



AWS welcomes the opportunity to comment on BEREC's draft Report on submarine cables connectivity in Europe. Submarine cable infrastructure is critical for enabling global communications and supports economic development and social interconnection. As one of the largest investors in submarine cable infrastructure, we recognise that scale and success bring broad responsibility. Security is fundamental to our operations - it is architected into our global cloud infrastructure and backed by the trust of millions of customers, including the most security-sensitive organisations. We support BEREC's efforts to ensure the security, resilience, and protection of this critical infrastructure.

Permitting Process Efficiency

The report does not address the critical impact of permitting processes on submarine cable deployment and maintenance. Currently, permitting timelines vary extensively across jurisdictions and can exceed one year, creating significant uncertainty in project planning and investment decisions. This uncertainty directly affects Europe's network resilience by delaying the addition of new systems and necessary repairs. These delays ultimately constrain the growth of Europe's digital economy.

Predictable, transparent and specified permitting timelines and processes are essential to plan and secure the supply-constrained marine resources needed for installation and maintenance activities. Specialist vessels for installation and repair must be scheduled far in advance, and with weather-dependent installation windows (typically May to October in Europe), permit-related delays can significantly postpone both the deployment of new cables and the repair of existing ones.

We recommend establishing harmonised permitting and licensing processes that consider end-to-end lifecycle requirements of submarine cable systems. This should include adopting a 'trusted applicant' process for pre-vetted companies who have demonstrated their ability to meet the EU's high security requirements; establishing transparent timeframes with clear guidelines on review process initiation; maintaining tight restrictions on deadline extensions; and supporting expedited processes for repair and maintenance activities. We encourage each Member State to establish a single coordinating body to serve as a 'one-stop shop' for submarine cable permits, with a view to establishing a single European coordinating body in the future.

Physical and Logical Resilience Requirements

Regarding BEREC's consideration of stricter physical and logical resilience requirements (section 6.1), we support a risk-based approach grounded in empirical analysis. International Cable Protection Committee statistics show that anchoring and fishing activities account for approximately 70% of cable damages.¹ Protection begins with cable system design and engineering through detailed desktop studies for route selection, followed by marine surveys to assess seabed conditions, geological factors, and maritime activity patterns. This then feeds into the engineering, armouring and cable protection (e.g. burial) planning for cable systems. Cable protection decisions should provide appropriate security tailored to the location-specific risks.

We encourage BEREC to harmonise physical security standards and recognise that cybersecurity measures are most effectively implemented at the data and application levels by operators who can adapt quickly to evolving threats. AWS is responsible for protecting the infrastructure that runs all of

¹ International Cable Protection Committee. "Government Best Practices for Protecting and Promoting Resilience of Submarine Telecommunications Cables." Version 1.2. London: ICPC, 2024. <https://iscpc.org/documents/?id=3733>.



the services offered in the AWS Cloud. This infrastructure is composed of the hardware, software, networking, and facilities that run AWS Cloud services. As leading experts in cloud security, AWS stands ready to share our expertise and best practices to inform any future security framework development.

A coordinated approach to marine spatial planning is essential for submarine cable deployment in increasingly crowded seas. Planning must recognize both submarine cables' unique routing requirements and their minimal environmental impact compared to other marine activities. An effective framework should: enable multiple routing options rather than designated corridors to avoid security vulnerabilities; protect existing cable routes and landing points; preserve areas for future deployment; coordinate with other maritime activities while maintaining submarine cables' status as critical infrastructure; and facilitate strategic landing points across EU countries for resilient connectivity.

As new marine spatial planning frameworks are developed, it is crucial to ensure a smooth transition that does not hinder ongoing projects. New requirements should not be applied retroactively; rather, the focus should be on implementing them for future projects. Concurrently, projects already underway should be allowed to proceed under the existing rules. Moreover, the Commission should encourage coordination of marine spatial planning between member states to foster a consistent, predictable environment that both safeguards existing infrastructure and supports the deployment of new cables.

Public Funding for Remote Connectivity

We support BEREC's recognition that public funding mechanisms play an important role in connecting territories where private investment alone may not be economically viable. The Connecting Europe Facility represents a vital tool for connecting communities and fostering digital inclusion, particularly for remote islands and sparsely populated coastal areas. These public funding instruments enable national and regional authorities to develop essential infrastructure that might otherwise not be commercially viable, supporting both initial deployment and the eventual replacement of ageing systems. This approach helps ensure that all European citizens can benefit from high-quality digital connectivity, regardless of their geographic location.

The steps taken today to facilitate marine spatial planning, streamline processes, enhance protection, and ensure adequate funding mechanisms will determine Europe's ability to maintain and expand its critical submarine cable infrastructure for decades to come. AWS remains committed to working with BEREC and other stakeholders to develop practical solutions that enhance the security and resilience of Europe's submarine cable infrastructure whilst ensuring its continued growth and development.