

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 12, 2015

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

Re: Ex Parte Notice *In the Matter of Improving the Resiliency of Mobile Wireless Communications Networks*, PS Docket No. 13-239 and *Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket No. 11-60

Dear Ms. Dortch:

The California Public Utilities Commission (CPUC) submits this ex parte notice pursuant to 47 C.F.R. § 1.1206(b)(2). On November 5, 2015, CPUC staff participated in a conference call with staff at the Federal Communications Commission (FCC). Participating for the CPUC were Communications Division (CD) Director Ryan Dulin, Assistant General Counsel Helen Mickiewicz, Senior Counsel Christopher Witteman, CD Supervisor Charles Christiansen, and Senior Engineer Karen Eckersley. Participating for the FCC were staff from the Public Safety and Homeland Security Bureau: Michael Saperstein, John Healy, Jeff Goldtharpe, Holly Rocco, Rene Roland. The attendees discussed the comments the CPUC had filed in January 17, 2014 in the above-referenced dockets regarding wireless network resiliency.

The CPUC discussed the importance of wireless customers to know when service is available, and specifically, the need for wireless resilience to ensure availability of service in emergencies. CPUC staff cited a recent power outage in Moss Landing, CA, which resulted in loss of service by two wireless carriers for many hours. CPUC staff also noted that more distributed antenna systems and micro coverage techniques are being deployed, resulting in increasingly widespread reliance on wireless service. At the same time, the CPUC pointed out that large areas in California do not have any coverage – wireless or wireline.

The CPUC noted that its wireless broadband measurement initiative has provided valuable information demonstrating that the published wireless operators' coverage maps are not accurate and, accordingly, this can mislead the public.¹ Also citing the CPUC's investigation of Cingular in 2009, CPUC staff highlighted its discovery that wireless service providers have very detailed and understandable coverage maps which they do not make available to the public.

The CPUC compared the process of evaluating coverage claims by wireless providers to the way that the MPG (miles-per-gallon) stickers on new cars provide information that is calculated using the same methodology and control criteria for all cars. Individual mileage may vary, but the MPG output is the result of applying the same methodology to the input data. Similarly, when a customer views wireless carrier representations of coverage, they should be comparing "apples to apples."

Thank you for your assistance in making this information part of the record. If you have any questions about this notice, please do not hesitate to contact me at hmm@cpuc.ca.gov.

Sincerely,

/s/ HELEN MICKIEWICZ
Helen Mickiewicz
Assistant General Counsel

HMM:rar

¹ On September 15, 2015, the CPUC commented GN Docket 15-191, the 11th Broadband Progress NOI, and explained its collection methodology and results.