

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter Of	)	
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Public Safety and Homeland Security Bureau	)	PS Docket No. 18-339
Seeks Comment on Hurricane Michael	)	
Preparation and Response	)	
	)	

**COMMENTS OF CHARTER COMMUNICATIONS, INC.**

Charter Communications, Inc. files these comments in response to the Commission's request for comment on the readiness, preparation, and response with respect to Hurricane Michael.<sup>1</sup> Charter recognizes the importance of its services to its customers, and takes very seriously the need to restore service as quickly as possible after a natural disaster. Hurricane Michael was initially forecast as a Category 1 storm, but quickly became a Category 4 storm. Although the total number of Charter customers impacted by the storm was significantly smaller than those effected by other hurricanes, including Hurricanes Florence and Irma, Hurricane Michael was devastating to some of the areas served by Charter, completely destroying homes and businesses and two of the company's plants.

Due to Charter's preparation and effective communication with private and public sector partners, the company has been able to quickly restore service to most customers suffering outages, and it continues to rebuild lost plants with plans to enhance its service capabilities after doing so.

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<sup>1</sup> See *Public Safety and Homeland Security Bureau Seeks Comment on Hurricane Michael Preparation and Response*, PS Docket No. 18-339, DA 18-1176 (2018).

## **DISCUSSION**

Charter understands the importance of planning ahead before natural disasters occur and thus took a proactive approach to reduce the impact of Hurricane Michael on its customers. Charter had recently undergone preparations for Hurricane Florence and Tropical Storm Gordon, which served its operations teams well when Hurricane Michael struck a few months later.

In anticipation of Hurricane Michael, Charter activated detailed Disaster Emergency Action Plans. This involved manning war rooms and local command centers, performing comprehensive pre-storm checks at all telecommunications sites to ensure maximum fuel for all emergency standby generators, testing and activating alternate communications systems, securing all office facilities, hubs, head ends, and data centers, and confirming all employees (particularly technicians) had contact information to receive updates and be activated for recovery efforts.

Charter's response efforts were bolstered by coordination with federal, state, and local partners—both in advance of and immediately after the hurricane. Charter maintains a collaborative relationship with the Department of Homeland Security and actively participates in the National Coordination Center for Communications/Communication Information Sharing Analysis Center ("NCC/Comm-ISAC"), with a Charter employee currently serving as the Vice Chair of the NCC, and slated to serve as Chair of the NCC in 2019. This ongoing relationship allowed Charter greater communication and coordination with federal agencies, including the Federal Emergency Management Agency ("FEMA"), during Hurricane Michael. In addition, Charter takes its obligations under the Emergency Alert System ("EAS") very seriously. For Hurricane Michael, Charter received several EAS alerts from FEMA through the Integrated Public Alert and Warning System or from local civil authorities, and forwarded all FCC-required alerts to its customers. Charter also successfully coordinated with local partners, such as state and county

Emergency Operation Centers, as well as cell tower providers and carriers, which has proved invaluable as Charter manages its recovery efforts. Moreover, Charter remained in constant communication with its vendors so that they had the appropriate materials and resources to react quickly when needed.

Of course, all the preparation and coordination in the world cannot prevent outages from occurring, particularly considering the devastation that resulted from Hurricane Michael. Charter sustained the loss of two plants (in Chattahoochee and Blountstown) and extensive damage to another, resulting in over 130 miles of plant damage and service outages to over 1,250 customers. Charter's advance preparation and coordination efforts enabled the company to restore service to many affected customers in a relatively short period of time after the storm. Within two weeks, Charter had fully restored service to over 700 customers in the communities of Chipley and Graceville.

Unfortunately, some customers in the community of Chattahoochee, where Charter has had to fully rebuild an entire plant, are still without service. Charter began the process of rebuilding as soon as the area was cleared and it could gain access. At the time of this filing, Charter has rebuilt approximately 90 percent of the damaged plant and expects to be able to complete the restoration of service by mid-January 2019. As part of that rebuilding process, Charter is upgrading its facilities to ultimately provide more advanced services to its customers. Similarly, Charter has now completed approximately 20 percent of the rebuild of the plant lost in Blountstown. Charter is working as quickly as possible to return service in Blountstown where clearing for access took longer than in Chattahoochee. The company plans to connect customers to improved network facilities and launch its complete service offering (high-speed broadband, video, and voice) in the early part of 2019.

In all affected areas, Charter offered customers a number of options to address their service interruptions. As a baseline, customers were not charged for damaged equipment, which Charter has replaced free of charge, and they were not charged any installation fee when transferring to a temporary location. In addition, Charter has extended bill credits to address service interruptions caused by Hurricane Michael.<sup>2</sup>

Even though Hurricane Michael did not directly impact the Spectrum News coverage area in Florida, meteorologists and news crews for Spectrum News 13 in Orlando and Spectrum Bay News 9 in Tampa Bay provided extensive coverage of Hurricane Michael to Spectrum customers before, during, and after the storm; providing emergency weather information is a core mission of Spectrum Networks. Spectrum News 13 and Spectrum Bay News 9 together employ ten full-time weathercasters, all of whom are certified broadcast meteorologists recognized by the American Meteorological Society, and several of whom are certified to teach severe weather preparedness to state and local government agencies. With respect to Spectrum News 13, among other things, weather experts provided team coverage in the hours leading up to Hurricane Michael, and around-the-clock updates were provided with each National Hurricane Center advisory, including overnight updates with Spectrum News 13's certified meteorologists. For Spectrum Bay News 9, six of the station's journalists went to several Florida Panhandle cities, such as Mexico Beach and Panama City, to highlight Hurricane Michael's potential impact zones. The station also provided near around-the-clock live reports from its seventeen teams located both in Tampa Bay and the Panhandle.

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<sup>2</sup> In the case of natural disasters, Charter has previously opened its public-facing Wi-Fi to non-customers. In this case, however, Charter did not have any public Wi-Fi access points in the affected areas. Nor were shelters opened in which Charter could install and provide wired access to data.

## CONCLUSION

Charter has been able to effectively respond to Hurricane Michael due to its preparation, coordination with federal, state, and local officials, and dedication to its customers, and has moved expeditiously to rebuild and improve its damaged facilities. Charter continues to support its customers and the communities affected by Hurricane Michael through its dedicated customer service team and by providing highly regarded local news and weather information through Spectrum News 13 and Spectrum Bay News 9.

Respectfully submitted,

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