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September 17, 2014

By IBFS

Ms. Sumita Mukhoty
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Transfer of Control of Hibernia Atlantic U.S. LLC and Hibernia Media, LLC to KCK Limited, ITC-T/C-20140820-00242; ITC-T/C-20140820-00244; SCL-T/C-20140820-00007

Dear Ms. Mukhoty:

On August 20, 2014, applications were filed with the Federal Communications Commission (“FCC”) requesting consent to the transfer of control that will occur as a result of the third stage (“Stage Three”) of a transaction (“Transaction”) involving Hibernia Atlantic US LLC (“HB Atlantic”) and Hibernia Media, LLC (“HB Media”) from Columbia Ventures Corporation (“CVC”) to Murosa Development S.A.R.L. (“Murosa”) and KCK Limited (“KCK”) (collectively the “Applicants”). HB Atlantic and HB Media each hold both domestic and international operating authority as common carriers under Section 214 of the Communications Act of 1934, as amended, and HB Atlantic also holds a submarine cable landing license.

In response to your telephonic request made on September 10, 2014, the Applicants are providing additional ownership information, pursuant to section 63.18(h) of the FCC’s rules, 47 C.F.R. § 63.18(h), regarding the ownership resulting after Stage Three of the transaction described in the applications, *i.e.*, the stage during which the proposed transfer of control for which Commission approval is requested will occur. As discussed on the phone, this information was provided, with certain correction noted below, in the August 20 applications, albeit not in one location, as you have requested. The ownership information provided herein was confirmed by KCK, Murosa, and CVC III Hibernia Blocker, Inc. (“CV Hibernia”) through their counsel. CVC ownership information was confirmed through its undersigned counsel.

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Sec. 63.18(h) requires identification of

[t]he name, address, citizenship and principal businesses of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one percent). The applicant shall also identify any interlocking directorates with a foreign carrier.

47 C.F.R. § 63.18(h)

The following individuals or entities will hold a 10% or greater direct or indirect interest in HB Atlantic and HB Media after Stage Three:

Hibernia NGS Limited (“Hibernia NGS”): Hibernia NGS is a company formed under the laws of the Republic of Ireland with an office at International Exchange Centre, Clonshaugh Industrial Estate Dublin 17, Ireland. The principal business of Hibernia NGS is that of a holding company.

After Stage Three, Hibernia NGS will hold a 100% direct ownership interest in HB Atlantic and HB Media.

Murosa: Murosa is an investment company organized under the laws of Luxembourg. Its registered offices are at 6, rue Guillaume Schneider, L-2522 Luxembourg.

After Stage Three, Murosa will hold a direct 51% ownership interest in Hibernia NGS. Accordingly, Murosa will hold a 51% indirect ownership interest (which is attributable as a 100% ownership interest) in HB Atlantic and HB Media.

KCK-FHN, Ltd. (“KCK-FHN”): KCK-FHN is a company organized under the laws of the Cayman Islands. Its registered address is Maples Corporate Services Limited, P.O. Box 309 Uglund House, Grand Cayman, KY1 – 1104, Cayman Islands. The principal business of KCK-FHN is that of a holding company.

After Stage Three, KCK-FHN will hold a 75.5% (subject to rounding) direct ownership interest in Murosa.¹ Accordingly, KCK-FHN will hold an indirect 75.5% ownership

¹ The Transaction contemplates that CV Hibernia will roll-up its interest in Hibernia NGS to a direct interest in Murosa contingent on certain conditions related to debt raising. If Hibernia NGS is unable to raise the threshold amount of debt, and the debt is funded by Murosa, then the KCK-FHN and CV Hibernia ownership interests in Murosa will be 75.5%, and 24.5% (subject to rounding) respectively. However, if Hibernia NGS is able to raise the threshold amount of debt,

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interest (attributable as a 100% ownership interest) in HB Atlantic and HB Media after Stage Three.²

KCK: KCK is a family-owned and run financial investment business that is owned by five members of the Clin / Karim Kassar family. KCK is incorporated under the laws of the British Virgin Islands with its registered offices at c/o OMC Chambers, Wickhams Cay 1, Road Town, Tortola, British Virgin Islands.

After Stage Three, KCK will hold a 100% direct ownership interest in KCK-FHN and its indirect interest in Murosa will be attributable as a 100% ownership interest. Consequently, KCK will hold an indirect interest attributable as a 100% ownership interest in HB Atlantic and HB Media after Stage Three.

Of the five members holding direct ownership interests in KCK, the following will hold indirect ownership interests of at least ten percent (10%) in HB Atlantic and HB Media after Stage Three:

Jean Francois Clin, a French citizen, holds a 42.5% direct ownership interest in KCK. Mr. Clin's address is: 7 Pollock's Path, The Peak, Hong Kong.

After Stage Three, per the Commission's attribution rules, Mr. Clin will hold an indirect 42.5% ownership interest in Murosa and an indirect 42.5% ownership interest in HB Atlantic and HB Media.

Radwan Karim Kassar, an individual with dual Lebanese and French citizenship, holds a direct 21.25% ownership interest in KCK. Mr. Karim Kassar's address is: 6 Wadham Gardens, NW3 3DP, London, UK.

After Stage Three, per the Commission's attribution rules, Mr. Karim Kassar will hold an indirect 21.25% ownership interest in Murosa and an indirect 21.25% ownership interest in HB Atlantic and HB Media.

KCK-FHN and CV Hibernia will hold direct interests of 70.9% and 29.1% (subject to rounding), respectively, in Murosa. A revision to the post-Stage Three organizational chart attached, as Exhibit C, to the Application (which identified KCK-FHN's post-Stage Three ownership interest in Murosa as 72.1% and CV Hibernia's interest as 27.9%.) is attached to this letter as Exhibit A and illustrates both scenarios and the corresponding percentages.

² In the event that Hibernia NGS raises the threshold amount of debt, KCK-FHN will hold a 70.1% (subject to rounding) direct ownership interest in Murosa after Stage Three. Accordingly, in that event, KCK-FHN will hold an indirect 70.1% ownership interest (attributable as a 100% ownership interest) in HB Atlantic and HB Media.

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Annabel Karim Kassar, an individual with dual Lebanese and French citizenship, holds a direct 21.25% ownership interest in KCK. Ms. Karim Kassar's address is: 6 Wadham Gardens, NW3 3DP, London, UK.

After Stage Three, per the Commission's attribution rules, Ms. Karim Kassar will hold an indirect 21.25% ownership interest in Murosa and an indirect 21.25% ownership interest in HB Atlantic and HB Media.

Nael Karim Kassar, an individual with dual Lebanese and French citizenship, holds a direct 10.0% ownership interest in KCK. Mr. Karim Kassar's address is: 10 Ulster Terrace, NW1 4PJ, London, UK.

After Stage Three, per the Commission's attribution rules, Mr. Karim Kassar will hold an indirect 10% ownership interest in Murosa and an indirect 10% ownership interest in HB Atlantic and HB Media.

No other person or entity, after Stage Three is complete, will hold a direct or indirect ownership interest of 10% or greater in KCK.

CV Hibernia: CV Hibernia is a Delaware corporation that principally operates as an investment company. Its principal address is c/o Constellation Growth Capital LLC, 40 West 57th Street, New York, New York, 10019.

After Stage Three, CV Hibernia will hold a 24.5% (subject to rounding) direct ownership interest in Murosa.³ Accordingly, CV Hibernia will hold an indirect 24.5% ownership interest in HB Atlantic and HB Media.⁴

Of the entities that have a direct or indirect interest in CV Hibernia,⁵ only Constellation Venture Capital III, L.P. ("CV Capital") will have a 10% or greater indirect ownership share in Murosa and, thus, in HB Atlantic or HB Media. CV Capital will hold a direct

³ See the discussion in footnote 1 for details.

⁴ In the event that Hibernia NGS raises the threshold amount of debt, CV Hibernia will hold a 29.1% (subject to rounding) direct ownership interest in Murosa after Stage Three. In that event, CV Hibernia will hold an indirect 29.1% ownership interest in HB Atlantic and HB Media and, of the entities that will have a direct or indirect interest in CV Hibernia, only CV Capital will have a 10% or greater indirect ownership share Murosa and, thus, in HB Atlantic or HB Media. In that event, CV Capital will hold a direct ownership share in CV Hibernia of 67% and, thus, an attributable 29.1% indirect ownership share in Murosa, HB Atlantic, and HB Media.

⁵ Footnote 18 of the Transfer of Control Application provides a more complete description of the ownership of CV Hibernia.

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ownership share in CV Hibernia of 67% and, thus, an attributable 24.5% indirect ownership share in Murosa, HB Atlantic, and HB Media. No other person or entity with a direct or indirect ownership share in CV Hibernia will have a 10% or greater indirect ownership share in HB Atlantic or HB Media.

CVC: CVC is a Washington state corporation that owns and operates a portfolio of telecommunications companies and a small number of manufacturing businesses around the world. The principal address for CVC and Ken Peterson is 12503 SE Mill Plain Blvd., Suite 120, Vancouver, WA 98684. Both currently, and after Stage Three, CVC will remain wholly-owned by Ken Peterson.

After Stage Three, CVC will hold a direct 49% ownership interest in Hibernia NGS and an indirect 49% ownership interest in HB Atlantic and HB Media.

Interlocking Directorates

Each of the following individuals is an officer or director of Hibernia NGS, HB Atlantic, and/or HB Media (as noted) as well as an officer or director of a foreign carrier as described below:

- Kenneth D. Peterson, Jr. (Hibernia NGS, **Hibernia Atlantic**, Hibernia Atlantic Cable System Limited, Hibernia Atlantic (UK) Limited, Hibernia Atlantic Communications (Canada) Company, Hibernia Atlantic (NI) Limited and Magnet Networks Limited).
- Bjarni K. Thorvardarson (Hibernia NGS, **Hibernia Atlantic**, **Hibernia Media**, Hibernia Atlantic Cable System Limited, Hibernia Atlantic (UK) Limited, Hibernia Atlantic Communications (Canada) Company and Hibernia Atlantic (NI) Limited).
- James P. Prenetta, Jr. (Hibernia NGS, **Hibernia Atlantic**, **Hibernia Media**, Hibernia Atlantic Cable System Limited, Hibernia Atlantic (UK) Limited, Hibernia Atlantic Communications (Canada) Company and Hibernia Atlantic (NI) Limited).
- Lloyd Jarkow (Hibernia NGS, **Hibernia Atlantic**, **Hibernia Media**, Hibernia Atlantic Cable System Limited, Hibernia Atlantic (UK) Limited, Hibernia Atlantic Communications (Canada) Company and Hibernia Atlantic (NI) Limited).

We trust that this letter satisfactorily answers your inquiries. Questions regarding this filing should be directed to the undersigned at (202) 342-8400.

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Respectfully submitted,



Edward A. Yorkgitis, Jr.
Denise N. Smith

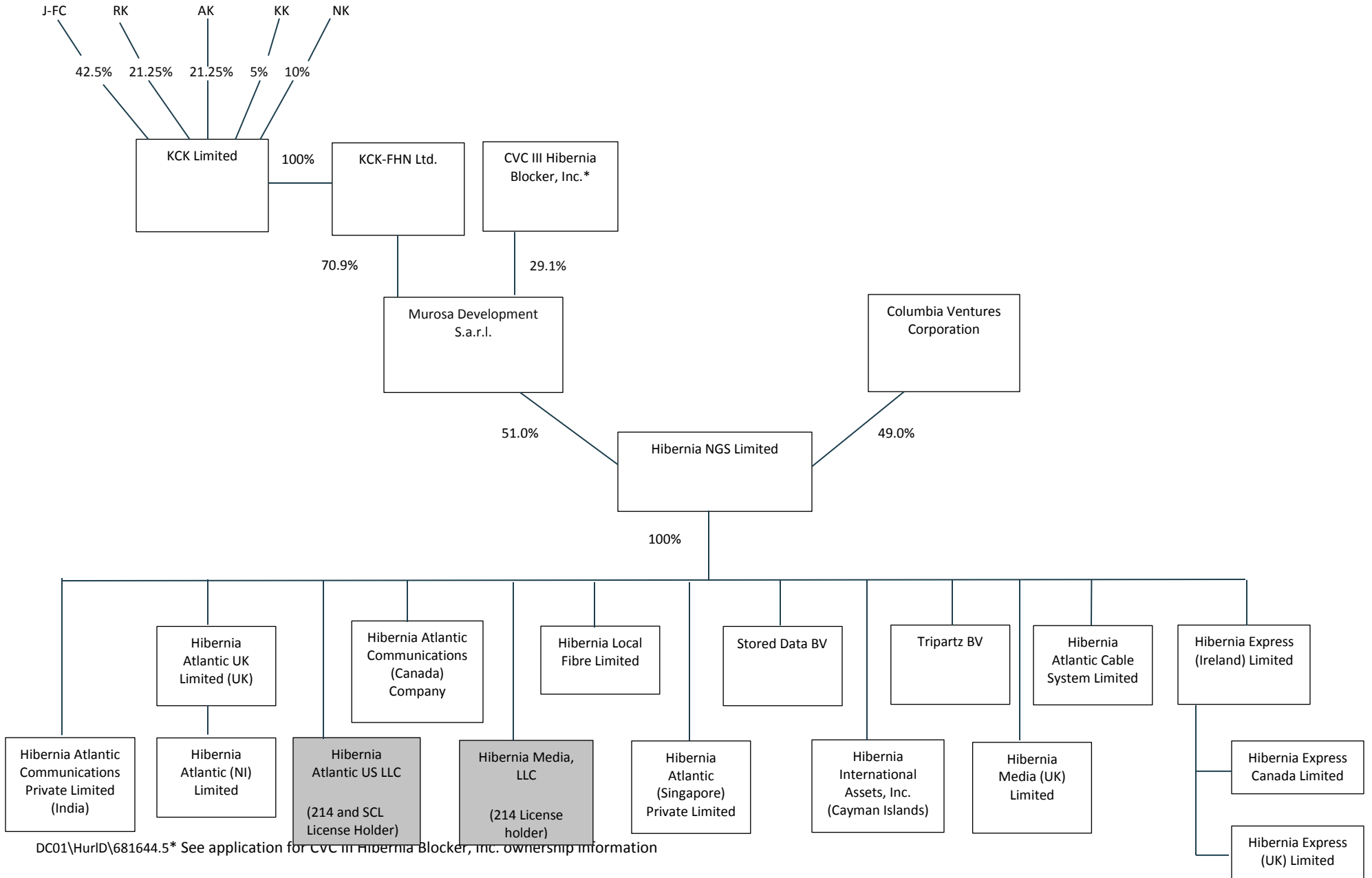
*Counsel to Hibernia Atlantic US LLC, Hibernia
Media, LLC and Columbia Ventures
Corporation*

cc: Jim Bird, FCC (by e-mail)
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David Krech, FCC (by e-mail)
George Li, FCC (by e-mail)
Jodie May, FCC (by e-mail)
Burt Braverman (by e-mail)
Defense Information Systems Agency (by overnight delivery)
U.S. Department of Commerce (by overnight delivery)
U.S. Department of State (by overnight delivery)

EXHIBIT A

Post-Stage Three Ownership Interests

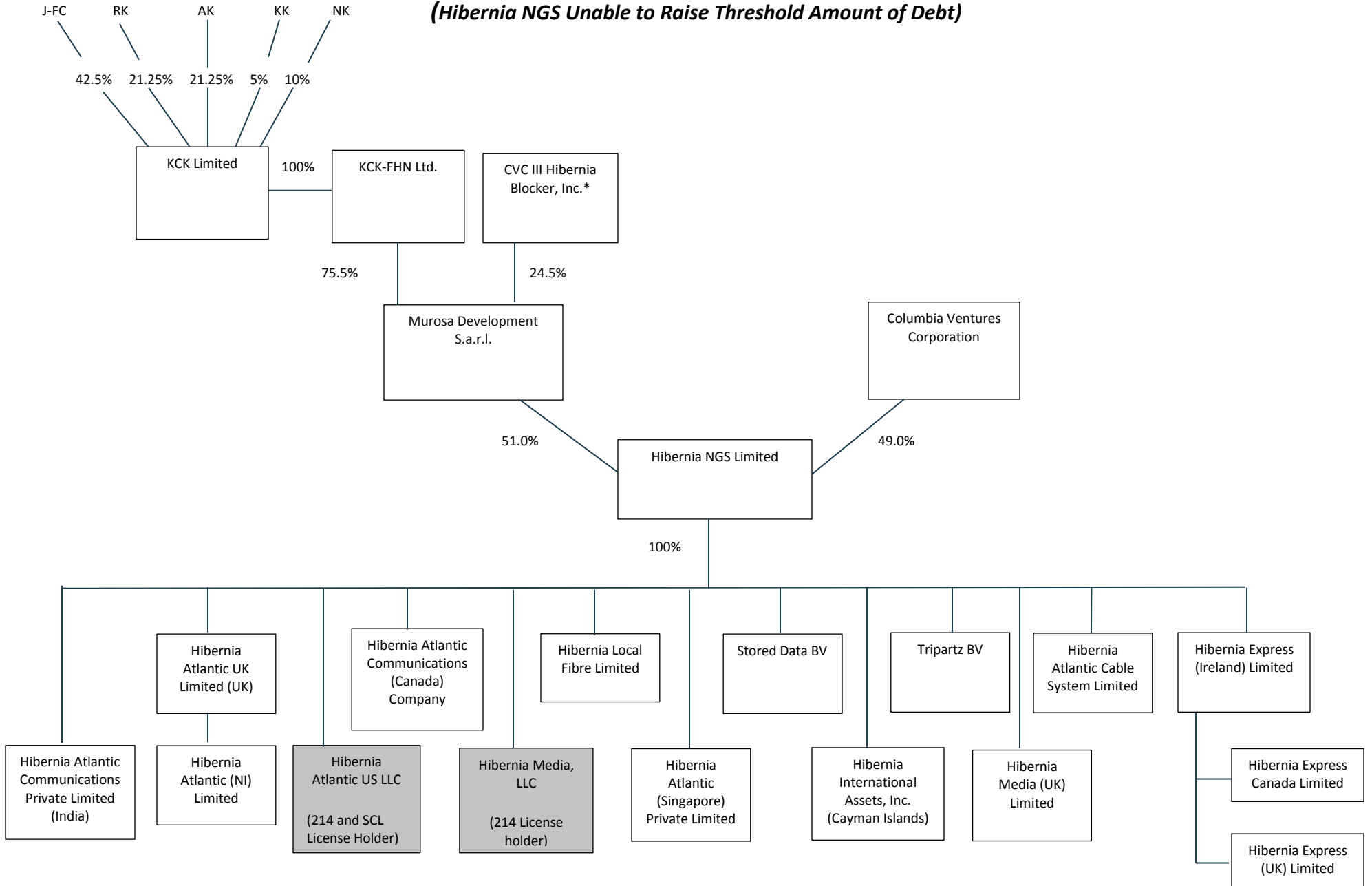
(Hibernia NGS Able to Raise Threshold Amount of Debt)



DC01\HurlD\681644.5* See application for CVC III Hibernia Blocker, inc. ownership information

Post-Stage Three Ownership Interests

(Hibernia NGS Unable to Raise Threshold Amount of Debt)



DC01\HurlD\681644.4* See application for CVC III Hibernia Blocker, Inc. ownership information