and Operate a Private Fiber-Optic Submarine Cable System Connecting the United States and Taiwan, to be Known as The ORCA System, ICFS File No. SCL-LIC-20241224-00052 (filed Dec. 24, 2024) (“Application”).

² Public Notice, Report No. SCL-00604, Actions Taken Under Submarine Cable Landing License Act (rel. April 16, 2026) (“2026 Public Notice”).

the expiration of its current STA, September 28, 2026, and ending 180 days from grant. Edge USA has notified the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (the “Committee”) of this request.

Edge USA acknowledges 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, Edge USA acknowledges that such STA can be revoked by the Commission on its own motion without a hearing.

I. BACKGROUND

On December 24, 2024, Edge USA applied for authority to land and operate the ORCA system connecting the United States to Taiwan. A supplement was filed on January 24, 2025. On January 27, 2025, the Commission released a public notice accepting the application for filing with streamlined processing.³ On January 30, 2025, the Committee notified the Commission that it would be reviewing the application. Edge USA submitted responses to the Triage Questions on February 3, 2025. Edge USA received Round 1 and Round 2 Follow Up Triage Questions on February 14, 2025, and April 16, 2025, respectively. Edge USA submitted additional responses to Round 1 and Round 2 Follow Up Triage Questions on February 28, 2025, and April 23, 2025, respectively. On April 1, 2025, the Committee notified the Commission that the Committee was beginning a 120-day initial review. Since the Committee commenced its review, the Commission adopted a Report & Order to modernize the FCC’s submarine cable rules to “facilitate faster and more efficient deployment of submarine cables” and protect critical U.S. communications infrastructure against foreign adversary threats.⁴ In light of the

³ Public Notice, Report No. SCL-00516S, Streamlined Submarine Cable Landing License Applications Accepted for Filing (rel. Jan. 27, 2025).

⁴ *Review of Submarine Cable Landing License Rules and Procedures to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks; Amendment of the Schedule of Application Fees Set Forth in*

Commission’s new rules and policies, Edge USA has been engaged in ongoing negotiations with the Committee to conform any obligations agreed to in a National Security Agreement with the goals of the Commission. These negotiations were further delayed by the extended government shutdown.

On March 13, 2026, Edge USA filed a request for STA to secure the installation vessel, begin shore-end and pre-lay preparations, coordinate with governmental agencies, and satisfy vendor commitments. The FCC granted the STA on April 13, 2026.⁵ The current STA expires on September 28, 2026. Continued regulatory authority beyond September 28, 2026, is necessary to allow these installation activities to proceed without interruption. A pause or delay in these activities would impose substantial additional costs on Edge USA and ultimately delay critical new transpacific connectivity. Edge USA, therefore, seeks continued STA authority to ensure that construction, connection, and testing in U.S. territory may continue on schedule. With this request, Edge USA does not seek authority for commercial operation of the cable.

II. GRANT OF THE STA WILL SERVE THE PUBLIC INTEREST

A prompt grant of this STA application will significantly serve the public interest and advance the U.S. policy objectives to accelerate deployment of critical infrastructure. *First*, U.S. policy directs federal agencies to streamline permitting of high-priority infrastructure projects to support economic competitiveness and national resilience. The FCC’s recent submarine cable Report & Order reflects such policy, noting that facilitating faster and more efficient deployment of submarine cables is critical to allow the United States to remain “the unrivaled world leader in

Sections 1.1102 through 1.1109 of the Commission’s Rules, OI Docket No. 24-523, MD Docket No. 24-524, Report and Order and Further Notice of Proposed Rulemaking, FCC 25-49, para. 1 (rel. Aug. 13, 2025) (“2025 Report & Order”).

⁵ 2026 Public Notice at 2.

critical and emerging technologies.”⁶ *Second*, the ORCA system will provide significant new capacity on routes where capacity demand continues to increase substantially each year and further enhance the resilience of Edge USA’s subsea connectivity. *Third*, the ORCA system will enhance facilities-based competition on the U.S.-Taiwan route. This increased competition will result in greater innovation; enhance service quality, redundancy, and resiliency of connectivity in the region; and ultimately lower prices for U.S. consumers of international communications services.⁷ *Fourth*, the ORCA system will advance the public interest by furthering U.S. national security and economic security goals by enabling a U.S. company to land and operate a cable network connecting the U.S. to Taiwan.⁸ *Fifth*, the ORCA system will be deployed as an “open” cable – allowing Edge USA to ensure the security of the system aligned with U.S. government requirements and independent of any other users of the system. Edge USA is also an investor on multiple U.S.-licensed submarine cable systems, and its operations and security program for submarine cable infrastructure is already subject to significant and ongoing oversight of the U.S. national security agencies.

The Commission has ample authority to issue STA for construction, connection, and testing prior to the grant of a cable landing license. Neither the Cable Landing License Act, 47 U.S.C. §§ 34-39, nor Executive Order 10,530 (delegating submarine cable licensing authority from the President to the Commission, subject to Executive Branch review) limits the

⁶ 2025 Report & Order, at para. 1 (citing The White House, Letter from President Donald J. Trump to Michael Kratsios, Director of the White House Office of Science and Technology Policy (Mar. 26, 2025), <https://www.whitehouse.gov/briefings-statements/2025/03/a-letter-to-michael-kratsios-director-of-the-white-house-office-of-science-and-technology-policy>).

⁷ See Daniel F. Runde, *et al.*, *Safeguarding Subsea Cables: Protecting Cyber Infrastructure amid Great Power Competition*, Center for Strategic & International Studies (Aug. 16, 2024).

⁸ See Dodge Billingsley, *China Creating Undersea Cable Network in Response to United States Isolation Efforts*, Foreign Military Studies Office (Oct. 11, 2024).

Commission's ability to issue STA for construction, testing, and/or operational authority prior to grant of a cable landing license. 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 Anjana, Echo, JUPITER, BRUSA, and Marea systems, among others.⁹ Edge USA seeks the same authority here to construct, connect, and test that portion of the ORCA system in U.S. territory.

⁹ See *e.g.*, Edge Cable Holdings USA, LLC, Request for Special Temporary Authority, ICFS File No. SCL-STA-20240202-00004 (granted Mar. 7, 2024) (granting STA for the Anjana submarine cable system prior to the grant of a cable landing license); Edge Cable Holdings USA, LLC and GU Holdings Inc., Request for Special Temporary Authority, ICFS File No. SCL-STA-20210827-99935 (granted Sept. 24, 2021) (granting STA for the Echo submarine cable system prior to the grant of a cable landing license); NTT America, Inc., *et al.*, Request for Special Temporary Authority, ICFS File No. SCL-STA-20190730-00023 (granted Aug. 22, 2019) (granting STA for the JUPITER submarine cable system prior to the grant of a cable landing license); Telxius Cable USA, Inc., *et al.*, Request for Special Temporary Authority, ICFS File No. SCL-STA-20170712-00017 (granted July 19, 2017) (granting STA 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, ICFS File No. SCLSTA-20170318-00007 (granted Mar. 24, 2017) (granting STA 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 request for extension of STA to construct, connect, and test the ORCA system by September 28, 2026, while proceeding with its consideration of the cable landing license application for the ORCA system.

Respectfully submitted,

EDGE CABLE HOLDINGS USA, LLC

Raj Singh

Raj Singh (Aug 21, 2026 10:05:10 PDT)

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August 21, 2026

CERTIFICATE OF SERVICE

I, Kimberly Alli, 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 ORCA submarine cable system, by U.S. First-Class Mail this 21st day of August, 2026 to the following:

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/s/ Kimberly Alli
Kimberly Alli