

IN THE MATTER OF:  
Implementation Plan for the  
National Strategy for the Arctic  
Region, and Telecommunications  
Assessment of the Arctic Region

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Docket No. 140925800-4800-01

Ms. Shaw,

Thank you for the opportunity to respond to the Telecommunications Assessment of the Arctic Region. Alaska Clean Seas (ACS) is the Oil Spill Response Cooperative for the North Slope of Alaska. ACS protects the environment by providing effective response services for ~150 miles of the Arctic Coast and the first 167 miles of the Trans-Alaska Pipeline System in accordance with Spill Prevention, Control, and Countermeasure (SPCC) plans. ACS strives to be recognized as a world leader in arctic land and marine oil spill response.

To meet our response requirement we have installed, maintain and operate a robust VHF radio system that consists of 12 fixed repeaters, six portable repeaters, and 22 tactical channels. There are hundreds of handheld radios as well as dozens of mobile radios operating on our network. Our VHF system is used to facilitate localized "onsite" communications in a response with reach back capabilities through VoIP. These frequencies are assigned to the "State of Alaska" and can be used seamlessly from Juneau to Prudhoe Bay. Our VHF system operates over the internet as well. We also have a UHF system that can be employed to support a response.

ACS utilizes cellular and satellite technology (to the extent possible) to support response operations. In cases where we can rely on cellular communication technology to support operations we do, and heavily. This is a fast, easy technology to setup Incident Management on. We do experience challenges using cellular technology in some "dead spots". This is where telecommunications within the *Implementation Plan for the National Strategy for the Arctic Region* is something we support and look forward too.

As you may know it is very difficult to logon to, and maintain a viable connection with a satellite in a geosynchronous orbit at or above 70° North latitude. Prudhoe Bay is also just on the edge of reception for commercial satellite operations, such as Broadcast Global Area Network (BGAN). There are many challenges being remote and being just on the edge of the satellite footprint, limitations with data capable cellular communications. Development and expansion of the current infrastructure of telecommunications services are critical to accommodate the increase in commercial, residential, governmental, and other critical economic and social activities across Arctic Alaskan communities.

The modernization, development, and implementation of telecommunications systems along the Arctic Coast, both inland and near shore will support the industry and interested parties to employ Unmanned Aircraft Systems (UAS) as outlined in the *Implementation Plan for the National Strategy for the Arctic Region*. We currently have ongoing projects supporting UAS's. It is always a challenge attempting to stream data from the UAS back to shore; let alone back to incident management.

In the Arctic region marine vessel traffic is increasing every year and it is clear there is a need for better, longer range communications on the North Slope as well as near shore in the Arctic Ocean. Not only do we respond to oil spills we are also called on for mariner in distress. ACS averages 500 missions a year, with an average of only 90 days of navigable water. In the past several years we have been called to rescue vessels in emergent situations some five different times. On three occasions ACS was called on to recuse Alaskan Native whaling vessels. We also responded to a vessel on fire and an ill passenger on a cruise ship. ACS stands ready to play a partner role in the enhancement of Arctic region search and rescue

ACS hosts the Alaska Marine Exchange's Automatic Identification Systems (AIS) for the North Slope. Our larger vessels are equipped with AIS. This is a recent upgrade to our fleet. AIS is gaining in capabilities, though for now we are limited to standard VHF AIS systems. ACS Supports deployment of the Long Range Identification and Tracking (LRIT) system on the North Slope and encourages the designation of an Arctic LRIT area of interest.

The local infrastructure in Prudhoe Bay and Deadhorse are sufficient for now. However, the area continues to expand and we do see an important need for expansion and upgrade sooner rather than later. ACS supports development and

implementation of increased telecommunications systems across the region. Systems that we all take for granted supporting internet access, video streaming, as well as simple office functions; like faxing, scheduling, and emailing will enhance responsible growth within the tribal communities, government and industry.

Sincerely,



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