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VIA ELECTRONIC FILING

Denise Coca
Chief, Policy Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
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**Re: Applications of Columbus Networks, Limited and Cable & Wireless
Communications Plc for Consent to Transfer Control of Licensees, File Nos.
ITC-T/C-20141121-00304, ITC-T/C-20141121-00307, SCL-T/C-20141121-
00013, SCL-T/C- 20141121-00014**

Dear Ms. Coca:

In response to your Information Request dated May 19, 2015 (the "Information Request"),¹ Cable & Wireless Communications Plc ("Cable & Wireless") hereby submits the following information in relation to the above-referenced applications.²

¹ Capitalized terms used herein and not otherwise defined have the respective meanings ascribed to such terms in the Information Request.

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1. For each of the submarine cable systems, provide for Cable & Wireless (a) the ownership interest and (b) the cable capacity held as of December 31, 2014. Provide the data as specified in Attachment A.

Response. Please see Attachment A.

U.S. Cable Systems:

America Movil (AMX-1)
Antillas 1
ARCOS-1
CFX-1
MAYA-1
Pacific Caribbean (PCCS)
Taino-Carib

Non-U.S. Cable Systems:

ALBA-I
BDSNi
Caribbean Bermuda U.S. Network (CBUS)
Cayman-Jamaica Fiber System (CJFS)
Eastern Caribbean Fiber System (ECFS)
East-West Cable None
Fibralink

If the ownership or capacity held varies significantly by segment of the particular cable, please insert rows in the spreadsheet to provide data on a segment-by-segment basis.

2. Provide the data on current (as of December 31, 2014) and planned capacity (as of December 31, 2016) for each of the submarine cable systems listed below, as specified in Attachment B and indicate the source of the data.

Response. Please see Attachment B.

U.S. Cable Systems:

America Movil (AMX-1)

² Columbus New Cayman Limited replaced Columbus Networks, Limited as the Transferor in the above-referenced applications following a *pro forma* transfer of control completed on March 31, 2015. See *Notification of Pro Forma Transfer and Minor Amendment to Applications*, SCL-T/C-20150421-00010, et al. (filed April 21, 2015) (the "Pro Forma Transfer").

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Antillas 1
ARCOS-1
CFX-1
MAYA-1
Pacific Caribbean (PCCS)
Taino-Carib

Non-U.S. Cable Systems:

ALBA-I
BDSNi
Caribbean Bermuda U.S. Network (CBUS)
Cayman-Jamaica Fiber System (CJFS)
Eastern Caribbean Fiber System (ECFS)
East-West Cable
Fibralink

If the current or planned capacity varies significantly by segment of the particular cable, please insert rows in the spreadsheet to provide information on a segment-by-segment basis.

3. Identify any submarine cable system planned or proposed to be in service in the Caribbean region within the next two years. Provide detailed information such as planned landing points, planned capacity and proposed in-service dates, and indicate the source of the information. In addition, state whether Cable & Wireless has an investment in the submarine cable system, and, if so, the level of ownership that will be held.

Response. None to Cable & Wireless' knowledge.

4. Provide a list of available terrestrial links between Haiti and the Dominican Republic, including the ownership of those links and provide:

Response. Each of Digicel and NATCOM S.A. (a consortium created in 2010 between Viettel Telecom (60%) (Vietnam's largest mobile operator) and the Government of Haiti (40%)) has built extensive fiber networks throughout Haiti including up to the border with the Dominican Republic in northern Haiti. Cable & Wireless does not have knowledge of how much capacity is available on these Haitian terrestrial fiber networks.

BW Telecom (a Dominican carrier controlled by Mr. Manny Lora), owns and operates a fiber optic network from the Haitian border with the Dominican Republic (where it connects with Digicel and NATCOM) to Puerto Plata,

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Dominican Republic. Puerto Plata is home to multiple subsea links to the U.S. and elsewhere, including AMX-1, ARCOS-1 and Fibralink. Cable & Wireless understands that Digicel has acquired one dark fiber pair from BW Telecom on this route. Hence, Cable & Wireless understands that Digicel has a robust terrestrial seamless platform from anywhere in Haiti to the Puerto Plata multi subsea network gateway. Cable & Wireless further understands that Digicel has the ability to port its capacity on the Kaliko Beach, Haiti spur for use from Puerto Plata, Dominican Republic.

Cable & Wireless understands that NATCOM had leased services also from BW Telecom to seamlessly connect its fiber network in Haiti to the Puerto Plata subsea networks in the Dominican Republic. However, Cable & Wireless understands that NATCOM recently cancelled these services.

Other carriers in the Dominican Republic such as Trilogy (owners of Viva), Claro (America Movil) and other small integrators provide microwave links between Haiti and the Dominican Republic at their borders.

- a. The capacity held by Cable & Wireless and how the capacity is held, e.g., ownership of the facility, long-term lease, short-term lease, etc.

Response. *Cable & Wireless does not hold any capacity on the terrestrial links in Haiti.*

- b. For each link, to the extent known, a list of other capacity providers and capacity holders, the amount of capacity held by each of these entities, and indicate the source of this information.

Response. *Cable & Wireless does not have this information.*

- c. Whether Cable & Wireless is having any problems, recent or ongoing, purchasing or accessing capacity on, or interconnecting with, terrestrial links between Haiti and the Dominican Republic. If so, explain what the access or interconnection impediments have been, such as capacity holders withholding capacity unless purchased at above cost-based rates.

Response. *No.*

5. Provide the amount of capacity, listed by cable system, sold to Digicel by Cable & Wireless, on either an IRU or ICL basis. Provide the data as specified in Attachment C.

Response. *Please see Attachment C.*

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6. Provide information on whether holders of capacity in cable systems serving the markets listed below have the legal and practical right (1) to collocate equipment in cable landing stations owned or controlled by Cable & Wireless in those markets; and (2) to acquire, access and connect to backhaul facilities provided by Cable & Wireless and/or other third parties, in those markets at cost-based rates.

1. Anguilla

Response. *Cable & Wireless in Anguilla has the legal and practical right to sell collocation space at a landing station (space permitting) and backhaul at market rates.*

2. British Virgin Islands

Response. *Cable & Wireless in BVI has the legal and practical right to sell collocation space at a landing station (space permitting) and backhaul at market rates.*

3. Cayman Islands

Response. *Cable & Wireless in the Cayman Islands has the legal and practical right to sell collocation space at a landing station (space permitting) and backhaul at market rates.*

4. Dominican Republic

Response. *Cable & Wireless in the Dominican Republic has the legal and practical right to sell collocation space at the Wind landing station (space permitting) at market rates. There are several other providers of collocation and backhaul facilities in the Dominican Republic, including Codetel (America Movil), Orange/Altice and Wind Telecom.*

5. Haiti

Response. *Cable & Wireless has no presence in this market.*

6. Jamaica

Response. *Cable & Wireless in Jamaica has the legal and practical right to sell collocation space at landing stations (space permitting) and backhaul at market rates. In addition to Cable & Wireless and Columbus, there are*

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other providers of colocation and backhaul facilities in Jamaica, including Telecomunicaciones Grand Caribe (operator of the ALBA-1 Cable).

7. Turks and Caicos ("T&C")

Response. Cable & Wireless in T&C has the legal and practical right to sell collocation space at a landing station (space permitting) and backhaul at market rates.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Patrick S. Campbell

Counsel to Cable & Wireless Communications Plc

Attachments

cc: David Krech
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(via e-mail)

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Attachment A

Cable & Wireless Communications Plc

Data Request

	Cable Ownership (%)		Cable Capacity Holdings (in STM-1s) as of 12/31/2014					
	Current	as of 12/31/2014	Capacity Thru Ownership (a)	Net IRUs (b)	Net Inter-Carrier Leaseholds (c)	Net Capacity Held (d) = (a)+(b)+(c) (d) = (e) +(f)	Activated Capacity (e)	Non-Activated Capacity (f)
	U.S. Cables:							
America Movil (AMX1)	0%		0	0	0	0	0	0
Antillas 1	5%		65	0	0	65	65	0
ARCOS-1	0%		0	82	0	82	82	0
CFX-1	0%		0	64	0	64	64	0
MAYA -1	11.73%		1165	0	0	1165	1165	0
Pacific Caribbean (PCCS)	0%		0	0	0	0	0	0
Taino-Carib	18%		884	-2	0	882	862	20
Non-U.S. Cables								
ALBA -1	0%		0	0	0	0	0	0
BDSNI*	100%		192	0	0	192	192	0
Caribbean Bermuda U.S. Network (CBUS)	50%		512	-223	0	289	173	116
Cayman-Jamaica Fiber System (CJFS)	94.7%		242	-2	0	240	240	0
Eastern Caribbean Fiber System (ECFS)	64%		9269	-15	0	9254	8652	602
East - West Cable	100%		256	-19	0	237	237	0
Fibralink	0%		0	64	0	64	64	0

* C&W affiliate-owned cable

Attachment B

Cable & Wireless Communications Plc

Data Request

Cable Capacity (in Gbps)				
	Current as of 12/31/2014	Source of Capacity Data	Planned as of 12/31/2016	Source of Capacity Data
U.S. Cables:				
America Movil (AMX1)	1000	Telegeography/Rawle Study	1960	Telegeography/Rawle Study
Antillas 1	3.7	Telegeography/Rawle Study	10	Telegeography/Rawle Study
ARCOS-1	1,468	C&W internal information	1,748	C&W internal information
CFX-1	1,580	C&W internal information	1,780	C&W internal information
MAYA -1	512	Telegeography/Rawle Study	1200	Telegeography/Rawle Study
Pacific Caribbean (PCCS)	1000	Telegeography/Rawle Study	1960	Telegeography/Rawle Study
Taino-Carib	3.9	Telegeography/Rawle Study	3.9	Telegeography/Rawle Study
Non-U.S. Cables				
ALBA -1	112	Telegeography/Rawle Study	307	Telegeography/Rawle Study
BDSNI*	30	C&W internal information	30	C&W internal information
Caribbean Bermuda U.S. Network (CBUS)**	160	C&W internal information	380	C&W internal information
Cayman-Jamaica Fiber System (CJFS)	40	C&W internal information	140	C&W internal information
Eastern Caribbean Fiber System (ECFS)	182	Telegeography/Rawle Study	260	Telegeography/Rawle Study
East-West Cable	40	C&W internal information	160	C&W internal information
Fibralink	70	C&W internal information	448	C&W internal information

BDSNI Bahamas-Haiti segment only other links are Intra-Bahamas *

Segment 1 and Segment 2 of CBUS**

Attachment C

Cable & Wireless Communications Plc.


Capacity Sold or Leased to Digicel by Cable (in STM-1s)

Data Request

	IRUs	Inter-Carrier Leaseholds
U.S. Cables:		
America Movil (AMX1)		
Antillas 1		
ARCOS-1	16	
CFX-1		
MAYA -1		
Pacific Caribbean (PCCS)		
Taino-Carib		
Non-U.S. Cables		
ALBA -1		
BDSNi		
Caribbean Bermuda U.S. Network (CBUS)	15	
Cayman-Jamaica Fiber System (CJFS)		2
Eastern Caribbean Fiber System (ECFS)	15	
East - West Cable	16	
Fibralink	16	

CERTIFICATION

On behalf of Cable & Wireless Communications Plc, I hereby certify that the foregoing Information Request response, including its corresponding attachments, was prepared under my direction and control. I further certify under penalty of perjury that all statements therein are true, complete, and correct to the best of my knowledge and are made in good faith.

By: 
Name: Perley McBride
Title: CFO and Director

Date: June 2, 2015