

**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 No. SCL-LIC-2025 _____

APPLICATION FOR A CABLE LANDING LICENSE

Starfish Infrastructure Inc. (“Starfish”), pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39, Executive Order 10,530, and 47 C.F.R. § 1.767, requests a 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. The cable system is known as Sol, which translates to “sun” in Spanish and Portuguese.

Starfish will operate the system on a non-common-carrier basis, by providing system capacity to affiliates pursuant to inter-affiliate agreement or by providing dark fiber, or spectrum and related services to wholesale and enterprise customers on particularized terms and conditions pursuant to individualized negotiations.

Grant of the license will serve the public interest, convenience, and necessity. The system will provide significant new and replacement capacity on U.S.-Southern Europe routes, where demand continues to increase substantially each year. A number of the existing systems between

the U.S. and Southern Europe are nearing the end of their useful lives, and capacity on many of the newer systems is fully subscribed. Sol will be the first transatlantic system to connect Florida to Southern Europe and the second system to directly connect the United States to the Azores. It will also be the second transatlantic system to have a landing point in Bermuda. This route between the U.S. and Southern Europe will further strengthen the redundancy and resilience of transatlantic telecommunications.

Subject to authorization, Starfish intends to install and test the system in U.S. waters as early as the fourth quarter of 2026 and commence commercial operation of the U.S. landing points of the system in the fourth quarter of 2027.

I. COMPLIANCE WITH 47 C.F.R. § 1.767

Information required by 47 C.F.R. § 1.767(a) follows.

A. Applicant's Name, Address, and Telephone Number: 47 C.F.R. § 1.767(a)(1)

Starfish Infrastructure Inc.
2801 Centerville Road
1st Floor, PMB 160
Wilmington, DE 19808
202-346-1100

B. Applicant's Place of Incorporation: 47 C.F.R. § 1.767(a)(2)

Starfish is a Delaware corporation.

C. Contact Information: 47 C.F.R. § 1.767(a)(3)

Correspondence concerning the application should be sent to the following:

Helen Marie Berg, Associate Corporate Counsel
Sybil Anne Strimbu, Legal Specialist
Google LLC
25 Massachusetts Avenue NW
Washington, DC 20001
202-346-1100
starfish-legal@google.com

With a copy to:

Ulises R. Pin
Leetal Weiss
Morgan, Lewis & Bockius LLP
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Washington, DC 20004
202-373-6000
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D. Description of the System: 47 C.F.R. § 1.767(a)(4)

The system will consist of the following segments:

- The **Transatlantic Segment** between Florida and Spain. The Transatlantic Segment has 16 fiber pairs and a length of approximately 7620 kilometers.
- The **Bermuda Segment** connecting Bermuda to a branching unit on the Transatlantic Segment. The Bermuda Segment has 16 fiber pairs and a length of approximately 211 kilometers.
- The **Azores Segment** connecting the Azores to a second branching unit on the Transatlantic Segment. The Azores Segment has 16 fiber pairs and a length of approximately 322 kilometers.

Each fiber pair will have a minimum design capacity of approximately 24.5 Tbps using current technology. Appendix A provides a route map for the system.

E. Description of Cable Landing Stations: 47 C.F.R. § 1.767(a)(5)

Starfish provides details regarding cable landing station facilities in Section 1.G. below. Consistent with 47 C.F.R. § 1.767(a)(5), Starfish will file a more specific description of each landing point no later than ninety (90) days prior to construction.

F. Regulatory Classification: 47 C.F.R. § 1.767(a)(6)

Starfish will operate the system on a non-common carrier basis. Non-common-carrier classification is consistent with established Commission policy and judicial precedent.

First, the system will not operate on a common-carrier basis as defined in *NARUC I*.¹ The courts have stated that “the primary sine qua non of common carrier status is a quasi-public character, which arises out of the undertaking ‘to carry for all people indifferently.’”² On this system, however, capacity will either be used by Starfish and its affiliates to meet their own internal needs for bandwidth, or made available to third parties pursuant to IRUs, the terms of which will vary depending on the characteristics and needs of the particular purchase. The Commission has consistently found that such offerings do not make an applicant a common carrier.³

Second, under the *NARUC I* test, the Commission must determine whether the public interest requires common-carrier operation of the submarine cable system.⁴ Traditionally, the

¹ See *Nat’l Ass’n of Regulatory Utility Comm’rs v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) (“*NARUC I*”) (court must inquire “whether there are reasons implicit in the nature of [the] operations to expect an indifferent holding out to the eligible user public”), *cert. denied*, 425 U.S. 992 (1976); see also *Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999) (affirming FCC’s use of *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

² *Nat’l Ass’n of Regulatory Utility Comm’rs v. FCC*, 533 F.2d 601, 608 (D.C. Cir. 1976) (quoting *Semon v. Royal Indemnity Co.*, 279 F.2d 737, 739 (5th Cir. 1960)).

³ See *AT&T Corp. et al.*, Cable Landing License, 13 FCC Rcd. 16,232, 16,238 (Int’l Bur. 1998) (finding that individualized decisions concerning the sale or lease of capacity on the China-U.S. Cable Network would not constitute the effective provision of a service to the public so as to make the applicant a common carrier); *AT&T Submarine Systems, Inc.*, Cable Landing License, 11 FCC Rcd. 14,885, 14,904 ¶ 64 (Int’l Bur. 1996) (“*St. Thomas-St. Croix Cable Order*”) (finding that an “offer of access, nondiscriminatory terms and conditions and market pricing of IRUs does not rise to the level of an ‘indiscriminate’ offering” so as to constitute common carriage), *aff’d* 13 FCC Rcd. 21,585 (1998), *aff’d sub nom. Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

⁴ *NARUC I* at 642 (court must inquire “whether there will be any legal compulsion . . . to serve [the public] indifferently”).

Commission has focused on whether an applicant has sufficient market power to warrant common-carrier regulation,⁵ although the Commission “is not limited to that reasoning” and has looked more broadly to determine whether common-carrier regulation is in the public interest.⁶ The system poses no such competitive or other public interest concerns.

Sol will compete with dozens of existing and planned transatlantic systems. Specifically on the U.S.-Southern Europe route, Sol will compete with the Amitié, Anjana, Grace Hopper, Marea, and Nuvem systems.⁷ On the U.S.-Bermuda route, Sol will compete with the Gemini, GlobeNet, and Nuvem systems. The Commission has found that facilities need not be identical in order to offer pro-competitive benefits. There are thus sufficient alternative facilities providing transatlantic and U.S.-Bermuda connectivity to preclude the system from becoming a bottleneck facility on those routes. Starfish’s intended operation of the system will therefore serve the Commission’s long-standing policy to encourage competition through private submarine cable transmission, pursuant to which the Commission has granted numerous cable landing licenses.⁸

⁵ *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,893 ¶ 30.

⁶ *See AT&T Corp. et al.*, Cable Landing License, 14 FCC Rcd. 13,066, 13,080 ¶ 39 (1999) (“Although this public interest analysis has generally focused on the availability of alternative facilities, we are not limited to that reasoning”); *Australia-Japan Cable (Guam) Limited*, Cable Landing License, 15 FCC Rcd. 24,057, 24,062 ¶ 13 (Int’l Bur. 2000) (“This public interest analysis generally has focused on whether an applicant will be able to exercise market power because of the lack of alternative facilities, although the Commission has not limited itself to that reasoning”); *Telefonica SAM USA, Inc. et al.*, Cable Landing License, 15 FCC Rcd. 14,915, 14,920 ¶ 11 (Int’l Bur. 2000) (“This public interest analysis has focused on the availability of alternative facilities, although the Commission has stated it is not limited to that reasoning”).

⁷ 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.

⁸ *See Tel-Optik Ltd.*, Memorandum Opinion and Order, 100 FCC.2d 1033, 1040-41 (1985).

For these reasons, the Commission should grant a cable landing license for the system on a non-common carrier basis.

G. System Ownership: 47 C.F.R. § 1.767(a)(7)

Ownership and control of the system is shown in Table 1. The percentage interest represents both a voting and economic interest.

Table 1: System Ownership

Entity	Portion in U.S. Territory	Portion in International Waters	Portion in Bermudian Territory	Portion in Portuguese Territory	Portion in Spanish Territory
Starfish	100%	--	--	--	--
Sea Fan Singapore Infrastructure Pte. Ltd. (“Sea Fan”)	--	100%	--	--	--
Skipjack Infrastructure Limited (“Skipjack”)	--	--	100%	--	--
Sailfish Infrastructure Unipessoal LDA (“Sailfish”)	--	--	--	100%	--
Cardinal Fish Infrastructure, S.L. (“Cardinal Fish”)	--	--	--	--	100%

Starfish, Sea Fan, Skipjack, Sailfish, and Cardinal Fish are all indirect, wholly-owned subsidiaries of Google LLC. As Sea Fan, Skipjack, Sailfish, and Cardinal Fish will not use the U.S. landing point of the system, none of these entities is required by 47 C.F.R. § 1.767(h)(2) to be an applicant for the cable landing license.

The cable landing station (“CLS”) arrangements are shown in Table 2 below.

Table 2: Cable Landing Stations

System Landing	New or Existing CLS Facility?	CLS Owner	Control of System Landing at CLS
Flagler County, Florida	New	Tarpon Services LLC (“Tarpon”)	Starfish
Annie’s Bay, Bermuda	New	Sea Grass Services Limited (“Sea Grass”)	Skipjack
São Miguel, Azores	New	Angler Fish Services, Unipessoal LDA (“Angler Fish”)	Sailfish
Cantabria Region, Spain	New	Lanternfish Services, S.L. (“Lanternfish”)	Cardinal Fish

Tarpon, Sea Grass, Angler Fish, and Lanternfish are all indirect, wholly-owned subsidiaries of Google LLC.

H. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(h)

Starfish certifies that it has the following 10-percent-or-greater direct or indirect interest holders, based on the publicly available data as of April 25, 2025.

Table 3: Direct or Indirect Interest Holders

Sea Coral Holdings LLC	
<i>Address</i>	2801 Centerville Road, 1st Floor, PMB 160, Wilmington, DE 19808
<i>Citizenship</i>	Delaware
<i>Principal Business</i>	Holding company
<i>Relationship</i>	Sea Coral Holdings LLC holds a 100-percent voting and equity interest in Starfish.
Google LLC	
<i>Address</i>	1600 Amphitheatre Parkway, Mountain View, CA 94043
<i>Citizenship</i>	Delaware
<i>Principal Business</i>	Technology search services and advertising
<i>Relationship</i>	Google LLC directly holds a 100-percent voting and equity interest in Sea Coral Holdings LLC.
XXVI Holdings Inc.	
<i>Address</i>	1600 Amphitheatre Parkway, Mountain View, CA 94043
<i>Citizenship</i>	Delaware

<i>Principal Business</i>	Holding company
<i>Relationship</i>	XXVI Holdings Inc. holds a 100-percent voting and equity interest in Google LLC.
Alphabet Inc. (“Alphabet”)	
<i>Address</i>	1600 Amphitheatre Parkway, Mountain View, CA 94043
<i>Citizenship</i>	Delaware
<i>Principal Business</i>	Holding company
<i>Relationship</i>	Alphabet holds 100 percent of XXVI Holdings Inc.’s common stock, giving it a more than 99 percent voting interest in XXVI Holdings Inc.
Larry Page	
<i>Address</i>	1600 Amphitheatre Parkway, Mountain View, CA 94043
<i>Citizenship</i>	USA
<i>Principal Business</i>	Co-Founder and Director of Alphabet
<i>Relationship</i>	Mr. Page holds 45.5 percent of Alphabet’s Class B common stock, giving him a 27.1-percent voting interest in Alphabet.
Sergey Brin	
<i>Address</i>	1600 Amphitheatre Parkway, Mountain View, CA 94043
<i>Citizenship</i>	USA
<i>Principal Business</i>	Co-Founder and Director of Alphabet
<i>Relationship</i>	Mr. Brin holds 42.4 percent of Alphabet’s Class B common stock, giving him a 25.2-percent voting interest in Alphabet.

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 publicly available data as of April 25, 2025, Alphabet has no 10-percent-or-greater direct or indirect shareholders other than those identified in Table 3 above.

Starfish further certifies that no corporate officer or director of Starfish is also an officer or director of any foreign carrier.

I. Certification Regarding the Anti-Drug Abuse Act of 1988: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(o)

Starfish certifies that it is not subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁹

J. Certification Regarding Foreign Ownership: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(p)

Not applicable. As described above, Starfish has no reportable foreign ownership within the meaning of 47 C.F.R. §§ 1.40001(a)(1) and 1.767.

K. Certifications Regarding National Security and Law Enforcement Requirements.: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q)

Please see the Certification attached hereto.

L. Certification Regarding Foreign Carrier Status and Foreign Affiliations: 47 C.F.R. § 1.767(a)(8)(ii)

Starfish certifies that it:

- (A) is not a foreign carrier in any foreign country;
- (B) does not own or control a cable landing station in any foreign country;
- (C) is affiliated with foreign carriers as noted in Table 4 below; and

Table 4: Affiliated Foreign Carriers

Country	Entity
Argentina	Google Infraestructura Argentina S.R.L.
Austria	Google Cloud EMEA Ltd.
Australia	Perch Infrastructure Pty Ltd
Belgium	Google Cloud EMEA Ltd. Google Voice Ltd.
Brazil	Google Infraestrututa Brasil Ltda.
Bulgaria	Google Cloud EMEA Ltd.

⁹ 21 U.S.C. § 862(a). Pub. L. No. 100-690, title V, §5301, 102 Stat. 4310 (1988), which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, § 1002(d)(1), 104 Stat. 4827 (1990), and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

Country	Entity
Canada	Google Infrastructure Canada Corp. Google Voice Canada Corporation
Chile	Inversiones y Servicios Dataluna Limitada
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.
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.
Netherlands	Google Cloud EMEA Ltd. Google Voice Ltd.
Norway	Google Cloud EMEA Ltd.
Portugal	Google Voice Ltd.
Singapore	Google Singapore Pte. Ltd.
South Korea	Google Cloud Korea LLC Google Korea, LLC.
Spain	Google Voice Ltd. Yeso Computing, S.L.U.
Sweden	Google Cloud EMEA Ltd. Google Voice Ltd.
Switzerland	Google Voice Ltd.
United Kingdom	Google Voice Ltd.

(D) is affiliated with the entities owning or controlling cable landing stations in Table 5 below:

Table 5: Affiliated Entities Owning Cable Landing Stations¹⁰

Entity	Location	Ownership
Google Infraestrutura Brasil Ltda.	Santos, Brazil (Monet cable)	100% ownership interest
Dapsi International ApS	Blaaberg, Denmark (Havfrue cable)	Non-controlling ownership interest of 25%

M. Certification Regarding Destination Countries: 47 C.F.R. § 1.767(a)(8)(iii)

Starfish certifies to the following:

- (A) Starfish is not a foreign carrier in Bermuda, Portugal, or Spain, the only foreign destination markets in which the system will land.
- (B) Starfish does not control a foreign carrier in Bermuda, Portugal, or Spain.
- (C) Starfish’s ultimate parent company, Alphabet, indirectly controls Yeso Computing, S.L.U., which has been registered as a public network operator (dark fiber) in Spain. Alphabet also indirectly controls Google Voice Ltd., which has been registered as a public electronic communications service provider in Portugal and Spain. Alphabet does not control a foreign carrier in Bermuda.
- (D) No grouping of two or more foreign carriers in Bermuda, Portugal, or Spain (or parties that control foreign carriers in Bermuda, Portugal, or Spain) own, in aggregate, more than 25 percent of Starfish and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the system in the United States.

N. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets: 47 C.F.R. § 1.767(a)(8)(iv)

Starfish did not identify any non-WTO countries in response to 47 C.F.R. §

1.767(a)(8)(iii). Portugal and Spain are members of the WTO. In 2000, the Commission found that Bermuda is also a Member of the WTO.¹¹

¹⁰ Table 5 includes only cable landing stations currently in operation. As described in the main narrative application, Starfish affiliates Sea Grass, Angler Fish, and Lanternfish will construct and own the new cable landing stations in Bermuda, the Azores, and Spain, respectively.

¹¹ See *In re Cable & Wireless USA, Inc.* 15 FCC Rcd. 3050 (2000).

O. Certification Regarding Routine Conditions: 47 C.F.R. § 1.767(a)(9)

Starfish certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

II. REQUEST FOR WAIVER OF 47 C.F.R. § 1.767(h)(1)

Starfish requests a waiver of 47 C.F.R. § 1.767(h)(1) rules so that Tarpon is not required to be an applicant for a U.S. cable landing license for the system. “The purpose of [Section 1.767(h)(1)] is to ensure that entities having a significant ability to affect the operation of the system become licensees so that they are subject to the conditions and responsibilities associated with the license.”¹² Tarpon will not have any independent ability to affect the system’s operation. Including Tarpon as an applicant is also 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. Moreover, grant of the waiver will be consistent with Commission precedent.¹³

¹² See *Actions Taken Under the Cable Landing License Act*, Public Notice, 23 FCC Rcd. 227, 229 (Int’l Bur. 2008) (“*TPE Cable Landing License*”) (citing *Review of Commission Consideration of Applications under the Cable Landing License Act*, Report and Order, 16 FCC Rcd. 22,167, 22,194-95 ¶¶ 53-54 (2001)).

¹³ See, e.g., *Actions Taken Under Cable Landing License Act*, Public Notice, 32 FCC Rcd. 1436, 1437-38 (Int’l Bur. 2017) (accepting the applicant’s representations that Tata Communications (US) Inc. (“Tata”) “will not have the ability to affect significantly Atisa’s operation” and declining to require that Tata be a joint applicant for the cable landing license); *Actions Taken Under Cable Landing License Act*, Public Notice, 24 FCC Rcd. 7828, 7829-30 (Int’l Bur. 2009) (accepting the applicants’ representations that “Tata will not be able to affect significantly the operation of HANTRU1” and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under Cable Landing License Act*, Public Notice, 24 FCC Rcd. 226, 227-28 (Int’l Bur. 2009) (noting that “Applicants will retain operational authority over their ASHC System facilities and provide direction to AT&T in all matters relating to the ASHC System”); *Actions Taken Under Cable Landing License Act*, Public Notice, 23 FCC Rcd. 13,419, 13,420 (Int’l Bur. 2008) (declining to require that Tata—which owns the existing cable station at Piti, Guam, where the PPC 1 System will land—be a joint applicant or licensee for the PPC 1 System, noting that “Applicants will retain operational authority over PPC 1 System facilities and provide direction to [Tata] in all matters relating to the PPC 1 System.”); *TPE Cable Landing License*, 23 FCC Rcd. 227, 229 (declining to require that WCI Cable, Inc. (“WCIC”)—

In U.S. territory, Tarpon is expected to provide certain limited services that would not enable Tarpon to significantly affect the system's operation, as all these services will be provided at Starfish's direction and under Starfish's supervision. Starfish intends to contract with Tarpon for the right to use separately-caged collocation space in the Florida CLS. Starfish also intends to contract with Tarpon for certain operation and maintenance services at the CLS. Tarpon is 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) to assist in cases of emergency. The agreement with Tarpon is expected to have an initial term of 25 years. Starfish is thus expected to retain full operational authority over the Florida landing point for the system, and provide direction to Tarpon in all matters relating to the system.

III. REQUEST FOR STREAMLINED PROCESSING

Starfish requests streamlined processing for this application. Starfish certifies that it has sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense pursuant to 47 C.F.R. § 1.767(j).

A. Streamlining - Market Power: 47 C.F.R. § 1.767 (k)

Starfish requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(2). Starfish qualifies for streamlining because: (a) Starfish is not a foreign carrier, (b) Starfish is not affiliated with a foreign carrier in Bermuda, one of the three foreign destination markets where the system

which owns an existing cable station at Nedonna Beach, Oregon—be a joint applicant or licensee for the Trans-Pacific Express Cable Network (“TPE”), which will land at WCIC’s Nedonna Beach cable station, finding that “WCIC will not have the ability to affect the operation of the TPE Network. Verizon will retain effective operational authority and provide direction to WCIC in all matters relating to the TPE Network”).

will land, and (c) in Portugal and Spain, Starfish is affiliated with a foreign carrier that lacks market power. The foreign carrier, Google Voice Ltd., is a competitive provider of communications services and lacks 50 percent market share in the international transport and the local access markets in Portugal and Spain. The affiliated foreign carrier in Portugal and Spain is also not on the Commission’s List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets.¹⁴

B. Streamlining - Coastal Zone Management Act: 47 C.F.R. § 1.767(a)(10), (k)

Starfish is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act (CZMA), codified at 16 U.S.C. § 1456(c)(3)(A). Florida, the only U.S. state in which the system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁵

IV. REQUEST FOR EXCLUSION FROM EXECUTIVE BRANCH REVIEW

The Commission’s *Executive Branch Foreign Ownership Review Order*¹⁶ states “applications where the only foreign ownership is through passive, offshore intermediary holding companies and 100% of the ultimate control is held by U.S. citizens or entities present a minimal risk and generally should not be referred to the Executive Branch.” This is such an application. As described above, Starfish has no reportable foreign ownership within the meaning of 47 C.F.R. §§ 1.40001(a)(1) and 1.767, and moreover the only foreign ownership of the system is

¹⁴ See *The International Bureau Revises and Reissues the Commission’s List of Foreign Telecommunications Carriers That Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, 22 FCC Rcd. 945 (2007).

¹⁵ See <https://coast.noaa.gov/data/czm/consistency/media/fl.pdf> (last visited September 10, 2025).

¹⁶ *In re Process Reform for Executive Branch Review of Certain FCC Application and Petitions Involving Foreign Ownership*, Report and Order, 35 FCC Rcd. 10927 (2020) (“*Executive Branch Foreign Ownership Review Order*”).

through indirect, wholly-owned subsidiaries of Google LLC. Starfish therefore requests that the Commission exclude this application from referral to the Executive Branch pursuant to 47 C.F.R. §§ 1.40001 et seq., and approve this application pursuant to streamlined processing.

V. CONCLUSION

For the reasons set forth above, the Commission should grant this application for a license to construct, land, and operate the system that connects the United States to Bermuda, the Azores, and Spain.

Respectfully submitted,

/s/ Ulises R. Pin

Ulises R. Pin

Leetal Weiss

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Counsel for Starfish Infrastructure Inc.

Dated: September 10, 2025

Attachments

LIST OF ATTACHMENTS

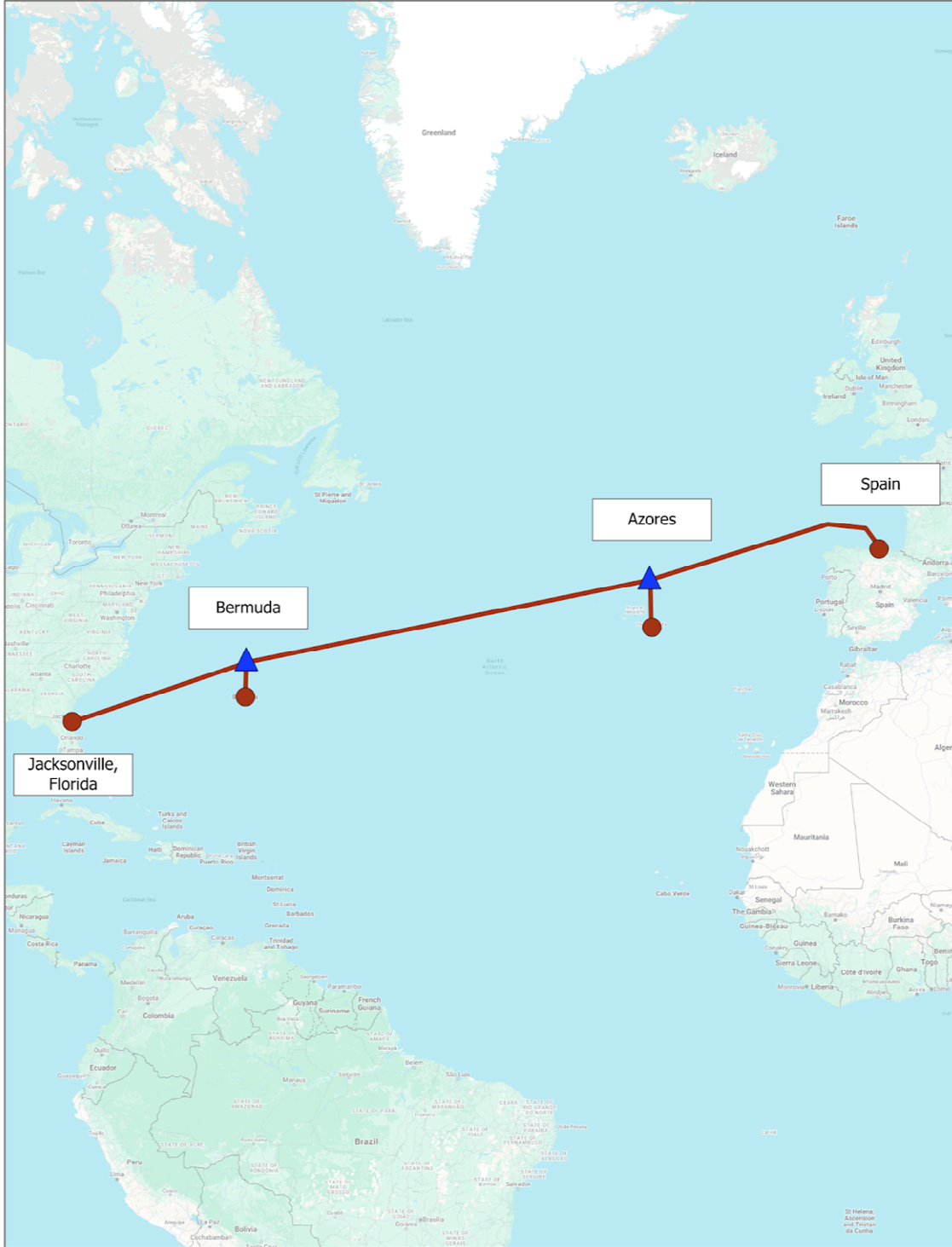
Appendix A System Route Map

Certification

Certificate of Service

APPENDIX A

System Route Map




CERTIFICATION

On behalf of Starfish Infrastructure Inc. (“Starfish”), I certify that all of the information contained in this application for the Sol cable system and the Appendix thereto is true and correct to the best of my knowledge and belief.

Pursuant to 47 CFR §§ 1.767(a)(8)(i), 63.18(q), I also certify that Starfish agrees:

1. To comply with all applicable Communications Assistance for Law Enforcement Act (CALEA) requirements and related rules and regulations, including any and all FCC orders and opinions governing the application of CALEA, pursuant to the Communications Assistance for Law Enforcement Act and the Commission’s rules and regulations in Title 47, chapter I, part 1, subpart Z;
2. To make communications to, from, or within the United States, as well as records thereof, available in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to:
 - a. The Wiretap Act, 18 U.S.C. § 2510 et seq.;
 - b. The Stored Communications Act, 18 U.S.C. § 2701 et seq.;
 - c. The Pen Register and Trap and Trace Statute, 18 U.S.C. § 3121 et seq.; and
 - d. Other court orders, subpoenas or other legal process;
3. To designate a point of contact who is located in the United States and is a U.S. citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;
4. That Starfish is responsible for the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector’s (“Committee”) request, as required under section 1.65(a) of the Commission’s rules, and to inform the Commission and the Committee of any substantial and significant changes while an application is pending;
5. That after the application is no longer pending for purposes of section 1.65 of the Commission’s rules, Starfish will notify the Commission and the Committee of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days; and
6. That Starfish understands that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in section 63.18(q) of the Commission’s rules or in the grant of an application or authorization and/or that if the information provided to the United States Government is materially false, fictitious, or fraudulent, it may be subject to all remedies available to the United States Government, including but not limited to revocation and/or termination of the Commission’s authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.

I certify under penalty of perjury that the foregoing is true and correct. Executed on September 8, 2025.

Signed by:

050B49BB9BFA494...

Nigel Bayliff
Authorized Signatory

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

In the Matter of

STARFISH INFRASTRUCTURE INC.

Application for a License to Construct, Land,
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Spain, to be Known as

THE SOL CABLE SYSTEM

File No. SCL-LIC-2025 _____

CERTIFICATE OF SERVICE

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

Office of Technology and Security Policy
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September 10, 2025