



August 22, 2013

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

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

Dear Secretary Bose:

Please find enclosed for filing in the captioned proceeding, a resolution of the North American Submarine Cable Association endorsing the adoption and application by U.S. regulatory agencies of Subsea Cables UK Guideline No. 6 (available at <http://www.thecrownestate.co.uk/media/343985/proximity-of-offshore-renewable-energy-installations-submarine-cable-infrastructure-in-uk-waters-guideline.pdf>) to the determination of the appropriate separation distance between submarine cables and all offshore renewable energy projects, including tidal energy projects. Consistent with its February 13, 2013 comments on the draft Environmental Assessment in the captioned proceeding, NASCA disagrees with the final EA's conclusion that the proposed separation between the Project and the Pacific Crossing transpacific fiber optic cable (PC-1) is adequate, and believes the current separation is a significant departure from industry guidelines such as Subsea Cables UK Guideline No. 6 and industry best practices, presenting a significant risk to the cable.

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

Respectfully submitted,

Robert Wargo
President
NASCA

cc: Service List
Attachment


- 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

August 22, 2013

Page 2

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 22nd day of August 2013, upon each person designated on the official service list compiled by the Secretary in this proceeding.

A handwritten signature in cursive script, appearing to read "Gerald Tourgee", is written over a horizontal line.

Gerald Tourgee
Secretariat, NASCA



August 5, 2013

The North American Submarine Cable Association unanimously supports the application of the Subsea Cables United Kingdom Guideline 6 for determining spatial separation between submarine telecommunications cables and off-shore renewable energy projects.

The “NASCA, with the goal of ensuring the compatible use of coastal waters among stakeholders invested in marine infrastructure development, endorses the adoption and application of the Subsea Cables United Kingdom Guideline No. 6, “The Proximity of Offshore Renewable Energy Installations & Submarine Cable Infrastructure in UK Waters” by the US regulatory agencies to all offshore renewable energy projects, including wind, tidal, and wave projects. Guideline No. 6, developed primarily for offshore wind infrastructure, describes basic principles for determining safe proximity distances and negotiating proximity agreements that can be applied equally well to tidal and wave energy projects. Guideline No. 6, and its underlying principles, should be followed for all projects, until such time that guidelines specific to wave and tidal energy infrastructure are developed by the industry.”

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
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LLC

Pacific Landing
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Reliance GlobalCom

Southern Cross
Cable Network

Sprint
Communications
Corporation

TATA
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Tyco Electronics
Subsea
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Verizon Business