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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
(Filed March 22, 2018)

**COMMENTS OF THE RURAL COUNTY REPRESENTATIVES OF
CALIFORNIA TO THE ASSIGNED COMMISSIONER AND
ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING
COMMENTS ON WIRELINE PROVIDER RESILIENCY STRATEGIES**

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August 10, 2020

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I. Introduction

In accordance with Rule 6.2 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure (“Rules”), the Rural County Representatives of California (RCRC) submits comments to the Order Instituting Rulemaking 18-03-011 (“Rulemaking”).

II. Comments

On behalf of the Rural County Representatives of California (RCRC), we are pleased to offer comments to the *Assigned Commissioner and Administrative Law Judge’s Ruling Requesting Comments on Wireline Provider Resiliency Strategies*, dated July 22, 2020. RCRC was granted party status via written ruling by the Administrative Law Judge on November 13, 2019. RCRC is an association of thirty-seven rural California counties, and its Board of Directors is comprised of one elected supervisor from each of our member counties.

RCRC believes that communication service providers, including the wireline providers that are the focus of this part of the proceeding, have a duty to maintain continuity of service for customers in times of disaster, including during power outages and public safety power shut-off (PSPS) events. It is not an exaggeration to state that losing communication services can often be a matter of life and death. Local emergency managers and the electrical utilities themselves depend

upon a working communications network to notify the public and customers about PSPS events, service restoration, and other emergencies or evacuation orders that may occur concurrently with a PSPS event. Similarly, residents need uninterrupted access to 9-1-1 service in case of an emergency.

RCRC strongly supported the resiliency requirements recently established for wireless providers in Decision 20-07-011 and even suggested that the scope and duration of those requirements be expanded. We cautioned that many residents in rural areas lacked wireless coverage and therefore continue to be at risk of losing important public safety communications services in the event of a power outage. As analog landlines increasingly transition to broadband-based Voice over Internet Protocol (VoIP), the communications network has lost much of the inherent resiliency that came with traditional copper landlines, since VoIP service is much more easily susceptible to disruption when electricity goes out. We are very pleased that the Commission has turned its attention to improving the resiliency of wireline communications providers and we offer the following comments.

Achieving system resiliency may be difficult, but electricity and communications capabilities are the lifeblood of our modern society. California regularly adopts technology forcing mandates to achieve its air quality and environmental objectives. Ensuring the ability to send and receive emergency communications is no less vital of a state public health or safety objective. Similar transformative changes may be necessary if the existing wireline networks are insufficiently resilient to maintain service during a power outage.

Our comments focus on those issues of primary importance to rural local governments and, as directed by the ruling, are presented in order of the topics and questions posed in the *Assigned Commission and Administrative Law Judge's Ruling Requesting Comments on Wireline Provider Resiliency Strategies*.

I. QUESTIONS REGARDING PROPOSAL AND D.20-07-011 APPLICABILITY TO WIRELINE PROVIDERS

Resiliency

1. *Please provide comment on whether the Commission should adopt this requirement for wireline providers?*

The Commission should adopt the same resiliency definition for wireline providers that it adopted for wireless providers in D.20-07-011. While wireline and wireless systems may be

different in many respects, customers have the same underlying expectation - that the ability to send and receive important emergency communications must remain unimpeded, especially during disasters, PSPS events, and other service outages.

The definition of “resiliency” should remain consistent between wireless and wireline providers even though the paths for achieving resiliency may vary between different types of systems. While there may be overlap between wireline and wireless coverage in many parts of the state, some rural areas have limited wireless coverage and so rely solely upon wireline providers for their communications service. California should not treat residents living in those rural areas differently by establishing different (and potentially lower) expectations for system resiliency.

As in D.20-07-011, wireline providers should be given similarly broad authority to utilize any of a portfolio of options to achieve system resiliency. Those may include backup power, redundancy, system hardening, use of temporary facilities, improved local coordination, and preparedness planning; however, there may be other strategies that are better suited for wireline providers. We encourage innovation to improve system resiliency and maintain minimum service levels and coverage during emergencies.

2. Should this requirement be modified or tailored for wireline providers? If so, how?

The overarching resiliency objective should not vary based on the type of technology used to deliver a particular service, especially one so important as emergency communications. While there may be opportunities to better tailor resiliency strategies for wireline systems, there should be no difference in the expected outcomes from implementation of those strategies. All communications modes must be equally resilient to facilitate effective emergency response and enable public access to emergency services.

Backup Power Requirement

1. Please provide comment on whether the Commission should adopt this requirement for wireline providers?

Given the potential for electrical power disruption, we believe that deployment of backup power will be a crucial part of meeting California’s communications resiliency targets. At a minimum, wireline providers should be subject to the same backup power requirements that were established for wireless providers in D.20-07-011.

As we previously suggested,¹ it may be necessary to expand both the duration and the geographic territory covered by the requirement. Backup power must be sufficient to maintain access to 9-1-1 emergency service, emergency notifications, and access to web browsing for emergency notices for all customers. Many communities impacted by the 2019 PSPS events went far longer than 72 hours before service was fully restored. Some communities never had service fully restored before the initiation of the next PSPS event. While we agree that a 72-hour standard establishes an appropriate baseline, we must stress that it cannot be acceptable for 9-1-1 or emergency notification services to go dark for any period of time – especially in rural and high fire risk areas during the wildfire season. As such, it may be necessary for some communications providers to go above and beyond that level to ensure that their systems remain operational during prolonged outages. Remaining operational for just 72 hours during a five-day (or longer) PSPS event is unacceptable.

While we believe that the 72-hour backup requirement should include the Tier 2 and Tier 3 High Fire Threat Districts (HFTD) (as required for wireless providers in D.20-07-011), it should also include facilities that are located outside of those HFTDs but that also lost power on multiple occasions during the 2019 PSPS events. To address this concern, we suggest making these requirements consistent with the geographic territory that is eligible for PSPS mitigation funding under the Equity Resiliency Budget of the Self-Generation Incentive Program (SGIP) pursuant to Decision 20-01-021.²

2. *Is it reasonable to adopt a backup power requirement of reduced duration?*

Unless wireline networks can maintain minimum service levels without backup power for at least 72 hours during a power outage, RCRC does not support reducing backup power duration below 72 hours. Such a reduction could undermine overall system resiliency. The failure to establish and maintain sufficiently resilient communications networks could negatively impact the ability to timely deliver emergency messages. Worse yet, insufficiently resilient communications systems will impair the ability for the public to request and for emergency responders to deploy life-saving and firefighting assets when and where needed.

¹ COMMENTS OF RURAL COUNTY REPRESENTATIVES OF CALIFORNIA ON PROPOSED DECISION ADOPTING WIRELESS PROVIDER RESILIENCY STRATEGIES, June 30, 2020, Page 7.

² SELF-GENERATION INCENTIVE PROGRAM REVISIONS PURSUANT TO SENATE BILL 700 AND OTHER PROGRAM CHANGES, January 16, 2020, Page 102.

Deployment

1. *Please provide comment on whether the Commission should adopt this requirement for wireline providers?*

Yes, wireline providers should be subject to the same deployment schedule as wireless providers. D.20-07-011 afforded flexibility for wireless providers to utilize various strategies to meet the overall resiliency requirements and wireline providers should be given similar accommodations. The Commission also allowed wireless providers to identify areas where service cannot be maintained. Such declarations should be an absolute last resort and carefully evaluated by Commission staff to ensure that providers mitigate loss of service in those areas to the greatest extent feasible.

2. *Should this requirement be modified or tailored for wireline providers? If so, how?*

Unless there are extraordinarily compelling reasons, wireline providers should not be subject to any different implementation timelines than have been set forth for wireless providers.

Service Level Coverage

1. *Please provide comment on whether the Commission should adopt this requirement for wireline providers?*

RCRC supported D.20-07-011's establishment of minimum service levels for wireless providers, which includes 9-1-1 service, 2-1-1 service, the ability to receive emergency alerts and notifications, and access basic internet service during a disaster or power outage. As we previously stated, requirements for system resiliency mean nothing without minimum service levels.

We believe that the Commission should adopt the same minimum service level and coverage requirements for wireline providers. There is no reason why wireline customers deserve or should expect less than those basic services that must be provided to wireless customers, especially when considering that some communities and households either have inadequate wireless coverage or cannot afford to subscribe to both wireline and wireless networks to ensure they will be able to contact 9-1-1 when needed.

2. *Should this requirement be modified or tailored for wireline providers? If so, how?*

We believe this requirement should be modified from "basic internet browsing" during a disaster or commercial power outage to "basic internet service" in order to be applicable to wireline providers.

1. Please provide comment on whether applying a 72-hour backup power requirement is reasonable for wireline companies.

Wireline providers question the utility of deploying backup generation and undertaking system resiliency improvements because their customers may not have the on-site power required to use their communications systems. They argue that such improvements will be burdensome and have limited public utility because relatively few customers have backup generators or batteries at their homes or premises. Unfortunately, these concerns miss the mark and ignore the significant increase in the utilization of backup generators and battery storage systems in residential and commercial settings as a result of the widespread disruption caused by last year's PSPS events.

Not only is it reasonable to require wireline communications providers to increase system resiliency to ensure consumer access to emergency notifications and 9-1-1 service, but it would be unreasonable to allow wireline providers to avoid such a responsibility. Ensuring access to emergency communications is an important component of protecting public health and safety.

While we understand that wireline technology shifts over the last few decades may have reduced the inherent resiliency of our communications system, now is the time to refocus our efforts to ensure that all Californians retain access to reliable communications systems for emergency communications regardless of electrical disruptions.

As utilities work to reduce the size and scope of future PSPS events and the Commission seeks to improve communications resiliency, the state and local governments are also working to improve local power resiliency. Last year's state budget included \$75 million for state and local government projects to respond to and mitigate the impacts of PSPS events. A similar provision in this year's budget provides \$50 million to state and local agencies for community power resiliency projects. Dwarfing those much-needed infusions is the Commission's dedication of hundreds of millions of dollars in SGIP funding to Equity Resilience projects that deploy energy storage systems to help reduce the impact of PSPS events on those communities and residents hit hardest by PSPS events. Local governments, businesses, and individual residents have also made considerable investments in backup power as a result of recent PSPS events. Furthermore, the Commission is working to reduce regulatory barriers to the development of microgrids to improve local power resiliency. These investments mean that more and more Californians will have some form of backup power that can be used to power consumer wireline communications devices.

Finally, to the extent that the Commission continues to revise SGIP, perhaps some portion of the Equity Resiliency budget could be devoted to residential improvements to ensure continuity of communications services.

1. *Please provide comments on [wireline providers comments that backup generation requirements would be overly burdensome because of the distributed nature of their network and the need for 10,000s of network components to be powered either through batteries, fixed generators, or portable generators]. What is the public benefit, if any, for wireline providers to maintain their networks for all customers during a power outage?*

Consistent with our previous responses, it is unacceptable for wireline providers to default on their obligation to maintain resilient infrastructure that is capable of enabling customers access to emergency services and receive emergency notifications. The Commission should not allow wireline providers to shirk their responsibility to ensure that all consumers have access to 9-1-1, emergency alerts, and other essential communications services. Rather than strand wireline-dependent customers because the task at hand may be difficult, the Commission and wireline providers should continue to focus on building resiliency into current and future communications technology and distribution systems.

Furthermore, in many other parts of the country, wireline companies are expected to prepare for outages related to hurricanes and their associated power loss and have taken steps to make their infrastructure more resilient to severe weather and storms, including through burying fiber and cable.³ While the solutions to address those risks may differ from what is needed to mitigate the impacts of PSPS events, we are confident that wireline providers will be best able to determine what measures are best suited to meet California's unique challenges.

Communications Resiliency Plans

1. *Please provide comment on whether the Commission should adopt this requirement for wireline providers?*

Just as the Commission required wireless providers to submit Communications Resiliency Plans, so too should wireline providers submit a similar plan outlining their strategies for maintaining minimum service levels. These plans will provide a useful overview to the public and

³ FCC Report, October 2018 Hurricane Michael's Impact on Communications: Preparation, Effect, and Recovery <https://docs.fcc.gov/public/attachments/DOC-357387A1.pdf>

regulators of how each provider will maintain service levels, discuss how they will work with other providers to reach those objectives, and disclose those facilities that either do not need backup power or where backup power cannot be deployed safely. Importantly, the Commission should ensure that the Communications Resiliency Plan also identifies strategies that the providers will take to mitigate service loss resulting from the lack of backup power at facilities where such resources cannot be deployed.

Waivers

1. Please provide comment on whether the Commission should adopt this requirement for wireline providers?

In place of a true waiver process where entities must apply for a waiver, D.20-07-011 includes a streamlined notification process for wireless providers. Rather than applying for a discretionary waiver, communications providers must simply identify in its Communications Resiliency Plan those facilities that do not need backup power, are unable to support backup power due to a safety risk, or where it is objectively impossible or infeasible to deploy backup power. Providers must also identify the basis for that determination and discuss actions being taken to mitigate service loss resulting from the lack of backup power at those locations.

RCRC recognizes that wireline providers may face difficulties in providing backup power to some of their facilities and so it is reasonable to establish a pathway to grant limited exemptions where necessary. At the same time, this should not be used as a free pass for wireline providers to walk away from their responsibility to ensure that customers have reliable access to emergency alerts and services, including 9-1-1. Resiliency is not achieved solely through deployment of backup generation, but is the result of a portfolio of backup power, redundancy, network hardening, temporary facilities, etc. As such, wireline providers should make every feasible effort to minimize and mitigate the impacts of service loss resulting from these “waivers” through employment of other resiliency strategies.

Emergency Operations Plans

1. Please provide comment on whether the Commission should adopt this requirement for wireline providers?

Annual submission of an Emergency Operations Plan to the Commission, the Office of Emergency Services, and local emergency response managers should be required of wireline

providers, just as is required of wireless providers. These plans will provide useful information about communications capabilities to local emergency managers and thereby help them better prepare for and respond to PSPS events and other power outages. Submission of these plans should complement the development and maintenance of close working relationships between the wireline providers and local emergency response managers. Of particular importance is the requirement that the provider must publicly post and update a map of disaster or PSPS-related outages and customer impacts. This information will assist enhance local emergency managers in effectively deploying resources and coordinating outreach to residents living in those impacted areas.

II. WIRELINE INDUSTRY PROPOSAL

1. Is this proposal reasonable?

RCRC believes the Wireline Industry Proposal is unreasonable because it abandons residential customer access to essential communications services (including the ability to receive emergency alerts, 9-1-1, 2-1-1, and basic internet access) and fails to maintain service for a large universe of critical facilities. As previously mentioned, access to emergency communications services is essential to protect public health and safety.

Residents need reliable access to telephonic emergency alerts, especially during PSPS events. Electrical utilities shut down power during PSPS events because weather conditions elevate the risk of wildfire. Given the increased risk of wildfire, residents in high fire risk zones need access to information about any fires that break out and any shelter-in-place or evacuation orders that may be issued by the local emergency manager.

Access to 9-1-1 is also vital. Timely response to wildfire is often the key to effective management and containment. Given the increased risk of wildfire during PSPS events, residents need to have the ability to quickly report wildfires to emergency responders. Similarly, emergency responders will be dependent on residents' ability to quickly report fires so they can quickly dispatch resources. Furthermore, residential customers need access to 9-1-1 services so they can reach out in the event of a medical emergency.

While we appreciate the industry's intent to preserve communications access for a small subset of critical facilities (many of which are operated by local governments), the scope of critical facilities included is unreasonably narrow, as discussed in response #3 below.

2. *Is it reasonable for non-critical customers to lose wireline communications during a power outage?*

Please see response to #1 above for explanation of why this is unreasonable.

3. *Is the proposed list of critical facility customers sufficient?*

The Wireline Industry Proposal contemplates maintaining at least 72 hours of communications service during a power outage to “critical facilities,” which it limits to fire stations, police stations, hospitals, and emergency command and dispatch centers. Unfortunately, that exclusive list is underinclusive and must be significantly expanded if the proposal is adopted. The Commission established a list of critical facilities and critical infrastructure in Decision 19-05-042. That list was expanded by Decision 20-05-051 to include public safety answering points and transportation facilities and infrastructure. These are the lists that should form the basis of what constitutes “critical facilities.”

The Wireline Industry Proposal’s definition of “critical facilities” does not include the following critical facilities designated by the Commission: schools, jails and prisons, public health departments, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, hospice facilities, public and private utility facilities, facilities associated with the provision of drinking water or processing of wastewater, facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals, and facilities associated with automobile, rail, aviation, major public transportation, and maritime transportation for civilian and military purposes.

These facilities were all designated as critical by the Commission for important public health and safety reasons. Just as those facilities need advanced warning of the loss of power and increased coordination with utilities about how to mitigate PSPS impacts on their operations, so too do those facilities need reliable communications services – especially during power outages. Given the need for prompt emergency response during a medical emergency or an accident posing risks to public health or safety, it would be unconscionable for communications services to go down for facilities like jails and prisons, skilled nursing facilities, nursing homes, water and wastewater facilities, flood control facilities, and facilities involved in the manufacture, maintenance, or distribution of hazardous materials and chemicals.

While RCRC believes it would be unreasonable to adopt the Wireline Industry Proposal without maintaining minimum service levels for residential customers, the Wireline Industry Proposal’s definition of “critical facilities” should be expanded to include:

- All of those facilities falling within the definition of “critical facilities” adopted in Decision 19-05-042⁴ and modified in Decision 20-05-051⁵.
- “Flood control facilities” and “independent living centers” which the Commission identified as “critical facilities” that are eligible for the SGIP Equity Residency Budget in Decision 20-01-021.⁶ Flood control facilities need access to reliable communications systems in order to communicate any problems that they may experience (which may have major impacts on public health and safety, depending on the type of problem experienced). Independent living centers also need access to emergency communications services to facilitate timely emergency response to render potentially life-saving care. This need is heightened for independent living centers during PSPS events because the loss of electricity may have a more serious impact on medically sensitive individuals.
- Facilities utilized as community resource centers during a PSPS event.

5. *Are the five proposed conditions reasonable? What is the significance of each of these conditions?*

The wireline providers’ conditions are not reasonable in that they condition the provision of 72 hours of service during a power outage on the applicable investor-owned utility (IOU) providing the “mandatory” 48-72 hours’ notice of a PSPS event to the wireline communications facility. The wireline providers mischaracterize the nature of the Commission’s requirement in Decision 19-05-042⁷ that IOUs provide advance notice of PSPS events. While RCRC would very much like the 48-72 hour advanced warning to public safety partners and priority notification facilities to be a mandatory requirement, D.19-05-042 instead says that IOUs “should, whenever

⁴ “DECISION ADOPTING DE-ENERGIZATION (PUBLIC SAFETY POWER SHUT-OFF) GUIDELINES (PHASE 1 GUIDELINES),” June 4, 2019, Appendix A, Pages 5-6.

⁵ “DECISION ADOPTING PHASE 2 UPDATED AND ADDITIONAL GUIDELINES FOR DE-ENERGIZATION OF ELECTRIC FACILITIES TO MITIGATE WILDFIRE RISK,” June 5, 2020, Appendix A, Page 10.

⁶ “SELF-GENERATION INCENTIVE PROGRAM REVISIONS PURSUANT TO SENATE BILL 700 AND OTHER PROGRAM CHANGES,” January 27, 2020, Page 48.

⁷ Appendix A, A8.

possible” notify public safety partners and priority notification entities 48-72 hours in advance of anticipated deenergization events. The Commission tailored this requirement to acknowledge that those guidelines may not always be achievable given rapidly changing weather conditions. As such, conditioning the provision of reliable, resilient emergency communications services on 48-72-hour advance notice is unacceptable. While there may certainly be exceptions, RCRC believes that adequate planning and preparation should enable wireline providers to maintain service even if the IOU fails to provide a 48-72-hour advanced warning.

6. How will the specific customers within each of the critical facility categories be identified?

Given the importance of maintaining minimum communications service levels, RCRC suggests that wireline providers work with utilities to access lists of critical facilities, coordinate with local governments, and establish a process through which critical facilities can self-identify to the provider as such.

8. Is twelve months a reasonable timeline to implement these requirements?

RCRC believes that wireline providers should be required to adhere to a compliance schedule similar to what applies to wireless providers. Given the inherently different nature of the distribution network, we are sensitive to the fact that the twelve month timeframe may not be realistic in all situations; however, we believe that wireline providers should work quickly to improve system resiliency, since so many communities depend on reliable communications services to protect public health and safety.

III. COMMUNITIES WITHOUT SUFFICIENT WIRELESS COVERAGE

1. Is this concern reasonable?

Yes. Please note our responses to question II.1. above. All Californians rely on telecommunications providers to protect public health and safety. Communications systems enable residents to timely access emergency services for medical assistance, fire protection, and public safety. Furthermore, communications systems facilitate prompt and effective emergency warnings and are vital for the issuance of evacuation orders. Access to these services is even more important during power outages, as the loss of power can have significant and far reaching impacts at both the societal and individual level that necessitate interaction with and service from local emergency responders. It is deeply disturbing that, in a state like California, entire communities

can lose access to electricity and communications networks for extended periods of time during the fire season. California is already a state with dramatic income and social equality gaps and we can ill afford to create a further split between those areas of the state with reliable communications and electrical service and rural areas without those basic services. California should and must do better and we appreciate the Commission's efforts to improve resiliency of the electrical and communications sectors to minimize these undesirable outcomes.

2. *Are there other communities without sufficient wireless coverage that rely solely on wireline communications?*

Given the rugged topography of the areas in which many rural communities are located, RCRC believes that there are many other communities facing situations similar to Bonny Doon. RCRC is currently surveying our member counties and other local governments throughout the state to identify other communities that have limited or no wireless communications service and that rely predominantly or exclusively on wireline communications services. In the meantime, it may be helpful to relate the experiences of California's two smallest counties (by population): Alpine County and Sierra County.

Alpine County has a population of just over 1,100 residents, has no incorporated cities, and Markleeville is its county seat. Alpine County relates that while their communities do have wireless service, significant parts of Markleeville, Woodfords, and Sorensen's Subdivision are in dead zones (because of topography and trees) and residents in those areas rely on their landlines. Admittedly, a new cell tower has been permitted for Markleeville that should address the dead zones in that community.

Sierra County has a population of just over 3,000 residents with a median household income of \$48,125 (far lower than the statewide average of \$71,228). Downieville is the county seat, and Loyalton is its only incorporated city. Downieville and Sierra City are both served by AT&T U-verse-based phones. Those phones fail if there is an interruption to their signal or power. It is unclear how thoroughly AT&T disclosed this system susceptibility to customers in those communities when encouraging them to abandon their copper lines and transition to U-verse. There is very limited cell service (based on residential cell extenders) in those two communities, so when they lose power there is no cell coverage at all. If they need to make a 9-1-1 call during a power outage, residents in those two communities must either try to find a local neighbor who kept their copper lines or find someone with a generator. The communities of Goodyears Bar,

Indian Valley, Pike City, and Alleghany have no cell service and no internet, with the rare exception for those residents who pay for relatively expensive satellite services. Residential generators are relatively rare in Sierra County as a result of the relatively low median household income and the high cost of generators.

3. If the wireline industry proposal is adopted, how would these communities receive vital emergency notices, such as evacuation alerts, particularly during a power outage?

If the Wireline Industry Proposal is adopted without any requirement for residential communications resiliency, it is unclear how residents in those orphaned communities will be able to receive vital emergency notices, including evacuation alerts. The national Emergency Alert System (EAS) utilizes cable systems and wireline video providers, neither of which would be required to maintain service to households. Without access to information through these wireline providers, coupled with the lack of access through wireless emergency alert systems (both local contracted services and the federal Wireless Emergency Alerts (WEA)), residents would be left with possible access to emergency information through AM, FM, satellite radio and satellite television providers, if the customer was able to maintain power. Additionally, not all local jurisdictions use the federal Integrated Public Alert and Warning System (the overarching national system that includes EAS and WEA), nor are service providers required to issue alerts.

While some have colloquially and informally suggested deploying archaic air raid warning sirens, such a system is fatally limited in the type of information that can be conveyed. While such an alert can warn a community that there is a danger, it can provide no information about what the danger is or how to respond to minimize risk. Furthermore, reliance on such a system in a state as technologically advanced as California is frankly embarrassing and further perpetuates the notion that there are “two Californias” – a notion that Governor Newsom is working hard to address.

4. Should additional requirements be developed for wireline service providers to maintain service in these communities during a power outage?

Yes. As noted above, Californians have a legitimate expectation that there will be a dial tone and access to 9-1-1 service when they pick up a telephone. That expectation does not diminish when there is an emergency or power outage. Indeed, those are the situations in which the need for reliable and resilient communication is at its greatest. In light of this expectation, and in view of the critical role that wireline communications systems play in maintaining public health and

safety and facilitating timely response to medical emergencies and natural disasters, it is imperative that the Commission adopt minimum wireline communication system resiliency standards. Those minimum service levels should mirror what was established in D. 20-07-011 for wireless communications providers, as all residents should have equal access to vital, life-saving information and services, irrespective of where they live or the type telecommunication available to them.

It is not lost on us that these system improvements will come at considerable cost; however, RCRC believes that California is perfectly positioned to draw on its capacity for technological innovation and to leverage the numerous existing sources of funding to achieve minimum communications resiliency standards that many Californians likely believe were achieved decades ago. We strongly urge the Commission to focus on building inherent resiliency into the communications system for all Californians.

III. Conclusion

The Rural County Representatives of California respectfully requests that the Commission's accept these comments for filing and incorporate the suggestions made therein.

Respectfully submitted,

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