North American Submarine Cable Association
Position Regarding Whether Florida Should Mandate Corridors
for Submarine Fiber-Optic Cables
February 12, 2001

The members of the North American Submarine Cable Association ("NASCA") are aware that:

- ?? on July 11, 2000, the Florida Department of Environmental Protection ("DEP") recommended to the Florida Board of Trustees that staff solicit proposals for evaluating offshore locations for corridors for future fiber-optic cables along the coastline, that would "minimize the impact on sensitive resources, avoid user conflicts, and minimize disruption of beach renourishment projects";
- ?? on October 31, DEP met with interested parties, and requested input from the submarine cable industry relevant to the corridor policy question, including an estimate of how many additional cable landings can be expected;
- ?? on January 17, 2001, DEP Commissioner David Struhs told the Board of Trustees that he expected within eight weeks to propose to them specific corridor locations;
- ?? a DEP Cable Task Force reportedly is in the process of investigating potential corridors around the state on a fast-track basis; and
- ?? DEP reportedly has scheduled a public meeting to discuss cables, corridors, and perhaps related issues on February 21, 2001.

Based on review and discussion by NASCA members of the above and related information, the members of NASCA have agreed on the following.

1. To provide DEP with a well-founded basis for estimating the number of cables likely to land at Florida in the foreseeable future, NASCA should submit (a) the paper prepared for NASCA by Terabit Consulting, Inc. and (b) the summary and commentary on same prepared by NASCA. These suggest that through 2009, the most likely number of cables landings at Florida (other than systems already permitted by Florida and under construction) is approximately eight (i.e., four ring systems, each with double landings in Florida).

2. NASCA agrees that, when a company selects a cable landing site, it should be subject to reasonable conditions to minimize the project's environmental impact. These may include conditions to a) require directional drilling under near-shore reefs, rather than trenching thru or cable-laying across such reefs; b) minimize the likelihood of bentonite drill mud release; c) monitor for and promptly clean up any such releases; d) select a cable route to the landing site that minimizes the amount of coral impacted; e) minimize the distance between parallel cables as they cross hard-bottom areas; f) use best-management practices to minimize the impact of the cable while being laid across hard-bottom areas; and g) provide appropriate mitigation for the minor environmental impact that may be unavoidable despite the above measures.

3. Through the use of such best management practices, the impacts of such projects on sensitive resources are relatively small. This conclusion is supported by data already provided to DEP from recent projects and other reliable information. In light of the expected number of cable landings (see 1 above), the expected cumulative impact of such projects on the sensitive resources and other users is also small.

4. Depending on how the corridor concept is defined and applied, it may cause great problems for companies that install submarine cables and for the general population that relies on them. First, a corridor may be inconsistent with the need to spread cables out sufficiently to allow a single cable to be retrieved for repair without cutting other cables.

5. Second, if too many cables are required to be clustered too close together, they are exposed to the risk of a common disaster that interrupts all of them (e.g., a ship dragging its anchor in a storm), thereby cutting off services to large numbers of people.

6. Third, landing points must be selected considering the terrestrial cable network that the submarine cable must connect to.

7. Fourth, landing points should not be government-mandated in a way that allows monopoly-pricing by landowners of potential landing points.

8. Consistent with 2 above, it would be reasonable for DEP to require that cables landing at a common point be clustered together as closely as feasible, consistent with the ability to retrieve any one cable for repair, such as was agreed for the multiple landings planned at Hollywood. This would minimize the area of seabed where other uses may be affected (e.g., recreational divers who may prefer not to see cables). Where such cables are laid at depths accessible by SCUBA divers, and in some cases deeper, clustering is limited primarily by the ability of the cable-laying vessels to avoid crossing one cable with another. At greater depths, where retrieval for repair must be by grapnel, parallel cables must be spaced at least twice the depth of water, and cables crossing each other should do so at close to right angles. Within these limits, cables landing at a particular site could reasonably be clustered into "corridors".