

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

In the Matter of)	
)	
Improving the Resiliency of Mobile Wireless Communications Networks)	PS Docket No. 13-239
)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies)	PS Docket No. 11-60
)	

COMMENTS OF PCIA – THE WIRELESS INFRASTRUCTURE ASSOCIATION

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COMMENTS OF PCIA – THE WIRELESS INFRASTRUCTURE ASSOCIATION

I. INTRODUCTION AND SUMMARY

PCIA – The Wireless Infrastructure Association (“PCIA”)¹ respectfully submits these comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) *Notice of Proposed Rulemaking* seeking comment on the resiliency of mobile wireless communications networks during emergencies.² PCIA provides these comments in response to the Commission’s inquiry into whether mandatory outage reporting and requirements will allow consumers to compare competing networks’ reliability and encourage competition that will improve network resiliency.

PCIA urges the Commission to recognize the complex nature of wireless infrastructure and resist the urge to adopt one-size-fits-all rules to address issues that demand flexibility. The wireless infrastructure industry shares the Commission’s concern regarding wireless network reliability and resiliency. Network reliability is central to the competitive marketplace for

¹ PCIA is the national trade association representing the wireless infrastructure industry. PCIA’s members develop, own, manage, and operate towers, rooftop wireless sites, distributed antenna systems, small cells and other facilities for the provision of all types of wireless, telecommunications, and broadcasting services. PCIA and its members partner with communities across the nation to affect solutions for wireless infrastructure deployment that are responsive to the unique sensitivities and concerns of each community.

² *In re* Improving the Resiliency of Mobile Wireless Communications Networks *et al.*, *Notice of Proposed Rulemaking*, PS Docket 13-239 *et al.* (2013) (“NPRM”).

wireless services, and carriers and infrastructure providers already work diligently to deploy reliable networks to meet their customers' needs. Additional regulations will not incent the creation of reliable networks better than current competition already does.

Moreover, the proposed reporting requirements will likely distort consumers' view of network reliability, not enhance it. The proposed creation of a single metric to compare network reliability ignores the multitude of circumstances, data, policy, and technology that come together to determine network reliability.

The proposed reporting requirements could also cause unanticipated delays in the deployment of DAS and small cell networks. The small, distributed nature of DAS and small cells means a single cell outage would likely have a minimal effect on the overall network's operation. The reporting metric, as proposed might discourage wireless service and infrastructure providers from deploying DAS and small cell networks as the metric would inflate a service provider's outage rate.

A mandatory backup power requirement is also unnecessary and impractical. Wireless service and infrastructure providers deal with a wide variety of cell site locations and technologies across the country. While backup power generators or batteries can provide improved resiliency, not all locations or technologies can effectively utilize backup power solutions. The flexibility currently permitted under the rules allows the wireless industry to capitalize on backup power options where practical and develop alternative resiliency strategies where it is not.

Finally, PCIA urges the Commission to prioritize a multi-stakeholder effort to analyze the proposed metrics and other potentially beneficial information prior to adoption of a new outage reporting rule. The Commission should work with the Communications Security,

Reliability and Interoperability Council (“CSRIC”) and the Technological Advisory Council (“TAC”), which have made great strides in researching and publishing data on improving the resilience of wireless networks. The Commission should also hold workshops with stakeholders so it can better combine industry-centric reliability efforts with consumer-centric data efforts.

II. WIRELESS SERVICE PROVIDERS ARE COMMITTED TO NETWORK RELIABILITY, RESILIENCE, AND RAPID RESTORATION

Additional regulation will not provide a greater incentive for wireless service and infrastructure providers to create a reliable network than the market incentives already in place. Network uptime and high qualities of service are demanded by consumers. When a network goes down, a wireless service provider’s product and reputation with consumers are put at risk.³

The wireless industry is moving toward an even more competitive marketplace. Recent changes by wireless service providers illustrate the fierce competition for customers among wireless providers. Within the last year, several providers announced innovative plans that offer customers greater flexibility, including the ability to upgrade their devices more frequently⁴ and subsidizing consumers’ switch from another carrier.⁵ Combined, these enhancements make it easier for consumers to switch wireless providers, further driving competition and investment in network reliability.

³ See Reply Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 11-60, PS 10-92, EB 06-119, at 3 (filed Sept. 1, 2011) (“PCIA Reply Comments”) (explaining the potential competitive harm carriers face for deploying unreliable networks); Comments of AT&T Services, Inc., PS Docket Nos. 11-60, PS 10-92, EB 06-119, at 3 (filed July 7, 2011).

⁴ See Press Release, AT&T, AT&T Customers Can Get a New Smartphone or Tablet Every Year With No Down Payment With “AT&T Next” (July 16, 2013), <http://www.att.com/gen/press-room?pid=24538&cdvn=news&newsarticleid=36749&mapcode=>; Press Release, T-Mobile, T-Mobile Announces Boldest Moves Yet as America’s Un-carrier (July 10, 2013), <http://newsroom.t-mobile.com/phoenix.zhtml?c=251624&p=irol-newsarticle&ID=1836669>.

⁵ Press Release, AT&T, AT&T Offers T-Mobile Customers up to \$450 Per Line to Switch (Jan. 3, 2014), <http://www.att.com/gen/press-room?pid=25181&cdvn=news&newsarticleid=37365&mapcode=>; Edward C. Baig, *CES 2014: T-Mobile to cover your early-termination fee*, USA TODAY, Jan. 10, 2014, <http://www.usatoday.com/story/tech/columnist/baig/2014/01/08/ces-tmobile-early-termination-fee/4379291/>.

Competition among wireless service providers flows to infrastructure providers as well, driving innovative solutions for backup power, backhaul redundancy, and other issues that impact network reliability.⁶ The status of these solutions and the infrastructure itself is monitored twenty-four hours a day, seven days a week from Network Operations Centers (“NOCs”).⁷ A NOC collects a variety of data on the cell sites within a given geographic area. If the NOC operators detect a problem at any site, the infrastructure or service provider can respond quickly and effectively to the problem. Infrastructure providers also regularly inspect sites to perform preventative maintenance.⁸

Wireless service providers continue to demonstrate their commitment to reliability and the rapid restoration of service. Members of the wireless industry work with the Department of Homeland Security’s National Coordinating Center to ensure wireless providers are prepared for emergency situations and can respond quickly to major outages caused by both natural and man-made disasters.⁹

Further, private agreements illustrate the wireless industry’s commitment to maintaining reliable networks and restoring service quickly when outages occur. The wireless industry’s response to Superstorm Sandy is one example of how wireless providers can work together to restore service without government intervention. In the wake of the storm, T-Mobile and AT&T

⁶ See PCIA Reply Comments at 4.

⁷ ON AIR Support, AMERICAN TOWER, <http://www.americantower.com/corporateus/solutions/on-air-support/index.htm> (last visited Jan.17, 2014); Tower Operations, CROWN CASTLE, <http://crowncastle.com/about-us/tower-operations.aspx> (last visited Jan.17, 2014); Operations & Services, SBA COMMUNICATIONS, http://www.sbsite.com/OperationsServices_Operations.aspx (last visited Jan.17, 2014).

⁸ ON AIR Support, AMERICAN TOWER, <http://www.americantower.com/corporateus/solutions/on-air-support/index.htm> (last visited Jan.17, 2014); Tower Operations, CROWN CASTLE, <http://crowncastle.com/about-us/tower-operations.aspx> (last visited Jan.17, 2014); Operations & Services, SBA COMMUNICATIONS, http://www.sbsite.com/OperationsServices_Operations.aspx (last visited Jan.17, 2014).

⁹ U.S. Department of Homeland Security, National Coordinating Center for Telecommunications, <http://www.dhs.gov/national-coordinating-center-telecommunications> (last visited Jan. 17, 2014).

agreed to open their networks to each other's customers in regions affected by the storm to speed restoration of service.¹⁰

Finally, the deployment of DAS and small cell solutions improves wireless networks reliability and resilience. DAS and small cell networks benefit from a distributed network design, using many small sites to create an overlapping wireless network to improve efficiency and capacity. This design also makes networks more reliable and resilient because no single cell site can act as a point of failure for the entire network. Wireless providers continue to develop and deploy these technologies because of their commitment to improve customers' wireless experience, including improved reliability.

The wireless industry is committed to the deployment of robust wireless networks, and it is already acting on this commitment without government intervention. The current ecosystem gives industry the flexibility to enter into voluntary private and public-private efforts to set standards and best practices that can best serve the wide variety of cell sites around the country. The Commission's interest in providing robust wireless service to all Americans is best served by giving the wireless industry the flexibility to continue its commitment to network reliability, resilience, and rapid restoration of service.

III. THE REPORTING REQUIREMENT WOULD BE OF QUESTIONABLE UTILITY TO CONSUMERS

The Commission seeks to establish a county-by-county, daily reporting requirement for facilities-based Commercial Mobile Radio Service ("CMRS") providers to assess the percentage of operational cell sites during times when the Disaster Information Reporting System ("DIRS")

¹⁰ Reuters, *Telecommunications firms restore service bit-by-bit after Sandy*, CHICAGO TRIBUNE, Oct. 31, 2012, http://articles.chicagotribune.com/2012-10-31/news/sns-rt-storm-sandytelecoms11e8lvezn-20121031_1_t-mobile-usa-wireless-service-verizon-wireless ("TRIBUNE").

is activated.¹¹ At the core of the Commission’s effort in this NPRM is the creation of a single metric to “enable consumers to compare how well various mobile wireless networks are able to withstand and recover from disaster conditions.”¹² The Commission’s attempt to reduce a multitude of circumstance, data, policy, and technology into a single percentage will not provide consumers with an adequate overview of network reliability and could mislead them. Indeed, a mere “snapshot” of one data point does not convey the whole reliability picture. This metric will not serve consumers in answering their primary question during outages: Where is my service operational and available? The Commission’s proposed metric will not provide sufficient transparency and clarity to be of use to consumers.

A. Network Reliability Should Not be Over-simplified into a Single Reporting Metric

A figure showing the percentage of operational cell sites will not clearly indicate the level of coverage consumers in the area would experience during an emergency. While certain sites could be rendered inoperable due to loss of power, backhaul, or other damage, effective network management and planning allows wireless providers to act before and during the emergency to ensure consumers do not lose connectivity. However, while the metric does not provide a clear picture of providers’ broader operational status, it could be construed by consumers as doing so, despite a multitude of qualifying language and disclosures.

First, the metric would not clearly convey the coverage providers are able to maintain during emergencies through effective network design and planning, which includes redundancy, overlapping coverage and site-specific hardening. Through provider’s planning and careful design before an emergency occurs, the same overlapping coverage that ensures a user’s smooth

¹¹ NPRM ¶24.

¹² *Id.* ¶20.

transition from site to site is also used to bolster coverage if nearby sites are inoperative. Through forward-thinking design service providers target certain sites for structural hardening and backup power installation. However, consumers could conflate the reporting metric with actual service coverage because these design and planning practices would not be clearly measured or conveyed by the metric.

Restoration coordination and prioritization could be complicated by the metric. Working to meet a desirable metric could divert resources that would otherwise be utilized to provide better coverage and capacity. In short, the metric could result in unintended consequences for restoration efforts. Like teaching to the test, this exercise may result in time and resources funneled into achieving high scores at the cost of real reliability and resiliency.

Further, the reporting requirement's transparency and clarity are thwarted by the complexity and sheer number of factors that must be boiled down into a lone metric. With the diversity of techniques and technology utilized by service providers for normal operations and for emergency service continuity – including DAS and small cell solutions, temporary sites, and network sharing agreements – a site-based percentage either over-simplifies the issue or will necessitate substantial boilerplate language to adequately explain to consumers how the metric accounts for these different factors. In either case, consumers will not be well-informed.

As discussed in greater detail in section IV below, the metric would have to differentiate between diverse network sites, such as macro sites and DAS and small cell solutions. The absence of a distinction would lead to inaccurate correlation between outage and the provision of service.

Temporary sites, such as COWs and COLTs, are a key component to service providers' reliability plans. However, they would likely be qualified or even diminished in value within the

metric. Temporary sites are strategically positioned prior to foreseeable events, such as hurricanes, so that they can be rapidly deployed as needed to ensure continuity of service. While a temporary site may not have the same coverage capabilities as the macro site it replaces, ascribing a proportional figure to COWs and COLTs for the purposes of the reporting metric is misleading to consumers. It fails to convey an adequate picture of service and diminishes the value and vital role of COWs and COLTs as part of any thorough continuity plan. As drafted, the metric could actually have the effect of disincentivizing the deployment of these technologies because a federal score could be lowered should they be rendered inoperable after deployment.

Roaming agreements further complicate what must be a simple metric. The Commission's proposed definition of "network site" could also include those sites operated under roaming agreements.¹³ While the roaming entity's coverage could be lost or maintained depending on the functionality of these sites, they are nonetheless outside the control of the provider as it relates to the restoration of services and long term investment and planning, such as the deployment of backup power and redundant backhaul.

Moreover, providers can enter into short-term agreements in times of crisis to share active elements of their radio access network, as was demonstrated in the aftermath of Superstorm Sandy.¹⁴ Such agreements are quick solutions to emergency coverage and capacity issues; however, how the Commission intends to include them in the reporting requirement raises several concerns. First, as these agreements can be reached shortly after a disaster, they may not be accurately and timely reflected in the daily percentage report. Second, similar to small cells and temporary towers, any numerical discount of these sites could mislead consumers as they infer coverage capability based on operational site percentages. Third, the proposed outage

¹³ NPRM ¶ 37.

¹⁴ See *supra* note 10 and accompanying text.

reporting requirement could add an additional layer of complexity to the establishment of any temporary, emergency network sharing agreements.

While the Commission seeks comment on whether its metric should account for the factors discussed above and numerous other variables that go into network reliability and restoration,¹⁵ conspicuously absent from its consideration are the multitude of other variables – topography, passable roads, site accessibility, fuel availability, lodging availability, etc. – that impact reliability and restoration efforts equally or even more so. To illustrate just one facet among the many that impact network reliability and restoration efforts, state and local governments could forego roadway brush clearing and tree trimming for a period of time for a variety of reasons. As a result, the effect of inclement weather is exacerbated as limbs sever power and communication lines, block roads, and disrupt access to telecommunications sites.¹⁶ While a resilience plan can account for redundant power and backhaul, it cannot account for factors out of the provider’s control, yet the proposed metric will ultimately apply to the provider alone.

Despite the fact the proposed reporting requirement shares many of the laudable, consumer-informative goals with the Measuring Broadband America (“MBA”) Program, these two programs are not analogous.¹⁷ The MBA Program is an example of a successful, consensus-based data compilation and disclosure to consumers because it uses a clearly objective measurement – data speeds as measured in Mbps. Such is not the case for this proposed measurement, which does not enable consumers to make meaningful comparisons between

¹⁵ Other considerations include, but are not limited to: geographic area for reporting, NPRM ¶33; and sites with multiple services, *Id.* ¶ 32, n.59.

¹⁶ See generally JOE MCGEE ET AL., REPORT OF THE TWO STORM PANEL (2012), http://www.governor.ct.gov/malloy/lib/malloy/two_storm_panel_final_report.pdf.

¹⁷ NPRM ¶20.

wireless service providers' network reliability, resiliency and service restoration practices. In sum, showing the answer to the math problem without also demonstrating how the problem was solved through various assumptions and estimates will not better inform consumers.

B. The Scope of the Reporting Requirement Could Negatively Impact Competition

The Commission proposes that the reporting requirement apply only to facilities-based CMRS providers.¹⁸ However, the scope of the proposed requirement could lead to consumer confusion and competitive inequity. The Commission should carefully consider the competitive impact and clarity of the proposed reporting requirement across the wireless industry.

The Commission appropriately raises questions about how mobile virtual network operators (“MVNOs”) fit into this scheme. MVNOs are a key part of the wireless ecosystem. They compete directly with facilities-based providers on a variety of levels (contracts, costs, devices, applications, services, etc.) for the very same customers the FCC seeks to target with this proposed reporting requirement.¹⁹ In the eyes of many consumers, MVNOs are no different than facilities-based providers. However, in the context of this reporting requirement, they are very different. Application of the reporting requirements to only facilities-based providers could competitively disadvantage facilities-based providers and MVNOs alike. Facilities-based providers, who continue to invest heavily in network deployment and resilience, solely bear the cost of restoration and resiliency and are solely subject to the reaction of the reported metric. MVNOs, on the other hand, cannot take competitive advantage of positive metrics facilities-based providers can.

¹⁸ NPRM ¶¶28-31.

¹⁹ See generally Comments of CTIA – The Wireless Association, WT Docket 13-135, at 13-16 (filed June 17, 2013).

Further, should MVNOs be required “to ascertain and report percentages of sites in operation . . . for the underlying network infrastructure they use to deliver service,”²⁰ it connotes the same level of investment in and attention to continuity of service as their facilities-based competitors. In short, they have no control over a metric that could have significant competitive ramifications for their business. Consumers today use a variety of information for comparison shopping for wireless providers. But the proposed reporting requirement could mislead consumers as they weigh outage reporting metrics that in fact impact the service of facilities-based providers and MVNOs alike.

IV. THE PROPOSED REPORTING REQUIREMENT COULD YIELD UNANTICIPATED NEGATIVE CONSEQUENCES FOR DAS AND SMALL CELL DEPLOYMENT

The FCC’s definition of “network site” could cast a wide net that inappropriately captures DAS, small cells and other components of heterogeneous networks with macro sites. While the use of small cells and DAS is growing, it is premature to include DAS and small cells in the broader outage reporting requirement.

Reported DAS and small cell outages do not necessarily correlate to a one-to-one outage of capacity and coverage. An outage in a limited geographic area could potentially catch so many small cells that it would artificially inflate a provider’s reported outage percentage. For example, an isolated outage in an area with three macro sites operating with backup power and twelve small cells without backup power could lead to a report of only twenty percent of sites in operation, when in fact coverage would be minimally impacted. As providers incorporate a variety of small cells being into their networks, the likelihood of this occurring will increase, thereby reducing the metric’s utility to consumers.

²⁰ NPRM ¶31.

DAS and small cells are often deployed to address capacity in high-traffic areas such as commercial centers and entertainment districts. However, many DIRS activations occur during events such as hurricanes that result in business closures and shelter-at-home advisories. In these cases, small cell sites would be counted against the service provider in a metric that indicates broader connectivity and capacity issues that aren't implicated while critical coverage sites are prioritized for restoration.

Further, due to their size and location, DAS and small cells often cannot take advantage of the same resiliency options as macro sites, such as backup generators or batteries.²¹ Therefore, inclusion of DAS and small cells, technologies with limited options for addressing resilience concerns, could inflate the outage percentage while diluting the usefulness of the metric to consumers.

V. THE COMMISSION SHOULD NOT ADOPT A MANDATORY BACKUP POWER REQUIREMENT

The distributed nature of wireless network architecture makes a backup power requirement unnecessary and impractical.²² Across the nationwide network, wireless service providers use more than 301,779 cell sites.²³ These overlapping networks help to ensure that a cell site failure will not act as single point of failure within wireless networks.²⁴ Network cell sites take advantage of a variety of configurations and support structures—stand-alone towers, rooftop sites, DAS and small cells or other specialty installations—each with unique backup

²¹ NPRM ¶ 43; *see* Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 11-60, PS 10-92, EB 06-119, at 3 (filed June 7, 2011); Reply Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 11-60, PS 10-92, EB 06-119, at 3 (filed Sept. 1, 2011).

²² NPRM at ¶62.

²³ Comments of CTIA – The Wireless Association, WT Docket 13-135, at 6 (filed June 17, 2013).

²⁴ *See* Comments of PCIA – The Wireless Infrastructure Association, FCC 10-62, PS Docket No. 10-92, at 2-3 (filed Sept. 3, 2010).

power considerations.²⁵ As the Commission continues to foster the development of small cells and DAS, wireless networks will become both more resilient and more complex. While diversity in network cell sites greatly improves wireless network resiliency, it makes the prospect of a mandatory backup power requirement a costly and complicated regulatory maze for wireless providers and tower owners.

Requiring backup power at cell sites will unnecessarily bring tower owners and wireless providers into conflict with existing regulation. Cell sites take advantage of a variety of support structures, which can implicate numerous of state, local, and federal regulations.²⁶ For example, a tower in a flood plain has very different regulatory burdens and backup power options than a DAS or small cell facility mounted on urban utility poles or inside a building. PCIA urges the Commission to maintain its current flexible approach to backup power that has facilitated both highly innovative solutions and a highly survivable wireless network. Furthermore, wireless service and infrastructure providers have in place operational and technical procedures to ensure that access is quickly restored in the event of a network outage.²⁷ Wireless service and infrastructure providers are able to quickly mobilize temporary cell sites either before or quickly following a network outage or anticipated usage spike.²⁸

The Commission should not distract from its primary goal of providing consumers with useful information about wireless network reliability by attempting to tackle the complex question of backup power requirements in this proceeding. The wireless industry is committed to

²⁵ Petition for Reconsideration of PCIA – The Wireless Infrastructure Association, EB Docket No. 06-119, WC Docket No. 06-63 at 6 (filed Aug. 10, 2007).

²⁶ See Comments of PCIA – The Wireless Infrastructure Association, FCC 10-62, PS Docket No. 11-60, PS Docket No. 10-92, EB Docket No. 06-119, at 4-6 (filed July 7, 2011).

²⁷ See Comments of CTIA – The Wireless Association, FCC 10-62, PS Docket No. 10-92, at 5-7 (filed June 25, 2010) (“CTIA”); Comments of AT&T, FCC 10-62, PS Docket No. 10-92, at 11-16 (filed June 25, 2010) (“AT&T”); Comments of Verizon FCC 10-62, PS Docket 10-92, at 3-5 (filed June 25, 2010) (“Verizon”).

²⁸ See CTIA at 5-7; AT&T at 11-16; Verizon at 3-5.

the deployment of robust wireless networks, which is already happening without uniform backup power rules. The current ecosystem gives wireless providers and tower owners the flexibility to enter into voluntary private and public-private efforts to set standards and best practices for the provision of backup power to the variety of cell sites around the country. Commission regulation will prevent the industry from continuing to find innovative backup power solutions and delay deployment of wireless networks by placing additional regulatory burdens on the deployment of each new cell site.

VI. THE COMMISSION SHOULD PRIORITIZE A MULTI-STAKEHOLDER EFFORT TO ANALYZE THE PROPOSED METRICS AND OTHER POTENTIALLY BENEFICIAL INFORMATION PRIOR TO ADOPTION OF A NEW OUTAGE REPORTING RULE

Prior to the adoption of a bright line rule, PCIA agrees that the FCC should “evaluate the merits of any relevant metrics on this subject through a collaborative forum such as the [CSRIC] or the [TAC].”²⁹ As demonstrated above, the issue of network reliability and reliance is too complex to be distilled down to a lone metric while maintaining transparency and utility to consumers. But network reliability persists as a concern for consumers and service providers alike, and there are opportunities for continued progress both on strengthening network reliability and providing consumers the information they need about service availability during emergencies and to make informed purchasing decisions.

Both the TAC and CSRIC have made great strides in researching and publishing data on improving resilience of wireless networks. The TAC’s Resiliency in Broadband Working Group recently made several “actionable,” preliminary recommendations to the FCC: create consumer education programs about what happens when the power goes out; collaborate with power

²⁹ Letter from Brian M. Josef, Assistant Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 11-60 (July 17, 2013).

companies by creating a liaison between the FCC and state public utility commissions; and encourage industry to do its own consumer education through product labeling and marketing.³⁰

CSRIC continues to evaluate its best practices governing the reliability of wireless networks. Recent efforts include establishing a working group to examine best practices for infrastructure and asset sharing among providers during emergencies and outages.³¹ In light of the questions raised about the treatment of roaming and other emergency network sharing agreements under the proposed reporting requirement, PCIA urges the FCC to rely upon these developed, expert bodies to inform their actions.

The Commission should also build upon its successful and informative reliability hearings.³² Further panels could focus on what matters most to consumers and how best to combine industry-centric reliability efforts with consumer-centric data efforts. In sum, the FCC should coordinate its efforts on developing data targeted at consumers with its ongoing efforts to develop data to enable better disaster recovery.

³⁰ See TAC Sept. 23rd Meeting Agenda at 71, <http://transition.fcc.gov/bureaus/oet/tac/tacdocs/meeting92313//TAC9-23-13Presentation.pdf> (last visited Jan. 17, 2014).

³¹ See CSRIC, Working Group 9: Infrastructure Sharing During Emergencies, Status Update, Sept. 12, 2013, http://transition.fcc.gov/bureaus/pshs/advisory/csric4/CSRIC_IV_WG9_STATUS_091213.pdf (last visited Jan. 17, 2014).

³² See, e.g., Transcript, Superstorm Sandy Field Hearing in New York City, PS Docket No. 11-60 (posted Feb. 28, 2013); Transcript, Superstorm Sandy Field Hearing in Hoboken, New Jersey, PS Docket No. 11-60 (posted Feb. 28, 2013).

VII. CONCLUSION

For the foregoing reasons, PCIA urges the Commission not to require facilities-based wireless providers to publicly report the percentage of operational cell sites during and after major emergencies. The metric would not present the most useful information to consumers during emergencies, lacks transparency, and would be misleading.

Respectfully Submitted,

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