

[OMB Control Number 3060-  
OMB Expiration Date]<sup>1</sup>

Dear [XXXXXX]:

The Public Safety and Homeland Security Bureau and the International Bureau of the Federal Communications Commission (FCC) seek [COMPANY]'s voluntary cooperation in providing information related to its FCC-licensed submarine cable(s). We seek this voluntary cooperation, consistent with our authority and responsibilities under the Cable Landing License Act, 47 U.S.C. § 34 et seq., the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i), 303(r) and 403, and Executive Order 10530 §5(a) (May 10, 1954), reprinted as amended in 3 U.S.C. § 301. This information is needed 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 cable system. We recognize that the information requested is sensitive, for national security and/or commercial reasons, and as explained below we presumptively will treat it as confidential upon submission.

Specifically, we request that [COMPANY] voluntarily commit to providing the following information regarding the [ID THE CABLE SYSTEM OR SYSTEMS]:

- (1) System Status and Restoration Messages: We understand that the owner/operator of a submarine cable generates and receives messages related to the technical performance of its system. These include messages sometimes normally referred to as "international restoration" messages (though they are also done for domestic cables that traverse great distances).

We need the following fields of data typically found in such messages:

1. Indications of potential problems (alarms, forward error correction and frame or packet loss, changes in latency, fiber degradation)
2. Potential traffic impacting/hazardous conditions/impairments (electrical and optical faults such as shunt and power conductor faults, fiber break, undersea and terrestrial component failures, terminal equipment failures, card failures, circuit pack problems, faulty switches, planned maintenance or construction, other maritime hazards)
3. Impact information (affected circuits, service impact, outage duration)
4. Restoration activity (ring switches, auto span switches, traffic restoration to other systems)
5. Repair activity (fault localization, repair plans, progress, vessel activity, power reconfiguration)

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<sup>1</sup> We will seek OMB approval for any information collection addressed herein that may occur beyond this expiration date.

6. Test activity - Optical time domain reflectometry (OTDR), coherent OTDR (COTDR), and other technical measurement activity for fault localization; link tests; terminal equipment tests
7. Event/activity/message date/time - restoration messages are produced in as near real time as possible and, to be useful, this is required.
8. Addressees - the identity of commercial or governmental recipients of each message is also required

We request that [COMPANY] voluntarily commit to provide available information/messages to a designated and secure FCC computer system interface at the time the information is generated.

- (2) Terrestrial Route Map: We request that [COMPANY] provide after-installation information on the terrestrial route (in map form) of its cable(s) from the shore landing to the beach manhole (BMH) and from the BMH to the cable landing station. Please indicate the type of protection provided to the cable on the route (*e.g.*, steel pipe, concrete conduit, etc.). We request that [COMPANY] report annually to update this information.
- (3) Undersea Location Spreadsheet: We request that [COMPANY] provide after-installation information in the form of an electronic spreadsheet of its associated route position list (RPL). Please detail the position of all system components – including repeaters, joints, branching units, repair splices, burial positions, burial depth and whether the cable is armored or unarmored. We request that [COMPANY] report annually to update this information.
- (4) Restoration Capability: We request that [COMPANY] provide information on its system restoration capability (internal and external). Please indicate whether the system has a Universal Restoration Manual, what type of catastrophic restoration plans (or similar plans for extreme circumstances) are in place and which other cable systems might be used for restoration. We request that [COMPANY] report annually to update this information.

We appreciate your prompt attention to this request. Please let us know by Thursday, May 1, 2008, if [COMPANY] voluntarily commits to provide the requested information and the date by which [COMPANY] can implement (1) above and provide the information in (2), (3) and (4). If you cannot respond by May 1, 2008, please let us know as soon as possible prior to that date.

As mentioned above, we recognize that the information requested is sensitive for national security and/or commercial reasons. Information provided pursuant to this request will be viewed as presumptively confidential upon submission because the submissions would reflect voluntary reports on weaknesses in or damage to national communications infrastructure, and the release of this sensitive information to the public could potentially facilitate terrorist targeting of critical infrastructure and key resources. The submissions also may contain internal confidential information that constitutes trade secrets and commercial/financial information that [COMPANY] does not routinely make public and public release of the submitted information could cause competitive harm by revealing

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information about the types and deployment of cable equipment and the traffic that flows across the system. For these reasons, the information requested in (2) and (3) above is presumptively exempt from public disclosure under Freedom of Information Act (FOIA) Exemption 3, 5 U.S.C. § 552(b)(3), and section 4(j) of the Communications Act of 1934, as amended, 47 U.S.C. § 154(j), as implemented in 47 C.F.R. § 0.457(c)(1)(i) (exempting disclosure of “maps showing the exact location of submarine cables”). The information requested in (1) and (4) above will be considered exempt under Exemption 4 of the FOIA, 5 U.S.C. § 552(b)(4). If a FOIA request is filed for information submitted in response to this request, you will be notified of the FOIA request and given the opportunity to oppose release of the records. *See* 47 C.F.R. § 0.461(d)(3). We note that the information provided in response to this request will be shared with the Department of Homeland Security’s National Communications System (NCS) and relevant Executive Branch agencies on a confidential basis. *See* 44 U.S.C. § 3510.

### **PAPERWORK REDUCTION ACT STATEMENTS**

**We have estimated that each response to this collection of information will take an average of 550 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, Office of Managing Director, AMD-PERM, Washington, DC 20554, Paperwork Reduction Act Project (3060-XXXX). We will also accept your comments via the Internet if you send an e-mail to [PRA@fcc.gov](mailto:PRA@fcc.gov).**

**Please DO NOT SEND COMPLETED DATA TO THIS ADDRESS. You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number and/or we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-XXXX.**

**THIS NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**

Sincerely,

Helen Domenici, Chief  
International Bureau  
Federal Communications Commission

Derek Poarch, Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission