

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

Reliability and Continuity of Communications        )  
Networks, Including Broadband Technologies        )       PS Docket No. 11-60

**COMMENTS OF NCTA – THE INTERNET & TELEVISION ASSOCIATION**

NCTA – The Internet & Television Association (NCTA) submits these comments in response to the *Notice* issued by the Public Safety and Homeland Security Bureau in the above-referenced proceeding.<sup>1</sup> As explained below, while there is room for improvement in the coordination that takes place between communications providers and power companies, there is no need for the Commission to take action at this time because the Department of Homeland Security (DHS) already has initiated a process to address these issues.

The availability of commercial electric power obviously plays a critical role in the provision of communications services to the public and any disruption to the provision of electricity necessarily has significant implications for communications providers and their customers. Increasingly the reverse is true as well, as electric providers rely on voice and data services in communicating with their customers, including voice and data services provided by cable operators. It is therefore in the best interests of all parties that communications providers and power companies work together to minimize outages on their networks and restore any outages as quickly as possible.

At present, there is no formal or uniform set of best practices that governs the relationship between power companies and communications providers. Rather, the situation on the ground in any particular disaster area varies depending on the companies and government agencies that are

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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*, Public Notice, DA 19-13 (rel. Jan. 3, 2019) (*Notice*).

involved. Given the wide variety of natural disasters that could affect network resiliency – from wildfires to blizzards to hurricanes – the absence of uniform best practices or rigid one-size-fits-all requirements reflects the need for flexibility in responding to the particular circumstances of a variety of circumstances.

Despite the significant benefits of this flexible approach, there is room for improvement in communications between power companies and communications providers in disaster situations. While some areas have arrangements in which critical information is made available in a timely manner to a broad range of stakeholders, in other areas the power companies and/or local governments do not include cable operators in critical communications regarding planning and restoration.

In particular, cable operators have found one of the biggest impediments to prompt network restoration is lack of communication regarding a power company's priorities after an outage occurs. During recent hurricanes, for example, there were several instances where communications providers repaired their aerial fiber lines, only to have those repaired lines cut by the power company (or its contractor) as it attempted to restore power. Better communications across companies about where and when restoration is taking place might reduce the incidence of situations like this. Sharing information on restoration plans and priorities of electric networks and communications providers also would help cable operators and others ensure efficient and effective placement of generators. It would be a waste of resources if a cable operator deployed a generator only to have the power company restore electricity to that area.

The challenge in developing any common set of communications protocols is ensuring that the burden of reporting on a company's network status and planned activities does not

interfere with the work that company must do to restore its network. Certain simple steps, such as expecting companies to identify one or more contacts for communications during an emergency, should be relatively easy to implement if they are not in place already. But other steps, such as sharing the details of work schedules, require a high level of coordination among companies and sufficient flexibility to reflect local needs. Accordingly, coordination across executive teams at the state or regional level should be encouraged.

NCTA's support for the concept of developing some basic, high-level communications protocols that could be followed by all providers does not necessarily mean that the Commission is the best forum for establishing such protocols. The Department of Homeland Security (DHS) and the National Coordinating Center for Communications (NCC) have convened a range of communications providers, power companies, and government officials to discuss ways in which coordination can be improved. This voluntary participation in a non-regulatory effort under the auspices of an agency that is not focused on one set of companies or the other may offer the best chance to develop a mutually agreeable set of principles. Continued participation in this effort is the best use of industry and Commission resources at this time.

Respectfully submitted,

**/s/ Loretta Polk**

Loretta Polk  
Steven F. Morris  
Jennifer K. McKee  
NCTA – The Internet & Television  
Association  
25 Massachusetts Avenue, N.W. – Suite 100  
Washington, D.C. 20001-1431  
(202) 222-2445

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