

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation to Address  
Intrastate Rural Call Completion Issues.

I. 14-05-012

**REPLY COMMENTS BY THE COUNTY OF MENDOCINO  
IN SUPPORT OF THE MOTION FOR PROCEDURAL SCHEDULE FILED BY  
THE UTILITY REFORM NETWORK AND THE CENTER FOR ACCESSIBLE  
TECHNOLOGY**

KATHARINE L. ELLIOTT (Bar # 135253)  
County Counsel  
501 Low Gap Road, Room 1030  
Ukiah, CA 95482  
Telephone (707) 234-6885  
Facsimile (707) 463-4592  
Attorney for the County of Mendocino  
E-mail: [elliottk@mendocinocounty.org](mailto:elliottk@mendocinocounty.org)

Filed: December 29, 2017

Pursuant to Rule 11.1(e) of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Mendocino County submits these brief comments in support of the December 21, 2017 *Motion of The Utility Reform Network and the Center for Accessible Technology for Procedural Schedule in Phase 2*. The recent fires in our county, which caused Governor Edmund G. Brown to declare a state of emergency and President Donald J. Trump to declare a major disaster, manifest the importance of this proceeding to ensure that public safety communications function effectively. To help support emergency communications, the County encourages the Commission to move forward to monitor and improve call completion, coordinate emergency communication efforts, and expand outage reporting. Many of the Ordering Paragraphs from Decision 16-12-066 directly relate to these issues and the County strongly supported the adoption of these action items that we believed would have a positive impact on call completion in the County and coordination of emergency services communications among state and local agencies, such as providing 24/7 emergency contact information to the Offices of Emergency Services for cities, counties and federally recognized Tribes. We were pleased to finally see local public safety input in discussions of outage reporting requirements and protocols via a Working Group (OP 25). However, even though we are a party to this proceeding, the County has received no information regarding the status of these Phase I obligations, and the progress of the Phase II Working Group. In particular, we have serious concerns regarding the make-up of participants at the July meeting,<sup>1</sup> the

---

<sup>1</sup> It should be clarified that under footnote 62 the Joint Consumers state: “While participating parties have not received an attendee list or notes from the meeting, Joint Consumers believe that there were no representatives from local sheriff’s departments or other local first responder and emergency services organizations.” While the text of the motion is correct in that Sheriff Allman could not attend the July meeting of the Working Group as originally planned because of a fire, the newly hired county OES coordinator (who was not a county employee at the time of the 2014 and 2015 outages) did attend on behalf of the Sheriff.

quality of discussions in relation to public safety issues, and the planned next steps for the issues covered by the Working Group meeting. The coordination of emergency communications, a central issue for this Working Group, is a critical element for our County.

We believe a procedural schedule for this proceeding, more than a year after the Decision was approved, would clarify any accomplishments to-date, create accountability for the Phase 1 and Phase 2 action items, and provide a framework for meaningful local public safety input to help in the resolution of these issues moving forward.

Respectfully submitted,

Dated: December 29, 2017

/s/ Katharine L. Elliott  
Katharine L. Elliott  
County Counsel  
County of Mendocino  
Bar # 135253