

1 Q. What validation was done for the data, and proprietary software used to study ice
2 berg risks in Exhibit 35 "Iceberg Risk to Subsea Cables in Strait of Belle Isle"?

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5 A. As part of the study, C-Core compared the results of this model to observations in
6 the field (please refer to Exhibit 35, Section 3.4.6). With respect to the input data,
7 there was no validation possible on a site specific basis. In order to achieve this
8 there would need to be measurements in consecutive years, that is, repetitive scour
9 mapping. As validation of data is important, the Marine Crossings Group has
10 awarded a contract to Provincial Airlines (PAL) for continuous iceberg tracking that
11 will start late 2011 and run for several years. As data is acquired, this data will be
12 used to validate and fine tune C-CORE's model. C-CORE is a subcontractor to PAL
13 for this work.

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15 With respect to validation of the proprietary software, the same software
16 application was used on the northeast Grand Banks for oil installations and on the
17 Makkovik Bank for gas installations. Repetitive seabed mapping has been
18 performed to establish measured iceberg scour rates in these areas to validate the
19 software predictions.