



# PUBLIC NOTICE

**FEDERAL COMMUNICATIONS COMMISSION**  
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**WASHINGTON D.C. 20554**

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**DA Number: 25-1049**

**Report No. SCL-00582**

**Thursday December 11, 2025**

**Section 1.767(a) Submarine Cable Landing Licenses, Modifications, and Assignments or Transfers  
of Control of Interests in Submarine Cable Landing Licenses (47 C.F.R. § 1.767(a))**

**Actions Taken Under Submarine Cable Landing License Act**

By the Chief, Telecommunications and Analysis Division, Office of International Affairs:

Pursuant to an Act relating to the landing and operation of submarine cables in the United States, 47 U.S.C. §§ 34-39 (Submarine Cable Landing License Act), Executive Order No. 10530, Exec. Ord. No. 10530 reprinted as amended in 3 U.S.C. § 301, and section 1.767 of the Commission's rules, 47 CFR § 1.767, the following applications ARE GRANTED. These grants of authority are taken under section 0.261 of the Commission's rules, 47 CFR § 0.261. Petitions for reconsideration under section 1.106 or applications for review under section 1.115 of the Commission's rules, 47 CFR §§ 1.106, 1.115, may be filed within 30 days of the date of this public notice.

These applications have been coordinated with the Department of State and other Executive Branch agencies pursuant to section 1.767(b) of the Commission's rules, 47 CFR § 1.767(b), and consistent with procedures established with the Department of State. See Review of Commission Consideration of Applications under the Cable Landing License Act, IB Docket No. 00-106, Report and Order, 16 FCC Rcd 22167, 22192-93, paras. 51-52 (2001) (Submarine Cable Landing License Report and Order); Commission Announces Department of State's Revised Procedures for its Consideration of Submarine Cable Landing License Applications, IB Docket No. 16-155, Public Notice, DA 22-435 (rel. Apr. 19, 2022).

This public notice serves as each submarine cable landing licensee's Submarine Cable Landing License, or modification thereto, pursuant to the Cable Landing License Act and sections 1.767 and 1.768 of the Commission's rules. Submarine cable landing licensees should review the terms and conditions of their licenses. Failure to comply with these terms and conditions or relevant Commission rules and policies could result in fines or forfeitures.

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**SCL-LIC-20241115-00046** S250410

Starfish Infrastructure Inc.

**Date filed:** 2024-11-15

Submarine Cable Landing License

Grant of Authority

Date of Action:

2025-12-11

Starfish Infrastructure Inc. (Starfish) filed an application for a license to construct, land, and operate the

Bulikula cable system, a non-common carrier fiber-optic submarine cable system that will connect Guam, the Commonwealth of the Northern Mariana Islands (CNMI), and Hawaii to Fiji and French Polynesia. Starfish filed supplements to the application on February 14, 2025, March 18, 2025 and November 19, 2025. On April 4, 2025, the application was placed on Public Notice. *See* SCL-LIC-20241115-00046, Streamlined Submarine Cable Landing License Applications, Accepted For Filing, Report No. SCL00534S, Public Notice (OIA Apr 4, 2025). No comments were filed in response to the Public Notice.

Starfish states that grant of the license is in the public interest. Bulikula will be the first system to (1) directly connect Guam to Fiji and French Polynesia, and (2) directly connect the CNMI to Hawaii, Fiji, and French Polynesia. Bulikula is designed with dual landing points in both Fiji and French Polynesia, providing path diversity and redundancy in island connectivity in case of a single branch failure. Further, grant of the license will accelerate Guam's position as a growing gateway for international connectivity, and improve reliability, add capacity, and reduce latency in the Pacific Island region.

#### Executive Branch Review.

On April 7, 2025, the U.S. Department of Homeland Security (DHS) notified the Commission that it was reviewing the application and requested that the Commission defer action on the application until it completes its review. Pursuant to Commission practice, the application was referred to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee) for its views on any national security, law enforcement, foreign policy or trade policy concerns. SCL-LIC-20241115-00046, Non-Streamlined Submarine Cable Landing License Applications, Accepted For Filing, Report No. SCL-00535NS, Public Notice (OIA Apr. 10, 2025). *See Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership*, IB Docket 16-155, Report and Order, 35 FCC Rcd 10927 (2020). On April 10, 2025, the Committee notified the Commission that it was reviewing the application. SCL-LIC-20241115-00046, Non-Streamlined Submarine Cable Landing License Applications, Accepted For Filing, Report No. SCL-00537NS, Public Notice (OIA Apr. 18, 2025). On November 25, 2025, the National Telecommunications and Information Administration (NTIA), on behalf of the Committee, filed a Petition to Adopt Conditions to Authorization and License. The Committee states that it has no objection to the Commission approving authority to land and operate the Bulikula cable system, provided that the Commission conditions its approval on the assurances of Starfish and Google, LLC (Google) to abide by the commitments and undertakings of the November 17, 2025 National Security Agreement between Starfish and Google on the one hand, and the Committee, represented by DHS, the U.S. Department of Justice, and the U.S. Department of Defense, on the other hand (November 17, 2025 NSA).

Following the completion of the Committee review of the application, the Office of International Affairs coordinated the application with the Department of State as required by Executive Order 10530, pursuant to section 1.767(b) of the Commission's rules, and consistent with the established Department of State procedures. Executive Order 10530, Section 5(a) reprinted as amended in 3 U.S.C. § 301; 47 CFR §1.767(b); *Review of Commission Consideration of Applications under the Cable Landing License Act*, IB Docket No. 00-106, Report and Order, 16 FCC Rcd 22167, 22192-93, paras. 51-52 (2001) (*Submarine Cable Landing License Report and Order*); Commission Announces Department of State's Revised Procedures for its Consideration of Submarine Cable Landing License Applications, IB Docket No. 16-155, Public Notice, DA 22-435 (rel. Apr. 19, 2022). *See* SCL-LIC-20241115-00046, Non-Streamlined Submarine Cable Landing License Applications, Accepted For Filing, Report No. SCL00564NS, Public Notice, DA 25-1014 (OIA Dec. 5, 2025).

## Actions Taken.

1. Grant of a Cable Landing License to Starfish Infrastructure Inc. for the purpose of constructing, landing and operating the Bulikula cable system, a non-common carrier fiber-optic submarine cable system that will connect Guam, the Commonwealth of the Northern Mariana Islands (CNMI), and Hawaii to Fiji and French Polynesia;
2. Grant of the request for waiver of section 1.767(h)(1) of the Commission's rules in connection with the license; and
3. Grant of the Petition to Adopt Conditions to Authorization and License filed by the National Telecommunications and Information Administration on November 25, 2025.

## Licensee Ownership Information.

Starfish is an indirect wholly owned subsidiary of Google LLC, a Delaware company. As of June 30, 2024, the 10% or greater direct or indirect interest holders of Starfish are: (1) Sea Coral Holdings LLC, a Delaware company (100% equity and voting interest in Starfish); (2) Google LLC (100% equity and voting interest in Sea Coral Holdings LLC); (3) XXVI Holdings Inc. (XXVI Holdings), a Delaware company (100% equity and voting interest in Google LLC); (4) Alphabet Inc. (Alphabet), a Delaware company (100% equity interest and more than 99% voting interest in XXVI Holdings); (5) Larry Page, a U.S. citizen (26.8% voting interest in Alphabet through ownership of 44.9% of Alphabet's Class B common stock); and (6) Sergey Brin, a U.S. citizen (25% voting interest in Alphabet through ownership of 41.9% of Alphabet's Class B common stock). Alphabet's shares are publicly traded on the NASDAQ stock market. As of June 30, 2024, no other individual or entity holds a 10% or greater direct or indirect equity or voting interest in either Alphabet or Starfish.

## Cable System Design and Capacity.

The Bulikula cable system will consist of the following segments and branching units (BUs): (1) segment from Tahiti Nui, French Polynesia to BU1, a length of approximately 55 kilometers; (2) segment from BU1 to Tahiti Iti, French Polynesia, a length of approximately 70 kilometers; (3) segment from BU1 to BU2, a length of approximately 4,100 kilometers; (4) segment from BU2 to Suva, Fiji, a length of approximately 270 kilometers; (5) segment from BU2 to BU3, a length of approximately 20 kilometers; (6) segment from BU3 to Natadola, Fiji, a length of approximately 90 kilometers; (7) segment from BU3 to BU4, a length of approximately 5,500 kilometers; (8) segment from BU4 to Piti, Guam, a length of approximately 100 kilometers; (9) segment from BU4 to BU5, a length of approximately 20 kilometers; (10) segment from BU5 to Tinian, CNMI, a length of approximately 230 kilometers; (11) segment from BU5 to BU6, a length of approximately 6,500 kilometers; (12) segment from BU6 to BU7, a length of approximately 20 kilometers; (13) segment from BU7 to Oahu, Hawaii, a length of approximately 245 kilometers; (14) segment from BU7 to BU8, a length of approximately 4,300 kilometers; (15) segment from BU8 to Tahiti Iti, French Polynesia, a length of approximately 80 kilometers; and (16) segment from BU8 to Tahiti Nui, French Polynesia, a length of approximately 103 kilometers. Each segment will have 16 fiber pairs, and each fiber pair will have a minimum design capacity of approximately 6 Terabits per second (Tbps).

Starfish states that the Bulikula cable system will include an unused branching unit (BU2a) on the segment from BU1 to BU2 and also include four additional branching units on the segment from BU3 to

BU4 (labeled BU3a-BU3d). Starfish states that there are specific plans to use one of these branching units, BU3a, to connect to a non-U.S. owned cable system, the Tuvalu Vaka system, that will be owned and operated separately from the Bulikula cable system. The separate system will have four fiber pairs and will be owned and operated by Tuvalu Telecommunications Corporation, which will obtain onward connectivity from Tuvalu to Suva, Fiji, via individually negotiated indefeasible rights of use (IRU) for dark fiber on the Bulikula cable system. Further, neither Starfish nor its affiliates currently have specific plans to utilize other unused branching units on the Bulikula cable system.

#### Ownership of the Cable System.

Starfish and its affiliates will own and control the Bulikula cable system as follows: (1) Starfish, a Delaware company, will hold 100% of the equity and voting interests in the portion in U.S. territory; (2) Sea Fan Singapore Infrastructure Pte. Ltd. (Sea Fan), a Singapore company, will hold 100% of the equity and voting interests in the portion in international waters; (3) Yellowfin Infrastructure Pte Ltd (Yellowfin), a Fijian company, will hold 100% of the equity and voting interests in the portion in Fijian territory; and (4) Octopus Infrastructure S.A.S. (Octopus), a French company, will hold 100% of the equity and voting interests in the portion in French Polynesia territory. Starfish, Sea Fan, Yellowfin, and Octopus are all indirect, wholly owned subsidiaries of Google LLC. Starfish states that because Sea Fan, Yellowfin, and Octopus will not use the U.S. endpoints of the system, none of these entities is required by section 1.767(h)(2), 47 CFR § 1.767(h)(2) of the Commission's rules, to be an applicant for the cable landing license.

#### Ownership of Landing Stations.

The Bulikula cable landing stations are owned and controlled as follows: (1) Piti, Guam: Tata Communications (Guam) Ltd (Tata), a U.S. company, owns an existing cable landing station and Starfish will be the U.S. landing party and control the landing station; (2) Tinian, CNMI: Unicornfish Services Inc. (Unicornfish), a Google affiliate, will construct and own a new cable landing station and Starfish will be the U.S. landing party and control the landing station; (3) Oahu, Hawaii: Humuhumu Services LLC (Humuhumu), a Hawaiian company, will construct and own a new cable landing station and Starfish will be the U.S. landing party and control the landing station; (4) Natadola, Fiji: Staghorn Services Pte Ltd (Staghorn), a Singapore company, will construct and own a new cable landing station and Yellowfin will be the landing party and control the landing station; (5) Suva, Fiji: Staghorn will construct and own a new cable landing station and Yellowfin will be the landing party and control the landing station; (6) Tahiti Nui, French Polynesia: Sea Turtle Services (Sea Turtle) will construct and own a new cable landing station and Octopus will be the landing party and control the landing station; and (7) Tahiti Iti, French Polynesia: Sea Turtle will construct and own a new cable landing station and Octopus will be the landing party and control the landing station. Unicornfish, Humuhumu, Staghorn, and Sea Turtle are all indirect, wholly-owned subsidiaries of Google LLC. Starfish states that consistent with section 1.767(a)(5) it will file a more specific description of each landing point no later than ninety (90) days prior to construction. 47 CFR § 1.767(a)(5).

#### Waiver of 47 CFR § 1.767(h)(1).

Starfish requests a waiver of section 1.767(h)(1) of the Commission's rules, 47 CFR § 1.767(h)(1), so that Tata, Unicornfish, and Humuhumu are not required to be applicants for a U.S. cable landing license for the Bulikula system. Section 1.767(h)(1) requires that "[a]ny entity that owns or controls a cable landing station in the United States" shall be "applicants for, and licensees on, a cable landing license." Starfish asserts neither Tata, Unicornfish, nor Humuhumu will have any independent ability to affect the

operation of Bulikula, and including them as applicants is not necessary to ensure compliance by Starfish with the Cable Landing License Act, the Commission's cable landing license rules, or the terms of any cable landing license. According to Starfish, in U.S. territory, Tata, Unicornfish and Humuhumu are expected to provide certain limited services at the U.S. cable stations that would not enable them to significantly affect the Bulikula system's operation, as these services will be provided at Starfish's direction and under its supervision. Starfish states that it intends to contract with Tata, Unicornfish, and Humuhumu for the right to use separately-caged collocation space in the Guam, Tinian, and Hawaiian cable landing stations, respectively, and for the provision of certain operation and maintenance services at the cable landing stations. Further, Starfish states that Tata, Unicornfish, and Humuhumu are not expected to have access to Starfish's space, except: (i) to perform certain operation and maintenance services as per Starfish's direction and instructions; (ii) to conduct work in the space unrelated to the system, after providing Starfish advance notice and opportunity to supervise any such work; or (iii) in cases of emergency. The agreements with Tata, Unicornfish, and Humuhumu are expected to have an initial term of 25 years.

The purpose of the 1.767(h)(1) requirement is to ensure that entities with a significant ability to affect the operation of the cable system become licensees so that they are subject to the conditions and responsibilities associated with the license. *See Submarine Cable Landing License Report and Order*, 16 FCC Rcd at 22194-95, paras. 53-54. Although Tata, Unicornfish and Humuhumu will own the Guam, Tinian and Hawaiian cable landing stations respectively, we find, based on the record in this proceeding that neither Tata, Unicornfish nor Humuhumu will have the ability to affect significantly the operation of the cable system. Accordingly, we grant the Applicant a waiver of section 1.767(h)(1) and do not require Tata, Unicornfish or Humuhumu to become an applicant/licensee for the Bulikula cable system.

#### Regulatory Status.

Starfish proposes to operate the Bulikula cable system on a non-common carrier basis. Starfish states that the system's capacity will be used by either Starfish and its affiliates to meet their own internal needs for bandwidth or made available to third parties pursuant to individually negotiated indefeasible rights of use (IRUs), the terms of which will vary depending on the characteristics and needs of the particular capacity purchase. Further, the capacity provided to affiliates will be pursuant to inter-affiliate agreement.

Starfish asserts that Bulikula will compete with other existing and planned submarine cable systems serving the Pacific Island region. Systems connecting Guam or Hawaii to Fiji include Southern Cross and Tabua and systems connecting Guam or Hawaii to French Polynesia include Honotua and Halaihai. Between Guam and Hawaii, Bulikula will compete with SEA-US and Asia-American Gateway.

The Applicant has provided information and demonstrated that the proposed operation of the cable on a non-common carrier basis satisfies the requirements set forth in *National Association of Regulatory Utility Commissioners v. FCC*, 525 F.2d 630, 642 (D.C. Cir 1976) (NARUC I), cert. denied, 425 U.S. 992 (1976). *See also Submarine Cable Landing License Report and Order*, 16 FCC Rcd at 2220222203, paras. 69-70; *Review of Commission Consideration of Applications under the Cable Landing License Act*, IB Docket No. 00-106, Notice of Proposed Rulemaking, 15 FCC Rcd 20789, 20815-18, paras. 62-67 (2000).

#### Conditions and Requirements.

Starfish shall comply with the routine conditions specified in sections 1.767(g) and 1.70007 of the

Commission's rules, 47 CFR §§ 1.767(g), 1.70007.

We grant the Petition to Adopt Conditions to Authorization and License (Petition) filed in this proceeding by NTIA, on behalf of the Committee, on July 25, 2025. Accordingly, we condition grant of the application on Starfish and Google abiding by the commitments and undertakings set forth in the November 17, 2025 NSA. A copy of the Petition and November 17, 2025 NSA are publicly available and may be viewed on the FCC website through the International Communications Filing System (ICFS) by searching SCL-LIC-20241115-00046 and accessing the "Pleadings & Comments" tab in the Document Viewing area.

A failure to comply and/or remain in compliance with any of these commitments and undertakings shall constitute a failure to meet a condition of the cable landing license and thus grounds for declaring the license terminated without further action on the part of the Commission. Failure to meet a condition of the license may also result in monetary sanctions or other enforcement action by the Commission.

#### License Term.

Under the Commission's rules, a cable landing license shall expire 25 years after the in-service date for the cable. The Licensee must notify the Commission within thirty (30) days of the date the cable is placed into service. 47 CFR § 1.767(g)(15). The in-service notification must be filed in ICFS through the "Pleadings and Comments" for file number. SCL-LIC-20241115-00046.

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