

August 12, 2017

**VIA IBFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

*Re: File Nos. SCL-T/C-20170328-00008, SCL-T/C-20170417-00010, and  
SCL-T/C-20170417-00011*

Dear Ms. Dortch:

Through its counsel, Telefónica, S.A. (“Telefónica”), supplements the application pending in above-referenced files seeking consent to transfer certain negative control rights over cable landing licensees Telxius Cable USA, Inc. (“Telxius USA”), Telxius Cable Puerto Rico, Inc. (“Telxius Puerto Rico”), and Telefónica International Wholesale Services América, S.A. (“Telxius América”) to KKR Management LLC (“KKR Management”) (the “Proposed Investment Transaction”). At the time the application was filed with the Commission on March 28, 2017, the cable landing license applications for both the Marea and BRUSA submarine cable systems remained pending before the Commission. The Commission has now granted licenses for each of those systems.<sup>1</sup> Telefónica therefore supplements and restates the cable landing license interests described on pages 4 through 6 of the application as follows:

- Telxius USA (transfer of certain negative control rights to KKR Management pending in File No. SCL-T/C-20170328-00008):
  - File No. SCL-LIC-20160525-00012 (Marea)
  - File No. SCL-LIC-20160330-00011 (BRUSA)
  - File No. SCL-LIC-20130122-00001 (Pacific Caribbean Cable System)
  - File Nos. SCL-LIC-20000204-00003 and SCL-MOD-20061207-00012 (SAm-1)

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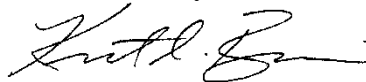
<sup>1</sup> *Actions Taken Under Cable Landing License Act*, Public Notice, DA 17-420 (Int’l Bur., rel. May 4, 2017) (granting Marea cable landing license); *Actions Taken Under Cable Landing License Act*, Public Notice, DA 17-758 (Int’l Bur., rel. Aug. 11, 2017) (granting BRUSA cable landing license).

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- Telxius Puerto Rico (transfer of certain negative control rights to KKR Management pending in File No. SCL-T/C-20170417-00011):
  - File No. SCL-LIC-20160330-00011 (BRUSA)
  - File No. SCL-LIC-20130122-00001 (Pacific Caribbean Cable System)
  - File Nos. SCL-LIC-20000204-00003 and SCL-MOD-20061207-00012 (SAm-1)
- Telxius América (transfer of certain negative control rights to KKR Management pending in File No. SCL-T/C-20170417-00010):
  - File No. SCL-LIC-20160525-00012 (Marea)
  - File No. SCL-LIC-20160330-00011 (BRUSA)
  - File No. SCL-LIC-20130122-00001 (Pacific Caribbean Cable System)

The licensing of Marea and BRUSA does not affect the cable landing license interests of Telxius Cable Colombia, S.A., the transfer of certain negative control rights to KKR Management of which is pending in File No. SCL-T/C-20170328-00009, as Telxius Cable Colombia, S.A., is not a joint licensee for the Marea or BRUSA systems.

Yours sincerely,



Kent Bressie

*Counsel for Telefónica, S.A., Telxius Cable USA, Inc.,  
Telxius Cable Puerto Rico, Inc., and Telefónica  
International Wholesale Services América, S.A*

cc: David Krech  
Jodi Cooper