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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

GN Docket No. 15-206

**Improving Outage Reporting for
Submarine Cables and Enhancing
Submarine Cable Outage Data**

**Comments of the Attorney General of the
Northern Mariana Islands**

These comments are submitted in response to the Notice of Proposed Rulemaking issued by the Commission on September 18, 2015.

The Commonwealth of the Northern Mariana Islands and American Samoa are unique among U.S. jurisdictions in that they each lie precariously on the ends of a single submarine cable. If those cables break, the entire jurisdiction's capacity to transmit and receive information is limited to backup microwave systems, which are inadequate to handle modern telecommunications traffic. If the backup systems are offline, as was the case in the Commonwealth when our cable broke in July, the outside world is almost entirely cut off.

The threat of a cable break is even greater in the Commonwealth because of the strategic position of the Marianas. Saipan lies just 150 miles north of Guam, the centerpiece of American military power in the Pacific. A hostile power intent on attacking the United States could sever the cable and seize the Commonwealth before then Pentagon could respond. The Russian Federation has the capacity to carry out just such an attack. Steve Weintz, *The Ultimate Hybrid War Strategy: Attack Deep-Sea Fiber-Optic Cables*, The National Interest (Sept. 17, 2015), available at <http://nationalinterest.org/feature/the-ultimate-hybrid-war-strategy-attack-deep-sea-fiber-optic-13860>.

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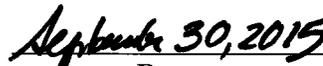
1 When an entire local government relies on a single submarine cable for information, the local
2 government bears the brunt of the damage upon a service disruption, and the local government is
3 the one with the greatest interest in the restoration of service. The Commonwealth's efforts to
4 mitigate the damages caused by the July cable break were hampered by IT&E's reluctance to
5 disclose data to the Commonwealth government.

6 Furthermore, the 911 system for the entire Commonwealth is based on Saipan. When the cable
7 broke, residents of Tinian and Rota were unable to use 911. Because the Commonwealth government
8 did not receive prompt reports of the cable break, Tinian and Rota were left without emergency
9 services for a longer period than necessary.

10 Therefore, I strongly recommend that the FCC require submarine cable operators to report
11 outages, and that in jurisdictions that are served by a single cable, operators must also transmit
12 copies of outage reports to the jurisdiction's governor.

13 

14 Hon. Edward Manibusan
15 Attorney General

16 
17 Date