



COMMONWEALTH OF PENNSYLVANIA
Pennsylvania Emergency Management Agency

Office of the Director

717.651.2007

April 1, 2010

The Honorable James J. McNulty
Secretary
Pennsylvania Public Utility Commission
The Keystone Building
400 North Street
Harrisburg, Pennsylvania 17105-3265

RE: Docket. No. M-2008-2065532

Dear Secretary McNulty:

I am responding to the Pennsylvania Public Utility Commission's request for comments regarding the *Proposed Policy Statement Regarding Utility Service Outage Public Notification Guidelines*, which was published in the March 6, 2010 edition of the *Pennsylvania Bulletin*.

The Pennsylvania Emergency Management Agency (PEMA) noted the absence of any policy concerning the impact of power outages on the telephone industry, which supports various areas of emergency management. During Hurricane Ike in September 2008, telephone service, both wire-line and wireless, were affected by the loss of power. The loss of power to critical telephone central offices; end offices; and tower sites disrupted not only dial-tone service, but also created 9-1-1 network outages. Coupled with the absence of utility communications to citizens, citizens could not report emergencies or contact their utility service providers.

In a number of cases, outages were due to the electric utility response, and some were due to a lack of power redundancy at critical telephone infrastructure sites. If the policy and regulatory changes are going to expand communication requirements for the utilities, the communications infrastructure has to be functional. If these rules had been in place during Hurricane Ike, and if telephone service was not restored, customer and other stakeholder communications would have been difficult, at best.

These electric outages also affected the ability of county 9-1-1 centers to dispatch first responders. PEMA suggests your consideration in requiring county radio infrastructures to register with utility providers as priority restoration sites. In a widespread, far-reaching disaster, you may want to consider the need to categorize the priority sites.

PEMA fully supports the direction of the proposed policy that the utility's Joint Information Center (JIC) would communicate with the county emergency management agencies; however, the JICs should also communicate regularly with PEMA regarding their activities during a disaster.

Finally, we suggest revisiting the one-year requirement for the submission of a written report following a utility investigation. It is imperative that corrective actions be taken as soon as possible. In periods where we experience multiple disasters over a three- to four-month span, the residents would suffer, as we would be repeating the same mistakes for an entire year while awaiting the After Action Report. A three-month period would seem much more responsive to addressing issues that are affecting our stakeholders, the citizens of Pennsylvania.

Thank you for the opportunity to comment regarding this proposed policy statement. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert P. French".

Robert P. French
Director, PA Emergency Management Agency
and Pennsylvania Homeland Security Advisor

cc: Mr. Daniel Searfoorce, Pennsylvania Public Utility Commission