



August 23, 2013

**VIA ELECTRONIC FILING**

Division of Environmental Planning  
and Management  
California State Lands Commission  
100 Howe Ave., Suite 100-South  
Sacramento, CA 95825

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

PC Landing Corp

Reliance GlobalCom

Southern Cross  
Cable Network

Sprint  
Communications  
Corporation

TATA  
Communications

Tyco Electronics  
Subsea  
Communications

Verizon Business

Dear Executive Officer Lucchesi:

The North American Submarine Cable Association (NASCA) respectfully submits the following comments on the proposed OGPP update.

NASCA requests that cable burial verification surveys (4<sup>th</sup> bullet, line 26 and 27, page ES-3) should be excluded from the OGPP Update. These surveys are required as a mitigation measure of permits granted by the CSLC for the initial installation of the cables. To our knowledge none of the burial verification surveys that have been completed in California State waters have ever applied for, or been granted, a Geophysical Survey Permit by the CSLC. NASCA feels this is completely appropriate given the fact that the equipment used to locate the cable does not create or use sound in any way to determine depth of burial. NASCA and its member companies would gladly work with the CSLC to develop more appropriate protocols for cable burial verification surveys should they be excluded from the OGPP Update.

Should you not grant our first request, NASCA requests the addition of equipment used in cable burial verification surveys, which are conducted periodically as a condition of permits granted by the CSLC by several NASCA member companies, be added to the list if equipment that may be used on a 24 hour per day basis (MM BIO-4).

If you have any questions about this submission, kindly contact the undersigned

Respectfully submitted,

Robert Wargo  
President  
NASCA