



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

March 30, 2020

The Honorable Mike McGuire
Member, California State Senate
State Capitol, Room 5061
Sacramento, CA 95814

**RE: Senate Bill 431 – SUPPORT
As Amended February 10, 2020**

Dear Senator McGuire:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for your Senate Bill 431, which would require telecommunication providers to have backup power systems for their infrastructure in high-fire threat areas.

RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties have been disproportionately affected by the destruction caused by catastrophic wildfires over the past decade and experienced most of the state's public safety power shutoff events.

As you know, the California Public Utilities Commission (CPUC) has regulatory authority over public utilities, including telecommunication providers. Current law requires the CPUC to develop and implement performance reliability standards for backup power systems installed on the property of residential and small commercial customers.

SB 431 builds upon ongoing legislative efforts to strengthen notification process and frameworks for response to PSPS events and other emergencies. Specifically, SB 431 requires the CPUC, in consultation with the California Governor's Office of Emergency Services, to develop and implement performance reliability standards for all cell towers and for all infrastructure for providing mobile telephony service, Voice over Internet Protocol service, Internet Protocol enabled service, and cable television service located within a commission-designated Tier 2 or Tier 3 High Fire Threat District. Furthermore, SB 431 would require that cell towers and cable technology have at least three full days of backup power in high-fire threat areas. SB 431 would give the state until July 2021 to implement stronger standards.

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Consistent, reliable and noninterrupted telecommunication services is crucial, especially for state and local public safety operations that provide emergency response services to its residents. Local emergency managers and the electrical utilities themselves depend upon a working communications network to notify the public and customers about PSPS events, service restoration, and other emergencies or evacuation orders that may occur concurrently with a PSPS event. Inversely, residents need uninterrupted access to 9-1-1 services, just as emergency responders need a reliable means to give and receive real-time information. Last year's widespread PSPS events resulted in widespread communications outages. 57% of cell towers lost power in Marin County, followed by 39% in Calaveras County and over 19% in each Humboldt, Lake, Napa, Santa Cruz, and Sonoma Counties. Additionally, 450,000 customers also lost access to land lines and internet.

Many residents and customers rely on wireless communication devices to receive notifications and access 9-1-1 services; however, there are large areas of the state with inadequate or unavailable wireless coverage and which instead rely upon landlines for those services. Furthermore, the loss of internet service during a de-energization can have equally devastating results, since many notifications sent via text message contain links to websites where consumers can access more information about the outage or emergency. As analog landlines increasingly transition to broadband-based Voice over Internet Protocol (VoIP), the communications network has lost much of the inherent resiliency that came with traditional copper landlines, since VoIP service is much more easily susceptible to disruption when electricity goes out.

RCRC believes SB 431 will also help local governments, particularly those serving small, rural communities, to improve local planning efforts and increase resiliency of critical communications infrastructures.

For the above reasons, RCRC supports your SB 431. If you should have any questions, please do not hesitate to contact me at trhine@rcrcnet.org or (916) 447-4806.

Sincerely,



TRACY RHINE
Legislative Advocate

cc: The Honorable Tim Beall, Member of the State Senate
The Honorable Anna Caballero, Member of the State Senate
The Honorable Jerry Hill, Member of the State Senate

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The Honorable Bill Monning, Member of the State Senate
The Honorable Jim Nielsen, Member of the State Senate
The Honorable Bob Wieckowski, Member of the State Senate
The Honorable Brian Dahle, Member of the State Senate
The Honorable Scott Wilk, Member of the State Senate
The Honorable Bill Dodd, Member of the State Senate
The Honorable Lena Gonzalez, Member of the State Senate
The Honorable Steven Glazer, Member of the State Senate
The Honorable Henry Stern, Member of the State Senate
The Honorable Marc Levine, Member of the State Assembly
The Honorable Jim Wood, Member of the State Assembly
The Honorable Blanca Rubio, Member of the State Assembly
The Honorable Rebecca Bauer-Kahan, Member of the State Assembly
Members of the Assembly Communications & Conveyance Committee
Consultant, Assembly Communications & Conveyance Committee
Daniel Ballon, Consultant, Assembly Republican Caucus