

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

In the Matter of)	
)	
TeleGuam Holdings, LLC, AP TeleGuam)	File No. SCL-T/C-20170210-00003
Holdings, Inc., and Forager Holdings Corp.)	
)	
Transfer of Control of a Cable Landing)	
Licensee)	
)	
)	
)	

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

The Department of Homeland Security (“DHS”) hereby 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, DHS advises the Commission that DHS, on behalf of the Department of Justice (“DOJ”) and Department of Defense (“DoD”, and collectively, the “USG Agencies”), has no objection to the Commission approving the authority sought in the above-referenced proceedings, provided that the Commission conditions its approval on the commitment of Forager Holdings Corp. (“Forager”), attached hereto as Attachment A (“Forager Commitment Letter”), to acknowledge and assume the commitments of TeleGuam Holdings, LLC d/b/a GTA that are set forth in the National Security Agreement dated January 11, 2017, among GTI Corporation d/b/a GTI Telecom, Hawaiian Telcom Services Company, Inc., RAM Telecom International, Inc., TeleGuam Holdings, LLC d/b/a GTA, and DHS, with respect to the Southeast Asia-US (“SEA-US) cable system (SCL-LIC-20150626-00016) (“2017 NSA”; attached hereto as Attachment B).

¹ 47 C.F.R. § 1.41.

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 with representatives of Forager in connection with the above-referenced proceedings, the USG Agencies have concluded that the commitments set forth in the 2017 NSA, help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, DHS advises the Commission, on behalf of the USG Agencies, that it has no objection to the Commission granting the application in the above-referenced proceedings, provided that the Commission conditions its consent on compliance by Forager with the 2017 NSA, as reflected in the Forager Commitment Letter.

Respectfully submitted,

/S/ Janine Slade

Janine Slade

U.S. Department of Homeland Security

Acting Director – Foreign Investment Risk Management (Acting)

Office of Policy

3801 Nebraska Avenue

Washington, D.C. 20016

June 22, 2017

Attachments:

Attachment A (Forager Commitment Letter)

Attachment B (2017 NSA)