

## Attachment D

### Standard Questions for an Application for Assignment or Transfer of Control of a Submarine Cable Landing License

**Submarine Cable Name:**

**Applicant(s):**

**FCC File Number(s):**

**Purpose:** This list of standard questions solicits the initial information that the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee) will review in connection with any referral of the above-referenced application by the Federal Communications Commission (FCC) in order to assess any national security and law enforcement concerns raised by the application. After review, the Committee may request additional information from you, including through tailored questions. The 120-day initial review period will typically start on the date the Chair of the Committee determines that your responses to these standard questions and any tailored questions, when required, are complete. If the Committee determines no tailored questions are necessary, the 120-day initial review period will start no more than 30 days after the FCC's referral, on the date the Committee informs the FCC that the responses to the standard questions are complete and that no tailored questions are required. If you fail to provide timely responses to any Committee requests for information, the Committee may recommend that the FCC dismiss the application without prejudice.

**Dissemination of Information:** The information received by the Committee pursuant to 47 CFR § 1.40003 and any subsequent requests for information by the Committee may be shared and used in accordance with Section 8 of Executive Order 13913 of April 4, 2020, Establishing the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector, 85 Fed. Reg. 19643 (Apr. 8, 2020).

### Instructions

- 1) Complete all Sections:** When a "Yes" answer is indicated, provide further information as appropriate. The questions seek further details regarding the Applicant and its security-related practices, and some questions are particularly directed at identifying and assessing the complete scope of the equipment that the Applicant will be operating and the services that the Applicant will be offering should the FCC grant those authorities.
- 2) Response Format:** Uniquely and sequentially Bates-number your responses to the standard questions, including any attachments, with an endorsement on each page. The Bates number must be a unique, consistently formatted identifier; the number of digits in the numeric portion of the format should not change in subsequent productions, if any, nor should spaces, hyphens, or other separators be added or deleted. Produce any Excel documents in native format (if desired, you may also produce a PDF version for record keeping purposes).
- 3) Identify Sensitive Information:** Specifically identify answers or documents that you deem to be privileged or confidential as the information contains trade secrets or commercial or financial information. If there are multiple applicants, each applicant should also clearly mark any answers or

documents that contain sensitive information that should not be disclosed to the other applicants. Personally Identifiable Information (PII) may be submitted in a separate attachment. The PII Supplement is Attachment G.

- 4) **Individuals' names:** For names that follow different naming conventions, such as the use of surnames as first names (e.g., Korean names), or the use of mother's last name as one of two last names that are often hyphenated (e.g., Spanish names), follow standard English convention for purposes of completing this information. For example, if the name is Kim Chul-su, write "Chul-su Kim" in the form. If the name in Spanish is Juan Garcia-Reyes, write "Juan Garcia Reyes."
- 5) **Residential Addresses:** Contract mail receipt locations, post office boxes, co-working, or shared virtual locations may not be used in lieu of residence addresses.
- 6) **Business Addresses:** For each business address, clearly indicate whether the address is a shared business venue, co-working location, virtual office, or traditional physical office.
- 7) **Obligation to Update:** The Applicant must inform the Committee if there is any material change to any of the information provided in the Applicant's responses while the Committee's review is ongoing, including, but not limited to, changes in ownership, equipment, and Communications Assistance for Law Enforcement Act (CALEA") compliance.
- 8) **Definitions** – These terms, as used in this questionnaire, have the following definitions:
  - "Applicant" shall have the same meaning as the term is defined in 47 CFR § 1.767(h).
  - A "Controlling Interest" is generally a 50% or greater Ownership Interest (either equity or voting). Also, a Controlling Interest shall be determined on a case-by-case basis considering the distribution of ownership, and the relationships of the Owners, including family relationships. The term Controlling Interest includes Individuals or Entities with positive or negative *de jure* or *de facto* control of the Applicant/Licensee. *De jure* control includes holding 50% or more of the voting stock of a corporation or holding a general partnership interest in a partnership. Ownership Interests that are held indirectly by any party through one or more intervening corporations may be determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain except that if the ownership percentage for an interest in any link in the chain is equal to or exceeds 50% or represents actual control, it may be treated as if it were a 100% interest. *De facto* control is determined on a case-by-case basis. Examples of *de facto*, or actual, control include constituting or appointing 50% or greater of the board of directors or management committee; having authority to appoint, promote, demote, and fire senior executives that control the day-to-day activities of the Licensee; or playing an integral role in management decisions. In the case of a consortium, each member of the consortium shall be considered to have a Controlling Interest in the consortium.
    - "Ultimate Owner" and "Ultimate Parent" refer to the Entity or Individual that ultimately owns and controls the Applicant/Licensee.
    - "Immediate Owner" refers to the Entity or Individual in the vertical ownership chain that immediately owns and controls the Applicant/Licensee. In other words, the Immediate Owner is the Entity or Individual in the ownership chain that is closest to the Applicant/Licensee.
    - An Entity or Individual with an "Ownership Interest" is any entity in the ownership chain with more than a 5% attributable interest in the Applicant/Licensee, including the "Ultimate Owner/Parent" and the "Immediate Owner," and all Controlling Interest

holders. Note that Controlling Interests include *de facto* controlling interests, for which equity and/or voting ownership may be below 5%.

- “Corporate Officer” refers to any Individual hired or appointed by the Entity’s board of directors that has actual or apparent authority to exercise day-to-day management responsibilities over an Entity.
- “Director” refers to any Individual serving on an Applicant’s board of directors or similar governing body organized to set policies for corporate management of or oversight for an Applicant/Licensee.
- “Entity” includes a partnership, association, estate, trust, corporation, limited liability company, consortium, joint venture, governmental authority, or other organization.
- An “Equity Interest Holder” is any Individual or Entity that has the right to receive or the power to direct the receipt of dividends from, or the proceeds from the sale of, a share or other ownership stake in the Applicant.
- The term “Foreign Government” includes any person or group of persons exercising sovereign *de facto* or *de jure* political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign *de facto* or *de jure* authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.
- “Individual” refers to a natural person, as distinguished from an Entity.
- “Managed Services” or “Enterprise Services” refers to the provision of a complete, end-to-end communications solution to customers.
- A “Non-U.S. Individual” is an Individual who is not a U.S. citizen.
- An “Owner” is an Individual or Entity that holds an Ownership Interest in the Applicant/Licensee.
- An “Ownership Interest” is a 5% or greater equity (non-voting) and/or voting interest, whether directly or indirectly held, or a Controlling Interest in the Applicant, and includes the ownership in the Ultimate Parent/Owner of the Applicant and any other Entity(ies) in the chain of ownership (i.e., all entities that exist in the ownership structure between the Applicant itself and its Ultimate Parent).
- “Principal Equipment” means the primary components of the Domestic Communications Infrastructure (DCI) and the Wet Plant. Principal Equipment includes: network element servers; routers; switches; repeaters; submarine line terminal equipment (SLTE); system supervisory equipment (SSE); signal modulators and amplifiers; power feed equipment (PFE); tilt and shape equalizer units (TEQ/SEQ); optical distribution frames (ODF); branching units (BU); synchronous optical network (SONET), synchronous digital hierarchy (SDH), wave division multiplexing (WDM), dense wave division multiplexing (DWDM), coarse wave division multiplexing (CWDM), or optical carrier network (OCx) equipment, as applicable; and any non-embedded software necessary for the proper monitoring, administration, and provisioning of the submarine cable system (with the exception of commercial-off-the-shelf (COTS) software used for common business functions, *e.g.*, MS Office).
  - “Domestic Communications Infrastructure” or “DCI” means: (a) any portion of the cable system that physically is located in the United States, up to the submarine line terminating equipment, including (if any) transmission, switching, bridging, and routing equipment, and any associated software (with the exception of COTS software used for common business functions, *e.g.*, MS Office) used by or on behalf of the Applicant to provide, process, direct, control, supervise, or manage domestic communications; and (b) Network Operations Center (NOC) facilities.

- “Wet Plant” means hardware components installed and residing on the undersea portion of the submarine cable system, including fiber optic cables, repeaters, branching units, and routers (if any). Wet Plant includes all the components used in order to define the topology of the undersea portion of the submarine cable system.
- “Remote Access” is access from a point that is not physically co-located with the Applicant’s network facilities, or that is not at a point within the Applicant’s network.
- “Senior Officer” refers to the Chief Executive Officer, President, Chief Financial Officer, Chief Information Officer, Chief Technical Officer, Chief Operating Officer, or any other similarly situated Individual that has actual or apparent authority to act on behalf of the Entity.

## **Section I: Identification of Relevant Parties**

- 1) Provide the name, address, principal place of business, and place of incorporation of Relevant Parties. For the purposes of the following questions “Relevant Parties” means the following:
  - a) Current Cable Landing Licensee(s) (“**Licensee(s)**”):
  - b) Any Individual or Entity with an Ownership Interest in the Licensee(s) (“**Owner(s)/Controller(s)**”):
  - c) Assignee(s)/Transferee(s) of the Cable Landing License(s) (“**Proposed Licensee(s)**”):
  - d) Any Individual or Entity with an Ownership Interest in the Proposed Licensee(s) (“**Proposed Owner(s)/Controller(s)**”):

## **Section II: Applicants’ Ownership**

- 2) Identify the current and proposed ownership percentage in the submarine cable system of each of the Relevant Parties.
- 3) Identify each Individual or Entity that holds an Ownership Interest in the Proposed Licensee(s) and the Proposed Owner(s)/Controller(s), highlighting any foreign Entities or Foreign Government-controlled Entities, including the Ultimate Parent/Owner of the Proposed Licensee(s) and any other companies/individuals holding an Ownership Interest in the chain of ownership.
  - a) For each such Individual or Entity with Ownership Interest in Relevant Parties, include a clear explanation of its involvement in the submarine cable system Proposed Licensee(s), including whether it has or will have a management role:
  - b) For each such Individual or Entity with Ownership Interest in Relevant Parties, provide all identifying information, as follows:
    - i) For Individuals, provide name (to include all names and aliases used by that person), country of citizenship (indicate whether the individual is a dual citizen and all countries where citizenship is held), date and place of birth, U.S. alien number (indicate whether the individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses and all phone numbers. Personally Identifiable Information (PII) may be provided in Attachment G.
    - ii) For Entities, provide country of incorporation (if United States, include state of incorporation), principal place of business, general business type (e.g., holding company, investment firm, etc.), all business addresses, email addresses and related phone numbers.
- 4) Provide the dollar amount that each Proposed Owner(s)/Controller(s) or Proposed Licensee(s) has/will invest in the submarine cable system.
- 5) What is the source of funding for each Proposed Owner(s)/Controller(s) or Proposed Licensee(s)’s investment?

- 6) Provide a detailed ownership structure diagram for the all Proposed Owner(s)/Controller(s) or Proposed Licensee(s).
- 7) List all other submarine cable systems in which each Proposed Owner(s)/Controller(s) or Proposed Licensee(s) have equity and provide the amount of the equity for each Proposed Owner(s)/Controller(s) or Licensee(s) in each cable system.

### **Section III: Overview of Submarine Cable Owners**

- 8) How many fiber pairs comprise the submarine cable system and what is its design capacity?
- 9) What Entity owns or controls each segment of the cable and what Entities own or control which fiber pairs or what capacity? How will that change after the proposed transaction?
- 10) Do the Relevant Parties currently operate or plan to operate a website?  
Yes  No

If yes, provide all URL addresses for any current or known future sites and describe whether the information in the website is up to date.

- 11) For each of the Proposed Owner(s)/Controller(s) and Proposed Licensee(s), name the Senior Officers and Directors and provide the following:

(a) Explain the nature and extent of each Senior Officer's or Director's involvement in the Entity's business; and,

(b) Provide citizenship (indicate whether the Individual is a dual citizen, list all countries of citizenship), date and place of birth, U.S. alien number (indicate whether the individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses and all phone numbers.

- 12) Has the Proposed Licensee been involved in bankruptcy proceedings, or any other legal proceeding undertaken for the purpose of liquidating, reorganizing, refinancing, or otherwise seeking relief from all or some of the debts of the Proposed Licensee or any Proposed Owner(s)/Controller(s), in any jurisdiction over the past 5 years?  
Yes  No

If yes, provide details.

- 13) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been involved or associated with a previous application to the FCC?

Yes  No

If yes, provide application identifying information.

- 14) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors, ever been blocked, sanctioned, penalized, or had an authorization or other permission revoked/terminated by the FCC?

Yes  No

If yes, provide details.

**15)** Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been involved or associated with a previous filing to the Committee on Foreign Investment in the United States (CFIUS)?

**Yes**  **No**

If yes, provide filing identifying information.

**16)** Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been blocked, sanctioned, penalized, or had an authorization or other permission prohibited, suspended, or revoked by CFIUS?

**Yes**  **No**

If yes, provide details.

**17)** Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors, ever been convicted of any felony (an offense carrying a maximum potential sentence of a term of imprisonment of more than a year) in the United States or any other country? This includes any settlements or negotiated resolutions, non-prosecution agreements, or deferred prosecution agreements.

**Yes**  **No**

If yes, provide details, including name(s) of the Individual and/or Entity with an Ownership Interest involved, dates, offenses, jurisdiction/court, sentence.

**18)** Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been subject to any criminal, administrative, or civil penalties imposed for violating the regulations of the FCC, the U.S. Department of State, the U.S. Department of the Treasury (to include, but not be limited to, the Internal Revenue Service, the Office of Foreign Assets Control, the Financial Crimes Enforcement Network (FinCEN), and the Office of the Comptroller of the Currency), the U.S. Department of Energy, the U.S. Department of Commerce, the U.S. Federal Trade Commission, the U.S. Securities and Exchange Commission, the World Bank Group, the U.S. Environmental Protection Agency, or the U.S. Commodity Futures Trading Commission, or for violating the regulations of any comparable state or foreign agency? This includes any settlements or negotiated resolutions, non-prosecution agreements, or deferred prosecution agreements.

**Yes**  **No**

If yes, provide details, including name(s) of the Individual and/or Entity with an Ownership Interest, dates, violations, agency, penalty, and if a fine was imposed, status of payment.

**19)** Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, Directors, or any associated foreign Entities ever been on the Specially Designated Nationals And Blocked Persons List (SDN List), the BIS Unverified List or Entity List in 15 CFR part 744, or equivalent list of the United Nations Security Council or European Union?

**Yes**  **No**

If yes, provide details.

20) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been investigated, arraigned, arrested, indicted, or convicted of any of the following:

a) Criminal violations of U.S. law, including espionage-related acts or criminal violations of the International Trade in Arms Regulations (ITAR) or the Export Administration Regulations (EAR)?

Yes  No

b) Deceptive sales practices, violations of the Consumer Fraud Act and regulations, and/or other fraud or abuse practices whether pursuant to Federal, state, or local law?

Yes  No

c) Violations of any laws (Federal, state, or local) in connection with the provision of telecommunications services, equipment and/or products and/or any other practices regulated by the Telecommunications Act of 1996 and/or by state public utility commissions?

Yes  No

If yes to any of the above, describe in detail, including name(s) of the Individual and/or Entity with an Ownership Interest involved, date(s), and current status or final disposition of matter, including any terms of settlement. Provide any available supporting documentation.

21) Do any of the present or Proposed Owner(s)/Controller(s) or Proposed Licensee(s) have existing (or planned) relationships/partnerships (formal or informal), funding or service contracts, directly or indirectly, with any foreign individuals, foreign companies, Foreign Governments, and/or any Foreign Government-controlled companies?

Yes  No

If yes, indicate whether the relationship/partnership includes a management role by any foreign Individuals, foreign Entities or Foreign Governments. Provide the name(s) of the foreign individuals, foreign Entities and/or Foreign Government and explain the nature of the relationship/partnership, including whether the relationship/partnership currently exists and/or is intended to continue in the future.

#### **Section IV: Submarine Cable System(s) Overview**

22) When did the submarine cable system(s) first go into service?

23) What is the design capacity of the submarine cable system(s)? What is the current lit capacity? Is this expected to change post-transfer? If yes, describe in detail the changes.

24) Provide a brief description of the operational purpose of the submarine cable system(s), and the current market segmentation:

Is this expected to change post-transfer? If yes, describe in detail the changes.

25) Describe the nature of services delivered by the submarine cable system and the customer base:

Is this expected to change post-transfer? If yes, describe in detail the changes.



**26)** Provide addresses or physical locations for all of the submarine equipment, transmission/transport equipment, network equipment and infrastructure, who owns/leases it (if leased provide details for the Applicant):

- a)** The NOC (and back-up NOC, if any);
- b)** All submarine Cable Landing Stations;
- c)** All associated data centers and distribution facilities; and
- d)** All associated Points of Presence.

Is this expected to change post-transfer? If yes, describe in detail the changes.

**27)** List current vendors, contractors, or subcontractors involved in operating, managing or maintaining the Principal Equipment. For each Entity, provide country of incorporation, principal place of business, general business type (e.g., holding company, investment firm), all business addresses, and related phone numbers:

Is this expected to change post-transfer? If yes, describe in detail the changes.

**28)** Provide a description of all Principal Equipment, including a list of functions supported and information related to the manufacturer, model, and/or version number of any such equipment:

Is this expected to change post-transfer? If yes, describe in detail the changes.

**29)** List current vendors, contractors, or subcontractors involved in maintaining or securing the submarine cable system. For each entity, provide country of incorporation, principal place of business, general business type (e.g., holding company, investment firm), all business addresses, and related phone numbers:

Is this expected to change post-transfer? If yes, describe in detail the changes.

**30)** List any Federal, state, and local government customers, including pursuant to any classified contracts, and include a description of all services that are currently being provided to such customers:

Is this expected to change post-transfer? If yes, describe in detail the changes.

#### **Section V: Cable System Security Overview**

**31)** What, if any, capability do Owner(s)/Controller(s) and Licensee(s) have to control or monitor operations over the network (e.g., audit mechanisms, record access monitoring) via Remote Access?

If Remote Access is available, provide a copy of the Remote Access security policy, if available.

Is this expected to change post-transfer? If yes, describe in detail the changes.

**32)** Do/will any third-party vendors, associated companies, or investors have remote access/monitoring to the network, systems, or records to provide managed services? If so, provide additional details, i.e., who are they, what are their role(s), and why do they need this capability.

Is this expected to change post-transfer? If yes, describe in detail the changes.

**33)** What access control provisions, physical and logical security policies are in place for your submarine cable system for day-to-day operations and maintenance? If the policies exist and are available in writing, provide copies of these policies.

Is this expected to change post-transfer? If yes, describe in detail the changes.

**34)** What provision is in place to monitor suspicious activity occurring over the paths of the cables?

Do the Relevant Parties have any screening and/or vetting procedures which are applied to U.S. or non-U.S. Individuals (employees, contractors or others) who have access, remote or otherwise, to the submarine cable system Owners' facilities, equipment, or data?

Yes  No

If yes, provide copies of the written procedures. If these procedures are not available in writing, explain all such procedures in detail.

Is this expected to change post-transfer? If yes, describe in detail the changes.

**35)** Does/will any Non-U.S. Individual have access to one or more of the following:

**a)** Physical facilities and/or Principal Equipment?

Yes  No

If yes, provide identity of Individual(s) and explain the type of access provided.

**b)** Network control, monitoring, and/or auditing features, including any NOC facilities?

Yes  No

If yes, provide identity of Individual(s) and explain the type of access provided.

**c)** Communications content and data?

Yes  No

If yes, provide identity of Individual(s) and explain the type of access provided.

**d)** Customer records and billing records?

Yes  No

If yes, provide identity of Individual(s) and explain the type of access and records that will be provided.

Is this expected to change post-transfer? If yes, describe in detail the changes.

For each Individual identified in response to these questions, provide the following information: name, all countries of citizenship, date and place of birth, U.S. alien number (indicate whether the individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses and all phone numbers. PII may be provided in Attachment G.

**36)** Does/will the submarine cable system Proposed Owner(s)/Controller(s) store and/or maintain any domestic communications content, customer records, or billing records?

Yes  No

- a) Describe the types of records that will be stored.
- b) Provide all addresses of locations where such records will be stored and/or remotely accessed/managed via electronic systems.
- c) If any storage location differs from the submarine cable system Owners' primary business address, explain the general purpose of the location and its function within the cable owners' business.
- d) If any of the records will be accessible from outside the United States, explain where, how, and who will have access to them.

Describe all physical/electronic security measures utilized for all locations/systems to protect the confidentiality of records.

**37)** Identify whether, if required by law, regulation, or a license condition, the Applicant(s) will inform the Committee if, in the future, any record storage/access location is transferred and/or newly established outside of the United States.

**38)** Identify an Individual (who is a U.S. citizen residing in the United States with an active security clearance or who is eligible to obtain one) who will be the Licensee's authorized law enforcement point of contact responsible for accepting and responding to requests or compulsory processes from U.S. law enforcement or other U.S. government agencies.

- a) Explain the Individual's relationship to the Licensee and provide name, all countries of citizenship, date and place of birth, U.S. social security number, all passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. Also identify whether the Individual has an active U.S. Government security clearance. PII may be provided in Attachment G.

**39)** Explain how the Applicant(s) would make any and all records not stored in the United States electronically available in the United States within five (5) business days pursuant to a lawful request to the authorized law enforcement point of contact identified above. PII may be provided in Attachment G.

**40)** Describe all lawful intercept capabilities of the submarine cable system Owners to include switching platforms, mediation devices, and use of third-party service providers for provisioning and delivery.

#### **Section VI: Submarine Cable System Network Overview**

**41)** Provide:

- a) The most current submarine cable system network diagram/topology map showing all Cable Landing Stations, fiber termination points, Principal Equipment, Point of Presence, segments and branching units;

- b) Network and telecommunications architecture descriptions and associated descriptions of interconnection points and controlled gateways to the DCI and Wet Plant;
- c) Submarine cable system network operational plans, processes, and procedures; and
- d) Descriptions of interfaces and connections to the submarine cable system for service offload, disaster recovery or administrative functions.

Is this expected to change post-transfer? If yes, describe in detail the changes.

- 42) Do the submarine cable system Owner(s)/Controller(s) or Licensee(s) use interconnecting carriers and/or peering relationships?

Yes  No

If yes, provide details and list the carriers.

Is this expected to change post-transfer? If yes, describe in detail the changes.

- 43) Do the submarine cable system Owner(s)/Controller(s) or Licensee(s) rely on underlying carrier(s) to furnish services to its customers and/or resell any services?

Yes  No

If yes, provide details and list whose services are utilized or resold.

Is this expected to change post-transfer? If yes, describe in detail the changes.

- 44) Are the submarine cable system Owner(s)/Controller(s) or Licensee(s) or their affiliates able to control operations at any Point of Presence, data center, and/or NOC from any overseas locations?

Yes  No

If yes, what is the nature of the foreign-based control?

Is this expected to change post-transfer? If yes, describe in detail the changes.

- 45) Explain how disaster recovery is managed, including interconnection mechanisms with other submarine cable systems for restoration in the case of outages due to cable disruptions. Identify any third parties who will be contracted for restoration/repair of damaged cables. Provide a copy of a restoration plan for the submarine cable system, if available.

Is this expected to change post-transfer? If yes, describe in detail the changes.

- 46) Has the cable experienced any outages during its operational history? If so, provide the date, cause and duration of the outage(s).

**Section VII: Submarine Cable System Critical Infrastructure Services**

47) Does the submarine cable system provide services to any sectors of U.S. critical infrastructure?

Yes  No

If yes, check all that apply:

- |   |   |
|---|---|
| a. <input type="checkbox"/> Defense Industrial Base   | i. <input type="checkbox"/> Information Technology      |
| b. <input type="checkbox"/> U.S. Intelligence Community   | j. <input type="checkbox"/> Chemical                    |
| c. <input type="checkbox"/> Emergency Services<br>(i.e., Federal, state, local law enforcement, fire, police) | k. <input type="checkbox"/> Commercial Facilities       |
| d. <input type="checkbox"/> Government Facilities<br>(i.e., Federal, state, local entities)                   | l. <input type="checkbox"/> Agriculture and Food Supply |
| e. <input type="checkbox"/> Banking and Finance   | m. <input type="checkbox"/> Health Care                 |
| f. <input type="checkbox"/> Nuclear Reactors, Materials, or Waste   | n. <input type="checkbox"/> National Monuments          |
| g. <input type="checkbox"/> Drinking Water and Water Supply   | o. <input type="checkbox"/> Transportation              |
| h. <input type="checkbox"/> Energy  | p. <input type="checkbox"/> Postal Shipping             |
|   | q. <input type="checkbox"/> Dams                        |
|   | r. <input type="checkbox"/> Other (explain in detail)   |

Is this expected to change post-transfer? If yes, describe in detail the changes.

48) If the submarine cable system provides or will provide services to any sectors of U.S. critical infrastructure, answer each question below as it relates to each type of service provided:

- a) Does/will the submarine cable system have a service contract with any entity in the sector? If so, provide details.
- b) In what manner are/will the service(s) be delivered to its customers?
- c) What kind of network infrastructure is/will be utilized to deliver the service(s)?
- d) What equipment (make & model) and software version is/will be utilized to provide the service(s)?

**WARNING**

If an Applicant knowingly and willfully (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry, the Applicant may be subject to prosecution under Title 18, United States Code, Section 1001. The FCC may also terminate, revoke, or render null and void any license or authorization granted in this matter if any responses provided are false or intentionally misleading.

**Licensee Certification**

Pursuant to Title 28, United States Code, Section 1746, I, an authorized representative of \_\_\_\_\_, the License Holder, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, year of \_\_\_\_\_.

Representative Name: \_\_\_\_\_

Representative Title: \_\_\_\_\_

Representative Signature: \_\_\_\_\_

**Proposed Licensee(s) Certification**

Pursuant to Title 28, United States Code, Section 1746, I, an authorized representative of \_\_\_\_\_, the Proposed Licensee, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, year of \_\_\_\_\_.

Representative Name: \_\_\_\_\_

Representative Title: \_\_\_\_\_

Representative Signature: \_\_\_\_\_