

FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

April 10, 2008

Kevin Neyland
Deputy Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D. C. 20503

Dear Mr. Neyland:

The Federal Communications Commission (Commission) requests approval under the “emergency processing” provisions of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3507(j); 5 C.F.R. § 1320.13, of a voluntary information collection from entities that currently hold submarine cable landing licenses from the Commission. We request approval for this information collection by April 17, 2008.

As described in the attached draft information collection instrument, we would like to request that current submarine cable landing licensees voluntarily provide information regarding the system status and service restoration activities for the submarine cable systems and cable landing stations and information about the physical location, assets, and restoration plans for the submarine cable systems. There are currently 50 authorized submarine cable systems, many having multiple entities on the cable landing license. (There are four pending cable landing license applications, and we anticipate conditioning grant of those licenses on compliance with this information request.) We expect to request this information from approximately 25 different entities because, in many cases, the same entity is a licensee for more than one submarine cable system. We plan to contact the cable landing licensees as soon as we receive emergency PRA approval for this information request from OMB and will request that the licensees respond, at least on a preliminary basis, by May 1, 2008.

The Commission is responsible for licensing submarine cable systems. The information requested herein is needed immediately in order to support Federal government national security and emergency preparedness communications programs, for the purposes of providing situational awareness of submarine cable system performance as well as a greater understanding of potential physical threats to the submarine cable systems. 44 U.S.C. § 3507(j)(1)(A); 5 C.F.R. § 1320.13(a)(1). We have been working with Mark E. LeBlanc, Assistant Director for National Security and Emergency Preparedness, at the Office of Science and Technology Policy (OSTP) on this information collection on behalf of other Executive Branch agencies, at the direction of the President.

Emergency OMB approval is necessary for this information collection because the use of normal clearance procedures could result in public harm. 44 U.S.C. § 3507(j)(1)(B)(i); 5 C.F.R. § 1320.13(a)(2)(i). This information will provide situational awareness regarding the operational status of submarine cable systems to the Federal government, and allow the Executive Branch to assess potential risks and threats to these critical communications systems in the context of other available information. The type of information to be collected is not currently otherwise available to the Federal government. While the Commission will be the collection point for this

information, we will share it with the Departments and agencies that have direct responsibility for national and homeland security. We understand that OSTP will be contacting you in support of this request.

We have been in contact with AT&T and Verizon, two of the largest submarine cable operators, regarding this information request. *See* 5 C.F.R. § 1320.13(c). Based on our discussions, we believe the submarine cable operators already have much of this information, and will not be required to generate new information in order to comply with this request.

As aforementioned, there are national security considerations and time sensitivity associated with this information request. In accordance with your office's prior approval of our request to file this emergency processing request and to waive the Federal Register notice requirements, we will not publish any notice in the Federal Register under 5 C.F.R. § 1320.5(a)(1)(iv). *See* 5 C.F.R. § 1320.13(d).

FCC staff is ready to work with your OMB Desk Officer to immediately provide any additional information needed to assure OMB's approval of this emergency request by April 17, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read 'M Stone', with a stylized flourish at the end.

Mark Stone
Deputy Managing Director

Enclosures