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October 25, 2012

VIA ELECTRONIC & OVERNIGHT MAIL
Hon. Robert Stein, Chairman
and Members of the Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Connecticut Siting Council Docket No. 432
Feasibility Study of Back-Up Power Requirements for
Telecommunications Towers and Antennas Pursuant to Public Act 12-148

Dear Chairman Stein and Members of the Siting Council:

On behalf of New Cingular Wireless PCS, LLC (AT&T) and in connection with the above referenced Docket, we respectfully enclose the original and fifteen (15) copies of the following:

1) AT&T's Responses to Siting Council Interrogatories;
2) AT&T's Pre-Hearing Information and Witness List.

Should the Siting Council or Staff have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

Lucia Chiocchio for

Christopher B. Fisher
Enclosures
CBF/mf
Cc: Linda Roberts, Executive Director
Fred Cunliffe, Siting Analyst
Docket 432 Service List

C&F: 2020138.1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:
FEASIBILITY STUDY OF BACK-UP POWER REQUIREMENTS FOR TELECOMMUNICATIONS TOWERS AND ANTENNAS PURSUANT TO PUBLIC ACT 12-148.

DOCKET NO. 432

October 25, 2012

NEW CINGULAR WIRELESS PCS, LLC ("AT&T")
RESPONSES TO SITING COUNCIL PRE-HEARING INTERROGATORIES

New Cingular Wireless PCS, LLC ("AT&T") is participating in Docket 432 and provides this information to assist the Connecticut Siting Council ("Siting Council") in discharging its responsibilities under Section 8 of P. A. 12-148 (the "Act"). Section 8(b) of the Act required the Siting Council, in consultation and coordination with the Department of Energy and Environmental Protection ("DEEP"), the Department of Emergency Services and Public Protection ("DESPP") and the Public Utilities Regulatory Authority ("PURA") to study the feasibility of requiring backup power for telecommunications towers and antennas. AT&T's participation in Docket 432 and its responses to the Siting Council's interrogatories in no way implies a waiver of its rights, nor does it constitute a consent to DEEP, DESPP, PURA, or the Siting Council's authority over AT&T or its provision of wireless services in the State of Connecticut than otherwise provided for by law.

AT&T has consistently stated in proceedings before the State Legislature and State agencies, that the State of Connecticut and its agencies do not have the authority to regulate Federal Communication Commission ("FCC") licensed providers of commercial mobile radio services ("wireless provider(s)") on their methods of provisioning backup power at transmitting facilities otherwise referred to as "cell sites." AT&T reasserts its position that the Siting Council, DEEP, DESPP and PURA do not have jurisdiction over wireless providers' network reliability and cannot, as a legal matter, require wireless providers to deploy specific forms of backup power. In responding to the Siting Council's interrogatories, AT&T further notes that Section 8(a) of the Act requires an annual report by wireless providers on their plans and ability to provide backup power during outages which report is statutorily exempt from disclosure under the State's Freedom of Information Act. AT&T's initial report was filed with the Siting Council on October 1, 2012. Accordingly, AT&T's responses to the Siting Council's interrogatories below reflect general information and by providing same, AT&T does not waive the confidentiality and exemption of AT&T's annual report from public disclosure.

1) Provide a list of web-links for similar studies, laws or initiatives in other states other than those listed in the Council's Administrative Notice List.

Response: AT&T is not aware of any similar current studies, laws or initiatives in other states.

2) Of the laws listed in the Council's Administrative Notice List identify the states in which your company does business and describe how your company complies with these requirements.

Response: AT&T does business in all of the states listed under "Other States" in the Council's Administrative Notice List, and complies with all requirements that apply to it as a wireless provider. The laws and regulations listed in the Council's Administrative Notice List cover a number of different topics, some of which are not relevant to the subject matter identified in Section 8(c) of the Act. Based on a facial reading of the citation references provided in the Council's Administrative Notice List, it does not appear that the requirements listed under "Other States" apply to wireless providers. For instance, the referenced sections of the Alaska Administrative Code and Iowa Code apply to eligible telecommunications providers ("ETC's"), not to wireless providers. The sections of the South Dakota administrative rules apply to local exchange companies. The Texas decision applies to a specific wireline carrier's request for designation as an ETC, and does not apply to AT&T or wireless carriers generally.

3) Describe the Federal Communications Commission recent endeavors to resume/initiate an investigation on backup power.

Response: AT&T is aware of the FCC's Notice of Inquiry ("NOI") identified in the Siting Council's Administrative Notice List as item 7. As stated by the FCC itself, the NOI seeks comment on current efforts by the telecommunications industry to ensure the continuity of communications service during major disasters, existing reliability and resiliency standards for broadband communications networks, the FCC's role in promoting the reliability, resiliency and continuity of communications services, and the FCC's legal authority to act to ensure the reliability, resiliency and continuity of communications services. The text of the FCC's NOI as referenced by the Siting Council contains a detailed description of its current factual inquiry.

4) Does the Safe Port Act and Stafford Act sufficiently address the carriers need to access each and every site in the State?

Response: It is not clear what specific information this question seeks by way of interrogatory response. The Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 et seq. (the "Stafford Act") authorizes the President to issue major disaster or emergency declarations in response to catastrophes in the United States that overwhelm state and local governments.

The Security and Accountability for Every (SAFE) Port Act of 2006 (PL 109-347, October 13, 2006, 120 Stat 1884) incorporated various amendments to the Stafford Act. We generally refer the Siting Council to Section 607 of the SAFE Act which amended the Stafford Act (codified as 42 USC § 5189E) to read as follows:

> ESSENTIAL SERVICE PROVIDERS
> **a) Definition** In this section, the term "essential service provider" means an entity that—
> **(1)** provides—
> **(A)** telecommunications service;
> **(B)** electrical power;
> **(C)** natural gas;
> **(D)** water and sewer services; or
> **(E)** any other essential service, as determined by the President;
> **(2)** is—
> **(A)** a municipal entity;
> **(B)** a nonprofit entity; or
> **(C)** a private, for profit entity; and
> **(3)** is contributing to efforts to respond to an emergency or major disaster.
>
> **(b) Authorization for accessibility**
> Unless exceptional circumstances apply, in an emergency or major disaster, the head of a Federal agency, to the greatest extent practicable, shall not—
> **(1)** deny or impede access to the disaster site to an essential service provider whose access is necessary to restore and repair an essential service; or
> **(2)** impede the restoration or repair of the services described in subsection (a)(1).
>
> **(c) Implementation**
> In implementing this section, the head of a Federal agency shall follow all applicable Federal laws, regulations, and policies.

This provision of federal law provides that "essential service providers" be given access where possible, by federal agencies, to the site of an emergency or major disaster for the purpose of restoring services. These provisions of the Stafford Act as amended by the SAFE Act are applicable when the Governor and/or President declare a major disaster area or emergency.

5) Describe the need for backup power requirements.

Response: AT&T does not believe there is a need for state, local, or federal requirements on backup power at cell sites. All wireless providers have the incentive to ensure that their networks remain operational during commercial power outages and providers such as AT&T have significant plans and resources already dedicated to backup power at their cell sites. Additionally, wireless providers are in the best position to determine what type

of backup power is appropriate for particular cell sites based on their particular network configuration.

6) Describe the types of back-up power technologies for temporary/portable backup power and for permanent on-site backup power that are feasible, available and cost functional for deployment during a prolonged power outage. List the criteria used in determining what type of generator is utilized at any one particular antenna site.

Response: Backup power technologies that are feasible, readily available and cost functional for use during a prolonged power outage include batteries, portable generators, and fixed on-site generators. The type of backup power generator used at a particular site (fixed or portable) depends upon numerous considerations and factors, including the coverage associated with a particular site, the traffic carried by a site, whether and what type of overlap of a site exists, whether a particular site would support a permanent or temporary generator, and the ability to gain physical access to sites in order to deploy generators.

7) Discuss operating conditions as they relate to fuel type, availability, and deliverables?

Response: The type of fuel used and the availability of fuel depend upon the type of generator and the duration of a commercial power outage. The majority of generators currently used by AT&T to provide backup power to its cell sites use diesel fuel. As AT&T explained in PURA Docket No. 11-09-09, AT&T's Business Continuity Plan includes measures to deploy and refuel temporary generators as needed in emergency events. During the two major storms in 2011, AT&T provided its own tanker trucks for fueling its generators, eliminating the need to rely on commercial stations to supply a fuel source. AT&T coordinated a fueling and refueling schedule for generators until commercial power was restored. These efforts were coordinated by a telephone bridge open 24/7 that allowed command personnel in the AT&T local response center ("LRC") to communicate the status of refueling to workers in the field at all times. The federal government has recognized AT&T's commitment to emergency preparedness. Earlier this year, AT&T received the first certification of the Department of Homeland Security's ("DHS") Voluntary Private Sector Preparedness Accreditation and Certification Program (PS-Prep TM), recognizing AT&T's organizational ability to plan, prepare for, and respond to major events using its local and national resources.[2]

8) What is the useful life of a battery backup power source and when does it need to be replaced?

Response: There are several factors that affect the useful life of battery backup power sources including battery type, operating conditions, and temperature of the surrounding environment. The key factor that could affect battery lifetime is temperature. Batteries operating in elevated temperature environments for extended periods of time will degrade

[2] See DHS announcement at http://www.dhs.gov/news/2012/03/14/dhs-announces-att-ps-prep-certification

more quickly. For cell sites in AT&T's Connecticut network, batteries generally have a four to eight year useful life, depending on type, and are routinely inspected, maintained and replaced as needed.

9) Is a shared backup power source technically, environmentally, economically and legally feasible for sites with multiple carriers on cell towers/buildings?

Response: Batteries are typically incorporated into each wireless provider's equipment at a transmitting site and cannot be shared by providers. Each carrier's plan for additional backup power may differ and involve a combination of fixed and mobile generators at their facilities irrespective of whether another wireless provider has a facility located at the same property. Each property where wireless providers are collocated would need to be specifically evaluated to determine whether it was technically, environmentally, economically and legally feasible to share a backup power generator.

In AT&T's experience, it is often not feasible to share a backup power source for one or all of the factors cited by the Siting Council. Tower sites, facilities on buildings and inside church steeples, on water towers, and other structures may not have the physical space required to accommodate any fixed generator which would be physically smaller than a shared generator. The physical arrangement of some cell sites and their underlying structure, or fire and building codes, may also make connection of any generator—even a mobile generator—impossible, which is true for all wireless providers. Lastly, because technologies evolve and the addition of new equipment will be different for each provider, it is not feasible to coordinate and accommodate backup power demands with other parties each of which has its own independent technologies and business continuity designs and standards.

10) What criteria are used to determine whether a particular site is critical or that a particular site would not require backup power?

Response: AT&T employs battery backup power at all of its cell sites and, as explained in response to Interrogatory 6, additional types of backup power may also be deployed.

11) Describe network reconfiguration associated with cell sites out of service? How does this strategy minimize lost coverage?

Response: The critical distinction between wireless networks relative to terrestrial networks is that service from cell sites typically and largely overlaps with neighboring cell site(s) coverage. In contrast, wireline service—whether telephone or cable-based—is provisioned from mutually exclusive central points, the CO or cable head-end. At any one location, cell service is typically available from multiple cell sites, albeit at differing signal strengths. This is readily demonstrated by driving down the road as the cell call is transparently handed off from one cell site to the next which would be impossible without overlapping coverage from multiple cell sites. The overlapping nature of wireless network design provides an ability to operationally control adjacent cell sites providing service into the area where an adjacent cell site may be out of service.

12) Provide the hierarchy for restoring commercial power for community infrastructure. (Where do switching office, remote terminals, and cell sites fit in that hierarchy?)

Response: Information about how electric companies determine the hierarchy for restoring commercial power to community infrastructure is better obtained from the electric companies which AT&T notes is the subject of other Sections of the Act. During emergency events, AT&T does provide a liaison to the emergency operations centers of any affected electric distribution companies. In addition, AT&T provides a representative to staff the State Emergency Operations Center ("EOC") as needed. AT&T provided liaisons to both electric companies and staffed the State EOC during both Tropical Storm Irene and the October 2011 snow storm. Requests for expedited restoration of commercial power to affected cell sites are appropriately made through the State EOC, which is the State's centralized command center.

13) Provide a copy of the CTIA The Wireless Association (CTIA) Business Continuity/Disaster Recovery Program. (Annual 10 step certification program for wireless carriers who met planning standards and objectives) Identify each year the carrier has received CTIA certification. If not, identify all other best practices the carriers adhere to and include web links, if applicable.

Response: See CTIA letter dated October 25, 2012 with information responsive to this interrogatory attached as Exhibit 1.

14) Compare and contrast the CTIA program with Network Reliability & Interoperability Council (NRIC) Power-Related Best Practices.

Response: See CTIA letter dated October 25, 2012 with information responsive to this interrogatory attached as Exhibit 1.

15) Provide the total number of wireless antenna sites in the State and identify the percentage of back-up power for each of the following: None, 0-8 hours, 8-12 hours, 12-24 hours, one day, and more than one day.

Response: As noted in filings with the Siting Council pursuant to Section 16-50ee of the Connecticut General Statutes, AT&T operates over 750 antenna sites in the State of Connecticut. One hundred percent of AT&T's wireless sites in the State of Connecticut have backup power systems which automatically engage during commercial electric outages and provide 0-8 hours of service or much longer. In the event of prolonged commercial power outages, in addition to backup battery power, AT&T's wireless sites are powered by either fixed on-site backup power systems such as a diesel generator or temporary mobile generators that are deployed to wireless sites. Standard fixed diesel generators have an approximate backup power run time of up to 2 days depending on site traffic experienced. AT&T has its own tanker trucks and refuels generators as needed.

AT&T's combination of backup battery power and generators allow AT&T to continue to provide service in an emergency until commercial power is restored.

16) In response to the Statewide Hurricane Exercise that was held in July 2012, municipal representatives question whether their local emergency responders can assist with the provision of fuel or other assistance to re-start or maintain telecommunications towers. Please respond to this inquiry.

Response: While AT&T appreciates the offer of local emergency responders to assist, any work needed on telecommunications facilities should be left to personnel with the requisite training, skills, and experience. AT&T is able to request help from local emergency responders, if needed, through the State's Emergency Operations Center, which is the State's command center during an emergency event.

17) List the type(s) of permit(s) required for installing back up power.

Response: AT&T installs battery backup power at its facilities, the components for which are incorporated into external equipment shelters, cabinets or improvements to existing building space. Battery backup components are incorporated into permit and construction drawings submitted in support of AT&T applications or notices filed under Siting Council or municipal jurisdiction. The types of permits generally involved are Siting Council exempt modification filings or municipal zoning applications (site plan, special permit, etc.) and a municipal building permit. Permits are obtained as part of AT&T's construction of new sites or modification of existing sites in the State of Connecticut.

When AT&T decides to deploy a fixed backup power generator at a wireless facility, the specifications for such units are typically incorporated into its permit and construction drawings submitted in support of applications or notices filed with the Siting Council or municipal agencies. To the extent such back up power generators involve air emissions such as a diesel fuel unit, DEEP general permits ("permit by rule") typically provide coverage for such units. Other discretionary approvals may be required from the Siting Council, in the event a tower site's boundaries are proposed for expansion, or municipal zoning and wetlands agencies to the extent a specific generator unit is proposed in a location that does not comply with municipal zoning or regulatory requirements.

18) List constraints that limit types of backup generators, including, but not limited to, space, weight, environmental, legal and safety.

Response: Space at a tower site or other type of wireless facility is required for any backup power generator. Such space may not exist by lease or physically, particularly where a site was not designed to accommodate a generator. Access for refueling must be considered as well and may be a constraint. In building rooftop environments, generators typically require new natural gas lines, if such a fuel source is available at the street. Structural and other regulatory requirements for rooftop generator sites can be a major constraint and the costs to try and implement a fixed generator prohibitive.

19) Identify alternative backup power sources to responses to Question 18.

Response: As noted in AT&T's responses to interrogatories 6 through 8, AT&T incorporates battery backup power into all of its cell site deployments with generally few constraints. Battery technology has continually improved with longer useful life and demonstrated reliability. When additional backup power sources are deployed, fixed or mobile generators with a diesel fuel source are typical. Fuel storage is incorporated directly into diesel generator units and includes secondary containment systems. As set forth in AT&T's response to interrogatory 7, AT&T has the capability to provide its own tanker trucks for fueling its generators and vehicles, eliminating the need to rely on commercial stations to provide diesel fuel. Where a fixed diesel generator is not an option, a mobile diesel generator is generally an alternative provided there is physical space and a close connection to the cell site architecture. Alternative fuel sources for a fixed or portable generator, such as propane or hydrogen, require some further element for on-site fuel storage and refueling which could be constrained in a given context including regulatory requirements regarding the storage of such sources on, in or adjacent to occupied buildings. Where available, natural gas can be considered as an alternative fuel source. In Connecticut, other alternative fuel sources including solar or wind, are not generally considered viable for purposes of backup power given the infrastructure required to reliably store and produce such power for a cell site for purposes of a prolonged commercial power outage.

20) Provide a copy of the Wireless Proposal as approved in PURA's Docket 11-09-09 – PURA Investigation of Public Service Companies' Response to 2011 Storms. Is the wireless carrier a participant in the proposal? If not, would the wireless carrier be willing to participate in the proposal?

Response: AT&T is a participant in the Wireless Proposal as approved in PURA Docket 11-09-09 and a copy is annexed as Exhibit 2.

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of the foregoing was sent electronically and by overnight mail to the Connecticut Siting Council with a copy by overnight mail and electronically to:

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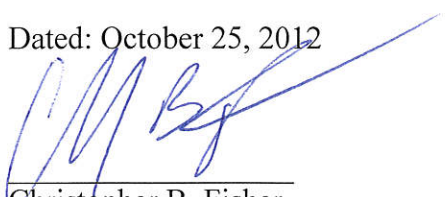
Dated: October 25, 2012



Christopher B. Fisher

EXHIBIT 1

October 25, 2012

VIA ELECTRONIC MAIL

Christopher B. Fisher, Esq.
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445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
cfisher@cuddyfeder.com

Re: **Docket No. 432- Feasibility Study of Back-Up Power Requirements for Telecommunications Towers and Antennas Pursuant to Public Act 12-148.**

Dear Chris:

In response to your request for information regarding the CTIA Business Continuity/Disaster Recovery Program (the "CTIA Program") (a copy of which is attached hereto) and the Network Reliability & Interoperability Council ("NRIC") Power-Related Best Practices, we offer for purposes of the above-numbered docket the following information:

We implemented the CTIA Program in 2006. AT&T, Sprint Nextel, T-Mobile, and Verizon Wireless certified their compliance with the CTIA Program in 2006, and have been certified each year since that time. The CTIA Program is a progression of ten key steps designed to reflect carriers' efforts to ensure network reliability in the event of an outage. Specifically, the CTIA Program requires companies to (1) establish, fund, implement, maintain, and update Business Continuity and Crisis Management plans; (2) complete and monitor results of exercises and drills of the Business Continuity/Disaster Recovery program; and (3) develop plans to communicate with employees, management, other stakeholders and government representatives. The CTIA Program is comprehensive, guiding companies through all stages of the process, from project initiation to training and maintenance. At the same time, the CTIA Program elements provide the necessary flexibility to address the different issues companies may face -- issues that will be identified as part of the Program's vulnerability assessment -- whether operating in a flood plain, a hurricane belt, a tornado alley, an earthquake zone, or a major city that could be subject to a terrorist attack. By describing the entire recovery process, the CTIA Program reflects the reality that the carriers themselves are the primary experts regarding their respective network resources, assets, and performance.

In contrast, the NRIC Power-Related Best Practices focus on one element of business continuity and disaster recovery: the placement and management of back-up power resources. The NRIC Power-Related Best Practices establish standards for placement of these resources, as well as maintenance and redundancy of equipment such as generators, batteries, and fuel cells. The wireless industry has a history of compliance with the NRIC Power-Related Best Practices.

Please note that while CTIA has moved for intervenor status in the above-numbered docket, we do not intend to offer any witnesses or direct testimony at the hearing scheduled for November 1, 2012.

Respectfully Submitted,

Jackie McCarthy
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CTIA-THE WIRELESS ASSOCIATION®
BUSINESS CONTINUITY/NETWORK RECOVERY PROGRAM

Requirement 1: Project Initiation and Management
Companies must demonstrate that they have done the following:
Defined objectives
Developed project plan and budget
Defined and recommended process structure and management
Obtained senior management commitment

Requirement 2: Risk Evaluation and Control
Companies must demonstrate that they have done the following:
Identified risks, events, and external surroundings that can adversely affect the company
Evaluated the damage that such risks and events could cause and probability of occurrence
Identified controls and safeguards to prevent or mitigate losses to company

Requirement 3: Business Impact Analysis
Companies must demonstrate that they have done the following:
Identified the critical functions of the organization
Identified the impacts resulting from disruptions and disaster scenarios
Determined recovery priorities and timeline objectives

Requirement 4: Developing Business Continuity Strategies
Companies must demonstrate that they have done the following:
Selected business recovery operating strategies
Assessed risk associated with each optional continuity strategy

Requirement 5: Emergency Response and Operations
Companies must demonstrate that they have done the following:
Developed and implemented procedures for responses to situations
Established a process for activation of an Emergency Operations Center
Integrated Disaster Recovery/Business Continuity procedures with Emergency Response procedures
Established Command and Control procedures

Requirement 6: Developing and Implementing Business Continuity Phase
Companies must demonstrate that they have done the following:
Established and implemented Business Continuity and Crisis Management plans
Established procedures to transition from emergency response to crisis management/business continuity
Established a procedure to maintain and update Business Continuity plans

Requirement 7: Awareness and Training Programs
Companies must demonstrate that they have done the following:
Established a process to educate the company regarding business continuity issues and programs
Developed and presented training programs

Requirement 8: Exercise Business Continuity Program
Companies must demonstrate that they have done the following:
Established a process to drill/exercise the Business Continuity/Disaster Recovery Program
Organized and completed exercises/drills
Developed and monitored after-action reports and results of exercises

Requirement 9: Public Relations and Crisis Communications
Companies must demonstrate that they have done the following:
Developed plans to communicate with employees and management
Developed process to communicate, if necessary, with other stakeholders

Requirement 10: Coordination with External Agencies
Companies must demonstrate that they have done the following:
Established applicable procedures and policies for coordinating response with government representatives.

EXHIBIT 2

DOCKET NO. 11-09-09
WIRELESS CARRIER COMMUNICATIONS PROPOSAL

Purpose: This document describes collaborative efforts between certain wireless carriers[1] ("Wireless Carriers") and the Public Utilities Regulatory Authority ("PURA") relating to the mutual sharing of information regarding situational awareness and operational status during times of crisis.

Scope: Wireless carriers will provide PURA with certain information described herein regarding operational status in the event of a state and federally declared emergency in Connecticut consistent with the Federal Communications Commission ("FCC") establishment of the Disaster Information Reporting System ("Declared Event").

During a Declared Event, such information will be provided to PURA by the wireless carrier on a daily basis, except when there is a material change in status, in which case the wireless carrier will provide PURA with such updated information. Such communications shall be provided for a period sufficient to convey the status of operations during emergency situations. The sharing of such information shall be limited to efforts to stabilize, recover and restore operations to levels necessary to support the communications needs of the carrier's respective customers within the state of Connecticut. The information provided to PURA is intended to eliminate duplicative requests for such information from various state and local agencies. PURAs efforts to eliminate and/or minimize such additional requests for information will allow wireless carriers to better service the needs of their customers in the wake of a disaster.

PURA Information: PURA will convey and collaborate with wireless carriers to ensure access to important information to aide efforts to stabilize and restore operations within a disaster area within the state of Connecticut. Specifically, the provision of information from PURA related to evacuation routes, commercial power outages and more, will aide wireless carriers in their efforts.

Wireless Carrier Information: Wireless carriers will individually convey to PURA mobile voice service operational status information. Such information will consist of the percentage of affected mobile voice operations statewide. Such information in the nature provided will provide PURA with sufficient detail to understand and communicate aggregated information regarding wireless carrier efforts to restore services consistent with industry best practices and the general prioritization of such efforts.

Confidentiality: Because any information to be provided to PURA as described herein has both national security and commercial competitiveness concerns, all such information shall be treated confidentially at the submission level under both federal and state law consistent with the following:

---

[1] Wireless carriers include AT&T Mobility, Sprint Nextel, T-Mobile and Verizon Wireless.

- The FCC and the federal Department of Homeland Security ("DHS") have concluded that common carrier network information, including such information maintained by wireless providers, must presumptively be treated as confidential by federal and state government entities in order to ensure that national homeland security efforts are not compromised by the release of confidential service provider network information to the public. See FCC Rules 47 C.F.R. Part 4 *et seq*.
- The public release of information to be shared individually by a wireless provider with PURA is of a nature that if released may result in a safety risk and is provided as part of a preparedness plan and emergency recovery or response plan. As such, all information that is provided shall be deemed exempt from public disclosure pursuant to Connecticut General Statutes Section 1-210(b)(19).
- The information provided is trade secret, highly confidential, propriety and competitively sensitive information and documents the public disclosure of which would cause substantial injury to the competitive position of a wireless provider, and is exempt from public disclosure pursuant to Connecticut General Statutes Section 1-210(b)(5).

In consideration, PURA will ensure that information provided by a wireless carrier will be protected and maintained by PURA and not shared with other wireless carriers, competitors or the general public. Once information is provided to the PURA, the Agency must aggregate and anonymize carrier identification before providing this information to any entity, individual, or upon making such information public. PURA agrees to limit disclosure of any information provided during a Declared Event to the Connecticut ESF 2 Telecommunications Task Force for use during the Declared Event. The process for sharing information as described herein provides a balance of efficiency and effectiveness, allowing for information sharing without imposing any unnecessary burdens or risks on PURA or wireless carriers as it relates to multiple requests for similar information.

Policy and Reasoning: PURA and the Wireless Carriers have a long-standing relationship which has resulted in collaborative efforts which have benefitted consumers in the state of Connecticut. The efforts described herein are in furtherance of that relationship and an acknowledgment by both that any and all opportunities to work collaboratively versus the imposition of mandates serves the public interest.

Sharing of information between PURA and Wireless Carriers regarding situational awareness and operational status during times of crisis can be important to reduce the risk and effects of an emergency or disaster. Such information sharing must not be unduly burdensome to the point where it has negative and detrimental effect on safety, restoration and recovery by wireless carriers. While the Wireless Carriers are providing this information in collaboration with PURA, the Wireless Carriers do not waive any legal rights with respect to the jurisdiction of PURA or any other state agency over wireless service. The Wireless Carriers also reserve the right to modify the efforts described herein, as may be mutually agreed to by PURA and the Wireless Carriers, for the benefit of Connecticut consumers.