

September 18, 2018

VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Presentation  
Resiliency of Mobile Wireless Networks, PS Docket No. 11-60

Dear Ms. Dortch:

PRWireless PR, LLC (“PR Wireless”) files this letter to reflect a telephone communication Karla Pinero, Neville Cruz and Juan Saca of PR Wireless had with Renee Roland, Robert Finley, Jennifer Holtz, Claudia Pabo, William Andrie, Pramesh Jobanputra and Charles Mathias of the Public Safety and Homeland Security Bureau on September 4, 2018.

Participants discussed PR Wireless’s position regarding communications between backhaul providers and wireless carriers during and after emergency events, as well as measures the FCC could establish as a result of the Wireless Network Resiliency Cooperative Framework. We emphasized that sharing information between backhaul providers, fiber and cable providers, and wireless carriers is essential for the survival of medium and small wireless companies during and after a natural disaster such as Hurricane Irma and Hurricane María. We also suggested that the FCC require commitments from backhaul providers to provide wireless carriers real-time information about the status of their network restoration efforts. We noted that there is currently no uniformity in the format or frequency of such information and emphasized that uniform communication and reporting is crucial for the overall restoration plans to be aligned effectively. We also stressed the importance of ensuring meaningful coordination of those efforts among backhaul providers, wireless companies, local government and the power company.

Finally, we recommended placing a high priority on fiber circuit resiliency. We suggested the establishment of construction requirements, so the percentages of underground fiber versus aerial fiber can improve over a period of time. Fiber is a vital element in the ecosystem; even more important than power. A cell site with a power outage can be powered up with a generator, and can be operated for months. However, without transport/backhaul (fiber) there will be no service. The industry needs the fiber infrastructure to be as robust and resilient as possible. The only way to reach that point is to get the majority of it (if not all) underground.



Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced docket. If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Karla Pinero

Karla Pinero  
VP Legal and Regulatory

cc: Renee Roland  
Robert Finley  
Jennifer Holtz  
Claudia Pabo  
William Andrie  
Pramesh Jobanputra  
Charles Mathias