



December 3, 2015

Federal Communications Commission
445 12th Street SW
Washington DC 20554

VIA Electronic Submittal: <http://fjallfoss.fcc.gov/ecfs21/>

**RE: FEDERAL COMMUNICATIONS COMMISSION 47 CFR Parts 1, 4
[GN Docket No. 15–206; FCC 15–119] Improving Outage Reporting for Submarine Cables and
Enhancing Submarine Cable Outage Data**

Dear Commissioners:

Quintillion is a U.S. based/U.S. owned Telecommunications Company building a new subsea fiber optic cable system off of the northern arctic coastline of Alaska. Quintillion will be making an application for landing licenses to the Commission for this system in December of this year. As a future cable licensee, Quintillion appreciates the opportunity to provide comment to the proposed rulemaking.

Quintillion agrees with the Commission's statement regarding the important role of submarine cables to the nation's economic and national security. However, to *require* submarine cable licensees, as a condition of their license, to report on outages involving either lost connectivity or degradation of 50 percent or more of a submarine cable's capacity for periods of at least 30 minutes, regardless of whether the cable's traffic is re-routed, raises four principle concerns.

- Additional increases to cable license administration costs for taxpayers, users and cable owners;
- Increased barrier to market entry for new subsea cable developers;
- The potential use of the data by competitors to gain market advantage; and most concerning
- *Exposing the potential vulnerability of a network - particularly those specific operations supporting key national infrastructure.*

For these reasons, **Quintillion supports the continuation of voluntary reporting** for Submarine Cable Outages. We believe the system information within each landing license application is highly detailed and comprehensive. The information contained within the application together with the annual reporting requirements, which are already in-place, would be the most efficient means to accomplish the Commission's goals: gaining visibility into the operational status of submarine cables while protecting the data from unintended use by competitors or other interests. If the Commission has questions or concerns regarding the operations or outages plan of a specific licensee, Quintillion believes the communication should be between the parties rather than a comprehensive rule-making. Should the Commission decide that it will move forward with mandatory reporting, Quintillion would urge the Commission to consider right-sizing the new regulations so as not to over-burden small and developing subsea cable operators.

Respectfully submitted,

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