

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

Public Safety and Homeland Security Bureau	)	
Seeks Comment on Improving Wireless	)	PS Docket No. 11-60
Network Resiliency through Encouraging	)	
Coordination with Power Companies	)	

**COMMENTS OF AT&T**

AT&T Services, Inc., on behalf of its affiliates (collectively, “AT&T”), submits these comments in response to the Federal Communications Commission’s *Public Notice* seeking information to help identify actions the Public Safety and Homeland Security Bureau, communications providers, and power companies can cooperatively take to encourage and increase coordination in the power and communications sectors, before, during, and after an emergency or disaster.<sup>1</sup>

As widely recognized, AT&T has a long history as an industry leader in disaster preparedness and network recovery, demonstrated by significant financial and personnel resources dedicated to developing and maintaining unmatched capability and expertise in the communications industry.<sup>2</sup> AT&T’s priority in any service-affecting disaster is to get service up safely, and then as quickly as possible, for FirstNet subscribers and other AT&T customers.

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<sup>1</sup> *Public Safety and Homeland Security Bureau Seeks Comment on Improving Wireless Network Resiliency through Encouraging Coordination with Power Companies*, PS Docket No. 11-60, Public Notice (PSHSB 2019) (*Public Notice*).

<sup>2</sup> *See, e.g.*, Comments of AT&T, PS Docket No. 18-339 at 2-3 (filed Dec. 17, 2018) (AT&T Hurricane Michael Comments).

AT&T's Network Disaster Recovery (NDR) and FirstNet teams set the standard for providing communications where they are needed in a time of emergency.<sup>3</sup>

Maintaining and restoring commercial power that feeds telecommunications equipment in a disaster zone is a critical component to this mission. There is simply no substitute for the efficiency, reliability, safety, and environmental benefit of utility power. In an emergency, under the most difficult circumstances, AT&T must work with stakeholders at all levels of government and in the electric power industry to ensure that restoration priorities are established and clearly communicated to all stakeholders, and that commercial power restoration activities do not inadvertently damage telecommunications facilities whether buried or aerial. Communications facilities, like the power grid, are critical infrastructure that is needed most in times of crisis. As such, AT&T works very hard both in advance of disasters and in real-time during an event to collaborate constructively with its counterparts in the relevant electric utilities. In fact, electric utilities, their mutual aid partners, and tree trimming contractors commonly employ wireless service to coordinate and communicate during their power restoration work.

The Department of Homeland Security (DHS) has the lead in this inter-industry preparation, and when disaster strikes, representatives from both industries are embedded with state and local emergency operations centers (EOCs) to facilitate safe and efficient restoration of services. AT&T's FirstNet Response Operations Program aligns with the National Incident Management System to better guide the deployment of assets and coordination during large-scale emergency events. As part of our FirstNet program, we have a process and resources to provide dedicated liaisons and 24/7 support to state EOCs during disaster events. FirstNet liaisons serve

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<sup>3</sup> The NDR team is responsible for the rapid recovery of service at AT&T network sites following catastrophic events for both FirstNet subscribers and AT&T's other customers.

as the primary link between public safety and their FirstNet resources, coordinating across federal, state, tribal and local agencies, giving public safety agencies a level of support during emergencies unavailable before FirstNet. It is also important to note that FirstNet is available to the utility industry, as extended primary users, because utility personnel are regularly called upon to help support first responders during an emergency or in its aftermath.

In advance of the next disaster, AT&T maintains productive relationships with its counterparts in the electric power industry. For example, AT&T has established a Power Technology Reliability Center (TRC), serving a network operations center function, focused exclusively on power and is designed to interface with electric utilities on a day-to-day basis. A key function of the TRC is to maintain up-to-date and accurate contact information so that AT&T can contact the right people at the relevant power company during a disaster. In addition, AT&T actively participates along with its energy sector counterparts in a variety of fora focused on improving network resiliency and disaster recovery:

- **NSTAC** – The National Security Telecommunications Advisory Committee (NSTAC) has issued several reports examining the dependencies between energy and communications, including the 2006 Telecommunications and Electric Power Interdependency Task Force (TEPITF) Report; the 2007 Report on Emergency Communications and Interoperability; and the 2014 report on ICT Mobilization.<sup>4</sup>

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<sup>4</sup> See NSTAC Telecommunications and Electric Power Interdependency Task Force (TEPITF), *People and Processes: Current State of Telecommunications and Electric Power Interdependencies* (January 31, 2006), available at <https://transition.fcc.gov/pshs/docs/advisory/hkip/GSpeakers060418/ACT1070.pdf> (last visited Feb. 7, 2019); National Security Telecommunications Advisory Committee, *NSTAC Report to the President on Emergency Communications and Interoperability* (January 16, 2007), available at <https://www.dhs.gov/sites/default/files/publications/NSTAC%20Report%20on%20Emergency%20Communications%20and%20Interoperability.pdf> (last visited Feb. 7, 2019); National Security Telecommunications Advisory Committee, *NSTAC Report to the President on Information and Communications Technology Mobilization* (November 19, 2014), available at <https://www.dhs.gov/sites/default/files/publications/NSTAC%20-%20Information%20and%20Communications%20Technology%20Mobilization%20Report%2011-19-2014.pdf> (last visited Feb. 7, 2019).

- **HSAC** – The Homeland Security Advisory Council (HSAC) issued a report on cybersecurity incident response related to both the communications and energy sectors.<sup>5</sup> AT&T was actively involved in development of the report and AT&T’s executive leadership represented the industry in the working group.
- **Tri-Sector** – Dating as far back as 2014, the Tri-Sector group has been addressing inter-industry issues and currently has three major projects underway: (1) developing a joint playbook; (2) identifying common risks; and (3) making intelligence gathering recommendations.
- **NIAC/NSTAC** – The National Infrastructure Advisory Committee (NIAC) and NSTAC have held joint meetings over the course of years to engage on issues related to inter-industry cooperation.
- **Exercises** – Periodically, members of the communications and electric power industries have collaborated in joint exercises to understand sector processes, improve coordination, and strengthen communication channels to prepare for emergencies.

Because of these preparation efforts, AT&T is ready to work cooperatively with its power utility counterparts once the disaster hits. Coordination between AT&T and its power utility counterparts occurs primarily through AT&T’s emergency management processes at the local level and through interaction with the state and/or local EOCs. AT&T works side-by-side with local authorities, first responders, power utilities, and others to achieve the primary goal of restoring communications networks safely and quickly. When AT&T’s emergency protocols are activated, coordination with the appropriate power companies occurs through company-designated power company liaisons within a Local Response Center (LRC). These AT&T personnel are responsible for identifying the particular power companies that serve the disaster-affected areas, maintaining proper contacts at each power company, serving as AT&T’s single point of contact for receiving power company requests for AT&T service restoration to power

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<sup>5</sup> See Homeland Security Advisory Council, *Final Report of the Cybersecurity Subcommittee: Part I - Incident Response* (June 2016), available at [https://www.dhs.gov/sites/default/files/publications/HSAC\\_Cybersecurity\\_IR\\_FINAL\\_Report.pdf](https://www.dhs.gov/sites/default/files/publications/HSAC_Cybersecurity_IR_FINAL_Report.pdf) (last visited Feb. 7, 2019).

company sites, and for making requests for priority electric service restoration of critical network sites. These AT&T power company liaisons are also responsible for disseminating within AT&T information from the power companies regarding status or restoration of service schedules. When priority requests encounter difficulties, these power company liaisons have the internal contacts to escalate within AT&T as needed, and to facilitate further coordination or escalation through state or federal channels. These processes have proven effective for inter-industry coordination on the ground and for problem resolution, when necessary.

Finally, in the wake of the disaster, on-the-ground coordination between power utilities and telecommunications providers does not stop. It is needed to prevent damage to networks that may occur during the debris-removal process and electric line repair. In nearly all disasters, there is a complex process of providing road access, trimming downed trees, and repairing damaged electric lines caused when trees and branches fall across roadways taking down electric lines that block passage. And because of the electrical hazard, only the electric utility and its high-voltage-qualified contractors can “cut and toss” the downed trees safely to open road access. This critical roadway clearing function impacts a broad group including police, fire, and emergency medical vehicles, as well as communications companies and their support contractors, such as refueling tankers. During this process, there are documented cases of electric utility crews (including independent contractors) cutting fiber communications lines, sometimes lines recently repaired, and as such, continued collaboration during restoration is critical to ensure timely, efficient, and most importantly, safe work on both the communications and power infrastructure.<sup>6</sup> AT&T is committed to continued improvement of coordination with

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<sup>6</sup> Extensive *preventative* tree trimming or vegetation management benefits electric company customers and telecommunications consumers as well.

the electric power industry (including its contractors) and will continue to work with inter-agency and inter-industry efforts to implement lessons learned from each event.

As demonstrated, the telecommunications and electric power industries are already engaged in intensive disaster preparation and recovery coordination in a variety of venues. Although events on the ground during a disaster are inherently unpredictable and no amount of coordination can prevent all outages, these inter-industry coordination efforts have improved response and restoration in these events. Significant work is ongoing to further improve this collaboration and to resolve identified concerns about restoration procedures of one industry that affect the other. The Commission would likely hamper (rather than improve) network resiliency by establishing new and/or duplicative procedures related to commercial power outages. Onerous requirements and duplicative procedures further strain already overextended resources and risk further miscommunication at the most critical times.

As AT&T has previously suggested, the Commission could perform a valuable role in facilitating communication among the industry stakeholders and regulators.<sup>7</sup> The Commission could improve its situational awareness during a disaster event by having FCC representatives participate in the relevant EOCs to listen in real-time to inter-industry activities and to gather status directly at the source. Following the event, the Commission could participate in the after-action review coordinated by the National Coordination Center for Communications (NCC) to gather inter-industry and inter-agency key learnings to make preparedness better the next time. Perhaps most critically, the Commission could work with its counterparts in the Federal Energy Regulatory Commission or other regulatory agencies to emphasize the need for improved

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<sup>7</sup> See AT&T Hurricane Michael Comments at 5; Reply Comments of AT&T, PS Docket No. 17-344 at 13 (filed Feb. 21, 2018) (AT&T 2017 Hurricane Reply).

In conclusion, AT&T strives to efficiently deliver the highest levels of service, quality, and reliability under all circumstances. To that end, it works closely with the electric power industry through well-established inter-industry processes to restore service safely and as quickly as possible in the event of a service-affecting disaster. It could be productive for the Commission to engage more actively in existing processes, but it should not disrupt or burden the existing coordination efforts across agencies at all levels of government and with these critical industries.

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