



September 23, 2019

Lisa M. Fowlkes  
Bureau Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: PS Docket No. 19-251

Dear Ms. Fowlkes:

I am writing on behalf of U.S. Cellular in response to your September 12, 2019 letter regarding our preparations for potential power shutoffs during the California Wildfire Season.

U.S. Cellular has taken a number of steps to mitigate the effects of the Public Safety Power shutdown practices being implemented by power companies in California. Those steps include the following:

- All communications for planned power shutoff activities have been consolidated to one contact number within our National Operations Center (NOC).
- We have completed a comprehensive assessment of our network assets within the potentially impacted areas and have identified locations with potential exposure to controlled power shutdowns.
  - We have 79 sites in areas potentially subject to power shutoff which today rely on commercial power. All 79 sites have battery backup resources in place. In addition, 49 sites currently have backup generators in place. Our budget for 2020 includes the deployment of at least 7 additional fixed generators.
  - We have also staged 14 portable backup generators either within, or less than 1 hour away from our northern California market. An additional 14 generators are staged within 1 days transportation time.

- Our plans will provide fixed and/or portable backup power solutions which address 97% of the potentially impacted area and that number will exceed 100% in 2020.
- In terms of public outreach, The California Public Utilities Commission, (in Decision 18-03-011 - Adopting an Emergency Disaster Relief Program for Communications Service Provider Customers), adopted emergency disaster customer relief protections for landline and wireless providers. This decision requires providers file a plan for customer outreach of emergency disaster customer relief protections by October 14, 2019. U.S. Cellular currently has an emergency and disaster team that responds to emergencies and disasters throughout its service area. This team is augmenting its processes to accommodate for Decision 18-03-011 requirements. While it is anticipated that customer impact due to planned power shut downs will be minimal, due to extensive planning and preparation for the events, U. S. Cellular will incorporate de-energization customer outreach to insure education and notification.
- In terms of coordination with public safety officials and power companies, our practices are governed in accordance with our internal Emergency Operations Center Processes and Standards. Specifically, all power companies in California who provide power to U.S. Cellular sites have been notified to use the U.S. Cellular NOC contact number for coordination.
- As for industry best practices, we would highlight our continuing focus on FCC BP Number 11-10-0407 to be helpful in putting into practice direct notifications of Public Safety Power Shutoff activities from Power Companies to the USCC NOC. This single communications source increases efficiency in coordinating emergency Forest Fire responses.

In summary, we believe we are prepared to address any potential planned outages that occur as a result of California utility shutdown plans. As in all emergency scenarios, our ability to operate on backup power indefinitely will be contingent upon continued access to fuel as well as the ability to safely access sites to complete refueling without endangering our associates, contractors or the public in general.

Please feel free to contact me if you have any questions regarding our answers. We would be glad to discuss our efforts in greater detail.

Sincerely,

Grant B Spellmeyer  
Vice President – Federal Affairs & Public Policy

