

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

**REPLY COMMENTS OF
USTELECOM—THE BROADBAND ASSOCIATION**

USTelecom — The Broadband Association (USTelecom)¹ submits these reply comments² to confirm its members’ experience of meaningful coordination with power companies during the complete arc of a disaster scenario—from planning to clean-up—because we know the public depends on it. USTelecom and many of its members also participate in the Communications Sector Coordinating Council (CSCC), and we embrace its comments in their entirety.³ We too “commend the FCC’s Public Safety and Homeland Security Bureau (Bureau) for recognizing the interdependencies between electrical supply and communications service, particularly during disasters.”⁴ While the history of communications and coordination between communications and electric companies runs deep, there may be room for improvement, though the statements of some utilities on existing coordination efforts are puzzling. Nonetheless, to the extent further and enhanced coordination is needed, it is appropriate to continue those discussions in existing venues

¹ USTelecom is the premier trade association representing service providers and suppliers for the telecom industry. Its diverse member base ranges from large publicly traded communications corporations to small companies and cooperatives – all providing advanced communications service to both urban and rural markets.

² *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, DA 19-13 (rel. Jan. 3, 2019) (*Public Notice*).

³ Communications Sector Coordinating Council Comments, PS Docket No. 11-60 (filed Feb. 8, 2019) (“CSCC Comments”).

⁴ *Id.* at 1.

at the Commission and within other government partners.

Many USTelecom members have a legacy as the “telephone company,” giving them a wide vantage point over the years on disaster preparedness generally, and coordination with power companies specifically. These members are in the business of providing backhaul services to wireless service providers (and some USTelecom members are themselves wireless service providers). USTelecom’s members were among those that founded the National Security Telecommunications Advisory Committee (NSTAC) more than 30 years ago. “Throughout its history,” NSTAC, including USTelecom members, have devoted resources to tackling America’s national security/emergency preparedness issues particularly those related to both “[a]ssuring communications for disaster response” and “[a]ddressing critical infrastructure interdependencies and dependencies”⁵—exactly the types of activities the Bureau seeks to foster. Participation in NSTAC is just one venue for such coordination; we support the CSCC’s description of our historical and present participation in the many different collaborative planning processes with the power companies to make our networks more resilient and to restore any outages as quickly as possible.⁶

The record also demonstrates how these pre-planning coordination efforts pay off. ATIS, describes how industry planning has led to “a significant number of existing industry Best Practices, ranging from restoration priority and resiliency to safety recommendations and backup power practices;” these practices are continually refined.⁷ AT&T describes that “[b]ecause of these preparation efforts, AT&T is ready to work cooperatively with its power utility counterparts

⁵ DHS, About NSTAC, <https://www.dhs.gov/about-nstac> (last visited February 25, 2019).

⁶ CSCC Comments at 3-7 (noting the sector’s efforts to bolster coordination with power companies in numerous venues such as with the National Infrastructure Advisory Council and the Homeland Security Advisory Council).

⁷ ATIS Comments, PS Docket No. 11-60, at 3 (filed Feb. 8, 2019).

once the disaster hits,” including “through emergency management processes at the local level and through interaction with the state and/or local EOCs [Emergency Operations Centers].”⁸

This experience of coordination is confirmed by the power companies, with “Southern Company and Gulf Power both report[ing] regular coordination and communications with communications providers, including providing communications providers updates regarding electricity restoration status and efforts.”⁹

We take note of the comments filed by power companies that suggest better coordination is possible. In particular, a common theme of the utility comments is that some communications providers can improve coordination by working more closely with state EOCs. For example, EEI *et al.*, state that “much of the communication and coordination is designed to occur at the state and local . . . EOC,” and that “representation at the EOC by all stakeholders from relevant industry sectors is crucial, as it will improve collaboration, address exceptions, and help maintain confidence and consistency in the recovery process.”¹⁰ Likewise, AEP states that “a communications provider’s representative at an EOC would be able to coordinate directly with government, public safety, and utility representatives regarding the need to elevate the priority for restoration of particular routes or facilities that may be critical to that communications provider.”¹¹ While some USTelecom members are undoubtedly already making use of EOCs as a coordination point—as AT&T demonstrates above and Verizon has also demonstrated in other filed comments related to hurricane response¹²—this may be an area where the communications

⁸ AT&T Comments, PS Docket No. 11-60, at 4 (filed Feb. 8, 2019).

⁹ Edison Electric Institute et al. Comments, PS Docket No. 11-60, at 5-6 (filed Feb. 8, 2019) (EEI Comments).

¹⁰ *Id.* at 6.

¹¹ American Electric Power Service Corp. and Southern Company Services Comments, PS Docket No. 11-60, at 7 (filed Feb. 8, 2019) (AEP & Southern Co. Comments).

¹² Verizon Comments. PS Docket No. 18-339, at 6-7, 9-10 (filed Dec. 17, 2018) (“Verizon and Gulf Power engaged

sector as a whole can enhance coordination.

USTelecom disputes, however, any suggestion that our sector does not work together in disaster recovery. AEP and Southern Company claim that “[t]he main practical obstacles to coordination between power companies and communications providers are the number of affected communications providers and their apparent unwillingness to cooperate with each other.”¹³ This is demonstrably false. As CSCC detailed in its comments, “CSCC members [including three USTelecom members] have already provided substantial feedback on how they coordinate in times of disaster with DHS and its National Coordinating Center for Communications under the ESF #2 construct.”¹⁴ Indeed, ESF #2 is *the* primary designated mechanism for communications sector response in a disaster.¹⁵ Additionally, the communications sector’s Information Sharing and Analysis Center (ISAC) is a widely-used platform for information sharing amongst communications providers both in times of disaster and during times of normal activity.¹⁶ Further, communications providers have made use of the ISAC forum to engage directly with the electric sector. Finally, it is worth noting that the CSCC itself is a means of coordination and information sharing. Claims of the lack of intra-sector

one another at the highest executive levels of their companies, and thereafter used the Bay County government emergency operations center to enable their personnel on the ground to more directly coordinate recovery efforts with one another.”).

¹³ AEP & Southern Co. Comments at 8.

¹⁴ CSCC Comments at 4-5.

¹⁵ FEMA, Emergency Support Function #2 – Communications Annex at 1 (2016), https://www.fema.gov/media-library-data/1473679033823-d7c256b645e9a67cbf09d3c08217962f/ESF_2_Communications_FINAL.pdf (“Emergency Support Function (ESF) #2 – Communications supports the restoration of communications infrastructure, coordinates communications support to response efforts, facilitates the delivery of information to emergency management decision makers, and assists in the stabilization and reestablishment of systems and applications during incidents.”).

¹⁶ See National Council of ISACs, About ISACs, <https://www.nationalisacs.org/about-isacs> (last visited Feb. 25, 2019) (“Information Sharing and Analysis Centers help critical infrastructure owners and operators protect their facilities, personnel and customers from cyber and physical security threats and other hazards. ISACs collect, analyze and disseminate actionable threat information to their members and provide members with tools to mitigate risks and enhance resiliency.”).

coordination simply lack credibility.

There is, however, widespread agreement that even where coordination improvements are possible, the improvements will come by making better use of the existing structures for coordination. USTelecom agrees with AEP and Southern Company's assessment that, "there already exists a well-developed, multiagency, multi-stakeholder process for coordination during emergency events" so the Commission should make use of any such existing fora. USTelecom also agrees with CSCC and EEI that the Commission should use the recently charged "Disaster Response and Recovery Working Group" of the Broadband Deployment Advisory Council (BDAC) to "develop best practices for coordination among wireless providers, backhaul providers, and power companies during and after a disaster."¹⁷ It is therefore logical that this group should be the forum for making recommendations—including any possible improvements to working through the EOC process.¹⁸ The Commission should then study the BDAC recommendations carefully, taking into account the numerous existing venues for coordination. By doing so, the Commission can best take advantage of the history and experience these sectors already have in coordinating to make their networks more resilient.

Respectfully submitted,

By: 

Michael Saperstein
USTelecom Association
601 New Jersey Avenue, N.W.
Suite 600
Washington, D.C. 20001
(202) 326-7300

February 25, 2019

¹⁷ CSCC Comments at 7.

¹⁸ EEI Comments at 4.