

Brian Raymond
Director
Technology and Domestic Economic Policy

December 16, 2015

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: License Application for the NCP Submarine Cable System,
File No SCL-LIC-20151104-00029**

Dear Ms. Dortch:

On behalf of the National Association of Manufacturers (NAM), the largest industrial trade association in the United States representing more than 14,000 small, medium and large manufacturers in all 50 states, I write to emphasize the importance of submarine cables to manufacturers in the U.S. as they connect with their customers around the world.

Manufacturing has become a data-driven industry. All of its segments are increasingly dependent on the wireless Internet and advanced telecommunication devices in their daily operations to facilitate the delivery of products, communicate with global operations, and to manage supply-chains. This connectivity is not only critical in the U.S. but also around the globe.

Submarine cables form the backbone of the Internet and the global communications network facilitating these connections between manufacturers and their networks outside the U.S. They carry more than 95 percent of transoceanic voice and data communication and as a result have been designated by the federal government as critical communications infrastructure.

U.S. telecommunications and technology companies have invested heavily over the years to expand significantly the circuit capacity of submarine cables landing in the United States. In order to meet exploding industry demand for data, particularly on mobile devices, the industry continues to invest in its commitment to enhance our telecommunications infrastructure by deploying new submarine cables. The proposed New Cross-Pacific ("NCP") cable system is the most recent example of an investment that will foster manufacturing growth in the United States by connecting us with four of our top-ten trading partners: China, Japan, South Korea, and Taiwan.

The NCP will compete vigorously with other cross-Pacific cable systems and carriers, increasing competition on the key U.S.-Asia route. The NAM anticipates that such competition

will lower prices for the inputs for vital telecommunications and information technology services in the United States, promoting U.S. competitiveness and continuity in the delivery of manufacturers' goods and services.

Manufacturers in the U.S. are dependent on a robust communications system that connects us with our trading partners. The NAM therefore urges the FCC and other federal agencies involved in the licensing of submarine cables to act promptly and favorably on the NCP application.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Raymond', with a long horizontal flourish extending to the right.

Brian Raymond
Director
Technology and Domestic Economic Policy