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May 10, 2016

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

Re: *File No. SCL-LIC-20160314-00008*
DOCOMO Pacific Application for the Atisa Cable

Dear Ms. Dortch:

By this letter, PTI Pacifica, Inc. d/b/a IT&E (“IT&E”) supplements its comments filed May 4, 2016 in the above-referenced proceeding to identify an issue that IT&E could not have addressed in its initial comments because the circumstances have changed since the date of its comments.

In its May 4, 2016 comments, IT&E did not ask the Commission to deny DOCOMO Pacific’s application for a submarine fiber optic cable that would compete with IT&E’s existing Mariana-Guam submarine cable connecting the Commonwealth of Northern Mariana Islands (CNMI) to Guam. Rather, IT&E asked the Commission to confirm regulatory parity between the two submarine cables, such that each operator is subject to the same test concerning whether any offerings would be considered non-common carrier offerings.¹

After these initial comments were submitted, on May 6, 2016, IT&E received two notices from the International Cable Protection Committee (ICPC) advising IT&E that DOCOMO Pacific is proposing to lay its proposed Atisa submarine fiber optic cable across IT&E’s existing Mariana-Guam cable in two locations. See attached notices. This is the first time that IT&E was made aware that DOCOMO Pacific proposes that its Atisa cable be allowed to physically touch IT&E’s existing Mariana-Guam cable in two separate places on the ocean floor. Without a comprehensive description of how DOCOMO Pacific intends to protect the integrity of the existing IT&E cable, IT&E objects to the proposed crossing. As the second-in-time cable, Atisa should be routed to avoid crossing the Mariana-Guam cable.

¹ Comments of PTI Pacifica Inc. d/b/a IT&E, IBFS File No. SCL-LIC-20160314-00008, May 4, 2016, at 3-4.

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Specifically, DOCOMO Pacific proposes in ICPC Notification SPOEN-2769-01 to lay a double armor strength segment of its Atisa cable across IT&E's existing single armor segment 1 on the ocean floor. With virtual certainty this would result in the Docomo Pacific cable eventually cutting the single armor segment of IT&E's existing cable. At the water depth of ocean floor in this region (180 meters or approximately 590 feet), the currents not only are very strong but oscillate diurnally with the tides. The result is that the two cables will rub against each other continually and sometimes strenuously. The potential for Atisa's double armor sheath eroding the single sheath of the IT&E cable within a relatively short time is very high; and mending a break at 180 meters below sea level that has been crossed by another cable will be expensive and time-consuming.²

IT&E will object to the ICPC by separate letter but also wants to alert the Commission to this issue.

Respectfully submitted,

/s/

Timothy J. Cooney
Phillip J. Roselli

cc: Kent Bressie, counsel to DOCOMO Pacific

² A similar issue also will apply to IT&E segment 2.

ICPC Agreement to Cross Notification



Planned Cable System Name: *(Name of new cable)*

ATISA

Planned cable Owner: *(Company name and contact)*

Docomo Pacific (DPAC)

Agreement to Cross Contact: *(cable owner or their agent, name contact details)*

Docomo Pacific (DPAC)

ICPC Recommendation No2 Recommended Information Exchange

- i) Route Position List (RPL) for consideration: (either co-ordinate listing below or the name of a separate file attached)

Event	Latitude	Longitude	Bearing °T	Distance (km) Between Positions
CUC Outfall (Reef Edge)	14 ° 08.440 ' N	145 ° 08.122 ' E	318.2	0.136
WD 5M	14 ° 08.495 ' N	145 ° 08.071 ' E	318.4	0.072
WD 10M	14 ° 08.5243 ' N	145 ° 08.0449 ' E	318.3	0.082
WD 20M	14 ° 08.5575 ' N	145 ° 08.0146 ' E	318.3	0.332
WD 50M	14 ° 08.6918 ' N	145 ° 07.8918 ' E	318.3	1.096
CX MTC seg 1	14 ° 09.1353 ' N	145 ° 07.4865 ' E	318.3	0.125
EXIT HARBOR LIMIT	14 ° 09.1860 ' N	145 ° 07.4401 ' E	318.3	0.075
WD 200M (Transition DAS/SA)	14 ° 09.2165 ' N	145 ° 07.4122 ' E	318.3	0.572
POL	14 ° 09.4480 ' N	145 ° 07.2010 ' E	318.2	0.787
WD 500M	14 ° 09.7663 ' N	145 ° 06.9097 ' E	318.3	0.202
AC1	14 ° 09.8479 ' N	145 ° 06.8351 ' E		

- ii) Information Source for the crossed cable (Admiralty Chart, 3rd party database name or RPL provenance)

Fugro own Cable Database

- iii) Depth of water at the crossing

180m (Pre Survey stage)

Information Source: NOAA 60m Grids and GEBCO 30 Arcsecond Grid

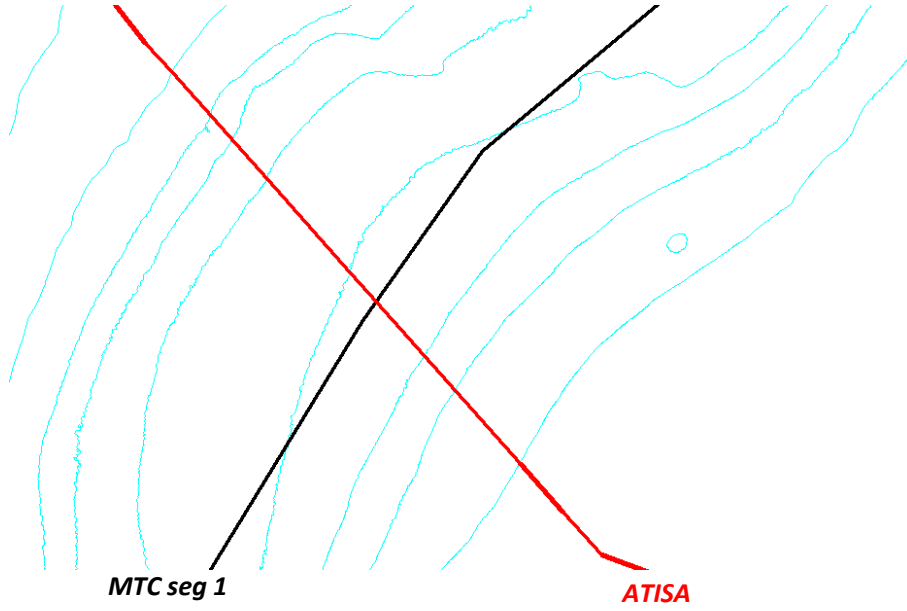
iv)	Angle of cables crossing 89°
v)	Cable armour type ATISA Cable Type: DAS MTC Cable Type: SA
vi)	Positions of any submarine plant within 3 x depth of water on both sides of the proposed crossing point. Position of any submarine plant (crossing cable): Non Repeated System
vii)	Derivation of navigational data, including datum WGS84
viii)	Type of seabed in area of crossing Unknown (Pre Survey stage)
ix)	Burial information, if applicable, including the procedures to be followed by the Installer, when crossing the cable. No Burial planned for ATISA

Crossing Chart

Planned Crossing Cable



As Laid Crossed Cable



ICPC Agreement to Cross Notification



Planned Cable System Name: *(Name of new cable)*

ATISA

Planned cable Owner: *(Company name and contact)*

Docomo Pacific (DPAC)

Agreement to Cross Contact: *(cable owner or their agent, name contact details)*

Docomo Pacific (DPAC)

ICPC Recommendation No2 Recommended Information Exchange

- i) Route Position List (RPL) for consideration: (either co-ordinate listing below or the name of a separate file attached)

Event	Latitude	Longitude	Bearing °T	Distance (km) Between Positions
AC8	14 ° 56.547 ' N	145 ° 35.463 ' E	284.2	1.193
AC9	14 ° 56.706 ' N	145 ° 34.818 ' E	300.4	1.136
CX MTC seg 2	14 ° 57.0175 ' N	145 ° 34.2710 ' E	300.4	0.774
WD 500M	14 ° 57.2300 ' N	145 ° 33.8984 ' E	300.4	0.379
AC10	14 ° 57.3339 ' N	145 ° 33.7163 ' E	309.7	3.217
EXIT 3 NM Limit	14 ° 58.4489 ' N	145 ° 32.3361 ' E		

- ii) Information Source for the crossed cable (Admiralty Chart, 3rd party database name or RPL provenance)

Fugro own Cable Database

- iii) Depth of water at the crossing

180m (Pre Survey stage)

Information Source: NOAA 60m Grids and GEBCO 30 Arcsecond Grid

- iv) Angle of cables crossing

60°

- v) Cable armour type

ATISA Cable Type: SA

MTC Cable Type: SA

vi)	Positions of any submarine plant within 3 x depth of water on both sides of the proposed crossing point. Position of any submarine plant (crossing cable): Non Repeated System
vii)	Derivation of navigational data, including datum WGS84
viii)	Type of seabed in area of crossing Unknown (Pre Survey stage)
ix)	Burial information, if applicable, including the procedures to be followed by the Installer, when crossing the cable. No Burial planned for ATISA

Crossing Chart

Planned Crossing Cable



As Laid Crossed Cable

