



May 13, 2006

***Via Electronic Mail***

Nancy J. Victory  
Chair, Hurricane Katrina Independent Panel  
Federal Communications Commission  
445 12th Street, S.W., Room 7-C737  
Washington, D.C. 20554

Re: Impact of Hurricane Katrina and Its Aftermath on Wireless Service Efforts

Dear Ms. Victory:

T-Mobile USA, Inc. (“T-Mobile”) appreciates the opportunity to respond to the Independent Panel’s request for information regarding the impact of Hurricane Katrina on communications networks. Given the significance of wireless service during emergency situations, it is appropriate for the communications industry, public safety, and government officials to consider its successes but to also review areas for improvement during disasters and other challenging times. T-Mobile is pleased to participate in this process and would like to first recognize the Federal Communications Commission’s (“FCC” or “Commission”) tremendous efforts and laudable leadership throughout the 2005 hurricane season. Below is a brief description of T-Mobile’s recovery efforts in the wake of Hurricane Katrina and the “lessons learned” from its experiences.

**Recovery Efforts**

T-Mobile’s disaster recovery efforts and overall response to network disruptions during the 2005 hurricane season, and in particular damage caused by Hurricane Katrina, facilitated rapid restoration of the company’s network and services. Three primary factors allowed T-Mobile to quickly restore communications to its customers in the Gulf Coast region after Hurricane Katrina: (1) centralized coordination of T-Mobile’s recovery efforts through its Crisis Management Team; (2) hard work by dedicated employees; and (3) the efforts by the Commission, the government, and the communications industry overall.

Like other communications companies operating in the Gulf Coast region, T-Mobile’s network facilities sustained considerable damage from Hurricane Katrina. Specifically, three switching facilities, 600 cell sites and 60 Wi-Fi Hot Spot locations were adversely affected by the hurricane. T-Mobile immediately deployed to affected areas teams who tirelessly worked to restore services and damaged network facilities. In addition, multiple T-Mobile retail stores in the Gulf Coast region lost power and suffered flooding and other collateral damage.

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Despite these challenges, T-Mobile was one of the first retail stores of any type to reopen in areas affected by Hurricane Katrina, including Gulf Port, Mississippi and parts of New Orleans. In addition, T-Mobile's Wi-Fi network played a valuable role in recovery efforts. T-Mobile made its wireless broadband network within affected areas (available in stores such as Starbucks, Borders, and FedEx Kinko's) accessible at no charge for more than a month following Hurricane Katrina so that people in affected areas could communicate with family and loved ones. T-Mobile also developed field-deployable Wi-Fi capability that used satellite backhaul to connect to the Internet and deployed several such Wi-Fi units in locations to further military and civilian recovery operations. In addition, as previously reported to the Commission, T-Mobile and other wireless carriers took extraordinary measures to maintain service for customers in areas impacted by the hurricanes. For example, in these affected areas, T-Mobile: (1) did not suspend the service of customers for non-payment and deferred billing and collection efforts; (2) provided wireless services at no charge; and (3) provided replacement handsets at no charge for all customers whose handsets were lost, stolen or damaged.<sup>1</sup> Further, T-Mobile provided its wireless services to the U.S. National Guard and local law enforcement agencies.

The efforts of dedicated T-Mobile employees and the work of an internal cross-functional Crisis Management Team was key to the company's rapid response and recovery efforts during the 2005 hurricane season. The Crisis Management Team is comprised of upper level management representatives responsible for planning and coordinating the company's response to emergency situations that affect T-Mobile and its customers. The company's coordination efforts were centralized through the Crisis Management Team so that recovery and restoration efforts were efficient and effective. Key personnel were kept informed of the status of restoration efforts and were able to quickly respond to any problems that arose during those efforts by directing the necessary resources to address those problems.

T-Mobile employees worked around the clock and often well outside their normal job responsibilities to restore T-Mobile's network and services and to reopen retail locations as quickly as possible after Hurricane Katrina. For example, for a period of 48 hours, a T-Mobile engineer protected a mobile switching center ("MSC") in New Orleans from flooding and other potential storm damage, which was crucial to the operation of T-Mobile's network. The engineer kept the MSC in operation during the hurricane by ensuring its generators remained fueled. Although many T-Mobile employees also suffered their own personal losses during the hurricane, they diligently worked to re-establish services and assist hurricane survivors and emergency personnel.

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<sup>1</sup> See Letter from Thomas J. Sugrue, T-Mobile USA, Inc., to Monica Desai and Catherine W. Seidel, Federal Communications Commission, DA No. 05-2461 (Sept. 8, 2005); Letter from Thomas J. Sugrue, T-Mobile USA, Inc., to Monica Desai and Catherine W. Seidel, Federal Communications Commission, DA No. 05-2668 (Oct. 12, 2005).

T-Mobile's recovery efforts were reinforced by the assistance of the Commission and other governmental efforts, such as the work of the U.S. National Guard. The Commission devoted significant time and resources to ensure that service providers had the means and opportunities to restore networks and services as quickly as possible. For example, the Commission took steps to minimize any regulatory impediments that might have slowed down the recovery process (*e.g.*, granting expedited treatment to requests for special temporary authority and other regulatory relief). The U.S. National Guard was key to providing important access and security in the impacted areas.

Also, the wireless industry displayed unprecedented solidarity by working together to reestablish communications in the Gulf Coast region quickly. Service providers shared significant resources and information to overcome the obstacles presented by Hurricane Katrina. Wireless carriers cooperated extensively to ensure that customers affected by the hurricane could use their wireless phones. For example, when technologically feasible, T-Mobile and other carriers allowed inter-network roaming so that customers could use their wireless handsets even if the network of their own carrier was not fully operational.

In addition, the Commission took immediate steps after Hurricane Katrina to assist hurricane survivors by targeting universal service support for reconstruction and rebuilding efforts, including the creation of a special, temporary program that allowed eligible consumers to obtain wireless services and handsets at no charge through the Lifeline program ("Katrina Lifeline Program").<sup>2</sup> The Katrina Lifeline Program ensured that those affected by the hurricane, many of whom no longer have permanent residences and have lost virtually all of their personal belongings, have access to the resources needed for their recovery efforts. Multiple wireless carriers participated in the Katrina Lifeline Program, providing critical communications services to tens of thousands of hurricane survivors. T-Mobile alone has provided wireless services through the Katrina Lifeline Program to more than 44,000 hurricane survivors.

### **"Lessons Learned" and Recommendations**

A number of disaster recovery initiatives following Hurricane Katrina may be instructive for future disaster recovery efforts. Based on T-Mobile's experiences, the following recommendations may enhance the effectiveness of future efforts.

- **Primary Contact List.** Primary emergency contacts (including names, titles, phone numbers) and key leadership personnel at the Commission, National Communications System ("NCS"), Federal Emergency Management Agency ("FEMA"), Department of

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<sup>2</sup> See *Lifeline and Link-Up*, Order, 20 FCC Rcd 16883 (2005) (adopting the Katrina Lifeline Program); *Lifeline and Link-Up*, Order, FCC 06-23, WC Docket No. 03-109 (rel. Mar. 1, 2006) (extending the Katrina Lifeline Program by three months until June 1, 2006).

Homeland Security (“DHS”), U.S. National Guard, state and local law enforcement, and other federal and state agencies should be identified and kept current at all times. A current list of contacts will help government agencies and service providers coordinate recovery efforts more efficiently. This list should be accessible on the Commission’s or other designated agency’s website.

For example, T-Mobile offered its field-deployable Wi-Fi units to FEMA and DHS early in the relief and recovery process. Although teams on the ground expressed great interest in the Wi-Fi units, it does not appear that their availability was broadly communicated. The development of a primary contact list would help to effectively disseminate offers of assistance and support and other key communications to governmental ground teams that are assisting with recovery efforts.

- ***Voluntary Reporting.*** Any reporting (that is in addition to existing network outage reporting requirements) should be voluntary and not unduly burdensome. During the 2005 hurricane season the Commission requested on an informal, voluntary basis certain information regarding the status of service providers’ networks and services. The data requested evolved over time and ultimately was not too burdensome. The Commission should ensure this remains the case going forward because it is not in the public interest to direct company resources away from recovery efforts for reporting purposes. Accordingly, the Commission should designate a central point-of-contact for carrier reporting during disasters to allow wireless carriers to direct their resources to the repair and restoration of their networks and services rather than the filing of multiple reports to different agencies.
- ***Safe and Timely Access to Affected Areas.*** Security and lack of power were significant obstacles to repairing and restoring communications networks after Hurricane Katrina. The Commission, working with other federal authorities and the localities, needs to devise improved procedures to assist carriers’ emergency response teams gain rapid access to affected areas in a safe and timely manner. This is critical to allow workers to begin network repairs and to refuel generators as quickly as possible after an emergency. After Hurricane Katrina, T-Mobile personnel eventually received letters from FEMA that allowed some access. But alarmingly, T-Mobile technicians were at times exposed to random shooting and looting incidents while trying to gain access to key network equipment. The government needs to take steps to ensure safe and timely access to affected areas for telecommunications workers during a crisis. This work is important so that emergency response teams can implement network repairs quickly and safely. With respect to Hurricane Katrina, we were thankful for the efforts of the U.S. National Guard for ultimately enabling our key employees to gain access under these difficult conditions.

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- ***Procedures for Re-Routing Traffic.*** The frequency and severity of fiber-cuts and other major damage to backhaul facilities intensifies during disasters and emergencies. Wireless networks require backhaul facilities to transport traffic from individual cell sites to MSCs. The vast majority of backhaul routes are operated by incumbent local exchange carriers (“ILECs”) and interexchange carriers (“IXCs”). The Commission should require ILECs and IXCs to provide formalized priority status for requests made by wireless carriers seeking to re-route their traffic around switch or transport failures caused by the disaster.
- ***Expedited Procedures for Changes to Microwave Facilities.*** Hurricane Katrina destroyed or damaged many microwave communications facilities essential to providing wireless services. Repairing or rebuilding the facilities often results in altering the operating parameters of the facilities. Specific procedures for the expedited approval of changes to microwave facilities would allow wireless carriers to more quickly restore their networks and provide services to end users.

The destruction caused by Hurricane Katrina highlighted the importance of the availability of communications services during and after disastrous events. Wireless service is a primary means of communications in emergency situations. People use wireless services to call for help, receive news and emergency information, and communicate with loved ones. Similarly, public safety officials and first responders rely heavily on wireless services to communicate with each other and to protect and save lives. T-Mobile lauds the Independent Panel’s work to learn from the 2005 hurricane season to improve the disaster response and recovery efforts of the government and the communications industry.

T-Mobile hopes that this information is helpful, and is happy to follow up with the Independent Panel’s efforts in any way.

Very truly yours,

/s/ Thomas J. Sugrue

Thomas J. Sugrue

Vice President – Government Affairs

cc: Lisa M. Fowlkes – Designated Federal Officer, Independent Panel  
Jean Ann Collins – Alternate Designated Federal Officer, Independent Panel