

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

STARFISH INFRASTRUCTURE INC.

Application for a License to Construct, Land,
and Operate a Submarine Cable Connecting
the United States to Bermuda, the Azores, and
Spain, to be Known as

THE SOL CABLE SYSTEM

File Nos. SCL-LIC-20250910-00044
SCL-AMD-20250922-00052
SCL-AMD-20260123-00016

SECOND AMENDMENT

Starfish Infrastructure Inc. (“Starfish”) submits this Second Amendment, pursuant to Staff request, to address questions regarding the license to construct, land, and operate a private, non-common carrier fiber-optic submarine cable system connecting the United States to Bermuda, the Azores, and Spain to be known as the Sol cable system.

First, Starfish clarifies that the Azores is an Autonomous Region of, and part of, Portugal. There are cables that connect the United States to Portugal, and Nuvem will also connect the U.S. to the Azores. Notably, Nuvem was granted a cable landing license on May 21, 2025, with non-common carrier status even prior to Sol being announced.¹ (“[Starfish] 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.

¹ See Brian Quigley, *Strengthening Network Resilience with the Sol Transatlantic Cable*, Google Cloud (July 9, 2025), <https://cloud.google.com/blog/products/infrastructure/announcing-sol-transatlantic-cable>.

992 (1976).” *See Actions Taken Under Cable Landing License Act*, Public Notice, 40 FCC Rcd. 3286 (2025).)

Cables that connect the U.S. to Southern Europe more broadly include Amitié, Anjana, Grace Hopper, and Marea systems.² In addition, the planned Anel CAM (Continente Açores Madeira) cable system will connect the Azores and Portugal and traffic from the cable will be able to continue to other parts of Europe and the U.S. As such, the public interest does not require the cable system to be operated on a common carrier basis on the Azores route. The Commission has found that facilities need not be identical in order to offer pro-competitive benefits. There are thus sufficient alternative facilities providing connectivity to Portugal (including the Azores) to preclude the Sol cable system from becoming a bottleneck facility on those routes.

Second, the percentage interest shown in Table 1 of the Application provides voting and economic interest. Starfish clarifies that economic interest is synonymous to equity interest.

Third, Starfish provides the places of organization for the Google LLC entities with ownership in the Sol cable system and cable landing stations.

² This list of competitive systems includes a cable system owned by Starfish affiliates. Similar to cables owned and operated by third parties, cable systems owned and operated by Starfish and its affiliates often provide competitive pressure on one another given Starfish and its affiliates’ practice of selling IRUs for dark fiber or spectrum to wholesale customers who, in turn, resell those assets to other wholesale or enterprise customers. In such cases, these wholesale transactions create competition by providing third parties with the opportunity to participate in relevant dark fiber, spectrum, or capacity services markets.

System Ownership

Entity	Country of Organization
Sea Fan Singapore Infrastructure Pte. Ltd. (“Sea Fan”)	Singapore
Skipjack Infrastructure Limited (“Skipjack”)	Bermuda
Sailfish Infrastructure Unipessoal LDA (“Sailfish”)	Portugal
Cardinal Fish Infrastructure, S.L. (“Cardinal Fish”)	Spain

Cable Landing Stations

Entity	Country of Organization
Tarpon Services LLC (“Tarpon”)	United States
Sea Grass Services Limited (“Sea Grass”)	Bermuda
Angler Fish Services, Unipessoal LDA (“Angler Fish”)	Portugal
Lanternfish Services, S.L. (“Lanternfish”)	Spain

The ICFS form has been updated to reflect that Starfish controls the cable landing station in Florida, Skipjack controls the cable landing station in Bermuda, Sailfish controls the cable landing station in the Azores, and Cardinal Fish controls the cable landing station in Spain.

Finally, Starfish confirms that Table 3 of the Application reflects the latest publicly available data. An Ownership Diagram is provided as Appendix A and an updated list of Affiliated Foreign Carriers is provided as Appendix B.

Respectfully submitted,

/s/ Ulises R. Pin

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Dated: January 23, 2026

LIST OF ATTACHMENTS

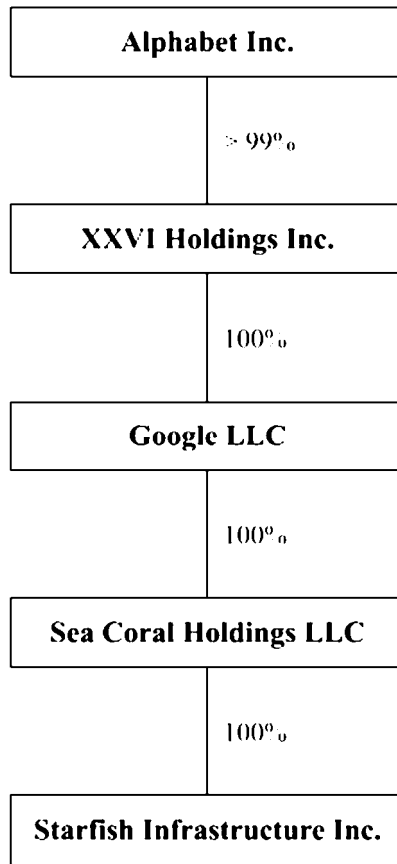
Appendix A Ownership Diagram

Appendix B Affiliated Foreign Carriers

Certificate of Service

APPENDIX A

Ownership Structure Diagram



Alphabet’s shares trade publicly on the Nasdaq Stock Market under the ticker symbols “GOOG” and “GOOGL.” As there is an active market in Alphabet’s shares, Alphabet’s share ownership is always fluid. Moreover, Alphabet can ascertain its significant shareholders only on the basis of its records and may not know of possibly related or affiliated shareholders that are not disclosed to it. Recognizing these limitations and based on the latest publicly available data, Alphabet has no 10-percent-or-greater direct or indirect shareholders other than those identified in Table 3 of the Application.

APPENDIX B

Affiliated Foreign Carriers

Starfish certifies that it is affiliated with the foreign carriers as noted in Updated Table 4 below.

Updated Table 4: Affiliated Foreign Carriers

Country	Entity
Argentina	● Google Infraestructura Argentina S.R.L.
Australia	● Perch Infrastructure Pty Ltd
Austria	● Google Cloud EMEA Ltd.
Belgium	● Google Cloud EMEA Ltd. ● Google Voice Ltd.
Brazil	● Google Infraestructura Brasil Ltda.
Bulgaria	● Google Cloud EMEA Ltd.
Canada	● Google Infrastructure Canada Corp. ● Google Voice Canada Corporation
Chile	● Inversiones y Servicios Dataluna Limitada
Czech Republic	● Google Cloud EMEA Ltd.
Denmark	● Google Cloud EMEA Ltd. ● Google Voice Ltd.
Fiji	● Yellowfin Infrastructure Pte Ltd
Finland	● Google Cloud EMEA Ltd.
France	● Google Cloud France SARL
Germany	● Google Cloud EMEA Ltd. ● Google Voice Ltd.
Greece	● Google Cloud EMEA Ltd.
Hong Kong	● Infraco (Hong Kong) Limited
Ireland	● Google Cloud EMEA Ltd. ● Google Voice Ltd.
Italy	● Google Cloud Italy S.r.l.
Japan	● Asa G.K. ● Google LLC ● Google Cable Japan G.K. ● Google Connect Asia Pacific Pte. Ltd. ● Jibe Mobile, Inc.
Maldives	● Hawksbill Services Private Limited

APPENDIX B

Affiliated Foreign Carriers

Country	Entity
Netherlands	<ul style="list-style-type: none">● Google Cloud EMEA Ltd.● Google Voice Ltd.
Norway	<ul style="list-style-type: none">● Google Cloud EMEA Ltd.
Portugal	<ul style="list-style-type: none">● Google Voice Ltd.● Google Cloud EMEA Ltd.
Singapore	<ul style="list-style-type: none">● Google Singapore Pte. Ltd.
South Korea	<ul style="list-style-type: none">● Google Cloud Korea LLC● Google Korea, LLC.
Spain	<ul style="list-style-type: none">● Google Cloud EMEA Ltd.● Google Voice Ltd.● Yeso Computing, S.L.U.
Sweden	<ul style="list-style-type: none">● Google Cloud EMEA Ltd.● Google Voice Ltd.
Switzerland	<ul style="list-style-type: none">● Google Voice Ltd.
United Kingdom	<ul style="list-style-type: none">● Google Voice Ltd.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-referenced Second Amendment was served this date upon the following via overnight delivery and/or electronic mail:

Office of Technology and Security Policy
Bureau of Cyberspace and Digital Policy
CDP/ICP/TS
U.S. Department of State
2201 C Street, N.W.
Washington, DC 20520-5818

Office of Chief Counsel/NTIA
U.S. Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Defense Information Systems Agency
ATTN: GC/DO1
6910 Cooper Avenue
Fort Meade, MD 20755-7088

/s/ Leetal Weiss
Leetal Weiss

January 23, 2026