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

In the Matter of )
)
)
Cable & Wireless Americas Systems, Inc. )
Licensee )
And )
)
Vodafone Europe B.V. )
Transferee )
File No. SCL-T/C-2012 ______ )
)
Application for Transfer of Control of )
Cable Landing License )

APPLICATION FOR TRANSFER OF CONTROL OF
CABLE LANDING LICENSE
STREAMLINED PROCESSING REQUESTED


As described below, under an arrangement negotiated between CWW and Vodafone Europe B.V., CWAS will become a 60% owned subsidiary of Vodafone Europe B.V. (the

\(^1\) As a result of a demerger that occurred in 2010, CWW is not affiliated with Cable & Wireless Communications plc. For a description of that transaction, please see FCC File No. ITC-T/C-20100329-00133.

\(^2\) FCC File No. SCL-LIC-20010122-00002. CWW currently holds an indirect 60% equity interest in Apollo Submarine Cable Systems Ltd (the "Apollo Cable"). The Apollo Cable holds a 100% equity interest in CWAS, the licensee.

\[\text{DC-002445/000013 - 3408005-v1}\]
As a result of the Transaction, Vodafone Europe B.V., an indirect wholly-owned subsidiary of Vodafone Group Plc ("Vodafone"), will control CWAS’s license to land and operate the Apollo Submarine Cable System (the "Apollo Cable"). Although control of CWAS will change from CWW to Vodafone Europe B.V., services in the United States will continue to be provided to the Apollo Cable’s existing customers under existing service arrangements, consistent with the submarine cable landing license granted to CWAS by the Commission. The Transaction, therefore, will be seamless to existing customers. Applicants provide the following information in support of this Application:

I. **THE APPLICANTS**

A. **Cable & Wireless Americas Systems, Inc. (Licensee)**

   FRN: 0009696071

   CWAS is organized under the laws of the state of Delaware in the United States and holds the license to land and operate the Apollo Cable.

B. **Vodafone Europe B.V. (Transferee)**

   FRN: 0021810718

   Vodafone Europe B.V. is a company organized under the laws of the Netherlands and is headquartered in Capelle aan den IJssel, Netherlands. Vodafone Europe B.V. is a wholly-owned subsidiary, through multiple corporate entities, of Vodafone, a U.K. corporation. Vodafone is a publicly traded company, with shares listed on the London and NASDAQ stock exchanges. Vodafone is one of the world’s largest mobile operators, with investments and operations on several continents, and also is a provider of fixed services in some markets. It had 398 million customers as of December 31, 2011. It generates revenues from mobile voice, messaging and data communications services, fixed line services, business managed services and wholesale

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3 Id.
access to mobile virtual network operators. Additional information about Vodafone is available at www.vodafone.com.

C. Cable & Wireless Worldwide plc (Transferee)

FRN: 0021810734

Cable & Wireless Worldwide plc ("CWW") is a publicly-held corporation organized under the laws of the U.K. and is headquartered in Bracknell, England. It is a global provider of primarily fixed telecommunications and related services, specializing in providing services to large users of telecommunications, including multinational corporations, governments, carrier customers and resellers. CWW has an international cable network that spans approximately 425,000 kilometers in length. Additional information on CWW can be found at www.cw.com.

II. THE PROPOSED TRANSACTION

The transfer of control of CWAS will occur under a corporate transaction by which Vodafone, as the corporate parent of Vodafone Europe B.V., will acquire de jure and de facto control of CWAS’s corporate parent, CWW. Pursuant to an agreement negotiated between Vodafone Europe B.V. and CWW, Vodafone Europe B.V. will acquire 100% of the issued and paid up shares of CWW. CWW indirectly owns 60% of the equity of CWAS. The Transaction is governed by U.K. law.

III. PUBLIC INTEREST CONSIDERATIONS

Consummation of the Transaction described herein will serve the public interest because it will lead to the emergence of a stronger and better-financed competitor in the submarine cable market for capacity between the United States and Europe (in particular between the United States and U.K. and United States and France). Under Vodafone’s control, CWAS and the Apollo Cable will be able to operate in a more efficient and economical manner and have better
access to the capital needed to maintain and grow the existing competitive submarine cable business.

Moreover, the change in control will not have any adverse impact on existing customers. Backed by its new parent company, Vodafone, the Apollo Cable will continue to possess the managerial and technical qualifications necessary to provide international telecommunications services. Because the Transaction involves the transfer of shares in CWAS’s and the Apollo Cable’s corporate parent, the Transaction will not result in a change of service provider for customers and will otherwise be seamless to customers receiving services in the United States. Immediately following consummation of the Transaction, the Apollo Cable’s customers will continue to receive high-quality private carriage services without interruption and without any immediate change in rates, terms or conditions.

At the same time, grant of the Application will not result in any anticompetitive effects. The market for transport between the United States and U.K. and United States and France is fiercely competitive, and, pursuant to Section 63.10(a)(3), neither Vodafone Europe B.V., CWW, nor any of their affiliates will exercise sufficient market power in the U.K. or France after consummation of the Transaction to affect competition adversely in the United States. For these reasons, Applicants respectfully submit that this Transaction is in the public interest.

IV. INFORMATION REQUIRED BY SECTION 1.767 OF THE COMMISSION’S RULES

In support of this Application, Applicants submit the following information in accordance with Section 1.767 of the Commission’s Rules, 47 C.F.R. § 1.767:

(1) Name, address and telephone number of Applicants:

Licensee: Cable & Wireless Americas Systems, Inc.
Registered in Delaware, USA, with principal contact address at:
Worldwide House
Western Road
Transferee: Vodafone Europe B.V.
Rivium Quadrant 173, 15th Floor
2909 LC Capelle aan den IJssel
The Netherlands
+31 10498 7711

Transferor: Cable & Wireless Worldwide plc
Worldwide House
Western Road
Bracknell, Berkshire RG12 1RW
United Kingdom
+44 (0) 1344 726542

(2) **Place of Formation:**

Licensee: Cable & Wireless Americas Systems, Inc. is organized under the laws of Delaware in the United States.

Transferee: Vodafone Europe B.V. is organized under the laws of the Netherlands.

Transferor: Cable & Wireless Worldwide plc is organized under the laws of the U.K.

(3) **Correspondence concerning this Application should be sent to:**

For Cable & Wireless Worldwide plc: Helen R. Watson
Head of Legal and Regulatory – Global Markets
Cable & Wireless
6 Temasek Boulevard, #33-03/05, Suntec Tower 4
Singapore
+65 647-75-828
Helen.R.Watson@cw.com

For Vodafone Europe B.V.: Dennis Kraan
Company Secretary
Vodafone Europe B.V.
Rivium Quadrant 173, 15th Floor
2909 LC Capelle aan den IJssel
The Netherlands
+31 10 498 7717
Dennis.Kraan@vodafone.com

each with a copy to: Michele C. Farquhar
Hogan Lovells US LLP
555 13th Street N.W.
Washington, D.C. 20004
Phone: (202) 637-5663
Michele.Farquhar@hoganlovells.com
Counsel to Vodafone Europe B.V.

(4) Description of the Cable System:

A description of the Apollo Cable is on file with the Commission and is incorporated by reference herein.

(5) Landing Points:

A general description of the Apollo Cable’s landing locations is on file with the Commission in the original license files and is incorporated by reference herein. The United States-based landing stations are located at 21 Ramsey Road, Shirley, New York 11967, and 1941 Highway 34, Wall, New Jersey 07719. The France-based landing station is located at Keradrivin Vihan, Servel 22300, Lannion, France. The UK-based landing station is located in Bude, England.

(6) A Statement as to Whether the Cable Will be Operated on a Common Carrier or Non-Common Carrier Basis:

The Apollo Cable is operated and will continue to operate on a non-common carrier basis.

(7) Ownership Interest in the Apollo Cable:

CWW currently holds a 60% voting and equity interest in the Apollo Cable and Alcatel-Lucent currently holds a 40% voting and equity interest in the Apollo Cable. This 60/40% ownership split applies to each United States-based landing station, and the Lannion, France-based landing station. The same ownership split applies to each wet-link portion of the Apollo Cable (up to the territorial waters limits for France and the U.K.). The Bude, U.K. landing station is 100% owned by CWW, but part of this cable landing station is leased to the Apollo Cable.

For clarity, the wet portion both (i) from the Lannion, France cable landing station to the edge of French territorial waters and (ii) from the Bude, U.K. cable landing station to the edge of U.K. territorial waters are owned by the applicable Cable & Wireless Worldwide licensed entity in that territory, who have each granted an IRU to the Apollo Cable for this capacity.

As a result of the proposed transaction, CWW’s 60% interest in the Apollo Cable, and CWW’s 100% interest in the Bude, UK landing station and wet-link portions not owned
by the Apollo Cable, will be transferred to Vodafone Europe B.V. The 40% interest in
the Apollo Cable currently held by Alcatel-Lucent will remain unchanged.

(8) Certification and Ownership Information Required by Section 63.18(h)-(k) and (o)
of the Commission’s Rules, 47 C.F.R. §§ 63.18(h)-(k), (o):

Section 63.18(h) - 10 Percent or Greater Shareholders in Transferee, Vodafone Europe
B.V.:

After consummation of the Transaction, 60% of the Apollo Cable and 60% of CWAS
will be held indirectly by Vodafone Europe B.V.

The following entities and persons have a 10% or greater ownership interest in Vodafone
Europe B.V.:

Company Name – Vodafone Investments Luxembourg Sarl
Address – 15 rue Edward Steichen, Luxembourg, 2540, Luxembourg
Tel No. – +352 (26) 12 72 30
Jurisdiction of Formation – Luxembourg
Principal Business – Telecoms
Interest – 47.84% (direct)

Company Name – Vodafone Consolidated Holdings Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (direct)

Company Name – Vodafone International B.V.
Address – Rivium Quadrant 173, 15th Floor, 2909 LC, Capelle aan den IJssel, The
Netherlands
Tel No. – +31 10 498 77 11
Jurisdiction of Formation – The Netherlands
Principal Business – Telecoms
Interest – 42.08% (indirect)

Company Name – Vodafone International Inc. (California)
Address – Denver Place, South Tower, 17th Floor, 999 18th Street, Denver, CO 80202
Tel No. – +1 303-293-5870
Jurisdiction of Formation – United States
Principal Business – Telecoms
Interest – 17.54% (indirect)
Company Name – Vodafone Americas Inc. (Delaware)
Address – Denver Place, South Tower, 17th Floor, 999 18th Street, Denver, CO 80202
Tel No. – +1 303-293-5870
Jurisdiction of Formation – United States
Principal Business – Telecoms
Interest – 17.54% (indirect)

Company Name – Vodafone Americas Holdings Inc. (Delaware)
Address – Denver Place, South Tower, 17th Floor, 999 18th Street, Denver, CO 80202
Tel No. – +1 303-293-5870
Jurisdiction of Formation – United States
Principal Business – Telecoms
Interest – 17.54% (indirect)

Company Name – Vodafone Americas Finance 2 Inc. (Delaware)
Address – Denver Place, South Tower, 17th Floor, 999 18th Street, Denver, CO 80202
Tel No. – +1 303-293-5870
Jurisdiction of Formation – United States
Principal Business – Telecoms
Interest – 17.54% (indirect)

Company Name – Vodafone Americas Finance 1 Inc. (Delaware)
Address – Denver Place, South Tower, 17th Floor, 999 18th Street, Denver, CO 80202
Tel No. – +1 303-293-5870
Jurisdiction of Formation – United States
Principal Business – Telecoms
Interest – 17.54% (indirect)

Company Name – Vodafone 4 Limited
Address – Ogier House, The Esplanade, St. Helier, JE4 9WG, Jersey
Tel No. – +31 10 498 77 11
Jurisdiction of Formation – Jersey
Principal Business – Telecoms
Interest – 17.54% (indirect)

Company Name – Vodafone 4 B.V.
Address – Rivium Quadrant 173, 15th Floor, 2909 LC, Capelle aan den IJssel, The Netherlands
Tel No. – +31 10 498 77 11
Jurisdiction of Formation – The Netherlands
Principal Business – Telecoms
Interest – 17.54% (indirect)

Company Name – Vodafone Luxembourg Sarl
Address – 15 rue Edward Steichen, Luxembourg, 2540, Luxembourg
Tel No. – +352 26 12 72
Jurisdiction of Formation – Luxembourg
Principal Business – Telecoms
Interest – 17.54% (indirect)

Company Name – Vodafone International 1 Sarl
Address – 15 rue Edward Steichen, Luxembourg, 2540, Luxembourg
Tel No. – +352 26 12 72
Jurisdiction of Formation – Luxembourg
Principal Business – Telecoms
Interest – 42.08% (indirect)

Company Name – Vodafone Finance UK Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 6 73923
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 15.48% (indirect)

Company Name – Vodafone Jersey Dollar Holdings Limited
Address – Ogier House, The Esplanade, St. Helier, JE4 9WG, Jersey
Tel No. – +44 1534 504000
Jurisdiction of Formation – Jersey
Principal Business – Telecoms
Interest – 25.76% (indirect)

Company Name – Vodafone Worldwide Holdings Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 26.9% (indirect)
Company Name – Vodafone Intermediate Enterprises Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Vodafone Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Vodafone 2
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Vodafone Holdings Luxembourg Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Vodafone Benelux Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Vodafone International Holdings Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 6 73923
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)
Company Name – Vodafone International Operations Limited
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 6 73923
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Vodafone European Investments
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 6 73923
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Vodafone Group Plc
Address – Vodafone House, The Connection, Newbury, Berkshire RG14 2FN, England
Tel No. – +44 (0) 1635 33251
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

There are no other individuals or entities that hold a 10% or greater direct or indirect equity or voting interest in Vodafone Europe B.V. The ultimate parent of Vodafone Europe B.V., Vodafone, is a publicly-traded entity that has no 10% or greater stockholders.

*Additional 10 Percent or Greater CWW-Controlled Shareholders in Cable & Wireless Americas Systems, Inc., the Licensee:*¹

In addition, the following CWW-controlled entities currently hold and will continue to hold a 10 percent or greater interest in Cable & Wireless Americas Systems, Inc., the licensee:

Company Name – Apollo Submarine Cable Systems, Limited
Address – 90 Long Acre, London WC2E 9RA, United Kingdom

¹ While not required under the Commission’s Rules, *see* 47 C.F.R. §§1.767(a)(11) and (8), Vodafone Europe B.V. is providing this information regarding 10 percent of greater shareholdings in CWAS by CWW-controlled entities for convenience.
Tel No. – +44(0) 2073 798825
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (direct)

Company Name – Cable & Wireless Global Network Limited
Address – Worldwide House, Western Road, Bracknell, Berkshire RG12 1RW, United Kingdom
Tel No. – +44(0) 1344 726542
Jurisdiction of Formation – Ireland
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – The Eastern Leasing Company Limited
Address – Worldwide House, Western Road, Bracknell, Berkshire RG12 1RW, United Kingdom
Tel No. – +44 (0) 1344 726542
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Cable & Wireless UK Holdings Limited
Address – Worldwide House, Western Road, Bracknell, Berkshire RG12 1RW, United Kingdom
Tel No. – +44 (0) 1344 726542
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)

Company Name – Cable & Wireless Worldwide plc
Address – Worldwide House, Western Road, Bracknell, Berkshire RG12 1RW, United Kingdom
Tel No. – +44 (0) 1344 726542
Jurisdiction of Formation – England
Principal Business – Telecoms
Interest – 100% (indirect)
Section 63.18(h) – Interlocking Directorates:

Erik Antonius Jacobus de Rijk is a director of the Transferee, Vodafone Europe B.V., and is Supervisory Board Chairman of Vodafone Libertel B.V., a wireless carrier in the Netherlands.

Michel Marie Alain Combes is a director of Vodafone, the ultimate parent of the Transferee, and is Supervisory Board Chairman of Vodafone D2 GmbH, a wireless carrier in Germany.

Section 63.18(i) – Certification Regarding Foreign Carrier Status and Foreign Affiliation:

By its signature to this Application, Vodafone Europe B.V. certifies that it, or one or more of its affiliates, is a foreign carrier within the meaning of 63.09(d) of the Commission’s Rules. Upon consummation of the Transaction, Vodafone Europe B.V. will be affiliated with the following foreign carriers by virtue of Vodafone’s control of at least 25% of the voting or equity interests of such foreign carriers:

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<tr>
<th>Country</th>
<th>Carrier</th>
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<tr>
<td>Albania</td>
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<td>Vodafone Hutchison Australia Pty Ltd</td>
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<td>Australia</td>
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<td>Czech Republic</td>
<td>Vodafone Czech Republic A.S.</td>
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<td>Democratic Republic of Congo</td>
<td>Vodacom Congo s.p.r.l</td>
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<td>Denmark</td>
<td>Cable &amp; Wireless Global A/S</td>
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<td>Egypt</td>
<td>Vodafone Egypt Telecommunications SAE</td>
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<td>Fiji</td>
<td>Vodafone Fiji Ltd</td>
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<td>France</td>
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<td>Germany</td>
<td>Vodafone D2 GmbH</td>
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<td>Ghana</td>
<td>Ghana Telecommunications Company Ltd</td>
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<td>Greece</td>
<td>Vodafone Panafon Hellenic Telecommunications Company S.A.</td>
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<td>Cable &amp; Wireless Global Network (Hong Kong) Limited</td>
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<td>India</td>
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<td>Russia</td>
<td>Cable &amp; Wireless CIS Syvaz</td>
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<td>Singapore</td>
<td>Cable &amp; Wireless Regional Businesses (Singapore) Pte Limited</td>
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<td>Singapore</td>
<td>Cable &amp; Wireless Worldwide (Singapore) PTE Limited</td>
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<td>Energis Communications Limited</td>
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<td>Cable &amp; Wireless Europe (UK) Limited</td>
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<td>United Kingdom</td>
<td>Apollo Submarine Cable Systems Limited</td>
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<td>United Kingdom</td>
<td>Cable &amp; Wireless Capital Limited</td>
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<td>United Kingdom</td>
<td>Thus Limited</td>
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Section 63.18(j) – Certification Regarding Destination Markets:

By its signature to this application, Vodafone Europe B.V. certifies that it or one or more of its affiliates currently and will continue to provide international telecommunications services in the U.K. and France, the destination markets of the Apollo Cable.

Section 63.18(k) – Demonstration Regarding WTO Status, Market Power, and the Effective Competitive Opportunities Test:

The U.K. and France are World Trade Organization members.
Section 63.18(o) – Certification Regarding the Anti-Drug Abuse Act of 1988:


(9) Certification of Compliance:

By its signature to this Application, Vodafone Europe B.V. certifies that it accepts and will abide by the routine conditions set forth in Section 1.767(g) of the Commission’s Rules, 47 C.F.R. § 1.767(g).

(10) Streamlined Processing Request:

Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Section 1.767(k)(2) of the Commission’s Rules, 47 C.F.R. § 1.767(k)(2). In particular, in the cable destination markets of the Apollo Cable, the U.K. and France, the Applicants currently are not, and after consummation of the Transaction will not be, affiliated with any foreign carrier that exercises market power.5 Pursuant to Section 63.10(a)(3) of the Commission’s Rules, each of the Applicants’ affiliates in the U.K. and France lack 50% market share in the fixed local access and international transport markets of those countries.

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V. CONCLUSION

For the foregoing reasons, Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by a grant of this Application. Applicants respectfully request that the Commission grant this application on a streamlined basis to permit the parties to consummate the Transaction as soon as possible.

Respectfully submitted,

Philip Davis
General Counsel
Cable & Wireless Worldwide plc
Worldwide House
Western Road
Bracknell, Berkshire RG12 1RW
United Kingdom
+44 (0) 1344 726542

Erik de Rijk
Director
Vodafone Europe B.V.
Rivium Quadrant 173, 15th Floor
2909 LC Capelle aan den IJssel
The Netherlands
+31 10498 7711

Date: June 13, 2012
Appendix A: Pre-Acquisition Organizational Chart

* Apollo Submarine Cable Systems Limited is a joint venture between Cable & Wireless Global Network Limited and Alcatel Submarine Networks Ltd. (UK), which hold ownership stakes of 60% and 40%, respectively.
Appendix B: Post-Acquisition Organizational Chart

Vodafone Group Plc (UK)

100%

Vodafone European Investments (UK)

100%

Vodafone International Operations Limited (UK)

100%

Vodafone Worldwide Holdings Limited (UK)

100%

Vodafone Intermediate Enterprises Limited (UK)

100%

Vodafone Limited (UK)

100%

Vodafone 2 Limited (UK)

100%

Vodafone Holdings Luxembourg Limited (UK)

100%

Vodafone Benelux Limited (UK)

100%

Vodafone Jersey Dollar Holdings Limited (Jersey)

100%

Vodafone International 1 Sàrl (LUX)

100%

Vodafone Luxembourg Sàrl (LUX)

100%

Vodafone 4 B.V. (NL)

100%

Vodafone 4 Limited (Jersey)

100%

Vodafone Americas Finance 1 Inc. (US)

100%

Vodafone Americas Finance 2 Inc. (US)

100%

Vodafone Americas Holdings Inc. (US)

100%

Vodafone Americas Inc. (US)

100%

Vodafone International Inc. (US)

41.89%

Vodafone International B.V. (NL)

42.86%

Vodafone Consolidated Holdings Limited (UK)

100%

Vodafone Investments Luxembourg Sàrl (LUX)

47.84%

Vodafone Europe B.V. (NL)

52.16%

100%

Cable & Wireless Worldwide (UK)

100%

Cable & Wireless UK Holdings Limited (UK)

100%

The Eastern Leasing Company Limited (UK)

100%

Cable & Wireless Global Network Limited (BVI)

60%

Apollo Submarine Cable Systems Limited (UK)

100%

Cable & Wireless America System, Inc. License

57.02%

55.31%

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served this date upon the following:

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