



601 Pennsylvania Ave., NW  
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September 23, 2019

**VIA ELECTRONIC MAIL**

Lisa M. Fowlkes, Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
[Lisa.Fowlkes@FCC.gov](mailto:Lisa.Fowlkes@FCC.gov)

Re: California Public Safety Power Shutoffs  
PS Docket No. 19-251 (Promoting Network Reliability During Disasters)

Dear Ms. Fowlkes:

T-Mobile USA, Inc.<sup>1</sup> ("T-Mobile") is in receipt of your letter dated September 12, 2019, regarding the company's plans related to initiatives announced by certain California energy companies to reduce the risk of electrical equipment triggering wildfires by turning off power at times and in areas where a wildfire risk is high.<sup>2</sup> In your correspondence, you reference recent media coverage of these programs and seek information about how T-Mobile intends to provide continued wireless service in the event that a utility shuts off power, which is also referred to as a public safety power shutoff ("PSPS") event.<sup>3</sup>

The overall resiliency of T-Mobile's network and its ability to provide service to first responders and consumers in the event of any type of communications service disruption is a matter of vital importance and a priority for the company. To that end, T-Mobile maintains a comprehensive enterprise-wide Business Continuity Program as part of its internal emergency response system that is designed to provide general guidance and maximum flexibility to the various parts of the business responsible for responding to a wide variety of potentially disruptive events. As a general matter, we have systems, assets, personnel and policies to quickly and effectively minimize any potential network disruption regardless of its cause - - power loss or otherwise. We utilize those same tools, driven by our commitment to maintaining continuity of service to our customers and first responders, to respond to PSPS events.<sup>4</sup>

As an initial matter, we have been working closely with the electric utilities on receiving timely and adequate notification of potential PSPS events. Various electric utilities can send a notice to a single T-Mobile email address, which will then be delivered to the relevant T-Mobile

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

<sup>2</sup> See Letter from Lisa M. Fowlkes, Chief, Public Safety and Homeland Security Bureau, Federal Communications Commission, to Shellie Blakeney, Director – Federal Regulatory Affairs, T-Mobile USA, PS Docket No. 19-251 (Sept. 12, 2019).

<sup>3</sup> See California Public Utilities Commission webpage at <https://www.cpuc.ca.gov/deenergization/>.

<sup>4</sup> Over the course of the past year, there have been a number of such PSPS events. In these past events, the power shutdown lasted less than 48 hours.



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personnel in the event of a possible or actual PSPS event. Those emails are monitored on a 24/7 basis. Upon receipt of a notification from a California electric utility about a potential PSPS event, company personnel immediately engage the appropriate teams who focus on ensuring adequate support to ensure continuity of service is in place for the identified areas that will be potentially impacted. We note that the California Public Utilities Commission has recently established notification guidelines for the electric utilities to use in advance or, during and after a PSPS event, which will further our ability to respond effectively.<sup>5</sup>

Upon receipt of notice of an imminent PSPS event, T-Mobile will proactively engage its resources to maintain service in the face of a shutdown. In particular, the relevant market personnel evaluate the information provided by the electric utility and make the necessary arrangements to deploy assets to potentially impacted sites, including portable generators, cells on wheels (“COWs”) and cells on light trucks (“COLTs”). T-Mobile has a fleet of such equipment prepositioned throughout California and the West Region, which is available to respond to a public safety power shutoff – or other service interruption – as needed. In addition, the company also retains national vendors that operate in California and that can supply additional COLTs, COWs and portable generators where needed.<sup>6</sup> T-Mobile notes that as part of maintaining a resilient network, it also has permanent generator backup power at all of its California mobile switching centers and data centers as well as in numerous strategic cell sites, including sites located in rural areas.

In the event of an actual wildfire or other natural disaster, T-Mobile is also fully committed to providing important emergency disaster relief to promptly resolve any loss of service and provide support to the affected community.<sup>7</sup> Among other things, we use a variety of tools to expedite restoration of service, including the use of COLTs, COWs, generators, and microwave or satellite backhaul as appropriate. In the recent California wildfires, T-Mobile also provided “pre-lit” devices at no cost to affected communities and customers at evacuation centers, T-Mobile stores, and various other locations in and near the areas of the fire. In addition, the company provided car, wall, and portable chargers and distributed air-filter masks to address air quality. We made Wi-Fi available at various locations, including evacuation centers and shelters, and provided impacted consumers with service and billing relief including making unlimited calls and texts available to customers who did not already have that access, removing equipment installment plan charges for devices lost in the fire, and granting payment extensions. Payment fee waivers were automatically applied to customer accounts in affected area codes and collection holds were placed on all impacted accounts. Further, regular updates regarding the status of the network and our efforts to restore service were provided to federal government staff, the California Public Utilities Commission staff and other emergency response organizations like the Governor’s Office of Emergency Services.

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<sup>5</sup> See Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions, Rulemaking 18-12-005, Decision 19-05-042 Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines) (June 4, 2019). This proceeding is currently in Phase II where further refinements of the Commission guidelines are being considered.

<sup>6</sup> In the event the shutdown is brief, T-Mobile notes that its macro cell sites have built-in battery backup. Generally, the only places where T-Mobile does not have battery backup on its macro cell sites is where local authorities restrict the provision of battery backup or where there are physical limitations or conditions at the site that prevent safe deployment of a backup power source.

<sup>7</sup> See, e.g., T-Mobile webpage at [www.t-mobile.com/news/cal-wildfire](http://www.t-mobile.com/news/cal-wildfire).



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T-Mobile continues to be actively engaged with the California Public Utilities Commission and the electric utilities to further develop and refine efforts to mitigate the risk of wildfires and to otherwise maintain service in the event of power shutdowns or natural disasters.

We look forward to any future collaboration on this topic and will gladly answer any questions regarding the information herein. Please do not hesitate to contact us.

Respectfully Submitted,

/s/ Shellie Blakeney

Shellie Blakeney

Director, Federal Regulatory Affairs

cc: Robert Finley