



Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House Canberra ACT 2600

**Re: Telecommunications Legislation Amendment (Submarine Cable Protection) Bill 2013**

Dear Sir or Madam,

SubPartners Pty Ltd is grateful for the opportunity to make this submission in support of the Telecommunications Legislation Amendment (Submarine Cable Protection) Bill 2013 (**the Bill**).

## About SubPartners

SubPartners Pty Ltd is an Australian-owned company headquartered in Brisbane, Queensland. We are delivering telecommunications infrastructure projects through trusted relationships and partnerships.

Headed up by Bevan Slattery and Ted Pretty (two of the industry's most trusted and experienced entrepreneurs), our management team has the experience of delivering the two most recent submarine cable systems to be permitted and installed in Australian waters: PIPE Pacific 1 between Sydney and Guam (PPC-1) and Telstra Endeavour between Sydney and Hawaii.

We are committed to two new cable systems: APX-West between Perth, Jakarta and Singapore and APX-East between Sydney and California along with a number of Pacific Island branches. These systems are scheduled for completion in late 2015 and early 2016 respectively.

## SubPartners' position on the Bill

We have substantial hands-on experience with the existing permitting regime for submarine cables in Schedule 3A to the *Telecommunications Act 1997* (Cth), gained from the permitting processes for the PPC-1 cable system and also the permitting activities associated with our current APX-East and APX-West projects.

We agree with the policy rationale for simplifying the permitting process, and in particular replacing the separate "protection zone" and "non-protection zone" permits with one permit that covers both activities.

We also agree that the protection afforded to *international* submarine cable systems should be extended to significant *domestic* submarine cable systems.

**We support the Bill and submit that it should be passed in its current form.**

We would be pleased to provide the Committee any further information or assistance that it may require.

Matt Whitlock  
Chief Operations Officer

**SubPartners Pty Ltd**