



601 Pennsylvania Ave., N.W.
North Building, Suite 800
Washington, DC 20004
Office: (202) 654-5900

February 12, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Communication
Hurricane Michael Preparation and Response, PS Docket No. 18-339

Dear Ms. Dortch:

On February 8, 2019, T-Mobile representatives Bentley Alexander, David Seale, Tim Chandler, Tony McDowell, John Hunter, Shellie Blakeney and the undersigned (“T-Mobile”),¹ met by phone with Jeffery Goldthorp, Michael Connelly, Ryan Hedgpeth, and John Healy of the Public Safety and Homeland Security Bureau about weather-related impacts to T-Mobile’s network operations during Hurricane Michael in October 2018. The group generally discussed T-Mobile’s planning, preparation, response, and restoration activities, as well as, its observations of what worked well in restoring service.

Consistent with previous submissions to the FCC,² we described how T-Mobile’s network remained largely operational during the event, despite the unprecedented impact of the hurricane. For that portion of the network rendered inoperable as a result of the storm, loss of service largely was due to loss of power and backhaul service. T-Mobile engages in extensive planning and preparation for potential service disruptions. Due to the southeast coastal regions’ susceptibility to hurricanes and other weather-related events, preparations for such events are a major focus. Thus, we have a significant number of fixed generators and portable assets pre-positioned throughout the area and available for our use as needed to support T-Mobile network operations in the event of power outages.

In response to questions from the staff, we described T-Mobile’s use of a number of different backhaul providers in the region impacted by Hurricane Michael. While alternative redundant providers are not used at individual cell sites, the use of competitive carriers support competition on price and reliability and provides additional flexibility during recovery efforts. In areas that experienced service loss due to the unavailability of fiber backhaul resulting from

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

² See generally, T-Mobile 2018 Hurricane Season Comments, PS Docket No. 11-60 (Nov. 26, 2018); T-Mobile Hurricane Michael Preparation and Response Comments, PS Docket No. 18-339 (Dec. 17, 2018).

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the storm, we were generally able to rapidly restore service by deploying back-up systems, including microwave and satellite. T-Mobile began deploying these assets within one-day of the event. In many cases, service is restored using fiber where available as a hub for microwave links to sites in the surrounding area. The microwave paths can be quickly established, including through use of spectrum in unlicensed bands.

While every disaster event is unique and requires on the ground coordination, decision making and expertise, we noted that the level of backhaul and power service loss as a result of Hurricane Michael were typical for major hurricane events. Accordingly, T-Mobile's service restoration was based on experience and planning, including significant pre-staging of equipment, such as microwave and satellite backhaul. We noted the importance of allowing carriers to determine how best to prepare for and respond to a disaster event based on the unique circumstances of the event.

The group discussed opportunities for improving onsite coordination among the multiple interests that must work together to respond, including backhaul providers and power companies. T-Mobile supports the Commission's efforts to facilitate coordination among all of the parties involved in service restoration.³ Conditions rapidly change and evolve during restoration efforts and on-site coordination between mobile broadband companies, power companies, backhaul providers and government responders is necessary to provide the most effective response.

This letter is being filed electronically via the Commission's Electronic Comment Filing System for inclusion in the public record of the referenced proceeding in accordance with Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned if there are questions concerning this submission.

Respectfully submitted,

/s/ Steve Sharkey

Steve Sharkey

Vice President, Technology and Engineering Policy

cc: Jeffery Goldthorp
Michael Connelly
Ryan Hedgpeth
John Healy

³ T-Mobile Power Company Coordination Comments, PS Docket No. 11-60 (Feb. 8, 2019).