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

Order Instituting Rulemaking Regarding
Emergency Disaster Relief Program

Rulemaking 18-03-011

**COMMENTS OF U.S. CELLULAR (U3043C) ON
ASSIGNED COMMISSIONER'S RULING AND PROPOSAL**

In accordance with the California Public Utilities Commission's ("Commission") Assigned Commissioner's Ruling and Proposal ("Ruling and Proposal"), California Rural Service Area #1, Inc. d/b/a U.S. Cellular ("U.S. Cellular") (U3043C) submits these comments.¹ U.S. Cellular supports the comments filed by CTIA on policy issues in response to the Ruling and Proposal. U.S. Cellular also submits information in this filing in response to the request for a discussion of current mitigation efforts, set forth in Question 7 of the Ruling and Proposal.²

U.S. Cellular provides wireless service only in Northern California. U.S. Cellular is committed to public safety and has taken significant voluntary measures to support and benefit consumers. In advance of the 2019 planned public safety power shut-off ("PSPS"), we proactively took actions to ensure, to the best of our abilities, continuity of service to our customers. As a result, despite the lack of notice and abrupt shut down of power, our network was minimally impacted by the PSPS last year. We did not lose service and our network continued to function, as we described in our November 8, 2019 response to the Commission staff data request regarding the 2019 PSPS.

¹ Pursuant to Administrative Law Judge's E-Mail Ruling Extending Time of Opening Comments and Reply Comments issued on March 25, 2020, these comments are timely.

² U.S. Cellular reserves its rights to challenge this request to the extent that the request seeks information regarding interstate services and/or information services provided by U.S. Cellular as the Commission's jurisdiction is limited to intrastate telecommunications service.

As we did before the 2019 PSPS, we continue to manage our network to minimize network impacts and service disruptions for future disasters and emergency situations. What was true before, is true now. We are providing information on these efforts, as directed by the Ruling and Proposal, in this filing. These efforts are a work in progress and are evolving as we work through the current COVID-19 emergency and prepare for the 2020 wildfire season.

U.S. Cellular is continually hardening its communications infrastructure to improve the safety, reliability, and functionality of its network. U.S. Cellular's network deployment efforts are focused on making the network even more reliable and robust. U.S. Cellular has taken several notable actions to harden its communications network. U.S. Cellular has increased generator penetration throughout its network, and continues to monitor the network in order to be able to deploy generator capability where ever needed quickly. We have backup power capabilities at all our sites and have had such capabilities since well before the 2019 wildfire season

U.S. Cellular currently has existing permanent generator back up power at over half of its cell sites located in California. We are currently working on a multi-year plan to increase the number of sites with permanent generator back up capabilities. Factors such as difficult zoning and building regulations will slow our progress and there are some sites where permanent generators will not be permitted. As a consequence, we recently purchased additional portable generators available for use in California. As part of this multi-year plan, U.S. Cellular will install automatic transfer switches for sites without permanent generators. This allows us to store a portable generator at a site which will automatically switch on if power is lost.

U.S. Cellular has COLTs (Cell on light trucks) that have full CDMA, EVDO, LTE, and VOLTE technologies available to support a wide range of disasters or special events in our Pacific Northwest service area. These COLTs can be mobilized at any time for Northern

California. U.S. Cellular also has a significant number of additional COLTs across the rest of its service area, with the same capabilities, that can be easily deployed to California in an emergency. All these units will run, self-contained, with a minimum of 25kw portable generator or minimum 100 amp electric service. These COLTs are also set up to use the following backhaul; T1 circuits, carrier ethernet, unlicensed microwave and satellite backhaul.

U.S. Cellular regularly reviews its network design for service continuity such as by planning for overlapping cell site coverage to provide redundant coverage in the event of power loss to an adjacent cell site. We also continually work with backhaul providers to design and implement redundancy to prevent large scale outages whenever feasible. For example, we are presently working with transport providers to add redundant fiber routes from Yreka to Ashland to protect area sites from isolation during fire season. In addition, we are presently working with transport providers to add a redundant Ethernet circuit to a site in Newell which will provide additional redundancy to other downstream sites.

We have taken all of the foregoing steps as part of our standard operation and management of a network that provides needed critical communications for our customers and first responders in times of emergencies. Despite the almost flawless performance by our network during the 2019 wildfire season, we have undertaken these network reliability steps as good stewards of the trust that has been placed in us by the public. We do not intend to let them down.

Of course, notwithstanding these efforts to harden the communications network, no network can withstand all catastrophic events. We believe, however, that the measures we describe above are the most prudent steps available to provide a high degree of confidence in the reliability of the network.

It is also vitally important that proper notice and accurate information about areas affected by any future PSPS events be provided to communications carriers with as much advance notice as possible so that assets can be deployed where they can do the most good. Power companies simply need to do a better job of coordinating with communication carriers in advance of commercial power shut downs.

Respectfully submitted,
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