



Federal Communications Commission
Washington, D.C. 20554

September 12, 2019

Jamie M. Tan
Director – Federal Regulatory
AT&T Services, Inc.
1120 20th St NW
Suite 1000
Washington, DC 20036

Dear Mr. Tan:

In recent years, the wildfires that have ravaged parts of California have affected communications networks and the public's ability to reach 911.¹ Now, to reduce the risk of electrical equipment triggering wildfires, certain California energy providers have announced plans to shut off power at times and in areas where the wildfire risk is high.² Media coverage indicates that wireless providers have plans to maintain wireless service, should these shutdowns occur.³ The Public Safety and Homeland Security Bureau (Bureau) would like to understand how AT&T intends to provide continued wireless service in the event of a power shutoff.

Please provide, in writing, a description of all steps AT&T has taken, or plans to take, to mitigate the effects of these potential power shutoffs. AT&T's response should include details related to its contingency plans to promote the continuity of communications for public safety officials and residents (including preparations to use back-up power), its strategy for outreach to consumers, and its plan for coordination with public safety officials, power companies, and other relevant stakeholders. Furthermore, the Bureau requests that AT&T advise on any additional measures it has taken to ensure the continued availability of communications in the event of a wildfire, such as the hardening of communications infrastructure or the construction of additional infrastructure in areas prone to wildfires. To the extent that AT&T finds certain industry best practices have been particularly helpful in preparation for potential power shutoffs or wildfires, please indicate those best practices and how AT&T has incorporated them, so we may better understand which ones are most effective for AT&T. We also encourage communications

¹ See, e.g., Anousha Sakoui, Todd Shields, and Scott Moritz, *Phones Fail in California Fires, Highlighting Cell Vulnerability*, Bloomberg (Nov. 16, 2018), <https://www.bloomberg.com/news/articles/2018-11-17/phones-fail-in-california-fires-highlighting-vulnerability>.

² See, e.g., Pacific Gas and Electric Co., Pacific Gas and Electric Co. Amended 2019 Wildfire Safety Plan (Feb. 6, 2019), https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/Wildfire-Safety-Plan.pdf; Southern California Edison, *Public Safety Power Shutoffs*, <https://www.sce.com/safety/wildfire/psps> (last visited Sept. 4, 2019).

³ See, e.g., Will Schmitt, *Cellphone companies reveal plans to maintain wireless service during PG&E power outages*, Press Democrat (Aug. 20, 2019), <https://www.pressdemocrat.com/news/9886542-181/cellphone-companies-reveal-plans-to>.

providers to review these industry best practices and implement those which are most useful as they prepare for wildfires or other disasters.⁴

The Bureau asks that AT&T please respond within ten calendar days via the Federal Communications Commission's Electronic Comment Filing System (ECFS) in PS Docket 19-251.⁵ Comments may be filed electronically using the Internet by accessing ECFS: <http://apps.fcc.gov/ecfs/>. If you have any questions, please contact Robert Finley at (202) 418-7835 or by email at robert.finley@fcc.gov.

Sincerely,



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

⁴ For example, the Federal Communications Commission (Commission) retains the Communications Security, Reliability, and Interoperability Council's collection of industry-supported best practices, which may prove helpful in planning for power outages. This collection of best practices is available at <https://opendata.fcc.gov/Public-Safety/CSRIC-Best-Practices/qb45-rw2t/data>. CTIA also maintains a list of industry best practices, *Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration*, available at <https://www.ctia.org/the-wireless-industry/industry-commitments/wireless-network-resiliency-cooperative-framework>.

⁵ Parties wishing to file materials with a claim of confidentiality should follow the procedures set forth in Section 0.459 of the Commission's rules. Casual claims of confidentiality are not accepted. Confidential submissions may not be filed via ECFS but rather should be filed with the Secretary's Office following the procedures set forth in 47 CFR § 0.459. Redacted versions of confidential submissions may be filed via ECFS. Parties are advised that the FCC looks with disfavor on claims of confidentiality for entire documents. When a claim of confidentiality is made, a public, redacted version of the document should also be filed.