November 26, 2018

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE PS Dockets 15-80 and 04-35

Dear Secretary Dortch:

On November 12, 2018, the Harris County Office of Homeland Security & Emergency Management (HCOHSEM) and the Federal Communications Commission's (FCC) Office of Public Safety and Homeland Security discussed the need and concerns associated with sharing network outage data.

HCOHSEM outlined several benefits that could come from a cooperative and responsible sharing of network outage data between carriers and public safety officials. Harris County saw massive power and telecommunications outages with Hurricane Ike in 2008, and had difficulty getting network outage data from carriers, often relying on field reports of where phones were working or not working. While power outages were severe during Ike, people who still had access to telecommunication service found ways to stay connected, including plugging in cell phones to their cars to make calls and listening to radio updates.

In an age where more and more people rely on digital and mobile content to stay informed - including our public safety officials - having an accurate picture of telecommunications capabilities is vital. Knowing where to send response resources to reestablish infrastructure and being able to communicate protective actions to the public where they will naturally go to look for information relies on knowing that status of our telecommunications networks. As the Wireless Emergency Alerts (WEA) system within the Integrated Public Alerts and Warning System (IPAWS) becomes more robust, public safety officials need to know they can have the latest outage data to ensure it remains a viable tool during a disaster.

From a public safety perspective, it is critical to know where there are network outages in disaster areas, regardless of the carrier. The faster that critical infrastructure can be restored at the local level, the better the response will be. Telecommunications is widely considered public infrastructure and is one of the few outliers in not providing open public data regarding outages. There is a strong relationship with utility partners such as CenterPoint Energy in Harris County

where outage and restoration data is provided to public safety officials and the public. This allows residents and responders to make more informed decisions about where it is safe to go in the area. Network outage data would also benefit Public Safety Answering Points (PSAPs) and 9-1-1 centers to make immediate judgements on response activities. Both parties in this discussion agree that further research into the benefits of this data to PSAPs is necessary.

Harris County and the FCC representatives in this discussion agree on the public safety benefits, but the FCC expressed concerns about the security of sharing this data with local jurisdictions. Rightly so, this information could be used for political or self-motivated purposes outside of the public safety benefits previously discussed. Harris County assured the FCC that it has robust IT security and support in place to protect sensitive data of all sorts for the nation's 3rd largest county. While there are tools already in place to provide network outage data such as the Network Outage Warning System and the Disaster Information Warning System from the FCC, Harris County believes more direct access to local jurisdictional information is needed.

The entire region often sees impacts from disasters in or near Harris County and HCOHSEM relies heavily on information sharing with trusted partners. In alignment with the National Response Framework premise that all disasters are local, there is a need for all local jurisdictions to have access to outage data in their area. With Harris County's pre-established relationships, it could use network outage data provided for its jurisdiction while working with regional partners doing the same to create a common operating picture. Harris County agreed that having a larger entity such as State government regulate access to the data would still meet local jurisdictional needs, while ensuring data and access security to telecommunications providers. HCOHSEM serves as a model for public-private partnership in infrastructure data sharing.

This discussion marks an important step forward in getting critical outage data to public safety officials when they need it most. Harris County looks forward to continue working with telecommunications providers to create a more robust operating picture during disasters.

A copy of this letter will be filed with the FCC, via ECFS.

Sincerely,

Francisco Sanchez, Jr.
Deputy Emergency Management Coordinator
Harris County Office of Homeland Security & Emergency Management