

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

In the Matter of)	
)	
Brasil Telecom of America Inc.)	
<i>Licensee,</i>)	File No. SCL-T/C-20130729-00006
)	
Oi S.A.)	
<i>Transferor,</i>)	
)	
and)	
)	
BTG Pactual YS Empreendimentos)	
e Participações S.A.)	
<i>Transferee.</i>)	
)	
Application for Transfer of Control of Cable)	
Landing License)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (DOJ), including the Federal Bureau of Investigation (FBI), with the concurrence of the Department of Homeland Security (DHS) (collectively, the Agencies), submits this Petition to Adopt Conditions to Authorizations and Licenses (Petition) pursuant to Section 1.41 of the Federal Communications Commission (Commission) rules.¹ Through this Petition, the Agencies advise the Commission that they have no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the assurance of Brasil Telecom of America Inc. (GlobeNet)² and BTG Pactual YS Empreendimentos e Participações S.A. (BTG), to abide by the commitments and undertakings set forth in the December 11, 2013 Agreement between GlobeNet, BTG, and DHS.

¹ 47 C.F.R. § 1.41.

² Oi S.A. (transferor) is the ultimate parent of GlobeNet.

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a/ Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions and communications with representatives of the Applicants in connection with the above-referenced proceeding, the Agencies have concluded that the additional commitments set forth in the Agreement will help ensure that the Agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety, can proceed appropriately to satisfy those responsibilities. Accordingly, the Agencies advise the Commission that they have no objection to the Commission granting the application in the above-referenced proceeding, provided that the Commission conditions its consent on compliance with the Agreement.

Respectfully submitted,

/s/ Richard C. Sofield

Richard C. Sofield

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