

April 29, 2011



To: National Ocean Council  
722 Jackson Place, NW.  
Washington, DC 20503.

**Re: North American Submarine Cable Association comments on  
Development of Strategic Action Plans for the National Policy for the  
Stewardship of the Ocean, Our Coasts, and the Great Lakes**

National Ocean Council,

The North American Submarine Cable Association (NASCA) is a non-profit organization of companies that own, install or maintain submarine telecommunications cables in the waters of North America. We are pleased to submit the following comments on the Development of Strategic Action Plans for the National Policy for the Stewardship of the Ocean, Our Coasts, and the Great Lakes. We will confine our comments to Priority Objective #2: Coastal and Marine Spatial Planning (CMSP).

The act of laying a cable is the end result of an exercise in CMSP. Planning the route of an undersea cable requires literature review, an inshore, coastal and deep water survey, avoidance of areas where activities may cause damage to a cable (fishing areas, anchorages, etc.) and in the event that a risk cannot be avoided, mitigation of that risk by working with other ocean user communities. As such NASCA members have been practicing CMSP for over 150 years. NASCA member's cables land in 14 States and Territories of the United States. In addition we bring a unique world view to the discussion as all of our undersea cables connect to another country, often with its own unique challenges related to CMSP. NASCA members deal with such interactions as pipeline and cable crossings with our cables, wind farms in proximity to our cables and commercial fishing and anchoring near our cables on an almost daily basis and are well versed in working with other ocean users. The National Ocean Council should draw upon this vast wealth of knowledge as it moves forward. Our members stand ready to assist your efforts in whatever way we can.

The United States, and indeed much of the world, is coming to the realization that undersea telecommunications cables are a critical infrastructure. Undersea cables carry more than 95% of all international telecommunications traffic. One of the major challenges for those involved in CMSP will be how best to

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Alaska  
Communications  
System

Alaska United Fiber  
System Partnership

Alcatel-Lucent  
Submarine Networks

Apollo Submarine  
Cable System Ltd

AT&T Corp.

Brasil Telecom of  
America, Inc  
(GlobeNet)

Columbus Networks

Global Marine  
Systems Limited

Hibernia Atlantic

Level (3)  
Communications,  
LLC

Reliance GlobalCom

Southern Cross  
Cable Network

Sprint  
Communications  
Corporation

TATA  
Communications

Tyco Electronics  
Subsea  
Communications

Verizon Business

accommodate current uses and protect critical infrastructure and make room for future uses. We encourage the National Ocean Council to ensure that the critical infrastructure embodied in the undersea cable network is given consideration proportionate to its importance to the United States.

Early international treaties, such as the Geneva Convention of the High Seas, contemplated CMSP albeit on a limited level. They foresaw the conflict between undersea cables and fishing and proposed a solution, one which is still adhered to by undersea cable companies to this day. NASCA would be remiss if we did not take this opportunity to encourage the Nation Ocean Council to ensure that CMSP plans are consistent with the United Nations Convention on the Law of the Sea (UNCLOS), as indicated in the public notice and to ensure that the special protections afforded to undersea cables in UNCLOS are included in all the United States' CMSP efforts.

Thank you for this opportunity to comment. As indicated above, NASCA is ready and willing to assist so if you have any questions please contact us at the address above.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Wargo", with a long horizontal flourish extending to the right.

Robert Wargo  
President  
NASCA