



February 13, 2013

The Honorable Jon Wellinghoff
Chairman
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Admiralty Inlet Pilot Tidal Energy Project, Federal Energy Regulatory Commission (FERC) Project No. 12690-0005 ("Project")

Dear Chairmen Wellinghoff and Genachowski:

We are writing in connection with the above-referenced application now pending before the Federal Energy Regulatory Commission (FERC) for a pilot project license to site two experimental hydrokinetic turbines in close proximity to the Pacific Crossing transpacific fiber optic cable (PC-1), in Admiralty Inlet, Washington. We understand that the application seeks approval to place two, 19.7-foot diameter, 386 metric ton turbines only 170 and 238 meters from the cable, and that this proposal is the first of its kind before FERC where it was necessary to consider the appropriate separation between a tidal energy project and an active fiber optic telecommunications cable.

NASCA as a non-profit organization representing the telecommunications and cable industry is very concerned at the proposed placement of experimental turbines in such close proximity to an active submarine telecommunications cable. The proposed separation distances significantly depart from industry guidelines and risk-management practices in the unpredictable marine environment, and would pose unacceptable risks to cable integrity and maintenance operations. Marine activity to repair the telecom cables in close proximity to the turbine infrastructure could also put the turbine infrastructure at risk. Approval of the application would also set a troubling precedent going forward. As marine renewable energy projects grow more common in the immediate future, adequate separation is crucial to avoid unacceptable cumulative impacts on our nation's submarine telecommunications cable networks which have been designated by the DHS as Critical Infrastructure and carry 95% of international communications traffic. PC-1 in particular is a significantly important cable linking the US to Japan with further connections to Asia.

For these reasons, NASCA urges the FERC to convene a joint, public process with the Federal Communications Commission (FCC) to confirm applicable guidelines on separation between current and future marine energy projects and undersea fiber optic cables. In this matter, we strongly suggest further consideration be given to the recommendations from other forums. Establishing proper review and recognition of

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

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industry guidelines among and between Federal agencies (and applicants) in these permitting processes will go a long way in promoting sound offshore resource development while avoiding project specific delays associated with discussions/negotiations, and at the same time averting systemic risks to a component of our nation's Critical Infrastructure.

We also intend that this letter to serve as a comment on the pending Environmental Assessment for the Project, to be filed in FERC Docket Number 12690-0005. We disagree with the EA's conclusion that the proposed separation is adequate, and believe the current separation is a significant departure from industry guidelines and best practices and presents a significant risk to the cable. We urge approval of the Project only if a separation consistent with industry guidelines and best practices is achieved.

Thank you for your consideration and your attention to this very important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'RWargo', with a stylized flourish extending to the right.

Robert Wargo
President
NASCA

cc: David Turner, FERC (david.turner@ferc.gov)

Official Service List