

From: bmpotech@cebridge.net
To: [CA Broadband Council](#)
Subject: Broadband document public comment
Date: Thursday, November 19, 2020 8:35:00 AM

Hello,

I would like to address the below excerpt from page 7:

Insufficient network resilience and redundancy

Unfortunately, progressively worse fire seasons have shown a spotlight on the limited requirements that broadband providers must ensure redundancy or hardening in the operations of their infrastructure. Given progressively worsening fire seasons and a changing climate, there is a risk that broadband access may fail due to power shut offs or damage done to fragile, legacy infrastructure.

In Northern California, and many other areas around the state, rural networks do not support power failures. After the PSPS major event in 2019, cellular services failed, the CPUC with legislators to enforce a bill that requires 72 hours of back up power. The risk in our area of example is 100% that the internet will fail if the power goes out. That means, now with more and more employees working from home. PGE will effectively cause unemployment.

We typically go out for a minimum of two days when an outage occurs. It takes PGE an entire day to clear our area for power up cycles.

The main problem is not temporary, as you might think with COVID issues and employees being sent home to work. Many are being told this will be the way it is beyond COVID and thus the support of our infrastructure is not sufficient to meet this requirement. I think at a minimum this section requires more detail. I understand with out legislation enacting a bill, it will not be possible!

Thank you,

Ben Palacio
IT Professional
