

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
	)	
Quintillion Subsea Operations, LLC	)	
	)	
And	)	
	)	
Q Gateway Ultimate Holdings, LLC	)	
	)	
And	)	FCC No. SCL-T/C-20230411-00010
	)	
Grain Communications Opportunity Fund	)	
III, Master, L.P.	)	
	)	
	)	
Application for Consent to Transfer	)	
Control of Domestic and International	)	
Authority Pursuant to the Submarine Cable	)	
Landing License Act (47 U.S.C. §§ 34-39)	)	
	)	
	)	

**PETITION TO ADOPT CONDITIONS
TO AUTHORIZATION AND LICENSE**

Pursuant to Executive Order 13913, the National Telecommunications and Information Administration (NTIA) submits this Petition to Adopt Conditions to Authorization and License (Petition) on behalf of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee).¹ Through this Petition, and pursuant

¹ Exec. Order No. 13913, § 9(h), 85 Fed. Reg. 19643, 19647-48 (2020). The Executive Order directs the Committee to “assist the [Commission] in its public interest review of national security and law enforcement concerns that may be raised by foreign participation in the United States telecommunications services sector.” *Id.* § 3(a), 85 Fed. Reg. at 19643.

to section 1.41 of the Commission's Rules, the Committee advises the Commission that it has no objection to the Commission approving the above-captioned application, provided that the Commission conditions its approval on the assurances of Quintillion Subsea Operations, LLC ("QSO"), Q Gateway Ultimate Holdings, LLC ("Q Gateway"), and Grain Communications Opportunity Fund III, Master, L.P. ("GCO III"), together, "the Parties," to abide by the commitments and undertakings set forth in the January 9, 2024, National Security Agreement (NSA), a copy of which is attached hereto.²

Pursuant to section 2 of the Cable Landing License Act, the Commission must determine whether a proposed transfer of control of any submarine cable landing license will serve the public interest, convenience and necessity.³ As part of the public interest analysis of such applications, the Commission considers whether any such application raises national security, law enforcement, foreign policy, or trade policy concerns related to the applicant's foreign ownership.⁴ With regard to these concerns, the Commission has long sought the expertise of the relevant Executive Branch agencies and has accorded deference to their expertise when they have identified such concerns in a particular application.⁵

After discussions with representatives of the Parties in connection with the above-captioned application, the Committee has concluded that the additional commitments set forth in the NSA will 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.

² 47 C.F.R. § 1.41.

³ 47 U.S.C. § 214(a).

⁴ See *Market Entry and Regulation of Foreign-affiliated Entities*, Report and Order, 11 FCC Rcd 3873, 3888, 3955, ¶¶ 38, 216-19 (1995).

⁵ *Id.* at 3955, ¶ 219.

Accordingly, NTIA on behalf of the Committee advises the Commission that the Committee has no objection to the Commission granting the above-captioned application, provided that the Commission conditions its consent on compliance with the January 9, 2024 NSA.

Respectfully submitted,

A handwritten signature in blue ink that reads "Sean Conway". The signature is written in a cursive style with a large, stylized "C" for Conway.

Sean Conway
Deputy Chief Counsel

National Telecommunications and
Information Administration
1401 Constitution Avenue, NW
Washington DC 20230
(202) 482-1816

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