Federal Communications Commission
Washington, D.C. 20554

November 6, 2018

Steve Sharkey
Vice President, Government Affairs, Technology and Engineering Policy
T-Mobile USA
601 Pennsylvania Ave., NW
Suite 800
Washington, DC 20004
Steve.Sharkey@T-Mobile.com

Dear Mr. Sharkey:

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, T-Mobile, 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.[1]

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.[2] 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.[3] The Framework came into effect most recently during Hurricane Michael.

To aid the Commission's reexamination of the Framework, I request that T-Mobile submit in writing an after-event summary for each event in which T-Mobile used the Framework in 2017 and 2018. In particular, the summary should:

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[1] 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*).
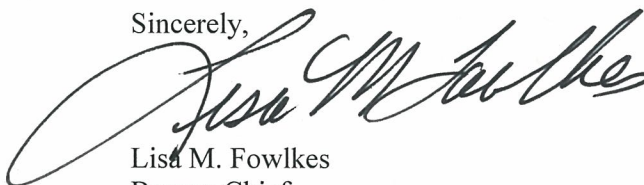
[2] Framework at 2-3; *Order* at para. 5.

[3] *Order* at para. 6.

- Identify each event by date, location, and type of disaster and include specific information related to the way T-Mobile fulfilled the reasonable roaming and mutual aid prongs of the Framework;

- Include a detailed list of both mutual aid and roaming agreements that T-Mobile had in place for each of the events, the names of the parties to the agreements, whether T-Mobile modified these agreements depending on the scope, location, and/or duration of the disaster, how T-Mobile operationalized each of these agreements, and what, if any, impediments T-Mobile faced in implementing or honoring these agreements;

- Describe any instances in which either T-Mobile or another carrier declined a request for mutual aid or roaming and the surrounding circumstances;

- Describe the extent to which T-Mobile implemented the CTIA Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration during each event;[4] and

- Identify any situations in which T-Mobile did not implement the Framework (when both ESF-2 and DIRS were activated) and explain why.

Please file T-Mobile'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 Jeffery.Goldthorp@fcc.gov and to Renee.Roland@fcc.gov. If T-Mobile wishes to file confidential material, please follow the procedures set forth in section 0.459 of the FCC's rules.[5] For a confidential submission, please include a redacted version.

Should T-Mobile have any questions, please contact Jeffrey Goldthorp at Jeffrey.Goldthorp@fcc.gov or (202) 418-1096 or Renee Roland at 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

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[4] 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-anddisaster-preparedness-and-restoration.pdf (last visited Oct. 30, 2018).

[5] *See* 47 CFR § 0.459.