



November 26, 2018

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

Re: PS Docket No. 11-60 Ex Parte Notice

I am writing on behalf of U.S. Cellular in response to Lisa Fowlkes' November 6, 2018 letter regarding the Wireless Resiliency Cooperative Framework ("Framework"). Let me begin by saying that the only DIRS event activated during 2017-2018 directly impacting our network was Hurricane Florence in September 2018. Therefore, we will confine our answers to events surrounding Hurricane Florence except as otherwise noted below. I believe that our answers below demonstrate that U.S. Cellular has faithfully and successfully discharged our obligations under the Framework and that our experience in dealing with the four national carriers during Hurricane Florence was consistent with the cooperative goals established by the Framework.

**1) Identify each event by date, location and type of disaster and include specific information related to the way U.S. Cellular fulfilled the reasonable roaming and mutual aid prongs of the Framework.**

U.S. Cellular was impacted by Hurricane Florence during September of 2018. The impact was confined to our operating markets in North Carolina, South Carolina, and Virginia. On September 13, 2018, pursuant to our normal operating procedures, we initiated email contact with all four national carriers to discuss mutual aid. In addition, individual phone calls occurred between representatives of U.S. Cellular and T-Mobile, and U.S. Cellular and Verizon. U.S. Cellular and T-Mobile agreed to operationalize unrestricted roaming between the customers of our respective companies inside the impacted region by removing tracking area codes. That unrestricted roaming arrangement continued until the parties mutually agreed to return to normal operations in late September. Beyond the arrangements with T-Mobile, no other carrier requested specific mutual aid or roaming accommodations during Hurricane

Florence.

- 2) Include a detailed list of both mutual aid and roaming agreements that U.S. Cellular had in place for each of these events, the names of the parties to the agreements, whether U.S. Cellular modified these agreements depending on the scope, location, and/or duration of the disaster, how U.S. Cellular operationalized each of these agreements, and what, if any, impediments U.S. Cellular faced in implementing or honoring these agreements.**

At the time of Hurricane Florence, U.S. Cellular had preexisting roaming agreements in place with all four national wireless carriers. In addition, as discussed above, we routinely reach out to carriers in advance of major storms for purposes of discussing mutual aid. No modifications were made to our agreements in regard to Hurricane Florence. We did not encounter any impediments to implementing or honoring these agreements.

- 3) Describe any instances in which either U.S. Cellular or another carrier declined a request for mutual aid or roaming and the surrounding circumstances.**

There are no such instances to report in connection with Hurricane Florence.

- 4) Describe the extent to which U.S. Cellular implemented the CTIA Best Practices for Enhancing Emergency and Disaster Preparedness and Restoring during each event.**

Following the adoption of the CTIA Best Practices in 2016, U.S. Cellular has fully implemented the CTIA Best Practices. As discussed above, reasonable roaming arrangements have been implemented. We have engaged in regular coordinated efforts to foster mutual aid arrangements including during times of need. We have engaged in CTIA convened discussions with local government officials as well as conducted separate consultations. We routinely engage in consumer readiness efforts and have complied with all DIRS reporting obligations.

- 5) Identify any situations in which U.S. Cellular did not implement the Framework (when both ESF-2 and DIRS were activated) and explain why.**

There are no such instances to report and as indicated above DIRS activations within our footprint were limited to Hurricane Florence.

Please feel free to contact me if you have any questions regarding our answers.

Sincerely,



Grant B Spellmeyer  
Vice President – Federal Affairs & Public Policy

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