

**BEFORE THE CALIFORNIA GOVERNOR'S
OFFICE OF EMERGENCY SERVICES**

Notice of Proposed Rulemaking – Community
Isolation Outage Regulations

Issued: February 12, 2021

**COMMENTS OF CTIA ON PROPOSED REGULATIONS IMPLEMENTING
GOVERNMENT CODE SECTION 53122 - COMMUNITY
ISOLATION OUTAGE REPORTING**

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March 30, 2021

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Pursuant to the Notice of Proposed Rulemaking issued by the California Governor’s Office of Emergency Services (“Cal OES”) on February 12, 2021, CTIA¹ respectfully submits the following limited comments on the proposed Community Isolation Outage Reporting Regulations ("Outage Reporting Regulations").

The Outage Reporting Regulations have been in effect on a temporary emergency basis since June of 2020. These regulations have been working effectively for Cal OES and CTIA does not have any comments on the additional reporting requirements proposed by Cal OES. That said, CTIA would offer one comment regarding the required notice format. Specifically, Section 2480.30(a) of the proposed regulations states as follows (emphasis added):

Telecommunications service providers shall provide the notices required by Government Code section 53122, subdivision (c) via electronic submission to the office. *Electronic notices shall be made in a format prescribed by the office* and submitted to CA911outages@caloes.ca.gov. The office may implement an alternative online submission method, including through an application program interface, and upon such implementation, providers may use the alternative submission method in lieu of the office’s form.

¹ CTIA – The Wireless Association® (“CTIA”) (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st -century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry, and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984.

CTIA's member carriers fully support Cal OES' efforts to develop clear, effective and timely notifications of community isolation outages and are prepared to work with Cal OES to help ensure that the information provided is in the format that is most useful to the agency. However, as highlighted above, the regulations currently provide that "[e]lectronic notices shall be made in a format prescribed by the office," but place no restrictions on Cal OES regarding the degree or frequency of format changes. CTIA and its member carriers do not object to Cal OES changing the format of the required notices, provided that the required content stays within the confines of the regulations, but request that carriers be provided a reasonable period of time by which to comply with any modified notice format. During that period, carriers should not be deemed out of compliance with the Outage Reporting Regulations provided that all required community isolation notices are submitted in the previously authorized format.

Respectfully submitted this March 30, 2021, at San Francisco, California.

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