



Federal Communications Commission  
Washington, D.C. 20554

November 6, 2018

Michael Rosenthal  
Director of Legal & External Affairs  
Southern Communications Services, Inc.  
d/b/a Southern Linc  
5555 Glenridge Connector, Suite 500  
Atlanta, GA 30342  
[mdrosent@southernco.com](mailto:mdrosent@southernco.com)

Dear Mr. Rosenthal:

The 2017 and 2018 hurricane seasons have been two of the most destructive and devastating in recent history. During some of these storms, communications networks performed relatively well. But for others, there were substantial outages that lasted for a prolonged period of time. Therefore, as a signatory to the Wireless Resiliency Cooperative Framework (Framework), I am writing to request your assistance as the Federal Communications Commission comprehensively reviews the Framework and how communications companies and others prepare for, and coordinate during and after, a disaster.

On April 27, 2016, Southern Linc, along with CTIA and other U.S. wireless providers, announced the Framework, a voluntary industry commitment to promote resilient wireless communications and situational awareness through enhanced coordination and information sharing during and after emergencies and disasters.<sup>1</sup>

The Framework set out a five-pronged approach to achieving this objective: (i) enhancing coordination during an emergency through providing for reasonable roaming when technically feasible, (ii) fostering mutual aid among wireless providers, (iii) enhancing municipal preparedness and restoration by convening with local government public safety representatives to develop best practices and establishing a provider/public safety answering point contact database, (iv) working to increase consumer readiness and preparation, and (v) improving public awareness and stakeholder communications on service and restoration status with county-by-county information for the FCC to post online.<sup>2</sup> Providers operate pursuant to the Framework when, for a given emergency or disaster, Emergency Support Function 2 (ESF-2) is declared and the Disaster Information Reporting System (DIRS) is activated.<sup>3</sup> The Framework came into effect most recently during Hurricane Michael.

To aid the Commission's reexamination of the Framework, I request that Southern Linc submit in writing an after-event summary for each event in which Southern Linc used the Framework in 2017 and 2018. In particular, the summary should:

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<sup>1</sup> Letter from Joan Marsh, AT&T; Charles McKee, Sprint; Grant Spellmeyer, U.S. Cellular; Scott Bergmann, CTIA; Steve Sharkey, T-Mobile; and William H. Johnson, Verizon, to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket Nos. 11-60 and 13-239 (dated Apr. 27, 2016), <http://www.ctia.org/docs/default-source/fccfilings/160427-final-network-resiliency-commitment-letter.pdf>; *Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 11-60, 13-239, Order, 31 FCC Rcd 13745 (2016) (*Order*).

<sup>2</sup> Framework at 2-3; *Order* at para. 5.

<sup>3</sup> *Order* at para. 6.

- Identify each event by date, location, and type of disaster and include specific information related to the way Southern Linc fulfilled the reasonable roaming and mutual aid prongs of the Framework;
- Include a detailed list of both mutual aid and roaming agreements that Southern Linc had in place for each of the events, the names of the parties to the agreements, whether Southern Linc modified these agreements depending on the scope, location, and/or duration of the disaster, how Southern Linc operationalized each of these agreements, and what, if any, impediments Southern Linc faced in implementing or honoring these agreements;
- Describe any instances in which either Southern Linc or another carrier declined a request for mutual aid or roaming and the surrounding circumstances;
- Describe the extent to which Southern Linc implemented the CTIA Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration during each event;<sup>4</sup> and
- Identify any situations in which Southern Linc did not implement the Framework (when both ESF-2 and DIRS were activated) and explain why.

Please file Southern Linc's response by November 26, 2018, using the FCC's Electronic Comment Filing System in PS Docket No. 11-60, and e-mail a courtesy copy to [Jeffrey.Goldthorp@fcc.gov](mailto:Jeffrey.Goldthorp@fcc.gov) and to [Renee.Roland@fcc.gov](mailto:Renee.Roland@fcc.gov). If Southern Linc wishes to file confidential material, please follow the procedures set forth in section 0.459 of the FCC's rules.<sup>5</sup> For a confidential submission, please include a redacted version.

Should Southern Linc have any questions, please contact Jeffrey Goldthorp at [Jeffrey.Goldthorp@fcc.gov](mailto:Jeffrey.Goldthorp@fcc.gov) or (202) 418-1096 or Renee Roland at [Renee.Roland@fcc.gov](mailto:Renee.Roland@fcc.gov) or (202) 418-2325.

Sincerely,



Lisa M. Fowlkes  
Bureau Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC  
Scott Bergmann, Senior Vice President, Regulatory Affairs, CTIA

<sup>4</sup> CTIA, Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration, <https://api.ctia.org/docs/default-source/default-document-library/best-practices-for-enhancing-emergency-and-disaster-preparedness-and-restoration.pdf> (last visited Oct. 30, 2018).

<sup>5</sup> See 47 CFR § 0.459.