January 14, 2025

VIA EMAIL AND FACSIMILE

Canadian Transportation Agency
Rail and Marine Determinations Division
15 Eddy Street
Gatineau, QC K1A 0N9
Fax No. 819-934-0631
Email: maritime@otc-cta.gc.ca
Attention: Manager, Rail and Marine Determinations Division

Canada Border Services Agency
Commercial Registration Unit
191 Laurier Avenue. W., 12th Floor
Ottawa, Ontario KIA 0L8
Fax No. 613-946-0242
Email: coastingtrade-cabotage@cbsa-asfc.gc.ca
Attention: Rail and & Marine Determinations Directorate, Canadian Transportation Agency

Dear Sir/Madam:

Re: IT INTREPID
Fast-Track Application
Request for Temporary Admission to the Coasting Trade of Canada and Reduction of Duties and GST/HST
C.S. IT Intrepid, Flag: Barbados
IMO No.: 8710871

1. OVERVIEW

IT International Telecom Canada Inc. (the "**Company**"), hereby makes this fast-track application through its Canadian agents, Metcalf & Company, for temporary admission to the coasting trade of Canada and, by copy of this letter to the Canada Border Services Agency, applies for a reduction of duties and GST/HST as applicable for the temporary entry and use in Canada of the cable ship IT INTREPID (the "**Vessel**"), a 115 m. cable-laying, service, and repair ship, to replace the damaged segments of the following critical subsea communication cables (the "**Work**") between January 31st and February 28th, 2025:

(i) The Bell-Aliant subsea fibre communication cable between Searston Bay, Newfoundland and Labrador, and Aspey Bay, Nova Scotia. This fibre communication cable suffered unforeseen damage, which Bell-Aliant notified the Company of on December 24, 2024.

(ii) The Eastlink subsea fibre communication cable between Rose Blanche, Newfoundland and Labrador, and New Victoria, Nova Scotia. This fibre communication cable suffered unforeseen damage, which Eastlink notified the Company of on January 10th, 2025

The contribution of the Work to the continued operation of Canadian telecommunications is essential. The subsea cables in question carry services such as 911-signaling, internet,

television, mobility linkage, voice signaling, IP and VPN traffic, business data and communications, and internal network communication and network management facilities for the Company's clients, Bell Aliant and Eastlink.

If you require any further information, please do not hesitate to contact our office as required. Thank you for your timely attention to this request.

Our detailed application follows.

2. DETAILS OF APPLICATION

2.1 Applicant

Metcalf & Company, Barristers and Solicitors on behalf of IT International Telecom Canada Inc.

2.2 Vessel Particulars

Name	IT Intrepid
Flag	Barbados
Category and	Cable ship
IMO No.	8710871
Gross Tonnage:	6141
Deadweight:	3523
Length:	115 m
Width:	18 m
Draught:	6.3 m
Engine Power	4400 Kw
Propulsion	Single Screw Fixed Pitch
Bow Thrusters	1 x 750 Kw
Stern Thrusters	1 x 750 Kw
Rudder	Singe Balanced
Dynamic	With bottom track mode
Fuel Capacity	621.00 tonnes
Fresh Water	508.00 tonnes
Generators	
Main Propulsion	2x2000 Kw Ruston Diesel Type
Auxiliary	2x750 Kw Allen Type 6S12F MBC
Emergency	1x350 Kw Caterpillar Diesel
Number of Berths	
/ Max POB	24 hour/day operations for crew of 86
Classification	ABS A1, AMS, ACCU

2.3 Proposed Activity

To repair and replace the damaged segments of (i) the critical Bell Aliant subsea fibre

communication cable between Searston Bay, Newfoundland and Labrador, and Aspey Bay, Nova Scotia; and (ii) the critical Eastlink subsea fibre communication cable between Rose Balance, Newfoundland and Labrador, and New Victoria, Nova Scotia. Further details on the scope of work and minimum required capabilities are set out in section 3 below.

2.4 Period of Time for Which Permission is Required:

Starting Date: January 31st, 2025

End Date: February 28th, 2025

The Work under ideal conditions is expected to take eighteen (18) days, however, sea and weather conditions in winter in the cable locations are often poor and unpredictable. Accordingly, the Company is, for prudence and safety, seeking a permission window wider than eighteen (18) days.

3. SCOPE OF WORK

3.1 Geographic location

Atlantic Canada

3.2 Details of Operation

The Vessel will mobilize in Halifax, NS, where it will load the required amount of Eastlink's replacement single armour cable and cable splicing accessories stored in the Company's supply base in Halifax. The Vessel will then sail to the affected section of Eastlink's cable, and the entire length of the affected cable will be replaced. The Vessel will then return to Halifax and load the required amount of Bell's replacement single armour cable before sailing to the affected section of Bell's cable, after which it will repair and replace the entire length of Bell's affected cable. The Vessel, being a purpose built installation and repair cable Vessel, will only require the personnel to supplement the cable load before proceeding to replace the damaged cable segments, but otherwise Vessel and crew must be kept intact to ensure continuous operations and maintain service synergies, efficiencies, and safety. Upon completion of the new cable installation for Bell's cable, the Vessel will transit back to Halifax to offload the equipment and the previously embarked cable install personnel.

The Work requires a Vessel that meets the following special characteristics, amongst others:

(a) Navigation capabilities

- In order to conduct an effective cable laying or repair operation, it is necessary for the cable laying ship to have Dynamic Positioning (DP) capability with bottom track mode. The DP system is used to control the Vessel's movements and progress along the installed cable route.

- A Makai lay survey package that combined with the DP capability ensures the Vessel accurately tracks along the desired route while laying the requisite amount of cable slack to fill seabed irregularities. The cable lay function must be performed either over the bow or stern sheaves pending weather conditions in a fully controlled manner. See Section (f) below for additional Makai Lay information.

- A Dynamic Positioning System ("DPS") supported by two thrusters and two propulsion motors. Once the repair/replacement is completed, the (DP) system must enable the Vessel to accurately track follow her tethered ROV. This DP function reduces the potential of damage to either the ROV or the fibre optic cable during ROV cable burial operations.

- An Integrated Navigation System ("INS") with multi-reference GPS positioning, USBL acoustic positioning, and inter-Vessel telemetry to support the DPS system in workable weather conditions and to supplement navigation.

- Cruising speed of 14 knots and an endurance of at least 14 days (operating at 12 knots).

(b) Cable splicing and jointing capabilities:

- A large climate controlled enclosed splicing and testing workshop in order to perform work on the sensitive components found in fibre optic cables during splicing / jointing operations.

- This is a highly critical task that is performed by trained jointing experts with specialized equipment. Fibre optic cable, and tolerances and control of the environmental conditions in which this work is done are of the utmost importance.

- In addition it is imperative that associated submarine equipment be stored and handled in a controlled environment. The jointing and testing workshops used in cable laying and repair as well as the storage areas for repair kits and equipment should be included as part of the controlled environment onboard.

(c) Cable storage capacity

- Cable tanks with a capacity of 1700 tonnes of submarine cable (1232 m^3), built in to the Vessel to remove the need to use suspended quadrants for paying out and reeling in cable.

- The Vessel must be able to safely load and store the required amount of cable onboard. The storage tanks must be large enough to stow and contain an adequate amount of replacement cable as well as a separate tank to stow recovered scrap cable. The tanks must be accessible to crewmembers and designed to minimize risk of cargo shift that would lead to cable damage and injury of personnel.

(d) Cable handling, laying and burying capabilities

- The Vessel engaged in the repair of submarine cable on the sea floor must have the equipment with the ability to both deploy and potentially recover the cable that is installed in as shallow as 15m and as deep as 500m water depth. Given the depth of the water and force of the tides in the area of operations, the Vessel must at all times have control of the cable whether paying away or picking up with minimal risk to damaging the cable in the process.

- The Vessel must be equipped with a minimum of 40 Te Cable Engine Drums to handle the weight of the cable in the water column without risk of slipping or parting. Each drum engine shall be equipped with a draw off hold back engine (DOHB). This equipment allows for the controlled pickup and payout of cable and grappling rope under potentially high tensions with controlled speed and minimal risk to personnel and the cable. It is imperative cable is deployed under specific tensions so the proper bottom tension is met allowing cable to follow the seafloor contours and avoid suspended spans and/or excess cable. The cable drums are used independently of each other to allow for simultaneous pick-up and payout when conducting a cable repair. The control of the drums and their hydraulic power supply are an integral part of the Vessel's equipment.

- An eighteen-wheel Linear Cable Engine with 18 tonnes of pulling capacity.

- A Subsea Cable Plough with HV power supply and deployment A-frame, capable of replacing and reburying cable up to 1.5m below the seabed, equipped with: cameras, object detection sonar, and instrumentation for depth of burial and residual tension detection.

- An remotely-operated tracked vehicle (ROV) jetting tool for cable laying, tracking, and inspection, equipped with (i) manipulator arms for subsea operations; (ii) sonar, altimeter, gyrocompass, auto-altitude, depth sensor, and auto-depth systems for navigation (iii) an accurate TSS system to locate, detect the depth of, and analyze damage of subsea cables (iv) cameras (v) a centerline-mounted sword cable-jetting tool and (vi) a firehose-type jetting tool for assistance in burying or exposing cable.

(e) Accommodation

- Due to the imminent requirement and labour intensive nature of submarine fibre optic cable work a large workforce is necessary for 24 hr operation. Each role on the Vessel requires 2 shifts. The entire crew on the Vessel could be as many as 70 people including representatives from the client.

(f) Survey Capabilities

- During lay operations, cable slack is calculated and adjusted to account for changes in seabed topography, water depth, cable characteristics, ship's speed, etc. A slack management system, such as MakaiLay must be available, to perform these calculations. MakaiLay is an At-Sea Cable Laying Monitoring System that provides realtime feedback and monitoring of the three-dimensional and dynamic cable shape and touchdown conditions during the lay.

- Ship instruments such as; DGPS, gyro, cable engine (cable count & tension), echo sounder, USBL, etc. connect via serial communications to the slack management program (MakaiLay) so data can be logged and recorded allowing users to view the information for later use and analysis and create a ship plan based on the Route Position List (RPL) during installation.

(g) ROV Capabilities

- The jetting sword is required as it is specifically designed to pump water at high pressure so as to excavate a trench. A dredge type burial tool is limited to soft bottom

- ROV must be equipped with tracks to ensure contact with the seabed is maintained with the seabed while moving forward during all burial operations

- The ROV must be capable of operating in 500m of water depth.

- The ROV to be capable of having the Vessel "Track Follow" while in DP mode

4. ADDITIONAL DETAILS OF / REASONS FOR FAST-TRACK APPLICATION

4.1 Customs Office of Importation: Halifax, NS

4.2 Customs Office of Accounting: Halifax, NS

4.3 Reasons for Fast-Track Application

(a) Minimum advance notice period of 30 days could not be provided for this activity

Bell-Aliant, Eastlink, and their customers require the restoration and repair of the fibre cable as soon as possible to mitigate impacts to users of the telecommunications network. Advance notice of 30 business days would push the earliest completion date for the Work well past the current proposed schedule, to the detriment of Bell-Aliant, Eastlink, and their numerous customers.

(b) Date the applicant became aware of the requirement to conduct the proposed activity

The Company became aware of Bell-Aliant's need for the Work on December 24, 2024 and of Eastlink's need for the Work on January 10, 2025.

(c) Names of the operators of Canadian-registered ships contacted before applying

Our client is itself a Canadian vessel operator in the cable-laying business. The Vessel is UK-built, and our client has imported the Vessel previously to Canada. Since 2013 our client has obtained a coasting trade waiver for the Vessel 13 times to perform similar work. Our client is not aware of any Vessels of this class, or capable of meeting the required capabilities for the scope of work detailed above in this application. Therefore, no other Canadian Vessel owners have been contacted before the filing of this application.

(d) Economic consequences of not obtaining a coasting trade licence on a fast track basis

The subsea fibre cable to which the Work relates is a critical component of the telecommunications networks of Bell-Aliant and Eastlink, and by extension, Canada's, telecommunications network. The economic impact on Bell-Aliant and Eastlink in mitigating the effects of the damaged cables on their customers is significant, and if the cables are not repaired, it may result in deterioration or disruption to thecustomers of Bell-Aliant and Eastlink, with knock-on economic effects. Letters of Support and Requests for Emergency Service from Bell Aliant and Eastlink detailing the economic consequences of not obtaining a coasting trade licence on a fast track basis are attached to this application at Appendix C.

4.4 Legislative Information:

This application is made under provisions of the Coasting Trade Act, Oceans Act and the Customs and Excise Offshore Application Act.

4.5 Details of the Applicant / Client

Applicant: Metcalf & Company, Barristers and Solicitors on behalf of IT International Telecom Canada Inc.

Contact: Eric Machum

Telephone: 902-420-1990

Fax: 902-429-1171

Client: IT International Telecom Canada Inc.

4.6 Attachments

We attach for further reference and in support of the Vessel's application:

Appendix A – Vessel Specifications

Appendix B – Vessel's Certificate of Registry.

Appendix C – Letters of Support and Request for Emergency Service from Bell Aliant and Eastlink.

4.7 Signature of Applicant's Authorized Representative

Eric Machum

APPENDIX A: VESSEL SPECIFICATIONS

INTERNATIONAL TELECOM

WWW.ITTELECOM.COM

COMMUNICATION IN WAVES

C.S. IT INTREPID

The IT Intrepid is a fully furnished cable ship capable of installation and maintenance activities in all ocean depths. Her immediate responsibility is to be on cable repair and maintenance stand-by for the *Sentinel Maintenance* program. The IT Intrepid is fitted with the IT ROVJET 207 for cable work and inspection to 2,600m.

SPECIFICATIONS

DIMENSIONS
Length Overall 115.0m
Breadth Moulded 18.0m
Depth Moulded 10.1m
Max Draught 6.3m
Gross Tonnage 6141t
Port of registry ..... Barbados

CLASSIFICATION
ABS, A1, AMS, ACCU
(Previously LR Ice Class 3)
ABS DP Class 1

DYNAMIC POSITIONING
GE DPS 11

POWER AND PROPULSION
2 x Main engines at 2,200kW
2 x Auxiliary engines at 750kW
2 x Propulsion Motors at 2,000kW

EMERGENCY GENERATORS
1 x 350kW Caterpillar diesel

SPEED/ENDURANCE
Maximum Speed .....14 Knots
Cruising Speed .....12 Knots
Endurance....42 days @ 12 Knots

THRUSTERS
Bow Thruster.....1 x White Gill 750kW
Stern Thruster.....1 x White Gill 750kW

CABLE MACHINERY
2 x 3.5m dia. CDE, 40t max pulling capacity
18 wheel pair LCE, 18t max pulling capacity
1 x 1 wheel pair transporter

CAPACITY (Max)
2 x Main Tanks, 1 x Spare
Cable Load Capacity.....1200t (up to 1700t)
Cable Volume.....1232m^3
Repeaters Capacity.....45

CRANES/LIFTING CAPACITIES
Bow Gantry.....1 x 5t bow hoist
Fwd Stbd.....3t at 16m / 6t at 6.7m
Aft Port.....3t at 16m / 6t at 8m
ROV (Fwd Port).....9t at 10.5m / 21.5t at 4m

ACCOMMODATION
Officers and Crew 76
Passengers 10
Total Berths 86

A-FRAME
Certification .....ABS
SWL 25t
Weight.....45t

IT PLOW
Weight.....17t
Burial Depth.....up to 2m
Burial speed..... 0.6-1km/h
Bending Radius.....1.5m

IT ROVJET 207
Operating Dept.....Up to 2600m
Power.....200hP
Max Payload.....54kg
Max Operation Sea State.....6
Burial up to 1.5m with cable depressor

ZODIAC RHIB (Zodiac 733IO)
Length Overall 7.24m
Beam max inflated 7.74m
Draft 0.53m
Max Horsepower 300
Person capacity ..... 15A + 0C

Montreal: +1 514-695-2993 Halifax: +1 902-422-5594 REV. 24-Apr-2020

APPENDIX B: VESSEL'S CERTIFICATE OF REGISTRY

The Shipping Act 1994

CERTIFICATE OF BARBADIAN REGISTRY

PARTICULARS OF SHIP

Name of Ship	Port	Year Number	Official Number
IT INTREPID	BRIDGETOWN	L2/2006	733450

Where built:	Date keel laid:	Date measured:	Name and address of builders:	Signal letters (if any)
NEWCASTLE, UK	Jan 1988	Oct. 1988 & 23.11.1994	SWAN HUNTER LTD., NEWCASTLE UPON TYNE, UK	8PSH

Number, year and port of previous registry (if any):	Whether a sailing, steam or motor ship; if steam or motor ship, how propelled:	These dimensions are as defined in the Merchant Shipping (Tonnage) Regulations 1982 Part			IMO Number
LAEX6 at BERGEN, NORWAY, AS "SIR ERIC SHARP"	MOTOR: SINGLE SCREW		Length	101.30 metres	8710871
			Breadth	18.00 metres	MMSI Number
Type of ship:	Material used to construct hull:		Moulded Depth	10.10 metres	314 199 000
CABLE LAYER	STEEL		Moulded Draught	6.30 metres	

Number of passengers for whom accommodation is certified in cabins of not more than 8 berths 11

Number of other passengers ..... NIL

Number of seamen and apprentices for whom accommodation is certified 76

If and when employed for the carriage of passengers, cargo or stores or using graving docks or dry docks or places provided for the repairing of vessels, the register tonnage on which dues based on register tonnage may be levied by

any harbour or dock authority is ..... tons

Particulars of Tonnage. The tonnages of this ship in accordance with her International Tonnage Certificate (1969) are:

Gross tonnage ..... 6141 Net tonnage 1842

A summary of the spaces included and excluded from the tonnages is shown on the International Tonnage Certificate (1969).

Propelling particulars (as supplied by builders, owners or engine makers)

Engines	Description	Name and address of makers	Reciprocating engines		Rotary engines	Estimated brake or shaft horse power (kW) Estimated speed of ship
			No.. of cylinders in each set	Diameter of cylinders	No. of cylinders in each set	
No. of sets: TWO No. of shafts: ONE When made: 1988	RUSTOM 270 INTERNAL COMBUSTION	GEC DIESEL, NEWTON-LE-WILLOWS	Twelve	254 mm		2 x 2200kW
Boilers Number: ..... Working pressure: ..... When made:	No main boilers		Length of stroke 304.80 mm			14 Knots

Details of Ownership

Name(s)	Address(es)	Occupation	No. of shares	Certifying Registrar's Stamp and Signature
IT INTERNATIONAL	SUITE 101, STEVMAR HOUSE	Shipowner	64/64ths	
TELECOM MARINE SRL	ROCKLEY, CHRIST CHURCH,			
	BB15137 BARBADOS			

Issue Date: 20 February 2018

WARNING: THIS CERTIFICATE 1) IS NOT proof of Title 2) DOES NOT show if the ship is subject to a mortgage

Current ownership and mortgage details must be obtained from the Registrar

NOTE: Registered owners must inform the Registrar of Barbadian Ships of any changes in; address, ownership, entitlement to register or if the vessel is lost or broken up.

[Vessels measured under Merchant Shipping Tonnage Regs.82]

APPENDIX C: LETTERS OF SUPPORT AND REQUESTS FOR EMERGENCY SERVICE FROM BELL ALIANT AND EASTLINK

Document One: Eastlink Letter

eastlink

David Wilkie
Director - Cable Maintenance
IT International Telecom Canada Inc.
3567 North Marginal Road, Pier 9A
Halifax, Nova Scotia
Canada, B3K 5X8

Dear Mr. Wilkie:

RE: Eastlink Subsea Cable between Nova Scotia and Newfoundland

We are writing regarding the Eastlink subsea fibre communication cable that comes to shore at New Victoria, Nova Scotia from Rose Blanche, Newfoundland. The fibre communication cable has suffered unforeseen damage, which Eastlink notified IT International Telecom Canada inc. on January 10, 2025.

This cable, which is approximately 190 kms long, is one of two paths between Nova Scotia and Newfoundland providing connectivity for all telecom services such as 911 signaling/Internet/TV/Mobility/Voice signaling/IPVPN customer traffic/Business Data/Next Gen Networks/IP Core as well as our internal network communication and network management facilities.

It is part of our redundant network and is critical to our network reliability in the Atlantic Provinces.

To maintain service, we have migrated all traffic between Nova Scotia and Newfoundland off this damaged cable to our alternate route between the provinces. While service is currently functioning, the network is in a very vulnerable state give the loss of redundancy.

Given the critical nature of this subsea cable, we require IT International Telecom Canada Inc. to take swift action to be on site to replace the damaged cable segment without delay. In addition, given the nature of the cable it must be laid continuously, without interruption.

It is our understanding that IT International will use their Barbados-flagged Cable Ship *IT Intrepid*. The work is planned to be conducted between January 31 and February 28, 2025. Under ideal conditions the work is expected to take nine days, however given sea and weather conditions during the winter, both the vessel and the crew will require authorizations to work for the full 29 days. We understand a fast-track application is being submitted to the CTA for approval for the vessel, and that this letter is also being provided in support of work permits requests for the crew of the vessel pursuant to R205, C10 – Significant Benefit to Canada – Canadian Interests.

Telecommunication services are vital and support a wide range of economic and social activities, as well as critical infrastructure sectors and government services. They drive economic growth, enable communication, promote innovation and support digital transformations in various sectors. Any failure in these cables will result in significant disruption to services in Atlantic Canada, which must be mitigated. Replacement of the damaged cable will result in significant social and economic benefits to Canada.

The current processing time for LMIAs is 64 business days, however this work must be completed urgently to ensure that there is no disruption to ongoing telecommunication services. As there is not enough time to secure LMIAs for the foreign crew onboard, we are supporting IT International's request that work permits be issued under the Significant Benefit to Canada regulation under the Immigration and Refugee Protection Act.

Please let me know if you need any additional information regarding this request.

Sincerely,

Steve Irvine
Senior VP Engineering and CTO
Jan 13, 2025

Box 8660, Station A, Halifax, Nova Scotia B3K 5M3
eastlink.ca

Document Two: Bell-Aliant Letter

David Wilkie
Director - Cable Maintenance
IT International Telecom Canada Inc.
3567 North Marginal Road, Pier 9A
Halifax, Nova Scotia
Canada, B3K 5X8

Dear Mr. Wilkie:

RE: Bell APOCS2 Subsea Cable between Nova Scotia and Newfoundland

I am writing in regard to the APOCS2 subsea fibre communication cable that comes to shore at Aspy Bay, Nova Scotia from Searston, Newfoundland.

This cable, which is approximately 134 kms long, is one of two paths between Nova Scotia and Newfoundland providing connectivity for all telecom services such as 911 signaling/Internet/TV/Mobility/Voice signaling/IPVPN customer traffic/Business Data/Next Gen Networks/IP Core as well as our internal network communication and network management facilities.

It is part of our redundant network and is critical to our network reliability in the Atlantic Provinces.

To maintain service, we have migrated all Nova Scotia to Newfoundland connectivity off this damaged cable onto our alternate APOCS cable between the provinces to maintain service. While service remains undisrupted, the network is now in a single point failure scenario.

Given the critical nature of this subsea cable, we require IT International Telecom Canada Inc. to take swift action to be on site to replace the damaged cable segment without delay. In addition, given the nature of the cable it must be laid continuously, without interruption.

Please let me know if you need any additional information regarding this request.

Sincerely,

Veronique Major
Director, Core Network
Bell Canada