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

*Re: Cable Landing License Application for the New Cross Pacific Submarine Cable System,
FCC File No SCL-LIC-20151104-00029*

Dear Ms. Dortch:

As the system supplier for the New Cross-Pacific (“NCP”) submarine cable system connecting the United States with China, Japan, Korea, and Taiwan, Tyco Electronics Subsea Communications LLC (“TE SubCom”) strongly supports the expeditious grant by the Commission of a cable landing license authorizing the construction and operation of NCP in U.S. territory. Timely licensing will permit TE SubCom to commence installation, testing, and commissioning of NCP on schedule and greatly benefit the U.S. economy.

Headquartered in Eatontown, New Jersey, TE SubCom is a market-leading, integrated developer and manufacturer of, and provider of installation and maintenance services for, submarine cables. It is the only such integrated supplier based in the United States. With a history dating to the very first trans-Atlantic systems, TE SubCom has deployed more than 500,000 kilometers of subsea fiber-optic cable connecting six continents. TE SubCom develops new systems such as NCP relying on its research and development labs (descendants of Bell Labs) in Eatontown. TE SubCom manufactures all of its submarine system equipment at its Newington, New Hampshire, factory, and maintains the global fleet headquarters for its cable ships in Baltimore.

TE SubCom’s work on NCP will generate significant economic activity and employment in the United States. Having already designed the NCP system, TE SubCom will manufacture and install more than 13,000 kilometers of submarine cable, more than 200 repeaters (which regenerate the optical signal as it degrades over distance), and terminal equipment at seven landing sites in five countries. Using its state-of-the art cable ships, it will install the cable on the surface of the ocean in deep sea areas and dredge and bury it in shallow coastal areas. It will then test and commission the NCP system. Given the complexity and sequencing of these activities, certainty of permitting and licensing is of utmost importance.



Upon commencement of commercial service, NCP will support even more significant U.S. economic activity. NCP will connect the United States with its third (China), fourth (Japan), sixth (Korea), and tenth (Taiwan) largest trading partners. This connectivity will serve U.S. companies that have invested in these countries. It will serve Microsoft—an owner of, and U.S. landing party for, NCP—in offering its cloud and Azure services in Asia. It will also serve the Asian carrier-owners of NCP—China Mobile International, China Telecom, China Unicom, Chunghwa, and KT—whose customers seek access to Internet content created by U.S. media and entertainment industries and stored in the United States.

NCP will also increase route geographic diversity. With mostly new landing points—including a new landing in Pacific City, Oregon—NCP will strengthen the resilience of U.S.-East Asia communications by minimizing potential disruptions due to tsunamis, earthquakes, anchoring, and commercial fishing.

For these reasons, TE SubCom urges the Commission to proceed with expeditious licensing of NCP.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Stucki', positioned above a horizontal line.

Aaron K. Stucki
President and CEO