

August 17, 2026

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Request for Confidential Treatment of Certain Appendices of the Cable Landing License Application for the Aurora System, ICFS File No. SCL-LIC-2026-0730-00104 Pursuant to 47 C.F.R. §§ 0.457, 0.459, and 1.70005

Dear Ms. Dortch:

Through counsel, and pursuant to 47 C.F.R. §§ 0.457, 0.459, 1.70005(e)(7), and 1.70005(f)(2), Edge Cable Holdings USA, LLC (“Edge USA”) requests confidential treatment for Appendices B through F (the “Confidential Information”) to the application to construct, land, and operate the Aurora system (the “Aurora Application”), and requests that the Commission withhold Appendices B through F from any future public inspection. These documents contains sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(4).

Exemption 4 of FOIA provides that the public disclosure requirement of the statute “does not apply to matters that are . . . (4) trade secrets and commercial or financial information obtained from a person and privileged or confidential.” 5 U.S.C. § 552(b)(4). Because Appendices B through F includes commercial information that is “of a kind that would not customarily be released to the public,” this information is “confidential” under Exemption 4 of FOIA. *See Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

Further, Appendices B through F include the information required to be submitted pursuant to 47 C.F.R. § 1.70005(e)(7), in particular the specific geographic location information for the Aurora system, including its route position list and geographic details for its cable landing stations and other facilities that will house Aurora SLTE. Pursuant to 47 C.F.R. § 1.70005(f)(2), “information under paragraph (e)(7) of this section and the exact location information of the wet segment as it approaches the shore, the submarine cable as it reaches the beach manhole, and the dry segment including the cable landing station(s), such as where the SLTE is located and/or from where it is operated, will be withheld from public inspection.”

EDGE USA

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In further support of this request and pursuant to 47 C.F.R. § 0.459(b), Edge USA hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (47 C.F.R. § 0.459(b)(1))

Edge USA seeks confidential treatment with respect to Appendices B through F to the Aurora Application.

2. Description of Circumstances Giving Rise to the Submission (47 C.F.R. § 0.459(b)(2))

Edge USA is required to submit the Confidential Information pursuant to 47 C.F.R. § 1.70005 in connection with the Aurora Application. The Confidential Information provides detailed geographic information for the system and its operational facilities. This is sensitive commercial information that Edge USA does not make otherwise publicly available. Public disclosure of this information could cause competitive commercial harm to Edge USA as well as create security risks for the system.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (47 C.F.R. § 0.459(b)(3))

The information for which Edge USA seeks confidential treatment contains sensitive “trade secrets or privileged or confidential commercial, financial or technical data,” which would customarily be guarded from competitors. 47 C.F.R. § 0.457(d)(2). The Confidential Information is both commercial and technical in nature, as the disclosed geographic coordinates convey the system’s precise deployment and disclose key operational points from which the system will be controlled—all commercially sensitive information relevant to Edge USA’s potential business plans.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (47 C.F.R. § 0.459(b)(4))

The Aurora system will be competing with numerous existing systems across the Atlantic on multiple routes served by numerous systems (individually or in combination), including the AEConnect-1, Amitié, Apollo, Atlantic Crossing-1, Dunant, EXA North and South, FLAG Atlantic-1, Grace Hopper, Havfrue, Marea, TGN Atlantic, Yellow/Atlantic Crossing-2 systems, as well as the newly licensed Nuvem system and the planned Fastnet & Sol system.

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5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (47 C.F.R. § 0.459(b)(5))

Disclosure of the Confidential Information would cause substantial competitive harm. *First*, disclosure would reveal details of the Aurora system's route and key operational locations. Edge USA's competitors could use this information to assess the Aurora System's competitive position and Edge USA's business plans along competitive routes. *Second*, disclosure of the Confidential Information would place Edge USA at a competitive disadvantage, as it lacks the same information regarding its competitors.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (47 C.F.R. § 0.459(b)(6))

Edge USA has never distributed the Confidential Information to the public, competitors, customers, or government officials without an obligation of confidentiality. The Confidential Information is subject to internal controls to ensure that it is treated as proprietary information.

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (47 C.F.R. § 0.459(b)(7))

The Confidential Information is and shall remain unavailable to the public. As noted in part 6 above, Edge USA has not previously disclosed any of the Confidential Information to third parties, other than the undersigned counsel and Team Telecom¹ (submitted concurrently to Team Telecom, subject to the confidentiality restrictions of Executive Order 13913).

8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (47 C.F.R. § 0.459(b)(8))

Edge USA requests that the Confidential Information not be disclosed for the operational life of the Aurora system. Once out of service, the specific landing arrangements and geographic details for the Aurora system's facilities will no longer be commercially sensitive—nor will public disclosure create a security risk for the system.

9. Other Information that Edge USA Believes May Be Useful in Assessing Whether Its Request for Confidentiality Should Be Granted (47 C.F.R. § 0.459(d)(9))

As explained above, the Confidential Information is the type of information that is subject, by rule, to confidentiality. The Commission should therefore decline to disclose publicly the Confidential Information.

¹ Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector.

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Should you have any questions concerning this letter, please contact the undersigned.

Respectfully submitted,

Preston Johnson

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Authorized Representative
Edge Cable Holdings USA, LLC

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