



# PUBLIC NOTICE

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

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News media information 202-418-0500  
Internet: <http://www.fcc.gov>

**Report No. SCL-00597S**

**DA Number: 26-203**  
**Friday February 27, 2026**

## **Streamlined Submarine Cable Landing License Applications** **Accepted for Filing**

Unless otherwise specified, the following procedures apply to the applications listed below:

The applications listed below have been found, upon initial review, to be acceptable for filing and subject to the streamlined processing procedures set forth in section 1.767 of the Commission's rules, 47 C.F.R. § 1.767. 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, each applicant seeks: (a) the grant of a submarine cable landing license; (b) the modification of a submarine cable landing license; and/or (c) the assignment or transfer of control of an interest in a submarine cable landing license.

Pursuant to its decision in Review of Commission Consideration of Applications under the Submarine 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 forty-five (45) days after release of this public notice, unless upon further examination an application is deemed ineligible for streamlined processing.

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 C.F.R. § 1.1206. Unless otherwise specified, interested parties may file comments with respect to these applications within 14 days of this notice. Such filings will not necessarily result in an application being deemed ineligible for streamlined processing.

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](mailto: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.

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**SCL-RWL-20251124-00078** S250442 EXA Infrastructure US LLC  
**Date filed:** 2025-11-25  
Renewal

On November 25, 2025, EXA Infrastructure US, LLC (EXA Infrastructure) filed an application for a new 25-year cable landing license for the EXA North and South system (EXA North and South), a non-common carrier fiber optic submarine cable network connecting the United States with Canada, Ireland, and the United Kingdom. The current license for EXA North and South (SCL-LIC-19990804-00012, SCL-MOD-20020412-00022, SCL-MOD-20020412-00023) will expire on May 4, 2026.

#### Licensing History.

EXA North and South was originally licensed to Worldwide Telecom (USA) Inc. in 2000 as the Hibernia cable system. *See* Worldwide Telecom (USA) Inc., Application for a License to Land and Operate in the United States a Private Fiber Optic Submarine Cable System extending between the United States, Canada, Ireland, and the United Kingdom, SCL-LIC-19990804-00012, *Cable Landing License*, 15 FCC Rcd 765 (IB 2000). The cable entered into commercial service on May 4, 2001. *See* letter from Ulises Pin, counsel for Hibernia Atlantic U.S. LLC, to Marlene H. Dortch, FCC, filed in SCL-LIC-19990804-00012 (dated Aug. 27, 2018). In 2002, the Commission granted two modifications of the license to add the then-new pro forma condition and to substitute the then-new no special concessions condition for the no exclusive arrangements condition. *See* Actions Taken Under Cable Landing License Act, SCL-MOD-20020412-00022, SCL-MOD-20020412-00023, *Public Notice*, 17 FCC Rcd 12916 (IB 2002). In 2009, a landing in Portrush (Coleraine), North Ireland was added. *See* Actions Taken Under Cable Landing License Act, SCL-LIC-19990804-00012, Report No. SCL-00092, *Public Notice*, 24 FCC Rcd 10698 (IB 2009).

As set out in the application, the cable system has had several names and owners over the years. Most recently, control of the cable system, which was known as GTT Atlantic System at the time, was transferred from GTT Communications, Inc. to Cube Telecom Europe US Bidco LLC, which is ultimately controlled by ISQ Holdings, LLC. *See* Actions Taken Under Cable Landing License Act, SCL-T/C-20201216-00048, Report No. SCL-00324, *Public Notice*, 36 FCC Rcd 11431 (IB 2021) (*2021 Public Notice*). Grant of the transfer of control was conditioned on Interoute US LLC and Cube Telecom Europe BidCo Limited abiding by the commitments and undertakings set forth in the July 1, 2021, Letter of Assurances from Anthony Hansel, SVP, Legal, Interoute US, LLC, and Mohamed El Gazzar, Director, Cube Telecom Europe BidCo Limited, to the Acting Under Secretary, Office of Strategy, Policy, and Plans, U.S. Department of Homeland Security, and the Principal Director of Chief Information Officer for Cybersecurity, U.S. Department of Defense (2021 LOA). *Id.* Following acquisition by ISQ Holdings, the system was renamed the EXA North and South system.

EXA North and South continues to be subject to the 2021 LOA.

#### Cable System Design and Capacity.

EXA North and South is a non-common carrier submarine cable with a ring-configuration system consisting of four segments and a spur, each with four fiber pairs:

- Segment A connects Halifax, Canada to Southport, United Kingdom;
- Segment B is a spur that connects Portrush (Coleraine), Northern Ireland to Southport, United Kingdom;
- Segment C connects Dublin, Ireland to Southport, United Kingdom;
- Segment D connects Halifax, Canada to Dublin, Ireland; and
- Segment E connects Lynn, Massachusetts, United States, to Halifax, Canada.

The cable system has an estimated total capacity of 18.59 terabits per second (Tbps).

#### Cable Landings.

EXA North And South has landing points in (1) Lynn, Massachusetts, United States, (2) Halifax, Canada, (3) Southport, United Kingdom, (4) Portrush (Coleraine), Northern Ireland, United Kingdom, and Dublin, Ireland.

#### Ownership of the System.

EXA North and South is owned and operated by EXA Infrastructure and affiliates of EXA Infrastructure that are all wholly owned by Cube Telecom Europe Bidco Limited, the indirect parent of EXA Infrastructure.

1. Lynn, Massachusetts, United States, to Halifax, Canada: EXA Infrastructure, 100% of the portion in U.S. territory; EXA Infrastructure Atlantic Canada Company (EXA Infrastructure Canada), 100% of the portion in Canadian territory, and EXA Infrastructure Atlantic UK Limited (EXA Infrastructure UK), 100% of the portion in international waters.
2. Halifax, Canada to Dublin, Ireland: EXA Infrastructure Canada, 100% of the portion in Canadian territory; EXA Infrastructure Atlantic Ireland Limited (EXA Infrastructure Ireland), 100% of the portion in Ireland territory, and EXA Infrastructure UK, 100% of the portion in international waters.
3. Halifax, Canada to Southport, United Kingdom: EXA Infrastructure Canada, 100% of the portion in Canadian territory; EXA Infrastructure UK, 100% of the portion in UK territory and 100% of the portion in international waters.
4. Portrush (Coleraine) to Southport, United Kingdom: EXA Infrastructure UK, 100% of the portion in United Kingdom (UK) territory and 100% of the portion in international waters.
5. Dublin, Ireland to Southport, United Kingdom: EXA Infrastructure Ireland, 100% of the portion in Ireland territory, EXA Infrastructure UK, 100% of the portion in UK territory and 100% of the portion in international waters.

EXA Infrastructure states that none of its affiliates will use the U.S. end of the system and thus are not required to be licensees on the EXA North and South under section 1.767(h)(2) of the Commission's rules. 47 CFR § 1.767(h)(2).

All of the cable landing stations for EXA North and South are existing facilities and are owned and controlled as follows

1. Lynn, Massachusetts: EXA Infrastructure
2. Halifax, Canada: EXA Infrastructure Canada
3. Southport, United Kingdom: EXA Infrastructure UK
4. Dublin, Ireland: EXA Infrastructure Ireland
5. Portrush (Coleraine), Northern Ireland: EXA Infrastructure UK

#### Regulatory Classification.

EXA North and South is currently operated on a non-common carrier basis. EXA Infrastructure proposes to continue to operate the cable on a non-common carrier basis.

The Applicant states it will not operate EXA North And South on a common carrier basis. EXA Infrastructure states that it does not sell capacity indifferently to the user public, but rather offers capacity on the EXA North and South system to third parties pursuant to individually-negotiated Indefeasible Rights of Use agreements (IRUs) and capacity leases, the terms of which will vary depending on the characteristics and needs of the particular capacity purchaser. The Applicant further states that the EXA North and South system competes vigorously with other submarine cable systems on North Atlantic routes, including FA-1, AEConnect-1, Amitié, Apollo, Atlantic Crossing-1, Dunant, Grace Hopper, Havfrue, Marea, TGN Atlantic, and Yellow/Atlantic Crossing-2, and will soon compete with other recently announced systems, including the Anjana and Nuvem systems. Thus, EXA Infrastructure contends that EXA North And South does not and will not function as a bottleneck facility on those routes.

#### Ownership of EXA Infrastructure.

EXA Infrastructure is wholly owned by Cube Telecom Europe (US BidCo), LLC (Cube Telecom US Bidco), both Delaware limited liability companies. Cube Telecom US Bidco is wholly owned by Cube Telecom Europe BidCo Limited (Cube Telecom Europe BidCo), an England and Wales holding company. Cube Telecom Europe BidCo is wholly owned by Cube Telecom Europe MidCo Limited which is wholly owned by Cube Telecom Europe TopCo Limited which, in turn is wholly owned by Cube Telecom Europe Holdings Limited (Cube Telecom Europe Holdings), all England and Wales companies. Cube Telecom Europe Holdings is wholly owned by Cube Telecom Europe Aggregator, LLC (Cube Aggregator), a Cayman Islands limited liability company.

Cube Aggregator is owned by five investment funds (ISQ Funds): (1) ISQ Global Infrastructure Fund III (UST) AIV, L.P. (ISQ Fund III (UST) AIV) (14.11% direct equity and voting interest in Cube Aggregator); (2) ISQ Global Infrastructure Pooling III (USTE) AIV, L.P. (ISQ Pooling III (USTE) AIV), a Cayman Islands limited partnership (3.60% direct equity and voting interest in Cube Aggregator). ISQ Pooling III (USTE) AIV is an indirect wholly owned subsidiary of ISQ Global Infrastructure Fund III (USTE) AIV, L.P (ISQ Global Infrastructure Fund III (USTE) AIV), a Cayman Islands limited partnership; (3) ISQ Global Infrastructure Fund III AIV, L.P. (ISQ Fund III (USTE) AIV), a Cayman Islands limited partnership (32.61% direct equity and voting interest in Cube Aggregator); (4) ISQ Apollo Co-Invest Fund III, L.P. (ISQ Apollo Fund III), a Caymen Islands company (32.27% direct equity and voting interest in Cube Aggregator); and (5) ISQ Global Infrastructure Fund III (EU) AIV, L.P. (ISQ Global Fund III (EU) AIV), a Luxembourg limited partnership (17.40% direct equity and voting interest in Cube Aggregator).

ISQ Global Fund III GP, LLC (ISQ Global Fund III GP), a Delaware limited liability company, is the general partner of Cube Aggregator and each of the ISQ Funds, except ISQ Global Fund III (EU) AIV. ISQ Global Fund III Lux GP, S.à r.l. (ISQ Global Fund III Lux GP), a Luxembourg entity, is the general partner of ISQ Global Fund III (EU) AIV. ISQ Global Fund III GP and ISQ Global Fund III Lux GP are both wholly owned by ISQ Holdings, LLC (ISQ Holdings), a Cayman Islands limited liability company. ISQ Holdings is also the managing member of I Squared Capital, LLC, a Cayman Islands limited liability company, that wholly owns I Squared Capital Advisors (US) LLC, a Delaware limited liability company, that serves as the investment manager of the ISQ Funds. The managing members of ISQ Holdings are Mr. Gautam Bhandari, a U.S. citizen and Mr. Sadek M. Wahba, a citizen of the U.S., United Kingdom, and Egypt, with each holding 50% equity and voting interests and negative control in ISQ Holdings. According to the Applicant, no other individual or entity holds a 10% or greater direct or indirect equity or voting interest in EXA Infrastructure.

## Conditions and Requirements.

EXA Infrastructure certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules. 47 C.F.R. § 1.767(g).

## Executive Branch Review.

EXA Infrastructure requests that the Commission not refer the application to the Executive Branch for national security, law enforcement, foreign policy and trade policy review. The Applicant notes that EXA Infrastructure is ultimately owned and controlled by two U.S. citizens, Sadek Wahba and Gautam Bhandari, and all reportable non-U.S. ownership interests are held through intermediate holding companies. Further, EXA North and South is subject to the 2021 LOA and the ownership and operational details of the of the system have not changed since the 2021 LOA and the ownership was recently reviewed as part of another transaction. *See Actions Taken Under Cable Landing License Act, SCL-T/C-20250325-00007, SCL-T/C-20250325-00008, Report No. SCL-00581, Public Notice, DA 25-1047 (OIA rel. Dec. 11, 2025).* Finally, EXA Infrastructure states that it is in compliance with the 2021 LOA and requests that the Commission condition grant of this application on continued compliance with the 2021 LOA.

On February 26, 2026, the U.S. Department of Justice, filed a letter stating that the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee) "does not believe, based on available information, that a referral of this application to the Committee for review under Section 5 of Executive Order ("E.O.") 13913 is necessary." *See Letter from Christopher R. Clements, Deputy Chief, Telecom and Supply Chain Foreign Investment Review Section, National Security Division, U.S. Department of Justice to Marlene H. Dortch, FCC, filed in SCL-RWL-20250812-00027 (dated Feb. 26, 2026).*

We find that this application presents a low or minimal risk to national security, law enforcement, foreign policy, and trade policy. Unlike most cable landing license applications, this application involves an existing facility with a mitigation agreement specific to the cable system and that was agreed to in 2021. The application does not propose any changes to the cable system since the 2021 LOA was entered into and there have been no substantive changes in the ownership since the 2021 LOA was entered into by the relevant parties. Further, the Applicant requested that the Commission condition grant of the application on its continued compliance with the 2021 LOA.

Consequently, we agree with the Applicant and will not refer this application to the Executive Branch for national security, law enforcement, foreign policy, and trade policy review. Although we are not referring this application, we will provide a courtesy copy of this public notice to the Executive Branch agencies. *See Executive Branch Review Process Order, 35 FCC Rcd 10927, 10941, para. 36, n.99.*

## **INFORMATIVE:**

**SCL-LIC-20250910-00044** S250488 Starfish Infrastructure Inc.  
**Date filed:** 2025-09-11  
Submarine Cable Landing License

On February 13, 2026, we released an Public Notice seeking comment on the application filed by Starfish Infrastructure Inc. (Starfish) for a license to construct, land, and operate the Sol cable system, a non-common carrier fiber-optic submarine cable system that will connect the United States to Bermuda, the Azores, and Spain. *See Streamlined Submarine Cable Landing License Applications Accepted for Filing, SCL-LIC-20250910-00044, Report No. SCL-00595S, Public Notice, DA 26-155 (OIA rel. Feb. 13, 2026).* On February 24, 2026, the U.S. Department of Justice (DOJ) requested a two-week extension of the comment date due to the lapse of funding for the U.S. Department of Homeland Security. *See Letter from Christopher R. Clements, Deputy Chief, Telecom and Supply Chain Foreign Investment Review Section, National Security Division, U.S. Department of Justice to Marlene H. Dortch, FCC, filed in SCL-LIC-20250910-00044 (dated Feb. 24, 2026).*

We grant the DOJ request and extend the comment date for SCL-LIC-20250910-00044 to March 13, 2026.

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## **REMINDERS:**

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 C.F.R. §§ 1.2001-1.2003.*

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 Submarine 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 be removed from streamlined processing and 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 submarine 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.