

**Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Accelerating Wireline Broadband Deployment by ) WC Docket No. 17-84  
Removing Barriers to Infrastructure Investment )

### **Comments of Uniti Fiber LLC**

Uniti Fiber LLC (“Uniti Fiber”) respectfully submits these comments in response to the Federal Communication Commission’s (“Commission”) Further Notice of Proposed Rulemaking in the above-referenced proceeding.<sup>1</sup> Uniti Group Inc. (Nasdaq: UNIT), an internally managed real estate investment trust, is engaged in the acquisition and construction of mission critical communications infrastructure and is a leading provider of wireless infrastructure solutions for the communications industry. Uniti Fiber is comprised of several legacy companies including PEG Bandwidth, Tower Cloud, Hunt Telecommunications, Southern Light, and InLine. The company is a leading provider of infrastructure solutions, including cell site backhaul and small cell for wireless operators and Ethernet, wavelengths and dark fiber for telecommunications carriers and enterprises.

Uniti Fiber focuses these comments on rebuilding and repairing broadband infrastructure after natural disasters.<sup>2</sup> Uniti Fiber's network encompasses more than 30,000 route miles of fiber

<sup>1</sup> *In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, WC Docket No. 17-84, FCC 17-154 (rel. Nov. 29, 2017) (“Report and Order and Further NPRM”).

<sup>2</sup> See *id.* at ¶¶ 178-179.

across 20 states. The majority of Uniti Fiber's network is located in the Southeast, which is particularly susceptible to hurricanes. Due to Uniti Fiber's network concentration along much of the Gulf Coast in Florida, Alabama, Mississippi and Louisiana, the company has developed a number of best practices that it relies on when undertaking disaster preparation and recovery. Uniti Fiber's preparation and recovery efforts consist of three key areas: (1) coordinating with state and local officials; (2) collaborating with other utilities, both communications and electric; and (3) applying advanced technology to improve communication of critical information as well as to efficiently deploy resources in the most advantageous manner possible.

Uniti Fiber routinely works with state and local officials on many different issues including accessing public Rights of Way for broadband infrastructure deployment. Across the jurisdictions in which Uniti Fiber operates, the company encounters varying levels of clarity regarding who are the appropriate state and local points of contact during an emergency event as well as for the subsequent recovery period. When a hurricane is approaching, every minute matters. Accordingly, knowing well in advance who the appropriate state and local officials to work with are and the scope of each official's responsibilities throughout the event, as well as during the recovery period, can save a lot of time and ease disaster recovery efforts for public and private entities.

After or even during a storm, Uniti Fiber takes action to secure necessary permissions from state and local officials to re-enter affected areas as soon as possible to restore critical infrastructure. While written authorizations may not be technically needed for utilities to re-enter disaster areas, Uniti Fiber's experience illustrates that having such authority enables the company's crews to work easily with law enforcement and other disaster recovery managers. Written authority provides utilities with confidence that they can gain access to impacted areas that are otherwise closed to regular traffic in order to reach critical infrastructure assets. While the

company's longstanding state and local relationships are often helpful in securing such permissions, Uniti Fiber believes that more collaboration between stakeholders and especially with state and local officials would be beneficial. Uniti Fiber believes that each state and locality should clearly designate multiple points of contact and to streamline the process for granting written authorizations to utilities to re-enter the area during the recovery stage. State and local governments and utilities should also establish clear expectations of operations during a crisis. In this way, utilities and localities can better work together to restore essential services that benefits the entire community.

While Uniti Fiber's first responsibility is to its customers, the company spends a great deal of time and commits significant resources to collaborating with other utilities, as well as with state and local officials both during and after hurricanes. In particular, Uniti Fiber regularly works with local power companies, local governments and state officials to ensure that the company is sharing information regarding impacted infrastructure and estimated time of restoration. Uniti Fiber also collaborates with other utilities in order to prioritize and allocate resources needed to restore services and infrastructure as rapidly as possible.

Uniti Fiber believes that further collaboration with other providers would be very beneficial to recovery efforts. Preparing before a disaster is the best way to speed recovery after a disaster. However, this is a complicated task. Dozens of communications providers across hundreds of jurisdictions often need not only to work together but also with dozens of different power companies. Each entity has its own resource constraints and challenges, its own recovery plan, and its own best practices. In this regard, both inter- and intra-industry relationships are important. While *ad hoc* arrangements have been the way of doing business in the past, the Commission

should examine whether there are other means by which to ensure that providers are communicating with each other before, during, and after a disaster hits.

Finally, the appropriate use of advanced technology is essential to disaster recovery efforts. Uniti Fiber invests heavily in technology to keep its networks operational. For example, Uniti Fiber uses a number of mobile applications to catalogue and distribute real-time information between work crews and network operation centers when the company deploys infrastructure as well as when it repairs damaged infrastructure. In the wake of hurricanes, this technology becomes crucial to Uniti Fiber's operations and recovery efforts.

One mobile application of critical importance to Uniti Fiber is "Collector" for ArcGIS. Through the use of this application, Uniti Fiber is able to upload, organize, and distribute detailed datasets within the company in real time. Uniti Fiber field technicians upload information regarding outages to the application. The application is used to track outages affecting service, the type of outages – for example, outages can be underground or aerial, or due to loss of power, or impaired for some other reason, or some combination thereof – where assets are deployed, and tracks location information associated with outages. Additional information, like where generators have been deployed, the type of gasoline needed to fuel generators, where open gas stations are located for crews and generators, and the type of gasoline available, is collected and shared through this application. The Geographic Information System ("GIS") team at the Uniti Fiber Emergency Operations Center uses the data collected from field technicians through the mobile application to geographically plot affected locations. The GIS team distributes the master map for the entire organization to track which greatly improves response time.

In addition to standard information, pictures of each area of damage can be uploaded as well. This is tremendously useful as it allows Uniti Fiber to properly outfit crews heading to the

scene with appropriate tools, engage in meaningful triage decisions, efficiently deploy resources and generally eases overall logistics, all of which are critical to the efficient and rapid restoration of service. Rich datasets dispersed widely and quickly throughout the company allow Uniti Fiber to bring all the necessary resources together to restore service.

In conclusion, Uniti Fiber emphasizes that the Commission can assist in bringing all stakeholders together to improve response times to natural disasters. In Uniti Fiber's experience, the focus should be on centralizing points of contact at state and local levels so it is clear who utilities need to contact in securing necessary approvals. Better communication among both telecommunications and electrical utilities would also speed restoration efforts. And finally, the appropriate use of technology on a shared basis would also improve restoration response times.

Respectfully submitted,

*/s/ Ronald W. Del Sesto, Jr.*

Ronald W. Del Sesto, Jr.

*Counsel for Uniti Fiber LLC*

cc: Jeffrey Strenkowski  
Deputy General Counsel of Governmental Affairs  
Uniti Group Inc. and Uniti Fiber LLC