

**Paper  
on  
Views of Subsea Fibre Optic Cable  
Repair and Maintenance in India**

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**Prepared by**



**ASEAN Cables Ship Pte Ltd**

151 Chin Swee Road, #11-01/10 Manhattan House

Singapore 169876

Company Registration No.: 198600412M

Tel : (65) 6835 2996, Tel : (65) 6835 2996

Website: [www.aseancables ship.com](http://www.aseancables ship.com)

## **1. Background**

ASEAN Cables Pte Ltd (ACPL) is a pioneer in subsea fibre optic cable repair and maintenance since 1986 with more than 500 repairs under her belt since start of our operation.

ACPL has been contracted under the SouthEast Asia Indian Ocean Cable Maintenance Agreement (SEAIOCMA) since 1986 to provide subsea fibre optic cable repair and maintenance works for scheduled cable systems maintained under the agreement. The area of service covers the ocean areas bounded by the Great Circle Lines connecting Djibouti in the West, Perth in the South, Guam in the East and Toucheng in the Taiwan.

ACPL has been engaged in all SEAIOCMA subsea fibre optic cable repairs and maintenance in the Indian Ocean for more than 35 years. We have been working cordially with our Indian Maintenance Authorities (MAs) in the India on the cable systems' repairs and maintenance. Our MAs are incumbent Indian telecommunication providers including, Bharat Sanchar Nigam Ltd, Network i2i Ltd, Reliance Jio Infocomm Pte Ltd and Tata Communications Limited, who are partial owners of subsea fibre optic cable systems and/or cable station landing parties.

Our cables Pte Ltd has been based in Kochi from 2004 to 2012. Thus, we are familiar with the regulations, requirements and operations of cable repairs in Indian waters. There was a study from ACPL to initiate setting up depot in Kochi, but the plan for the Indian depot did not materialize as it was supported by the then environment.

## **2. Objective**

ACPL would like to continue playing an active role in Indian Ocean region in the subsea fibre optic cable system repair and maintenance market. We have vast experience and knowledge in subsea fibre optic cable systems installation, repair and maintenance spanning across regions. As an active player in the Indian Ocean region, we can contribute to India's growth and path toward as a global robust telecommunications hub. With the existing cordial partnership with Indian MAs, we are willing to establish new relationship with new Indian entities so as to:-

- provide constructive suggestions towards improving the workflow
- minimize down time caused by cable faults
- delivery quality subsea fibre optic cable systems installation, repairs and maintenance so as to minimise the need for repair and maintenance
- provide constructive suggestions towards preventive measures to minimize faults

### **3. Repairs in Indian Waters**

ACPL like to draw reference to TRAI's consultation paper on "Licensing Framework and Regulatory Mechanism for Submarine Cable Landing in India". Out of the 17 fibre optic cable systems stated on page 17 of the consultation paper, 35% are scheduled subsea fibre optic cable systems systems are maintained under SEAIOCMA.

ACPL has been the sole party mobilised under SEAIOCMA. Working closely with our Indian MAs, local Indian entities and Indian agent, we successfully conducted 15 quality subsea fibre optic cable system repair and maintenance for the past 10 years. During our operation, ACPL has also actively engaged Indian business owners, entities and Indian nationals during the repairs and maintenance of the scheduled cable systems.

For ACPL to conduct a repair in the India waters, permits, approvals, and clearances have to be applied and attained via the various Indian authorities / bodies such as the Ministry of Defence (MoD), Ministry of Home Affairs (MoHA) etc. With the assistance garnered from our SEAIOCMA India MAs and Indian agents, all necessary permits and licenses are pre-applied whenever possible before the repair, thus facilitating the repairs to be completed in a timely and efficient manner.

In addition to the permits stated above, the cables ship as well as all items on board needs to be imported by an Indian entity. With the assistance of our Indian MAs and Indian agents, all custom duties and taxes have been duly paid so that ACPL is able to proceed with the contracted repair.

It is through our experience and understanding from the local Indian commercial vessels that a separate permit from MOD needs to be attained if the vessel is to be engage in jobs in different industries. Thus, a dedicated vessel needs to be allocated solely for the cable installation, repairs, maintenance industry to improve on the existing application time for MOD.

### **4. Challenges in the Subsea Fibre Optic Cable System Repair and Maintenance.**

Repairs in India will face challenges aside the flagship of the cables ship. The delivery of a quality repair not only depend on the cables ship, but is subject to other considerations.

#### **4.1. Shortage of cables ship and associated equipment**

The cables ship is a specialised vessel designed to carry out cable repairs and maintenance. There is an associated high cost of maintaining and certifying the cables ship, the equipment and spares to so that a quality and timely repair can be executed. Stringent checks are schedule on all tools and equipment and strict protocols are adhere to ensure the safety of the people and the operation.

#### **4.2. Shortage of trained and experienced professional**

The cables ship needs a team of experienced seafarers with the specialised skills in subsea fibre optic cable repair and maintenance. As the seabed condition, weather and cable site working environment is ever changing, each the repair is unique. Such knowledge and experience can only be accumulated after many years in the industry and in various countries with similar conditions.

Currently, there is a global shortage of certified pool of qualified and experienced professional required to carry out a quality repair. New professionals need to be trained, certified, and mentored. The experience required will take many years to accumulate.

#### **4.3. MOHA**

The experience, knowledge, and qualifications of the cables ship crew are not interchangeable with seafarers from other industries. With the limited pool of qualified and competent officers and seamen for the proper functioning of the cables ship, the application of MOHA for the required professionals for the repair proves to be challenging when carrying out repairs in India.

#### **5. Conclusion**

ACPL has been actively engaging Indian repairs and maintenance since 1986. We have proactively set up a base port for our cables ship to conduct repairs from India and initiated a study to set up a India depot. However, both are abandoned due to financial, regulatory and sustainability concerns.

ACPL would look forward to any opportunities to participate in the future discussions with TRAI and ILDOs and would like to be an active player and contributor to TRAI's objective of pivoting India to be a global telecommunications hub in India.

We are contactable through the following:-

Name : Lynn Kuah

Title : Business Development

Email :lynnkuah@acpl.com.sg