



PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION
45 L STREET NE
WASHINGTON D.C. 20554

News media information 202-418-0500
Internet: <http://www.fcc.gov> (or <ftp.fcc.gov>)
TTY (202) 418-2555

Report No. SCL-00460NS

Friday May 3, 2024

Non-Streamlined Submarine Cable Landing License Applications Accepted For Filing

The applications listed below have been found, upon initial review, to be acceptable for filing. Pursuant to the Submarine Cable Landing License Act, 47 U.S.C. §§ 34-39, and Executive Order No. 10530, reprinted as amended in 3 U.S.C. § 301, an applicant seeks: (a) the grant of a cable landing license; (b) the modification of a cable landing license; and/or (c) the assignment or transfer of control of an interest in a submarine cable landing license. These applications are not subject to the streamlined processing procedures set forth in section 1.767 of the Commission's rules. 47 CFR § 1.767.

Unless otherwise specified, filings relating to these applications must be received within 14 days of this notice. Ex parte communications between outside parties and Commission staff concerning these applications are permitted subject to the Commission's rules for "permit-but-disclose proceedings." See 47 CFR § 1.1206.

These applications are being coordinated with the Department of State and other Executive Branch agencies pursuant to section 1.767(b) of the Commission's rules and consistent with procedures established with the Department of State. 47 CFR §1.767(b); 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).

Pursuant to its decision in Review of Commission Consideration of Applications under the Cable Landing License Act, IB Docket No. 00-106, FCC 01-332, 16 FCC Rcd 22167 (2001), and section 1.767 of the rules, the Commission will take action upon these applications within ninety (90) days after release of this public notice, unless it determines that additional time is needed. 47 CFR §1.767.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice). All applications listed are subject to further consideration and review, and may be returned and/or dismissed if not found to be in accordance with the Commission's rules, regulations, and other requirements.

Assignment

Current Licensee: Jason Aleksander Kardachi

FROM: Jason Aleksander Kardachi

TO: Poseidon International Connectivity Pte. Ltd

Jason Aleksander Kardachi and Cosimo Borrelli, as the court-appointed managers and receivers for RTI Connectivity Pte. Ltd. as Debtor Under the Receivership and Management of Messrs. Cosimo Borrelli and Jason Aleksander Kardachi (RTI-C Receivers), have filed an application for consent to the assignment of the assets and interests held by the RTI-C Receivers in the cable landing licenses for the Japan-Guam-Australia North cable system (JGA North) (SCL-LIC-20181106-00035), and the Japan-Guam-Australia South cable system (JGA South) (SCL-LIC-20190502-00016), to Poseidon International Connectivity Pte. Ltd. (Poseidon International). This transaction does not affect the remaining interests held by other licensees of JGA North and JGA South.

RTI Connectivity Pte. Ltd. (RTI-C) was one of the original licensees on the JGA North cable, which connects Guam to Japan, and the JGA South cable, which connects Guam to Australia. RTI-C controlled the entire wet segment of JGA North and controlled the 62.5% equity and voting interest held by RTI JGA Pte. Ltd., an affiliated company, in the Main Trunk of JGA South. See SCL-LIC-20181106-00035, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00275, 35 FCCR 7904 (IB 2020) (JGA North grant); SCL-LIC-20190502-00016, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00276, 35 FCCR 7948 (IB 2020) (JGA South grant).

RTI-C received a loan to finance its contributions to the costs and expenses incurred for the development, construction, competition, ownership, operation, and maintenance of JGA North and JGA South. On May 2, 2023, Poseidon International became the sole lender of record and secured creditor to RTI-C by acquiring the loan. In an effort to enforce its rights under the loans, on August 15, 2023, Poseidon International filed an application with the High Court of the Republic of Singapore (High Court) seeking the appointment of independent receivers and managers over RTI-C's assets in JGA North and JGA South. On September 5, 2023, the High Court issued an order approving the request and appointing Messrs. Cosimo Borrelli and Jason Aleksander Kardachi as the RTI-C Receivers. See SCL-ASG-20231004-00032, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00275, DA No. 24-345 (OIA Apr. 11, 2024). On January 22, 2024, Poseidon International and the RTI-C Receivers entered into an agreement whereby the RTI-C Receivers would sell the RTI-C license interests in JGA North and JGA South to Poseidon International.

Poseidon International, a Singapore company, is wholly owned, on an indirect basis, by ISQ Asia Infrastructure II Aggregator, L.P. (ISQ Asia Aggregator), a Cayman Islands company. ISQ Asia Aggregator consists of investment funds that are ultimately controlled by ISQ Holdings, LLC (ISQ Holdings), a Cayman Islands company equally owned and controlled by three individuals (two U.S. citizens and a Canadian citizen).

The following entities and individuals will hold a 10% or greater direct or indirect equity and voting interest in Poseidon International: (1) Poseidon International Connectivity (Fund II) Holdings Pte. Ltd. (Poseidon Fund II), a Singapore company (100% direct equity and voting interest in Poseidon International); (2) ISQ Asia Infrastructure Holdings II Pte. Ltd., a Singapore company (100% direct equity and voting interest in Poseidon Fund II); (3) ISQ Asia Aggregator (100% direct equity and voting interest in ISQ Asia Infrastructure Holdings II Pte. Ltd.); (4) ISQ Global Infrastructure Fund II (UST), L.P. (ISQ Global II UST), a Cayman Islands company (28% direct equity and voting interest in ISQ Global II UST); (5) ISQ Global Infrastructure Pooling II, L.P. (ISQ Pooling II), a Cayman Islands company (46% direct equity and voting interest in ISQ Asia Infrastructure II Aggregator, L.P.); (6) ISQ Global Infrastructure Pooling II (EU), L.P. (ISQ Pooling II EU), a Canada company (19% direct equity and voting interest in ISQ Asia Infrastructure II Aggregator, L.P.); (7) ISQGI Holdings II, L.P. (ISQGI II), a Cayman Islands company (100% direct equity and voting interest in ISQ Pooling II, ISQ Pooling II USTE, and ISQ Pooling II EU); (8) ISQ Global Infrastructure Fund II (EU), L.P. (ISQ Global II EU), a Cayman Islands company (66% direct equity and voting interest in ISQGI II); (9) ISQ Global Infrastructure Fund II (EU), L.P. (ISQ Global II EU), a Canada company (28% direct equity and voting interest in ISQGI II); (10) ISQ Global Fund II GP, LLC (ISQ Global Fund II GP), a Delaware company (General Partner of ISQ Global II UST, ISQ Global II, ISQ Global II USTE, ISQ Global II EU, and ISQ Global II AU); (11) I Squared Capital, LLC (I Squared Capital), a Cayman Islands company (100% direct voting interest in ISQ Global Fund II GP); (12) ISQ Holdings (100% direct voting interest in I Squared Capital); (13) Adil Rahmathulla, a Canadian citizen (manager and equal owner of ISQ Holdings); (14) Gautam Bhandari, a U.S. citizen (manager and equal owner of ISQ Holdings); and (15) Sadek M. Wahba, a U.S. and Canadian citizen (manager and equal owner of ISQ Holdings). No other person or entity holds a direct or indirect 10% or greater equity or voting interest in Poseidon International. The Applicants state that the final ownership structure of the Poseidon International acquisition vehicles may change, but that they will notify the Commission of any changes that result in a new 10% or greater direct or indirect owner.

Post-consummation, Poseidon International will operate and manage RTI-C's interests in JGA North and JGA South system by and through Lightstorm Telecom Connectivity Private Limited (Lightstorm), an Asia data cloud center incorporated in India. According to the Applicants, Lightstorm will not have an ownership interest in or control over the cable systems or the associated cable landing stations and will act under the instructions of and oversight of Poseidon International. Lightstorm's access to cable landing stations will be governed by contract between Lightstorm and each cable station owner. Lightstorm is ultimately owned by I Squared Capital, which is owned and managed by ISQ Holdings, the ultimate owner of Poseidon International.

The Applicants state that the proposed transaction is in the public interest because it will ensure the continued offering of services over those portions of the JGA North and JGA South associated with RTI-C's interests. Further, they assert that the transaction will not adversely affect competition in any geographic market for submarine cable capacity because Poseidon International, ISQ Holdings, and their affiliates do not hold assets or properties that provide submarine cable capacity in the Pacific region generally and do not hold voting or equity interests in any submarine cable system that competes in the geographic market for JGA North and JGA South.

Poseidon International agrees to comply with the routine conditions set out in 1.767(g) of the Commission's rules. 47 CFR § 1.767(g).

Pursuant to Commission practice, the application is being referred to the relevant Executive Branch agencies for their views on any national security, law enforcement, foreign policy or trade policy concerns related to the foreign ownership of the Applicants. See Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership, IB Docket 16-55, Report and Order, 35 FCC Red 10927 (2020).

Assignment

Current Licensee: Jason Aleksander Kardachi

FROM: Jason Aleksander Kardachi

TO: Poseidon International Connectivity Pte. Ltd

Jason Aleksander Kardachi and Cosimo Borrelli as the court-appointed managers and receivers for RTI JGA Pte. Ltd. as Debtor Under the Receivership and Management of Messrs. Cosimo Borrelli and Jason Aleksander Kardachi (RTI JGA Receivers), have filed an application for consent to the assignment of the assets and interests held by the RTI JGA Receivers in the cable landing licenses for the Japan-Guam-Australia North cable system (JGA North) (SCL-LIC-20181106-00035), and the Japan-Guam-Australia South cable system (JGA South) (SCL-LIC-20190502-00016), to Poseidon International Connectivity Pte. Ltd. (Poseidon International). This transaction does not affect the remaining interests held by other licensees of JGA North and JGA South.

RTI JGA Pte. Ltd. (RTI-JGA) was one of the original licensees on the JGA North cable, which connects Guam to Japan, and the JGA South cable, which connects Guam to Australia. RTI JGA owned the entire wet segment of JGA North, including those portions of the cable system's wet segment in the U.S. territorial sea extending from Piti, Guam, and those portions in the territorial sea of Japan extending from Minami-Bosa, Japan, and 62.5% equity and voting interest in JGA South. RTI Connectivity Pte. Ltd., an affiliated company, served as the asset manager for RTI JGA and controlled the RTI JGA interests and assets in JAG North And JGA South. See SCL-LIC-20181106-00035, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00275, 35 FCCR 7904 (IB 2020) (JGA North grant); SCL-LIC-20190502-00016, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00276, 35 FCCR 7948 (IB 2020) (JGA South grant).

RTI JGA received a loan to finance its contributions to the costs and expenses incurred for the development, construction, competition, ownership, operation, and maintenance of JGA North and JGA South. On May 2, 2023, Poseidon International became the sole lender of record and secured creditor to RTI JGA by acquiring the loan. In an effort to enforce its rights under the loans, on August 15, 2023, Poseidon International filed an application with the High Court of the Republic of Singapore (High Court) seeking the appointment of independent receivers and managers over RTI JGA's assets in JGA North and JGA South. On September 5, 2023, the High Court issued an order approving the request and appointing Messrs. Cosimo Borrelli and Jason Aleksander Kardachi as the RTI JGA Receivers. See SCL-ASG-20231004-00031, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00275, DA No. 24-345 (OIA Apr. 11, 2024). On January 22, 2024, Poseidon International and the RTI JGA Receivers entered into an agreement whereby the RTI JGA Receivers would sell the RTI JGA license interests in JGA North and JGA South to Poseidon International.

Poseidon International, a Singapore company, is wholly owned, on an indirect basis, by ISQ Asia Infrastructure II Aggregator, L.P., a Cayman Islands company. ISQ Asia Aggregator consists of investment funds that are ultimately controlled by ISQ Holdings, LLC (ISQ Holdings), a Cayman Islands company equally owned and controlled by three individuals, two U.S. citizens and a Canadian citizen.

The following entities and individuals will a 10% or greater direct or indirect equity and voting interests in Poseidon International: (1) Poseidon International Connectivity (Fund II) Holdings Pte. Ltd. (Poseidon Fund II), a Singapore company (100% direct equity and voting interest in Poseidon International); (2) ISQ Asia Infrastructure Holdings II Pte. Ltd., a Singapore company (100% direct equity and voting interest in Poseidon Fund II); (3) ISQ Asia Aggregator (100% direct equity and voting interest in ISQ Asia Infrastructure Holdings II Pte. Ltd.); (4) ISQ Global Infrastructure Fund II (UST), L.P. (ISQ Global II UST), a Cayman Islands company (28% direct equity and voting interest in ISQ Global II UST); (5) ISQ Global Infrastructure Pooling II, L.P. (ISQ Pooling II), a Cayman Islands company (46% direct equity and voting interest in ISQ Asia Infrastructure II Aggregator, L.P.); (6) ISQ Global Infrastructure Pooling II (EU), L.P. (ISQ Pooling II EU), a Canada company (19% direct equity and voting interest in ISQ Asia Infrastructure II Aggregator, L.P.); (7) ISQGI Holdings II, L.P. (ISQGI II), a Cayman Islands company (100% direct equity and voting interest in ISQ Pooling II, ISQ Pooling II USTE, and ISQ Pooling II EU); (8) ISQ Global Infrastructure Fund II, L.P. (ISQ Global II), a Cayman Islands company (66% direct equity and voting interest in ISQGI II); (9) ISQ Global Infrastructure Fund II (EU), L.P. (ISQ Global II EU), a Canada company (28% direct equity and voting interest in ISQGI II); (10) ISQ Global Fund II GP, LLC (ISQ Global Fund II GP), a Delaware company (General Partner of ISQ Global II UST, ISQ Global II, ISQ Global II USTE, ISQ Global II EU, and ISQ Global II AU); (11) I Squared Capital, LLC (I Squared Capital), a Cayman Islands company (100% direct voting interest in ISQ Global Fund II GP); (12) ISQ Holdings (100% direct voting interest in I Squared Capital); (13) Adil Rahmathulla, a Canadian citizen (manager and equal owner of ISQ Holdings); (14) Gautam Bhandari, a U.S. citizen (manager and equal owner of ISQ Holdings); and (15) Sadek M. Wahba, a U.S. and Canadian citizen (manager and equal owner of ISQ Holdings). No other person or entity holds a direct or indirect 10% or greater equity or voting interest in Poseidon International. The Applicants state that the final ownership structure of the Poseidon International acquisition vehicles may change, but that they will notify the Commission of any changes that result in a new 10% or greater direct or indirect owner.

Post-consummation, Poseidon International will operate and manage RTI-C's interests in JGA North and JGA South system by and through Lightstorm Telecom Connectivity Private Limited (Lightstorm), an Asia data cloud center incorporated in India. According to the Applicants, Lightstorm will not have an ownership interest in or control over the cable systems or the associated cable landing stations and will act under the instructions of and oversight of Poseidon International. Lightstorm's access to cable landing stations will be governed by contract between Lightstorm and each cable station owner. Lightstorm is ultimately owned by I Squared Capital, which is owned and managed by ISQ Holdings, the ultimate owner of Poseidon International.

The Applicants state that the proposed transaction is in the public interest because it will ensure the continued offering of services over those portions of the JGA North and JGA South associated with RTI-C's interests. Further, they assert that the transaction will not adversely affect competition in any geographic market for submarine cable capacity because Poseidon International, ISQ Holdings and their affiliates do not hold assets or properties that provide submarine cable capacity in the Pacific region generally and do not hold voting or equity interests in any submarine cable system that competes in the geographic market for JGA North and JGA South.

Poseidon International agrees to comply with the routine conditions set out in 1.767(g) of the Commission's rules. 47 CFR § 1.767(g).

Pursuant to Commission practice, the application is being referred to the relevant Executive Branch agencies for their views on any national security, law enforcement, foreign policy or trade policy concerns related to the foreign ownership of the Applicants. See Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership, IB Docket 16-55, Report and Order, 35 FCC Red 10927 (2020).

Assignment

Current Licensee: Michael Wyse

FROM: Michael Wyse

TO: Poseidon International Connectivity II, LLC

Michael Wyse as the court-appointed receiver for RAM Telecom International, Inc. as Debtor Under the Receivership of Michael Wyse (RAM Telecom Receiver), has filed an application for consent to the assignment of the assets and interests held by the RAM Telecom Receiver in the cable landing license for the Southeast Asia-United States (SEA-US) (SCL-LIC-20150626-00016), to Poseidon International Connectivity II, LLC (Poseidon). The Applicants filed a supplement on April 25, 2024. This transaction does not affect the remaining interests held by other licensees of SEA-US.

RAM Telecom International, Inc. (RAM Telecom) was one of the original licensees of SEA-US, which connects the continental United States, Hawaii, Guam, the Philippines and Indonesia. RAM-T controlled a 39.82% equity and voting interest in the Segments 4, 5 and 6 of SEA-US, which connect California, Hawaii, and Guam. See SCL-LIC-20150626-00016, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00194, 32 FCCR 352 (IB 2017)

RAM Telecom received a loan to finance its contributions to the costs and expenses incurred for the development, construction, competition, ownership, operation and maintenance of SEA-US. On June 6, 2023, Poseidon became the sole lender of record and secured creditor to RAM Telecom by acquiring the loans RAM-T secured from various creditors, pursuant to a 2019 Facility Agreement, for its portion of the construction, operation, and maintenance of the SEA-US cable system. In an effort to enforce its rights under the loans issued under the Facility Agreement, on August 15, 2023, Poseidon filed a petition with the Court of Chancery of the State of Delaware (Delaware Chancery Court) seeking the appointment of independent receivers and managers over RAM-T's relevant assets in the SEA-US cable system. On October 11, 2023, the Delaware Chancery Court issued an order approving the request and appointed Mr. Michael Wyse as the RAM Telecom Receiver. See SCL-ASG-20231004-00034, Actions Taken Under Cable Landing License Act, Public Notice, Rep. No. SCL-00275, DA No. 24-345 (OIA Apr. 11, 2024). On January 18, 2024, Poseidon and the RAM Telecom Receiver entered into an agreement whereby the RAM Telecom Receiver would sell the RAM Telecom license interests in SEA-US to Poseidon.

Poseidon is an indirect wholly owned subsidiary of Poseidon International Connectivity Aggregator, LLC (Poseidon International Aggregator), both Delaware limited liability companies. The members of Poseidon International Aggregator consist of investment funds that are ultimately controlled by ISQ Holdings, LLC (ISQ Holdings), a Cayman Islands company equally owned and controlled by three individuals (two U.S. citizens and a Canadian citizen).

The following entities and individuals will hold a 10% or greater direct or indirect equity and voting interests in Poseidon: (1) Poseidon International Connectivity Holdings, LLC (Poseidon International Connectivity), a Cayman Islands company (100% direct equity and voting interest in Poseidon); (2) Poseidon International Aggregator (100% indirect equity and voting interest in Poseidon International through 100% equity and voting interests in Poseidon International Connectivity); (3) ISQ Global Infrastructure Fund II (UST), L.P. (ISQ Global II UST), a Cayman Islands company (28% direct equity and voting interest in International Connectivity Aggregator, LLC); (4) ISQ Global Infrastructure Pooling II, L.P. (ISQ Pooling II), a Cayman Islands company (46% direct equity and voting interest in International Connectivity Aggregator, LLC); (5) ISQ Global Infrastructure Pooling II (EU), L.P. (ISQ Pooling II EU), a Canada company (19% direct equity and voting interest in International Connectivity Aggregator, LLC); (6) ISQGI Holdings II, L.P., a Cayman Islands company (100% direct equity and voting interests in ISQ Pooling II, ISQ Pooling II USTE and ISQ Pooling II EU); (7) ISQ Global Infrastructure Fund II, L.P. (ISQ Global II), a Cayman Islands company (66% direct equity and voting interest in ISQGI Global II); (8) ISQ Global Infrastructure Fund II (EU), L.P. (ISQ Global II EU), a Canada company (28% direct equity and voting interest in ISQGI Holdings II, L.P.); (9) ISQ Global Fund II GP, LLC (ISQ Global Fund II GP), a Delaware company (General Partner of ISQ Global II UST, ISQ Global II, ISQ Global II USTE, ISQ Global II EU, and ISQ Global II AU); (10) I Squared Capital, LLC (I Squared Capital), a Cayman Islands company (100% direct equity and voting interest in ISQ Global Fund II GP); (11) ISQ Holdings (100% direct equity and voting interest in I Squared Capital); (12) Adil Rahmathulla, a Canadian citizen (manager and equal owner of ISQ Holdings); (13) Gautam Bhandari, a U.S. citizen (manager and equal owner of ISQ Holdings); and (14) Sadek M. Wahba, a U.S. citizen (manager and equal owner of ISQ Holdings). No other person or entity holds a direct or indirect 10% or greater equity or voting interest in Poseidon. The Applicants state that the final ownership structure of the Poseidon acquisition vehicles may change, but that they will notify the Commission of any changes that result in a new 10% or greater direct or indirect owner.

Post-consummation, Poseidon will operate and manage its interests in SEA-US by and through Lightstorm Telecom Connectivity Private Limited (Lightstorm), an Asia data cloud center incorporated in India. According to the Applicants, Lightstorm will not have an ownership interest in or control over the SEA-US or the associated cable landing stations and will act under the instructions of and oversight of Poseidon. Lightstorm's access to cable landing stations will be governed by contract between Lightstorm and each cable station owner. Lightstorm is ultimately owned by I Squared Capital, which is owned and managed by ISQ Holdings, the ultimate owner of Poseidon.

The Applicants state that the proposed transaction is in the public interest because it will ensure the continued offering of services over those portions of the SEA-US cable system associated with RAM Telecom's interests. Further, they assert that the transaction will not adversely affect competition in any geographic market for submarine cable capacity because Poseidon, ISQ Holdings and their affiliates do not hold assets or properties that provide submarine cable capacity in the Pacific region generally and do not hold voting or equity interests in any submarine cable system that competes in the geographic market for Sea-US.

Poseidon agrees to comply with the routine conditions set out in 1.767(g) of the Commission's rules. 47 CFR § 1.767(g).

Pursuant to Commission practice, the application is being referred to the relevant Executive Branch agencies for their views on any national security, law enforcement, foreign policy or trade policy concerns related to the foreign ownership of the Applicants. See Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership, IB Docket 16-55, Report and Order, 35 FCC Red 10927 (2020).

REMINDER:

Applicants must certify that neither the applicant nor any party to the application is subject to a denial of federal benefits by federal and/or state courts under authority granted in 21 U.S.C. § 862. See 47 CFR §§ 1.2001-.2003.

By this notice, we inform the public that submarine cable landing license applications that are part of larger transactions involving multiple Commission licenses or authorizations may involve "extraordinary circumstances" as referenced in Review of Commission Consideration of Applications under the Cable Landing License Act, Report and Order, 16 FCC Rcd 22167 (2001) and Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, Report and Order and Order on Reconsideration, 12 FCC Rcd 23891 (1997), paras. 327-28, Order on Reconsideration, 15 FCC Rcd 18158 (2000). Additionally, extraordinary circumstances result where Executive Branch agencies petition the Commission to defer action on an application pending the resolution of potential national security, law enforcement, foreign policy and trade policy issues. Accordingly, these applications may not be acted on within the 90-day review period that the Commission has established as the period of time normally required to reach a decision on non-streamlined cable landing licenses. This notice shall serve as public notice to applicants that, in these circumstances, additional time may be required for Commission review and final action. No additional formal public notice will be provided routinely with respect to specific applications in the event that the applicable review period extends beyond 90 days.