



March 22, 2016

The Honorable Mike McGuire  
California State Senator  
1303 10th Street, Room 5064  
Sacramento, CA 95814

Re: Senate Bill 1250, 911: Emergency Reliability and Public Safety Act

Dear Senator McGuire:

I would like to voice the strong support of the Broadband Alliance of Mendocino County (BAMC) and the North Bay-North Coast Broadband Consortium for SB 1250, the Emergency Reliability and Public Safety Act.

BAMC is a grassroots organization that has been working in Mendocino county for six years advocating for better broadband services. It has been an uphill battle, as our rural, low-density areas do not meet the business models for Return on Investment (ROI) that persuade the telecom companies to invest resources and to upgrade/expand their infrastructure. This lack of real investment in our rural areas has eroded the reliability of existing networks, which include our 911 system. This has been clearly demonstrated during two major telecommunications outages which occurred in Mendocino County during the past two years, impacting tens of thousands of citizens in a variety of negative ways, the most serious of which have been the loss of the public's access to the 911 emergency reporting system for extended periods of time.

To begin to address the public policy failures that have resulted in the loss of resiliency in our telecommunications systems, we first need to have data on what is happening. The current high reporting threshold means that when outages occur in rural areas, they typically go unreported, and the extent of the outage is often unknown. The carriers do not release this information, and so the burden has fallen on grassroots groups and broadband advocates to try to assess the scope and impact. BAMC has conducted comprehensive surveys about the last two major outages, producing outage reports for the coastal

outage in 2014 and the county-wide outage in 2015. These reports have required tremendous time and effort, but have been critical documentation that has contributed to important public discussions of network design and resiliency, and for holding carriers accountable for their failures. These reports have also been used in CPUC documents<sup>1</sup> and a 2015 Governmental Accountability Office (GAO) report.<sup>2</sup> Our county Board of Supervisors also has a 2016 Legislative Platform that supports these legislative efforts to address broadband outages that impact our 911 services.<sup>3</sup>

We believe that SB 1250 is an important step in the right direction to provide transparency and accountability in the critical networks upon which our county residents, businesses, government, hospitals, public safety networks, and so many others depend. It also goes without saying that notifying the County Office of Emergency Services (OES) during an outage should be a priority for any carrier, as any lack of information literally puts lives at risk.

Thank you for your leadership to move this bill forward with realistic telecommunications outage reporting thresholds that work for rural counties.



Trish Steel, Chair  
Executive Committee  
Broadband Alliance of Mendocino County

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<sup>1</sup> Page 8, 9, and 12; <http://www.mendocinobroadband.org/wp-content/uploads/Infrastructure-review-alternate-decision.pdf>

<sup>2</sup> Page 12; <http://www.mendocinobroadband.org/wp-content/uploads/GAO-IP-Transitions-report.Executive-Summary-and-pages-11-13-ONLY.pdf>

<sup>3</sup> From Mendocino County's 2016 Legislative Platform (Public Safety): Support legislative and administrative efforts to address broadband outages impacting our Enhanced 911 (E 9-1-1) services to ensure redundancy and reliable service.