



August 20, 2020

The Honorable Amy Paulin
Chair, New York Assembly Committee on Corporations, Authorities, and Commissions
LOB 422
Albany, NY 12248

The Honorable Kevin Parker
Chair, New York Senate Committee on Energy and Telecommunications
LOB 504C
Albany, NY 12247

Dear Chairs Paulin and Parker:

On behalf of CTIA®, the trade association for the wireless communications industry, I write to discuss the wireless industry's storm response in wake of Tropical Storm Isaias. Wireless carriers understand the need to keep consumers connected. Carriers have a history of promptly responding to emergencies and disasters to ensure their networks are operational as quickly as possible and restore communication links for their consumers. To coordinate and prepare for recovery from emergency events, wireless carriers use several strategies to address network reliability. In response to these types of events, carriers routinely deploy portable cell sites to increase network capacity when needed. Carriers also used cellular base stations on wheels (COWs), cellular base stations on light trucks (COLTs), and place back-up power at cell sites where appropriate and feasible.

In addition, CTIA, along with its members operating in New York, have developed "Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration," which are designed to help maintain wireless service during hurricanes and other natural disasters.¹ The initiative has enhanced coordination between wireless carriers to speed the restoration of wireless services in the wake of such events.

Recognizing that emergency coordination efforts will vary depending upon the event and available resources, the best practices focus on: planning before disasters and emergencies occur; coordination during and after emergencies and disasters; and education awareness campaigns. These flexible tools will enable greater coordination between wireless service providers and local governments to maintain mobile service continuity, promote resiliency efforts, and expedite restoration during and after natural disasters. These best practices build on the wireless industry's 2016 Wireless Network Resiliency Cooperative Framework.

Moreover, the communications and electric industries are working together to enhance coordination and cooperation to improve resiliency and ensure critical services are available when Americans need

¹ <https://api.ctia.org/docs/default-source/default-document-library/best-practices-for-enhancing-emergency-and-disaster-preparedness-and-restoration.pdf>



them the most. The Cross-Sector Resiliency Forum is a new collaborative effort that has brought together communications providers and electricity providers, as well as their major trade associations, to identify and implement strategies for improving information sharing, identifying lessons learned from previous events, and enhancing coordination between these industries before, during, and in the immediate aftermath of emergencies and disasters. Individual communications and electric providers have a long track record of coordination at the local level, and in recent years there has been a more concerted effort at regional and national level discussions in several different venues. The Cross-Sector Resiliency Forum builds on these efforts and brings together a broad cross-section of communications and electric providers and their trade associations to discuss resiliency and response efforts related to hurricanes, wildfires, and other emergency and disaster events.

Further, during a storm and other weather events, cell sites may be down for a variety of reasons, including the loss of commercial power at the site and backhaul issues that take down fiber connections. Weather events and other disasters may also lead to dangerous situations, such as downed power lines and trees, flooding, fires, and other challenging and life threatening conditions, that preclude carrier employees from reaching sites. Wireless carriers deploy back-up power at cell sites where appropriate and feasible. A “one size fits all” back-up power mandate is unnecessary and unworkable. At many cell sites, back-up power cannot be deployed because of limited space at the site, load limits on rooftops, challenging terrain, and hard to access locations. Property owners, who carriers lease space from, may also not want back-up power equipment deployed on their property. In addition, localities may outright prohibit the placement of back-up generators or have onerous permitting processes that effectively do so. Additionally, in the cases where commercial power is lost because of a weather event, not all cell sites require back-up power for consumers to have wireless service. Accordingly, wireless carriers need the flexibility to site back-up power where appropriate and feasible, which makes back-up power mandates unnecessary and unworkable.

Our electric utility partners should also prioritize the restoration of service at telecommunications facilities. Such prioritization would help ensure consumers have normalized communications services after storms and other events. We also support the deployment of smart meters by electric utilities at telecommunications sites. Smart meters will provide utilities with real time, automated information allowing them to know when commercial power is not being supplied to telecommunications sites.

The wireless industry continues to take action before, during, and after natural disasters to respond as quickly as possible to maintain wireless service. We stand committed to working with all stakeholders in New York to address storm recovery efforts.

Sincerely,

Gerard Keegan
Vice President, State Legislative Affairs