

**NORTH AMERICAN SUBMARINE CABLE ASSOCIATION COMMENTS
ON PROPOSED MODIFICATION AND REVOCATION OF RULING
LETTERS RELATING TO THE CUSTOMS POSITION ON THE
APPLICATION OF THE JONES ACT TO THE TRANSPORTATION OF
CERTAIN MERCHANDISE AND EQUIPMENT BETWEEN COASTWISE
POINTS**

Before U.S. Customs and Border Protection, Department of Homeland Security.

The North American Submarine Cable Association (“NASCA”) urges the U.S. Customs and Border Protection (“CBP”) to revise its Proposed Modification and Revocation of Ruling Letters Relating to the Customs Position on the Application of the Jones Act to the Transportation of Certain Merchandise and Equipment Between Coastwise Points (“Proposed Modification”) to address the domestic and international legal regimes governing undersea telecommunications cables and extend the deadline for comments.

NASCA is a non-profit association of submarine cable owners, submarine cable maintenance authorities, and prime contractors for submarine cable systems¹.

First, NASCA requests an extension to file more detailed comments concerning the Proposed Modification.

1. NASCA’s members include: Alaska Communication Systems; Alaska United Fiber System Partnership; Alcatel-Lucent Submarine Networks; Apollo Submarine Cable System Ltd.; AT&T, Inc.; Brasil Telecom of America, Inc. / GlobeNet; Global Crossing Ltd.; Global Marine Systems Limited; Hibernia Atlantic; Level 3 Communications, LLC; New World Network, USA, Inc.; Reliance Globalcom; Southern Cross Cables Limited; Sprint Nextel Corp.; Tyco Telecommunications (US) Inc; Verizon Communications, Inc.; and VSNL International, Inc.

Second, NASCA requests that CBP amend the Proposed Modification to address the special legal protection afforded submarine cables in international and domestic law.

NASCA is willing to meet with CBP to discuss its specific concerns with, and offer reasonable solutions to, the Proposed Modification should our request for an extension not be granted.

Respectfully submitted,

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North American Submarine Cable Association

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