

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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

**COMMENTS**



The American Cable Association (“ACA”) hereby files comments in response to the Federal Communications Commission (“Commission”) Public Safety and Homeland Security Bureau (“Bureau”) public notice seeking comment on the preparation for and response to Hurricane Michael within the communications sector.<sup>1</sup>

Nearly two dozen ACA member companies provide communications services in areas affected by Hurricane Michael. As smaller providers that live within the communities they serve, ACA members have every incentive to provide their customers—who include neighbors, friends and family—with resilient communications

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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, Public Notice, DA 18-1176 (rel. Nov. 16, 2018) (“Public Notice”).

services, and to rebuild damaged facilities and restore service as quickly as possible in the aftermath of a major storm.

Moreover, ACA members, including those who operate in areas prone to hurricanes or other weather emergencies, all compete against other providers. Failure to provide reliable service runs the risk of losing customers to these competitors, an outcome that can exacerbate the already substantial, unbudgeted costs of recovery from a natural disaster of Hurricane Michael's scale. Hence, ACA members recognize the value in investing resources appropriate to the size and scale of their businesses to mitigate the risk of physical damage to their networks in the event of a natural disaster. They also know that responding quickly and decisively when disaster strikes is a commercial necessity.

Accordingly, ACA members take significant steps to prepare for an impending weather emergency, and Hurricane Michael was no exception. Based on experience with prior storms, ACA member companies had plans that outline specific actions to be performed at different preparatory stages (e.g., at 72, 48 or 24 hours in advance of a storm's expected arrival) based on the expected size of the storm. Under these plans, ACA members preposition fuel, generators, and other materials at locations they expect to be just outside the disaster area; identify customers whose service restoration should be prioritized if possible; coordinate extensively within their companies to ensure all available resources are brought to bear effectively when the storm arrives; and instruct customer service staff on how to answer questions about the storm and its potential impact on service. They even reserve hotel rooms to give employees who travel from

afar to assist in the recovery a place to stay. They also communicate with their customers by various means, including on social media.

ACA members were ready for the storm that was expected; however, Hurricane Michael developed rapidly from a tropical storm into a Category 4 hurricane shortly before making landfall. Thus, while ACA members had engaged in extensive preparations well in advance of the storm initially anticipated, they and other providers had minimal lead time to prepare for the weather event of Hurricane Michael's magnitude that materialized. ACA members worked diligently to adjust their preparations as the scale of the storm became clear.

When the storm hit, communications networks in its path, including those of ACA members, suffered considerable damage. As the Bureau notes, Hurricane Michael was a disaster event of historic proportions, "the strongest storm to hit the continental United States since Hurricane Andrew in 1992."<sup>2</sup> Affected ACA members report suffering extensive damage to their networks, including the destruction of hundreds of miles of fiber optic and hybrid fiber-coaxial cable. The presence of significant aerial infrastructure in their networks was a factor that contributed to the extent of damage.

In the immediate aftermath of the storm, ACA member companies surveyed the damage to their networks and determined priorities for repair and restoration. One member reports that it coordinated closely with first responders in the area, to help ensure that public safety communications were up and running. Some ACA member companies also report participating along with fellow providers, electrical utilities and

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<sup>2</sup> See *id.* at 1.

other stakeholders on daily coordination calls held by Florida state government officials.<sup>3</sup> These calls helped ACA members in focusing their efforts to restore essential facilities, including backhaul service to wireless carriers, and also in targeting areas ready for ACA members to move in and begin restoring service to residential customers.

In the midst of rebuilding their networks and permanently restoring service, ACA members regularly posted service restoration updates on their websites and on social media. ACA member companies also took steps to provide temporary relief to customers and other residents in areas where recovery may have been weeks away, such as by opening Wi-Fi hotspots for free public use. Member companies also suspended billing and collection activities and waived early termination fees.

As noted above, ACA members' risk of losing customers to competitors—as well as their interest in minimizing losses of customer revenue—create strong incentives to bring service back online for customers as quickly as possible after a disaster strikes. Indeed, ACA members worked diligently to restore service to large numbers of affected customers within days of Hurricane Michael's arrival. In their continuing efforts to restore service they faced significant obstacles, including widespread commercial power loss that affected both their own facilities and their customers' ability to receive service. Wireless service outages also impeded ACA members' recovery by hampering communications with and among field personnel. As crews worked to clear debris and restore electrical power, ACA members sustained extensive fiber cuts, both to fiber that

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<sup>3</sup> While not all ACA members with operations in the disaster area participated in these calls, those who were invited to participate, including those who were on them from the very beginning and others who were asked to join days after the first call, found them to be a helpful vehicle for coordination of recovery efforts.

was not originally harmed and to fiber that had been damaged and restored, leading to additional service disruptions. The accumulation of roadside debris further impaired ACA members' recovery by causing additional damage to facilities and preventing access to utility poles.

ACA members have now made tremendous progress in restoring their networks throughout the disaster area, and they continue to work tirelessly towards a full recovery. For some providers these efforts have included laying hundreds of miles of new fiber optic and coaxial cable, a deployment project of considerable scale—and expense—for a smaller provider. The costs of repairing and restoring storm-damaged networks, which cannot be planned or budgeted for in advance, consume funds that a provider might have put to other valuable uses, such as network upgrades or expansions into new territory. Indeed, one member reports that the costs of repairing the damage its network sustained in Hurricane Michael is comparable to the amount it budgets *per year* for new network builds. Moreover, providers seeking to rebuild after a crippling storm face the prospect that some residents (i.e., current or potential customers) may permanently relocate, shrinking the provider's revenue base in the rebuilt area. Yet ACA members appreciate their responsibility to restore service to their communities, and they have made substantial investments of time, money and countless staff hours to fulfill this responsibility.

ACA appreciates the opportunity to report on the efforts of its members to prepare for and recover from Hurricane Michael. Should the Commission pursue measures to improve disaster resiliency in the wake of this storm, ACA encourages it to take into account the needs and circumstances of smaller providers such as ACA

members, as documented in these comments. In particular, ACA urges the Commission to ensure that the output of its newly formed broadband disaster resiliency working group<sup>4</sup> includes recommendations that are appropriately tailored for smaller providers with limited resources and personnel. ACA looks forward to providing any welcome assistance with these efforts.

Respectfully submitted,



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<sup>4</sup> See FCC Announces the Membership of the Broadband Deployment Advisory Committee's Disaster Response and Recovery Working Group, GN Docket No. 17-83, Public Notice, DA 18-1121 (rel. Nov. 1, 2018).