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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking  
Regarding Emergency Disaster Relief  
Program.

R. 18-03-011  
(March 22, 2018)

**OPENING COMMENTS  
OF  
CONSOLIDATED COMMUNICATIONS OF CALIFORNIA COMPANY  
(U 1015 C)  
ON  
ASSIGNED COMMISSIONER'S RULING AND PROPOSAL**

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1 I

2 INTRODUCTION

3 Consolidated Communications of California Company (U 1015 C) (hereinafter  
4 “Consolidated”) hereby submits its comments on the Assigned Commissioner’s Ruling  
5 and Proposal For Maintaining Resilient and Dependable Communications Networks,  
6 issued March 6, 2020 (the "Ruling"). This Ruling requests comments in response to a list  
7 of enumerated questions concerning the resiliency and dependability of communications  
8 networks during wildfires or electric utility-initiated public safety power shutoffs  
9 (“PSPS”) in the context of a Proposal included in the Ruling on these issues.

10 II

11 RESPONSES TO TOPICS REGARDING COMMUNICATIONS NETWORK  
12 RESILIENCY DURING CATASTROPHIC EVENTS

13 Consolidated responds to each of the topics identified in the ruling as follows.

14 1. **Applicability of Requirements: The Proposal states that the requirements  
15 shall be applicable to all companies owning, operating, or otherwise  
16 responsible for infrastructure that provides or otherwise carries 9-1-1, voice,  
17 text messages, or data.**

18 (a) **Is this definition of applicability reasonably tailored to ensure  
19 regulatory compliance over all communications service providers?  
20 Why or why not?**

21 (b) **Which types of providers, if any, should be excluded from these  
22 requirements because their services are not essential to reliable access  
23 to 9-1-1 and the distribution of essential emergency information?**

24 2. **Alternatively, D.19-08-025 defined communications service providers into the  
25 following categories: (1) facilities-based and non-facilities-based landline  
26 providers include 9-1-1/E9-1-1 providers, LifeLine providers, providers of  
27 Voice Over Internet Protocol [VoIP], Carriers of Last Resort [COLRs], and  
28 other landline providers that do not fall into the aforementioned groups; (2)  
wireless providers include those that provide access to E9-1-1 and/or LifeLine  
services; (2A) facilities-based wireless providers; and (2B) non-facilities-based  
wireless providers, include resellers and mobile virtual network operators  
[MVNOs].**

(a) **For purposes of Phase II, should the Commission apply the definition  
from D.19-08-025, instead of the proposed definition in the Proposal?**

Consolidated supports the proposed definition identified in question 1 above, but  
notes that waivers to particular requirements, as identified in question 5, may be  
warranted in certain circumstances. Given the varied size, economic resources, and  
service territories of the different communications companies, it may be unreasonable or

1 cost prohibitive to apply specific requirements to all providers in every single  
2 circumstance.

3  
4 **3. Definition of Resiliency: The Proposal defines resiliency as the ability to  
5 recover from or adjust easily to adversity or change and is achieved by  
6 Providers through utilizing a variety of strategies. The proposal lists an array  
7 of strategies and provides definitions for each one.**

8 (a) Please provide comments on the definition of resiliency in the context  
9 of communications service resiliency strategies and their definitions.

10 (b) Please comment on any recommendations or modifications that should  
11 be considered to the proposed resiliency definition and the resiliency  
12 strategies. Please provide a complete discussion for any proposed  
13 recommendations or modifications.

14  
15 Consolidated agrees with the proposed definition of resiliency and continues to  
16 invest in its infrastructure and network hardening, as described in more detail below.

17 Consolidated concurs that utilizing multiple strategies is the best way to maintain  
18 network reliability during emergency situations.

19  
20 **4. Backup Power Requirement: The Proposal recommends that all Providers  
21 have: on-site emergency backup power to support all essential  
22 communications equipment including but not limited to, switching centers,  
23 central offices, wire centers, head ends, network nodes, field cabinets, remote  
24 terminals, and cellular sites (or their functional equivalents) necessary to  
25 maintain service for a minimum of 72 hours immediately following a power  
26 outage. Service must be sufficient to maintain access for all customers to 9-1-1  
27 service, to receive emergency notifications, and to access web browsing for  
28 emergency notices.**

(a) Please provide comments on the proposed backup power requirement.

(b) How should “outage” be defined?

(c) Should the length of the 72-hour backup power requirement be  
shorter, longer or indefinite? Please provide an analysis to support  
your recommendation.

(d) What other backup power requirements or components should the  
Commission consider? Please provide an analysis to support your  
discussion of any additional requirements or components.

Consolidated agrees that backup power is a key element of network resiliency but  
finds the suggested 72-hour requirement for all equipment throughout the network not  
only unreasonable but also technologically unfeasible at this point. Further, neither  
Consolidated nor any carrier can reasonably ensure “all customers” have access to 9-1-1

1 service at all times after a catastrophic event. For example, a wildfire of the intensity and  
2 severity of the Camp Fire would damage an area's communications networks so  
3 extensively that service could not be ensured no matter what currently known resiliency  
4 strategies are employed. Nevertheless, Consolidated takes resiliency and backup power  
5 seriously. All of Consolidated's sites have backup power equipment and battery backup  
6 equipment is kept fully charged by commercial power before outages occur. In addition,  
7 all of Consolidated's central office and remote buildings have fixed generators in addition  
8 to commercial power, with fuel tanks that range in capacity from several hundred gallons  
9 to several thousand gallons. Sites that do not have fixed generators have portable  
10 generators with fuel tanks can be re-filled while the generators are running to guarantee  
11 functionality during extended power outages. Consolidated has a fleet of trucks allowing  
12 it to transport the fuel to the generators as needed so long as it is safe to do so.

- 13
- 14 **5. Backup Power Plans: The Proposal recommends that Providers file a**  
15 **Backup Power Plan with the Commission six months from the effective date**  
16 **of an adopted Commission decision with an array of requirements that**  
17 **illustrate the Provider's preparedness to ensure 9-1-1 access, ability to receive**  
18 **emergency notifications, and access web browsing for 100 percent of**  
19 **customers in the event of a commercial power outage. Please provide**  
20 **comments and analysis on this compliance requirement.**  
21 (a) **Clean Energy Generation: The Proposal directs Providers to utilize**  
22 **clean energy backup power options (e.g., solar, etc.) as reasonable**  
23 **before using diesel generators to meet the backup power requirement,**  
24 **among other provisions. Please provide comments and analysis on this**  
25 **issue, and specifically address the following:**  
26 i. **How should "clean energy backup" be defined?**  
27 ii. **Provide specific information on barriers to procuring specific**  
28 **types of clean energy backup power (e.g., cost, permitting, etc.).**  
(b) **Waivers: The Proposal directs Providers to submit waivers if they**  
qualify for any of the exemptions enumerated in the Proposal. Please  
provide comments and analysis on this issue.  
(c) **Critical Facility Location Information Sharing: The Proposal directs**  
Providers to share critical facility location information to emergency  
responders to enhance the ability to defend vital facilities against  
wildfire damage and ensure facility redundancy. Please provide  
comments and analysis on this issue.  
(d) **Critical Infrastructure Resiliency, Hardening and Location**  
**Information Sharing: The Proposal directs Providers to annually**  
submit geographic information system (GIS) information with the  
specific location of network facilities and backhaul routes to the  
Commission. The Proposal directs Commission staff to analyze and

1           **process this information, so it is accessible to state and local emergency**  
2           **responders, subject to confidentiality requirements. Please provide**  
3           **comments and analysis on these proposed directives.**

4           Consolidated finds it reasonable for providers to submit their backup power plans  
5 if ordered to do so by the Commission. Consolidated already proactively works with  
6 state and local authorities as part of the planning and implementation of various  
7 emergency response notification processes. In this regard, Consolidated supports both  
8 “critical facility location information sharing” and “critical infrastructure resiliency,  
9 hardening and location information sharing.” Consolidated also endorses the availability  
10 of waivers, which may be necessary given the vast diversity among communications  
11 providers and service territories prohibits having a one-answer solution for everything.

12           Consolidated recognizes the importance of clean energy generation but believes a  
13 quota or fixed requirement is premature. Given the limited amount of time and resources  
14 until the next fire season, improving network resiliency and hardening at-risk areas  
15 should be prioritized over identifying, purchasing, and installing clean energy backup  
16 power options that may or may not provide more reliable backup power solutions.  
17 Backup power options, by their very nature, run infrequently and are therefore unlikely to  
18 be a significant contributor to California’s carbon emissions. If the Commission decides  
19 to move forward with a mandate on clean energy backup power options, it should not  
20 include a “rip and replace” requirement that affects existing backup power equipment.

21 **6.    Emergency Operations Plans: The Proposal directs Providers to file**  
22 **emergency operations plans with the Commission, discussing how their**  
23 **operations are prepared to respond to emergencies. Please provide comments**  
24 **and analysis on this issue.**

25       **(a)    Additionally, the Proposal itemizes required content that the Providers**  
26       **must submit to the Commission. Please provide comments and analysis**  
27       **on this issue.**

28       **(b)    Should the proposed rule for Emergency Operations Plans include any**  
          **other information that the Proposal does not address? Please explain**  
          **why any additional information is legitimate and necessary for**  
          **adoption.**

1 Consolidated agrees that it is reasonable for providers to file emergency operations  
2 plans with the Commission and that these plans should include basic elements such as:  
3 (1) emergency contact information; (2) emergency preparedness exercises; (3) public  
4 communication plans; and (4) communication with state and local emergency responders.  
5 Consolidated has already created a companywide emergency operations plan and  
6 regularly works with state and local government agencies to plan and prepare for disaster  
7 responsiveness. Many of these collaborative processes are subject to on-going design  
8 and development in order to continuously improve upon them as requirements evolve.  
9 However, as mentioned above, Consolidated also believes a waiver process is necessary  
10 so that additional requirements can be evaluated as to specific providers on an item-by-  
11 item basis. For example, the proposed requirement identified in this question for each  
12 provider to “post on its website an outage map” depicting outages and expected  
13 restoration in real time may be reasonable for large providers but not feasible for smaller  
14 providers to implement.

- 15 **7. Current Mitigation Efforts: in response to this ruling, all respondent**  
16 **communications service providers shall provide a discussion of what current**  
17 **mitigation efforts they are undertaking to ensure continuity of service in**  
18 **preparation and in advance of the upcoming 2020 wildfire and grid outage**  
19 **season. This should include, but is not limited to, the following topics:**  
20 (a) **Number of additional generators acquired (both fixed and mobile);**  
21 (b) **Number of additional temporary facilities acquired (e.g., COWs,**  
22 **COLTs, etc.);**  
23 (c) **Additional network redundancy built into network (e.g., logical and**  
24 **physical);**  
25 (d) **Provide details on plans in the near, intermediate and long term to**  
26 **further harden facilities;**  
27 (e) **Identify barriers to building resiliency into your networks;**  
28 (f) **Identify any other investments or cooperative agreements that will be**  
made to build in more backup generation or minimize the need for  
backup generation; and  
(g) **Identify if communications service outages as a result of future public**  
safety power shutoff events are expected. Identify specific locations and  
reasons where network outages are expected.

To the extent practicable, communication service providers are directed to  
submit as much of this information as possible without assertion of confidentiality.

Consolidated will respond to this question with as much detail as possible in the  
limited time provided for response to this ruling without revealing confidential

1 infrastructure information in light of the Commission’s temporary suspension of all  
2 confidential filings due to the COVID-19 pandemic.<sup>1</sup>

3 Consolidated is extremely dedicated to the safety of its customers and is  
4 continually improving the resiliency of its network. Indeed, approximately 66% of  
5 Consolidated’s network is located underground, significantly reducing the potential for  
6 damage to the network during a wildfire. Consolidated continues to evaluate the  
7 transition of its remaining overhead facilities underground and locates its network  
8 underground for new greenfield construction. As for the remaining overhead facilities,  
9 Consolidated maintains its own inspection and trimming program to maintain the lines  
10 free from vegetation. Consolidated has also hardened the connection between legacy  
11 copper and fiber facilities in order to enhance resiliency and customer access to 9-1-1  
12 during emergency situations. Also, where possible, Consolidated has buried the short-  
13 span copper drops between the customer’s premises and its remote terminals, which are  
14 connected by fiber to a central office. From the central office to the selective router,  
15 Consolidated utilizes diverse fiber routes to direct the call to a public service answering  
16 point.

17 As described above, all of Consolidated’s sites have backup power systems and its  
18 central offices are served by commercial power and fixed generators. Locations that do  
19 not have fixed generators employ battery backup power systems and portable generators.  
20 Consolidated maintains a fleet of trucks to continuously transport fuel to fuel tanks that  
21 can be refilled while the generators are running when it is safe to do so.

22 Consolidated also employs diverse fiber routes which provide redundancy and the  
23 ability to reroute when necessary. Consolidated’s E-911 trunks are geographically  
24 diverse as are Consolidated’s toll trunks and data backbone facilities. Consolidated also  
25 maintains a 24 hour a day, 7 day a week Network Operation Center to facilitate incoming  
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27 <sup>1</sup> <https://www.cpuc.ca.gov/COVID19practitioneralert/>

1 repair communications such that Consolidated can immediately dispatch appropriate  
2 repair crews to impacted areas.

3 Consolidated assists wireless providers with the facilities needed to provide  
4 backhaul facilities to temporary cell sites and assists emergency responders with  
5 additional voice and data services during disaster situations. Additionally, Consolidated  
6 coordinates with electric utilities during power outages, including during disaster  
7 situations, to arrange for additional backup power if the outage will be of long duration.  
8 Finally, Consolidated provides information about emergency services and processes, in  
9 directory form, to its service area. Consolidated utilizes diverse and redundant measures  
10 to reach customers, including through the use of press releases, public service  
11 announcement, websites, outbound call messaging, email communications, direct-mail,  
12 and partnerships with emergency crews and other utilities.

13  
14 **8. Other Topics for Commission Consideration: Parties may identify issues in**  
15 **addition to the proposed rules and discussion in the Proposal.**

16 Consolidated does not have any additional issues to identify at this time.  
17

18  
19 **III**  
**CONCLUSION**

20 As can be clearly seen from the responses above, Consolidated is deeply  
21 committed, not just to providing a reliable communications network, but to continually  
22 improving the resiliency of its networks to provide for its customers during emergency  
23 situations. Consolidated looks forward to working with the Commission to continue to  
24 improve the safety and reliability of California's communications network.  
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1 Dated this 3rd day of April 2020, at San Francisco, California.

2 Respectfully submitted,

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