

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



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Order Instituting Rulemaking to Update
Communications Emergency Preparedness
and Network Resiliency Program.

Rulemaking 25-07-014

**OPENING COMMENTS OF SONIC TELECOM, LLC (U-7002-C) ON
ORDER INSTITUTING RULEMAKING TO UPDATE COMMUNICATIONS
EMERGENCY PREPAREDNESS AND NETWORK RESILIENCY PROGRAM**

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September 30, 2025

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Pursuant to the *Order Instituting Rulemaking to Update Communications Emergency Preparedness and Network Resiliency Program*, issued on August 1, 2025 (the “OIR”), Sonic Telecom, LLC (U-7002-C) hereby respectfully submits the following opening comments.¹

Sonic holds a Certificate of Public Convenience and Necessity (“CPCN”) issued by the Commission. Sonic is certificated as a full facilities-based competitive local exchange carrier (“CLEC”) and interexchange carrier (“IEC”) to offer telecommunications services in California.²

Sonic offers telecommunications and broadband services in California using its own fiber optic facilities. Unlike nearly every other fiber-based CLEC, Sonic focuses its efforts on deploying ubiquitous fiber optic networks designed to reach as many residential customers as possible in the target municipalities. With the exception of a few ground-mounted remote terminals,³ Sonic’s aerial and underground fiber optic outside plant network facilities do not require electrical power.

¹ The Preliminary Scoping Memo section of the OIR identifies 13 preliminary issue areas on which the Commission invites comments and reply comments from the parties. OIR Section 2, pp. 7-9.

² See D.06-11-008 and D.12-06-009.

³ Sonic has 10 remote terminals, all located in Northern California. These remote terminals require electrical power, and include battery backup equipment inside the remote terminal.

1. Should the Commission design and implement an enforcement mechanism for non-compliance with the Resiliency Program’s requirements? If so, how should the enforcement mechanism be structured?

Sonic respectfully submits that any such additional “enforcement mechanism” is unnecessary. The Commission already has the necessary tools to enforce the Resiliency Program’s requirements, including, *inter alia*, Resolution M-4846 (Commission Enforcement and Penalty Assessment Policy), Resolution SED-3 (Staff Citation Procedures), data requests, site visits, and SED audits. No additional enforcement mechanism is required.

2. What data and reporting methods should be required of Communications Service Providers to ensure compliance with the Resiliency Program’s requirements and provision of uniform data sets to facilitate the Commission’s analyses?

The Commission already has in place requirements for Sonic and other Communications Service Providers to supply annual Communications Resiliency Plans, pursuant to D.21-02-029. These Resiliency Plans require comprehensive information that is responsive to 14 question areas. In addition, Communications Service Providers are required to complete a template spreadsheet for each network component that requires electrical power. This standardized template has 35 columns of required information for each such component. The existing scope of required information, reporting frequency, and standardization of the data template should be sufficient for the Commission staff to perform its analyses.

3. How should the Commission improve access to resiliency data for state and local government entities and the public while addressing confidentiality concerns?

Sonic is unclear on what resiliency data the Commission believes state and local government entities and the public need to access. Sonic reserves further comment on this issue, pending review of the opening comments of other parties, and further developments in this proceeding.

4. How should the Resiliency Program apply to collocated service provider facilities?

As discussed above, Sonic (and similarly situated fiber-based communications providers) do not require electrical power for their outside plant fiber facilities that are deployed aurally on utility poles or underground in conduit. Thus, no battery backup is required for such facilities.

With the exception of a few ground-mounted cabinets, Sonic's equipment that requires electric power is located in collocation spaces in ILEC central offices. These locations normally have two levels of backup power: first, massive batteries that are designed to provide 72 hours of backup power to all the equipment in the building, and second, generators that will provide additional backup power if and when these batteries are exhausted. Moreover, Sonic's collocation hosts forbid Sonic and other collocators from installing other forms of backup power in their collocation spaces. As a result, Sonic and other collocators rely on their collocation hosts for the backup power required by the Resiliency Program, and they have no ability to augment or substitute that backup power by other means. The Commission's Resiliency Program's requirements should not apply to Communications Service Providers' facilities located in these collocation arrangements for these reasons.

5. What modifications should be made to the Resiliency Program's requirements for large Customer Premises Equipment?

Sonic reserves comment on this issue, pending review of the opening comments of other parties, and further developments in this proceeding.

6. How should the Commission define and consider "feasibility" for implementation of the Resiliency Program?

Sonic submits that there is not a "one size fits all" definition for feasibility with respect to the Resiliency Program. Feasibility (or infeasibility) analysis, done correctly, considers *inter alia* each carrier's serving technology, network architecture, specific geographic area of deployment,

physical access issues, and location and number of active customers. The Commission will need to take into account these and other relevant factors in determining feasibility (or infeasibility) with respect to assessing assertions of infeasibility by individual carriers in specific situations, which will likely require a case-by-case analysis.

7. How should the Commission’s staff evaluate and determine appropriate disposition of service provider claims that implementing 72-hour backup power requirements at specific sites are infeasible?

Sonic submits that there is not a “one size fits all” definition for feasibility with respect to the Resiliency Program. Feasibility (or infeasibility) analysis, done correctly, considers *inter alia* each carrier’s serving technology, network architecture, specific geographic area of deployment, physical access issues, and location and number of active customers. The Commission will need to take into account these and other relevant factors in determining feasibility (or infeasibility) with respect to assessing assertions of infeasibility by individual carriers in specific situations, which will likely require a case-by-case analysis.

8. Should the Resiliency Program be extended beyond HFTD Tier 2 and Tier 3 areas to include other areas, such as those areas frequently impacted by disasters, other communities frequently impacted by PSPS events, and the equipment served from non-HFTD area or statewide? If so, how should the Resiliency Program be extended?

Sonic respectfully submits that the Resiliency program should not be extended beyond HFTD Tier 2 and Tier 3 areas without a proven need to do so, for specific reasons in specific geographic areas. Sonic is not currently aware of any such areas that satisfy these criteria. Sonic reserves further comment on these issues, pending review of the opening comments of other parties, and further developments in this proceeding.

- 9. When relying upon mobile generators to fulfill 72-hour backup power requirements, what ratio of mobile generators to sites served is necessary to ensure system resilience performance at levels similar to facilities supported by non-mobile backup power supplies? At what maximum distance should mobile generator storage be from each site the generator serves to ensure timely deployment during adverse access conditions (such as during or immediately after severe storms, floods, earthquakes or wildfires)?**

Sonic submits that there is not a “one size fits all” answer to the issue of mobile generators. The answer will likely depend on the communications technology at issue (wireline vs. wireless, fiber networks vs. copper and coaxial networks, etc.), as well as the size and geographic scope of individual Communications Service Providers’ network deployments. Sonic reserves further comment on these issues, pending review of the opening comments of other parties, and further developments in this proceeding.

- 10. Are there technological advancements that can improve resiliency that should be adopted by the Commission? If so, how should the Commission require those technological advancements as part of the Resiliency Program?**

From a wireline perspective, the most significant technological advancement that has already improved communications resiliency is the broad and cumulative deployment of competitive fiber optic networks by Sonic and other Communications Service Providers. This deployment (1) reduces the need for electric power to support outside plant facilities, and (2) provides redundancy of service to communities, as multiple carriers offer service to end users.

The Commission does not need to “require” such fiber deployments in order to improve resiliency. However, it should actively remove existing barriers to such deployments that are faced by Sonic and other Communications Service Providers.

11. Do the Resiliency Program requirements ensure system resilience in ESJ communities? If not, what are the resilience deficiencies and how can the system resilience requirements in ESJ communities be changed to ensure system resilience performance at levels similar to those in non-ESJ communities?

Sonic reserves comment on these issues, pending review of the opening comments of other parties, and further developments in this proceeding.

12. Do the Resiliency Program requirements ensure system resilience for accessible communication services used by those with access and functional needs? If not, what are the resilience deficiencies and how can the system resilience requirements be changed to ensure system resilience performance for accessible communication services used by those with access and functional needs?

Sonic reserves comment on these issues, pending review of the opening comments of other parties, and further developments in this proceeding.

13. Should the Commission update existing requirements for providers to transition their 72-hour backup power sources to generation technologies that emit lower to no greenhouse gas emissions? If so, what parameters should the Commission establish for this requirement?

Sonic reserves comment on these issues, pending review of the opening comments of other parties, and further developments in this proceeding

Respectfully submitted,

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