

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

**Purpose:** This document describes collaborative efforts between certain wireless carriers<sup>1</sup> (“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. PURA’s 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:

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<sup>1</sup> 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.