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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Update Communications Emergency Preparedness and Network Resiliency Program	Rulemaking 25-07-014

REPLY COMMENTS OF CELLCO PARTNERSHIP (U 3001 C) DBA VERIZON WIRELESS ON RULING ORDERING COMMENTS ON QUESTIONS SPECIFIC TO SCOPED ISSUES

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Pursuant to the June 16, 2026 E-mail Ruling Granting In-Part, Joint Motion of the Telecommunication Providers for an Extension of Time and Page Limits in Response to Questions Specific to Scoped Issues, which extended the submission deadline to July 22, 2026, Cellco Partnership (U 3001 C) d/b/a Verizon Wireless ("Verizon" or the "Company") respectfully submits these reply comments in response to comments on *Ruling Ordering Comments on Questions Specific to Scoped Issues*, issued May 29, 2026 ("Ruling").[1]

I. INTRODUCTION AND SUMMARY

Verizon is one of the three wireless service providers that are parties to this proceeding and engage in network management every hour of every day. Based on this experience, wireless providers have demonstrated to the Commission and other parties to this proceeding (and its predecessor proceeding) the structural and design limitations associated with various proposals

[1] Verizon received opening comments from the following parties: Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., The Siskiyou Telephone Company, Volcano Telephone Company, and Winterhaven Telephone Company (collectively, the "Small LECs"); California Broadband & Video Association ("CalBroadband"); Center for Accessible Technology ("CforAT"); CTIA; Frontier California Inc., Citizens Telecommunications Company California Inc., and Frontier Communications of the Southwest Inc. (collectively, "Frontier"); Pacific Bell Telephone Company d/b/a AT&T California, AT&T Enterprises, LLC, Teleport Communications America, LLC, AT&T Mobility LLC (New Cingular Wireless PCS, LLC), AT&T Mobility Wireless Operations Holdings, Inc., and Santa Barbara Cellular Systems, Ltd.) (collectively "AT&T"); Public Advocates Office ("Cal Advocates"); Small Business Utility Advocates ("SBUA"); Rural County Representatives of California ("RCRC"); T-Mobile West LLC ("T-Mobile"); and The Utility Reform Network ("TURN") and Communications Workers of America, District 9 ("CWA").

under consideration. Further, Verizon and the other wireless parties have shown how real competitive forces drive constant improvements to network resiliency efforts, including dedicated teams on call 24/7 to ensure continuous coverage, negating the need for Commission intervention. Finally, the record shows how burdensome resiliency rules would tie up precious resources and make it more difficult to expand the network in rural, tribal, and other hard to serve areas. Quite simply, this proceeding suggests an uncertain solution in pursuit of an already considered problem. The physical and technical parameters and limitations that existed when the previous rules were adopted—specifically regarding backup power impediments at small cell sites—remain largely unchanged.

Despite these facts, the questions posed in the Ruling and non-industry party comments raise concerns that this rulemaking intends to impose standards that are unworkable and unnecessary. Verizon therefore urges the Commission to seriously consider the repeated record evidence when assessing whether new, potentially onerous rules are needed and to reject any comments that propose technical changes or requirements from any parties that lack technical expertise.

Before the Commission considers adopting new rules, it should explain what problem it seeks to solve, why the existing rules and company innovations (such as Verizon's direct-to-device satellite messaging partnership) are inadequate, what the benefits to consumers would be, and the costs of compliance. Because no evidence has been provided regarding why an expansion of the rules is necessary, Verizon urges the Commission to maintain this proven, flexible framework that prioritizes consumer outcomes over rigid network dictations.

II. REPLY COMMENTS ON SPECIFIC QUESTIONS POSED IN THE RULING

a. <u>Resiliency Data Reporting: Questions 1-4</u>

Questions 1-4 pertain to the public availability, scope, and frequency of resiliency reports. Non-industry commenters advocated for more data and public availability while providers cautioned against the risks of disclosure of Critical Infrastructure Information (CII), as well as the burdens and costs associated with expanded reporting that would yield little benefit. The Commission should reject calls for public disclosure of sensitive network data. Proposals for live-data sharing platforms or public dashboards[2] are not only costly and infeasible—they

[2] Cal Advocates Comments at 2-3; TURN and CWA Comments at 7; RCRC Comments at 2-3.

create severe security risks. By exposing proprietary CII, these measures invite threats ranging from vandalism to terrorism, a risk so serious that Verizon restricts even its own third-party vendors from accessing such internal systems. CTIA noted that "providing greater public access to the sensitive information in those reports risks undermining the network resiliency this proceeding seeks to promote."[3] As CalBroadband and other providers pointed out, public and government entities already have extensive access to network resiliency data via existing statutory mechanisms, Emergency Operations Plans, and near real-time Community Isolation Outage Reports.[4]

There is also no need for such clarifications or refinements to current data and reporting requirements.[5] TURN and CWA's proposal to mandate reporting on outages beyond CalOES Community Isolation Outages demonstrates why the suggested changes are a wrongheaded solution in search of a problem. Providers already supply such information, including FCC Network Outage Reporting System (NORS) data—detailing city, state, outage duration, and cause—along with DIRS-related information when activated.[6] Instead of imposing additional reporting burdens, the Commission should prioritize automating the NORS submission process. For over a decade, the industry has requested an API interface to the Commission's web portal to submit its NORS reports. Implementing such a system would enhance the Commission's situational awareness while eliminating the countless hours that Verizon's network team currently spends on manually filling out data fields, detracting from their primary responsibility of maintaining and improving the network. This specific implementation would provide greater efficiency without increasing the volume of data required in annual Resiliency Plans.

The Commission should reject suggestions that more frequent reporting of resiliency data is necessary. As noted above, Cal Advocates' suggestion for "instant access" to such data[7] and TURN and CWA's suggestion that the data be updated quarterly[8] is unrealistic and creates significant security risks. CalBroadband correctly points out that there has been no event, audit finding, or compliance pattern suggesting that annual updates are insufficient, and most providers stated that more frequent reporting would "divert engineering, operations, regulatory,

[3] CTIA Comments at 7.
[4] CalBroadband Comments at 6-7; AT&T Comments at 4-5.
[5] *See* AT&T Comments at 5-6; CTIA Comments at 8; T-Mobile Comments at 9-10.
[6] TURN and CWA Comments at 10.
[7] Cal Advocates Comments at 5.
[8] TURN and CWA Comments at 12.

and compliance resources away from network repairs, emergency preparedness, broadband deployment, and other activities that support service reliability and continuity."[9] Verizon further reiterates its opening comments that it is unclear what benefit more frequent reporting would offer, because the Commission is federally preempted from requiring providers to modify their networks to provide a certain level of service.[10]

Finally, Verizon and other providers explained why there is no need for them to provide shapefiles to the Commission.[11] The resiliency reporting requirements are already comprehensive, including a requirement to provide latitude and longitude points of wireless network sites. The Commission can easily create such shapefiles and maps from these data points. As AT&T pointed out, the provision of GIS shapefiles would impose duplicative compliance burdens without any regulatory benefit.[12] Moreover, as Verizon and others highlighted, such a requirement would increase the points at which such sensitive critical infrastructure data could be breached.[13]

b. **<u>Ensuring Compliance: Questions 5 - 7</u>**

Questions 5-7 pertain to compliance with the Resiliency Programs. Verizon and other service providers have consistently complied with these rules,[14] and Staff already performs regular audits of service providers' facilities, as they deem necessary, before approving any Resiliency Plans.[15] As AT&T explains, "[t]he Commission already has an enforcement policy in the event of a service provider's purported non-compliance with Resiliency Program reporting requirements."[16] They further note that "[i]f any penalty mechanism is adopted, it should be limited to failure to submit a resiliency plan after a reasonable opportunity to cure."[17] Verizon agrees and echoes CTIA's comments that "there is no indication that the Commission's existing

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[9] AT&T Comments at 7; *see also* CalBroadband Comments at 10-11; T-Mobile Comments at 11; Verizon Comments at 6.
[10] *See* Verizon Comments at 7.
[11] *See* Verizon Comments at 7-8; AT&T Comments at 8-9; CTIA Comments at 9; T-Mobile Comments at 11-12.
[12] AT&T Comments at 8-9.
[13] Verizon Comments at 7; AT&T Comments at 9; CalBroadband Comments at 11; CTIA Comments at 9.
[14] *See*, *e.g.*., CTIA Comments at 10-11, T-Mobile Comments at 12-13.
[15] Verizon's 2026 Wireless Resiliency Plan was just approved on July 16, 2026, the result of compliance with the Resiliency Program's requirements. *See also* AT&T Comments at 10, CTIA Comments at 11, Frontier Comments at 5.
[16] AT&T Comments at 9, *see also* Small LECs at 4, T-Mobile 12-13.
[17] AT&T Comments at 10.

enforcement mechanisms are inadequate to ensure that wireless providers continue to comply with the Resiliency Program requirements."[18]

Many non-industry commenters have a three-pronged approach to add complexity and burdens to these rules: more process, more staff, and more complex and onerous penalties. TURN and CWA suggest that the Commission "augment" staff resources to carry out site visits and verify compliance with the Resiliency rules.[19] They also suggest that the Commission create "a tiered penalty mechanism for noncompliance, including regular compliance reporting available to state, tribal, and local governments as well as all parties to this proceeding."[20] Similarly, Cal Advocates suggests that the Commission create "mandatory real-time reporting…a three-stage penalty structure with predetermined penalties and multipliers," and a license revocation process for even moderate violations.[21]

Verizon in contrast knows that simplicity and certainty promote investment and lead to greater resiliency. Verizon agrees with its affiliate Frontier that "the Ruling fails to identify a problem with the Resiliency Program's reporting and network resiliency requirements or industrywide compliance concerns that would justify the need for an enforcement program separate from the Commission's existing enforcement mechanisms."[22] Similarly, non-industry commenters fail to offer any reasons as to why such penalty mechanisms are necessary or what compliance issues currently exist that need to be solved.[23] Instead they all suggest ways to punish service providers without any evidence of wrongdoing or past failures. Moreover, TURN and CWA's claim that compliance improves following Commission site visits and follow-up inquiries[24] only accentuates industry's point that a collaborative process based on a goal of resolution rather than the pursuit of draconian penalties is the best approach. The fact that improvement can be made after a collaborative process with Staff is exactly the kind of process the Commission envisioned when establishing the Resiliency Plan requirements in the first place.[25]

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[18] CTIA Comments at 11.
[19] *See* TURN and CWA Comments at 13.
[20] *Id*.
[21] Cal Advocates Comments at 6-7.
[22] Frontier Comments at 4-5.
[23] *See*, *e.g.*, RCRC Comments at 3.
[24] TURN and CWA Comments at 13.
[25] D.20-07-011 at 97.

Moreover, non-industry commenters try to convince the Commission to engage in third-party audits and compliance monitoring and include an enforcement framework in a staff proposal.[26] However, as CalBroadband notes, "there is no evidence that third-party monitoring or auditing at providers' expense is necessary or reasonable."[27]

Wireless service providers have consistently complied with the Commission's reporting requirements and have regularly engaged with Staff to create a cooperative process for improving and understanding network resiliency.[28] In addition, as T-Mobile notes, "network resiliency is a matter of critical importance to [all providers] – and they each have comprehensive programs and practices in place statewide."[29] Moreover, wireless providers are always innovating to find new ways to ensure customers have emergency service access (*e.g.*, Verizon's direct-to-device satellite messaging partnership). Because there remains no evidence of non-compliance, nor has the Commission demonstrated that its existing regulatory tools are inadequate, Verizon maintains that there is no additional process needed to address any "discrepancies or deficiencies."

c. Infeasibility Claims: Questions 8-9

Questions 8-9 pertain to evaluation and verification of service providers' claims of infeasibility. As an initial matter, the current Resiliency requirements allow service providers flexibility regarding infeasibility claims, by design.[30] As CalBroadband explains, the Commission should recognize that infeasibility "may be a permanent condition that providers are unable to 'address' or remedy."[31]

As AT&T explains, "[i]nfeasibility determinations require case-by-case evaluation involving engineering, geographic, legal, structural, environmental, and safety considerations."[32] Similarly, T-Mobile states that "[f]easibility", like "resiliency", is a fluid concept that accounts for numerous factors, many of which are not within the control of wireless carriers (e.g., space and weight restrictions, zoning limitations, lack of technological solutions, cost, safety,

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[26] *See* Cal Advocates Comments at 7; CforAT Comments at 8.
[27] CalBroadband Comments at 14.
[28] As noted above, Verizon's 2026 Wireless Resiliency Plan was just approved on July 16, 2026.
[29] T-Mobile Comments at 20.
[30] *See* AT&T Comments at 12.
[31] CalBroadband Comments at 15.
[32] AT&T Comments at 13.

accessibility, etc.).[33] Moreover, T-Mobile explains that "whether or not it is feasible or necessary to install/deploy a generator to a particular site does not reflect anything about the resiliency of a network."[34] Therefore, the Commission should rely on its proven, established process to evaluate, verify, and address service provider claims of technical or administrative infeasibility.

Some commenters suggest that the industry does not provide sufficient data to prove infeasibility and that additional information is somehow needed to adequately evaluate service providers' claims. However, in making these suggestions, they clearly demonstrate their misunderstanding of the existing process and the realities of network management and design. TURN and CWA claim without merit that available public data doesn't offer sufficient site-specific details.[35] They also imply that in order for the Commission to validate claims of infeasibility "providers should be required to submit any information that staff deems necessary."[36] Similarly CforAT states that "providers offer very little data to support claims that building out resiliency creates technological, administrative, or economic challenges that would result in a financial loss for the provider."[37] In addition SBUA urges the Commission to require service providers to "submit documentation from an independent third party," such as rejected permit applications.[38] Moreover, Cal Advocates suggests the Commission adopt "a unified definition and standard of feasibility that applies to all Service Providers," disregarding the fact that not all networks are designed or operated the same (as the Commission has previously recognized).[39]

While these consumer groups may not be privy to all of the information that service providers provide to the Commission as part of the existing Resiliency reporting process, that does not mean that the information provided or the current process is somehow deficient or needs augmentation. But that lack of information does mean that these commenters are not well-positioned to suggest onerous, complex solutions regarding the networks in question. Because Staff has been evaluating and approving Resiliency Plans for years, there does not appear to be a

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[33] T-Mobile Comments at 14-15.
[34] *Id.* at 14.
[35] TURN and CWA Comments at 17-18; *see also* RCRC Comments at 3-4.
[36] TURN and CWA Comments 19.
[37] CforAT Comments at 10.
[38] SBUA Comments at 15-16.
[39] Cal Advocates Comments at 8; *see also* D.20-07-011 at 99.

problem with what information is received regarding claims of infeasibility. For these reasons, Verizon agrees with CTIA that "[t]here is no indication that any modifications are needed to the current process."[40]

d. Customer Premises Equipment (CPE) and Collocated Sites: Questions 10-12

Questions 10-12 pertain to whether resiliency requirements should be expanded to include CPE and/or Collocated sites. Regarding CPE, as Verizon has previously noted, wireless providers do not control customer power sources or equipment design, possess landlord rights, or have physical control over private property that would enable them to direct the use and placement of CPE. Verizon agrees with its affiliate Frontier that "[b]ecause the Commission already determined based on a comprehensive record in its prior resiliency rulemaking that the Resiliency Program's requirements do not apply to CPE, further consideration of CPE issues should be removed from the scope of this proceeding.[41] Moreover, as AT&T explains, "[p]roviders should remain responsible for resiliency measures applicable to facilities they own or control, and customers should remain responsible for equipment located on their side of the demarcation point.[42]

While some commenters want the Commission to "require carriers offering a service that requires backup power to provide power to support customer premises equipment,"[43] or require service providers to try and force customers to allow the installation of 72-hours of back up at their homes or nearby facilities,[44] these comments fail to justify why such requirements are necessary when customers already have the choice to obtain personal backup solutions. As CalBroadband explains, '[t]hese are the types of decisions that must be made by consumers—not by communications providers or the Commission.[45] Verizon agrees. If the Commission's goal is to prevent customer CPE from going offline during power outages, the most effective solution is

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[40] CTIA Comments at 12.
[41] Frontier Comments at 9.
[42] AT&T Comments at 16.
[43] TURN and CWA Comments at 21.
[44] *See* Cal Advocates Comments at 11. This would be akin to trying to talk customers into allowing the installation of several refrigerator sized battery cabinets or a giant diesel generator somewhere on the customer's property or within their dwelling space, assuming it would even be allowed by a landlord, if applicable.
[45] CalBroadband Comments at 20.

to engage the electric investor-owned utilities (IOUs) to improve electrical grid reliability and reduce the frequency and duration of Public Safety Power Shutoff ("PSPS") events.

Regarding collocated sites, Verizon maintains that wireless providers lack control of third party owned sites where they are collocated. As CTIA explains,"[t]he record confirms that the Resiliency Program already applies to, and wireless providers already report on, the resiliency of their *own* facilities when those facilities are collocated with other providers' facilities.[46] In addition, they explain that service providers have "no reliable way of knowing if it is collocated with another provider at a particular location."[47] Similarly, T-Mobile explains that "even in those limited situations where T-Mobile is generally aware that there are other utilities or providers on a particular site (e.g., joint utility poles), it would have no reason to maintain or collect information on the [identities] of all such entities or what type of backup power they might have in place as T-Mobile is not a site owner or the landlord."[48] The same is applicable to Verizon's position regarding shared facilities.

Consumer group commenters argue unpersuasively that all service providers should be responsible for ensuring that shared sites are equipped with at least 72 hours of backup power.[49] However, none of them provide any suggestions as to how the Commission could do so or what authority they have over third-party landlords of shared sites to allow sufficient backup power facilities for all attachers. For example, SBUA asserts that the Commission should "consider holding all providers at a shared site responsible for compliance.[50] In addition, Cal Advocates erroneously believes that "additional resources at any collocated facility would only increase the network resiliency in these areas."[51]

As Verizon explained in its opening comments, forcing carriers to oversee each other's compliance creates severe anti-competitive and confidentiality risks, could complicate emergency restoration, and could create burden without benefit as wireless providers utilize different siting plans, RF design, spectrum bands, equipment brands and types, designs, lease structures, etc. in designing their networks with needs that may not match other providers'

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[46] CTIA Comments at 14 (emphasis added); *see also* AT&T Comments at 15.
[47] T-Mobile Comments at 17.
[48] T-Mobile Comments at 18.
[49] *See* Cal Advocates Comments at 11; RCRC Comments at 4; SBUA Comments at 16.
[50] SBUA Comments at 16.
[51] Cal Advocates Comments at 11.

needs.[52] For these reasons, Verizon agrees with AT&T that "shared facilities and [CPE] raise distinct issues, but neither warrants any change to the current framework."[53]

e. **<u>Expansion beyond High Fire Threat Districts (HFTDs): Questions 13-16</u>**

Questions 13-16 pertain to geographic expansion of the Resiliency requirements. As explained in opening comments, the Commission's High Fire Threat District map was developed through an exhaustive, multi-year, evidence-based proceeding incorporating scientific data, Cal Fire experts, and utility stakeholders including Commission Staff, service providers, and consumer advocates. In D.20-07-011 and D.21-02-029, the Commission explicitly "narrowly tailored" its resiliency rules to Tier 2 and 3 HFTDs because these areas face the highest risk of catastrophic wildfire and associated PSPS outages.

Other commenters agree. As CalBroadband states, [e]xpanding regulatory obligations by reference to maps developed for different purposes would introduce uncertainty and misalign compliance resources."[54] Additionally, CTIA explains that these questions are "premised on the notion that the Commission's existing fire threat maps may not adequately identify areas where the threat of fire is greatest," and suggests that the Commission address the adequacy of the maps would be appropriately addressed in R.15-05-006.[55] Verizon's affiliate Frontier agrees that "the Commission should focus its efforts on updating its Fire-Threat Map pursuant to its existing practices to ensure that it is accurate, rather than expanding the Resiliency Program requirements."[56] Verizon reiterates that the Commission should not attempt to expand the boundaries of the Resiliency Program requirements without first assessing whether the HFTD map should be updated - which should be done in another proceeding.

Some commenters suggest expansion of the Resiliency Rules based on speculative assumptions rather than demonstrated evidence. For example, TURN and CWA state without any evidence that "networks are evolving to become less reliable during power outages."[57]

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[52] While some providers may require backup power at a specific site, another provider that may have equipment in the same area or on the same pole may not require backup power due to overlapping coverage. This could create forced coordination without the possibility of universal solution.
[53] AT&T Comments at 15.
[54] CalBroadband Comments at 24.
[55] CTIA Comments at 16-17.
[56] Frontier Comments at 10.
[57] TURN and CWA Comments at 22; *see also* Small LECs Comments at 8.

Moreover, CforAT claims without any factual basis that "the diversion of staff and equipment to areas affected by wildfires and other disasters necessarily diverts those resources from communities that are not in HFTDs."[58] Similarly, Cal Advocates offers no evidentiary support for its claim that "[b]y expanding the backup power requirements to CAL FIRE's FHSZ, there would be backup power available to a population of 7,137,360 people, and 2,568,265 households in California."[59] The Commission should reject these unsubstantiated claims.[60]

As explained in its opening comments, because the phrase "beyond Tier 2 and 3 HFTDs" is undefined and the scope of potential new rules is unclear, Verizon is not able to assess the full scope of the major cost drivers or estimated incremental costs associated with any expansion beyond the HFTDs. However, as we explained in our opening comments, any expansion would inevitably lead to additional costs that wireless service providers and ultimately California consumers will bear.[61] Other parties agree. For example, as Verizon's affiliate Frontier explains, "[i]f the resiliency requirements were expanded to Frontier's entire California service area, it estimates that the incremental equipment costs alone would exceed $38 million dollars.[62] Moreover, CalBroadband explained that its members "have spent more than $250 million, and devoted significant workforce hours, on compliance with the Wireline Resiliency Decision in Tier 2 and 3 High Fire-Threat Districts ("HFTDs") alone.[63] Verizon agrees with CalBroadband that "the Commission should expect any expansion of the resiliency requirements beyond Tier 2 and 3 HFTDs to impose even greater demands on providers' capital and operational resources—easily reaching into the billions of dollars industrywide."[64]

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[58] CforAT Comments at 12.
[59] Cal Advocates Comments at 14.
[60] *See* Pub. Util. Code § 1705 (requiring findings of fact and conclusions of law on all material issues) and Pub. Util. Code § 1757(a)(4)(establishing that Commission decisions may be subject to judicial review if "the findings in the decision of the commission are not supported by substantial evidence in light of the whole record."); *SFPP, L.P. v. Pub. Utils. Comm'n*, 217 Cal.App.4th 784, 794 (2013) (applying "substantial evidence" standard to review of Commission decision); *Util. Reform Network v. Pub. Utils. Comm'n*, 223 Cal.App.4th 945, 949, 959-966 (2014) (applying same standard and finding Commission's decision unsupported by substantial evidence). The Commission should not base any decision on any comments that lack supporting evidence.
[61] Verizon provided costs associated with different elements that it uses to ensure service continuity to its customers. Based on these costs, Verizon maintains that expansion of the existing Resiliency requirements could result in significantly increased costs. *See* Verizon Comments at 19.
[62] Frontier Comments at 11.
[63] CalBroadband Comments at 2.
[64] CalBroadband Comments at 26.

In addition, the Commission should similarly reject suggestions that a Benefit Cost Ratio (BCR) methodology should be applied at a site-specific level for potential expanded reporting requirements. As numerous providers emphasized, the Commission must analyze on a macro-level the costs against the benefits of expanded resiliency reporting pursuant to Public Utilities Code Section 321.1. Verizon agrees with AT&T that this analysis "should rigorously quantify both the expected resiliency benefits and the full range of compliance, operational, and consumer costs associated with any expansion."[65]

f. <u>**Mobile Generators: Questions 17-20**</u>

Questions 17-20 pertain to the use and deployment of mobile generators to meet the Commission's resiliency requirements. As explained in our opening comments, Verizon has developed a robust process to rapidly facilitate the deployment of temporary backup assets. To do this, Verizon purposefully and strategically stores and maintains backup equipment at diverse locations throughout the state. Verizon determines optimal storage facilities, deployment plans, and timelines for mobile generator use and manages the risk of impassable roads by employing a multi-faceted resiliency strategy that works for their specific network designs.

As CTIA explains, "[a]ny effort by the Commission to adopt specific resiliency regulations would be 'an effort by the Commission to micromanage wireless providers operations' based on a ''one size fits all' approach' that would 'hand-cuff[] providers in how they achieve and maintain their network's resiliency,'"[66] As CalBroadband points out, "[m]obile generator assets are effective precisely because they may be dispatched dynamically based on real-time outage conditions, network architecture, terrain, road access, crew availability, refueling logistics, safety conditions, and the remaining duration of on-site battery power."[67]

In addition, T-Mobile asserts that "[ra]pidly changing conditions inherent in disasters require flexibility to change generator deployment decisions as necessary" and go on to note that "[t]here is no simple formula that can be implemented to address the endless variety of situations that can arise in the day-today management of these sophisticated networks."[68]

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[65] AT&T Comments at 23.
[66] CTIA Comments at 17, citing D.20-07-011.
[67] CalBroadband Comments at 28.
[68] T-Mobile Comments at 22; *see als*o Small LECs Comments at 10 and AT&T Comments at 24.

As with so many of the proposals under consideration, the Commission has not established that a problem exists that would require burdensome mandates governing mobile generators. Specifically, no instances have been cited where providers lacked preparedness or faced generator shortages during a disaster. For example, TURN and CWA recommend that "[t]he ratio of mobile generators to sites served should be 1 to 1," except in limited circumstances.[69] However, they offer no evidence regarding why such an onerous requirement is necessary.

Non-industry comments highlight a fundamental misunderstanding about how wireless networks are managed, designed, and operated and the real limitations to permanent backup power that service providers experience. Verizon appreciates SBUA's comment noting that it "does not have visibility into individual providers' internal logistics planning and defers to parties and experts with direct technical knowledge of generator deployment practices.[70] Verizon believes the Commission should agree and refrain from mandating unnecessary and unfounded rules for mobile generators.

g. <u>Wildfire Resilience: Questions 21-23</u>

Questions 21-23 pertain to undergrounding of infrastructure after a disaster. As AT&T explains, undergrounding "does not provide backup power, supply fuel, extend battery duration, or improve a provider's ability to maintain service during electric-utility de-energization events," and "[u]nderground facilities remain vulnerable to wildfire heat, theft or vandalism, flooding, earthquakes, or other ground movement, which can damage vaults, conduits, handholes, and associated equipment, causing service disruptions."[71] CalBroadband states that "[o]ne-size-fits-all rules do not account for the nuance and range of circumstances inherent in disaster response, and go on to explain that "undergrounding communications facilities creates massive increases in service restoration costs and timelines, does not materially decrease wildfire ignition risk, and does not necessarily improve reliability."[72] Similarly CTIA explains that "[t]he removal of poles as a result of undergrounding eliminates the ability to place wireless facilities on them, which may lead wireless providers to discontinue service at such locations."[73]

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[69] TURN and CWA Comments at 25.
[70] SBUA Comments at 19.
[71] AT&T Comments at 26-27.
[72] CalBroadband Comments at 36.
[73] CTIA Comments at 27; *see also* T-Mobile Comments at 28.

The Commission has failed to establish why drastic new undergrounding requirements are warranted or how they would improve network resiliency, especially for wireless service providers, and so have non-industry commenters. For example, Cal Advocates asserts that "[t]he Commission should *require* Service Providers to underground equipment in coordination with electric utilities when possible,"[74] but fails to address what legal authority the Commission has to do so, how such a requirement would improve resiliency, or the astronomical costs or delays in restoration associated with undergrounding. CforAT outrageously attempts to paint providers as unhelpful or obstructive. Communications providers positions regarding undergrounding are in fact based on the real-world experience of rapidly restoring networks after a disaster, limitations on working with the IOUs, and the costs associated with unnecessary undergrounding.

Verizon does agree with CalBroadband that communications providers should be given the *opportunity* to join an electric utility that plans to underground its facilities by paying the incremental costs of adding their facilities to the project.[75] However, mandates to do so are not necessary or justified. As Verizon explained in its opening comments, if Verizon were forced to underground all fiber assets replaced aerially in the Palisades Fire burn scar (LA County), it would cost over $100 million. For these reasons, Verizon maintains that the Commission should not attempt to force wireless providers underground, or require them to construct entirely new poles where there are existing poles sufficient to support wireless facilities.

h. <u>Wildfire Mitigation Reporting: Questions 24-26</u>

Questions 24-26 pertain to the inclusion of wildfire preparedness and mitigation in their annual Resiliency Plans. Verizon agrees with its affiliate Frontier that "[t]he Ruling fails to identify any problems with carriers' current wildfire preparedness and mitigation plans that would justify the need for reporting or other requirements relating to wildfire preparedness and mitigation plans."[76] As T-Mobile explains, "Wildfire Mitigation Plans ("WMPs") are appropriately and exclusively associated with the electric utilities."[77] CforAT and RCRC fail to provide any adequate basis for additional reporting requirements. RCRC states unpersuasively that networks are degrading and that that "reinforces the need for more cohesive planning

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[74] Cal Advocates Comments at 21 (*emphasis added*).
[75] CalBroadband Comments at 34.
[76] Frontier Comments at 17.
[77] T-Mobile Comments at 30.

frameworks."[78] CforAT relies on the devastation of the Eaton and Palisades fires to support new rules, but the absolute destruction of all electric and communications facilities in those areas would have precluded even the most prepared service provider from being able to maintain service. If nothing remains, no amount of backup power or redundancy can solve the problem.

In our opening comments, Verizon explained how the Commission already collects a significant amount of data to address the relevant plan elements identified in the Scoping Memo.[79] For these reasons, the Commission should reject new reporting mandates. Parties have provided no evidence that current reporting obligations are insufficient, nor has it demonstrated how additional information would improve resiliency.

IV. CONCLUSION

Verizon appreciates the Commission's ongoing commitment to public safety and maintains that the existing resiliency rules established in D.20-07-011 are working well and no changes are necessary. Because the Scoping Ruling and non-industry commenters fail to identify any tangible problems or systemic deficiencies in the way service providers currently comply with the existing framework, Verizon urges the Commission to maintain the current flexible standards and refrain from enacting prescriptive, costly new rules.

Respectfully submitted this 22nd day of July, 2026,

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[78] RCRC Comments at 6.
[79] *See* Verizon Comments at 33-34.