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Federal Communications Commission

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Virtual Field Hearing on Improving Communications Resiliency and Recovery During Disasters

Good morning Acting Chairwoman Rosenworcel, Commissioners, other invited guests, and Commission staff, my name is Captain Jack Varnado and I am here to testify in my role with the Livingston Parish Sheriff's Office, as Commander of the Communications Division. Some of my responsibilities are overseeing the Dispatch Operations of Livingston Parish's Emergency Communications Center which include all Law Enforcement and Fire Dispatch and 911 Operations, and serving administratively as the Livingston Parish 911 Director. I also serve on the Board of Directors of the Association of Public-Safety Communications Officials (APCO) representing the Gulf Coast Region. I have served in Public-Safety Communications since 1989 as a frontline telecommunicator, Supervisor and Manager with the City of Baton Rouge, St. Tammany Parish 911 and currently with Livingston Parish. I have had the honor to serve in Public-Safety and that has included during some of the worst natural disasters to affect Louisiana since Hurricane Andrew in 1992. Thank you for holding this hearing and for inviting me to describe my agency's experience with Hurricane Ida and the communications challenges we faced. I also want to thank Livingston Parish Sheriff Jason Ard for allowing me to represent him and all of the deputies who I work with each and every day serving the citizens of Livingston Parish, Louisiana.

I want to begin my testimony with sending my heart felt appreciation to all of the Emergency Communications Center (or "ECC") Personnel who work "under the headset" and behind the scenes each and every day, especially during emergencies that can last for hours in their local communities or for weeks on end during large scale disasters such as Hurricane Ida. I would like to take this opportunity to encourage Commission leadership to continue to support correcting the way 911 professionals are classified by the federal government. These lifesaving professionals should be classified as "Protective Service" occupations, not "Office and Administrative Support," in the Standard Occupational Classification. Your help to effect this common sense change could be instrumental.

Hurricane Ida began to affect Livingston Parish during the late night hours on August 29, 2021 when we learned that the dual 911 ANI/ALI circuits that provide critical location information and callback numbers

of callers utilizing 911 was out of service. The degradation and loss of critical voice and 911 routing circuits would continue for the next couple of hours until all of our 911 system was “down”. Emergency reroutes were implemented to our administrative lines as per our pre-plans so we could still get some 911 voice calls, mostly from wireless callers. It would be August 31, 2021 around 5pm CDT before our 911 system would be restored. We would then have additional outages over the next several days due to generators running out of fuel and cable cuts that occurred when clearing roadways of downed trees and debris.

The challenge of losing our 911 Network was extremely frustrating as we have dealt with this very same type of outage situation during Hurricane Katrina (2005) again in Hurricane Gustav (2008) and now again during Hurricane Ida in 2021. The real frustrations come with AT&T having done nothing, in my estimation, to harden or make these critical circuits more resilient to known hazards. I have been told by multiple AT&T representatives, since Hurricane Katrina, that significant portions of these cables are run “in the air” and not buried. I want to be clear; I am NOT referencing lines/cables to houses and business, or even “feeder” lines down rural roads. I am referencing major carrier lines that directly support public safety communications. This critical infrastructure does not only service 911 but provides network facilities to FirstNet, and I will address these issues shortly. When St. Tammany Parish experienced the outages during Hurricane Katrina AT&T Executives were asked to meet with the St. Tammany Parish Communications Board of Directors and staff and they advised us that there would be an effort to harden and make this critical network more resilient. I was a part of those meetings. The only real improvement that I have witnessed since Hurricane Katrina is that the 2 Tandems serving Southeast Louisiana were mirrored, but this does not make their network more hardened or resilient if emergency calls cannot get into or out of the Tandems to the local ECC. In other words, having duplicate network elements does not improve reliability if there is a single point of failure for the inputs and outputs of those elements. We have also learned that several generators that power critical facilities during power outages were not refueled for varying reasons. How does this happen? AT&T could, and should work with the local Emergency Operations Centers to ensure that critical facilities are powered and if they need fuel, especially during the short-term, they should call. When we discovered that some of our 911 system was going down due to AT&T’s generators running out of fuel, several days after the storm, Sheriff Ard instructed me to let AT&T know that if they needed fuel to call me because we would have been able to lend the Fuel Truck servicing our generators to immediately fuel these other critical generators. This source of outages could have been easily avoided, and issues like this must be addressed in the future.

Let me pivot here to how Next Generation 911 networks and services can and will help with some resiliency and reliability of such a critical service. Livingston Parish, along with the parishes of East Baton Rouge, Terrebonne, Lafourche and East Carroll, released and published a Request for Proposals to implement, as a service, a Next Generation 911 System that will not be reliant on the Legacy Telephone System. The RFP was originally released and published on August 23rd but had to be suspended due to Hurricane Ida. It was released and published again on September 23rd and will be awarded to a vendor on November 15th. While monitoring our outage notifications from AT&T and other landline providers during Hurricane Ida we realized that our internet service never even blinked this service is provided by EATEL and its parent company, REV Broadband. Ask EATEL about how their network fared during

Hurricane Ida because the internet service was solid from our end. I learned that their main network cables are buried and hardened, which allowed for their critical facilities to continue operating. Sure, they had outages to homes and businesses where they had cables ran “in the air” and some from uprooted trees, but the main carrier lines remained intact. This proved to us that Next Generation 911 networks can be hardened and resilient when properly implemented.

Another challenge that was faced during Hurricane Ida was the loss of wireless service from FirstNet Built by AT&T. The challenges that FirstNet experienced were due at least in part to the failure of the AT&T Landline Network as referenced earlier. I’ll give you a personal example; I was sitting in my office trying to have a conversation over my FirstNet device but could not, while my daughter, who is also a Sheriff’s employee, was in my office having a Face Time call with her mom at that very time over her Verizon device and network. I had to continue my conversation over my landline VoIP Phone instead. Since our on-site meeting with Chairwoman Rosenworcel and Commissioner Carr I have learned that another issue faced by FirstNet was that generators supporting some AT&T towers were not refueled. Again, since my agency has assets to clear roadways and paths to these towers, or other facilities if need be, and can lend a fuel truck, better information and situational awareness may have helped.

The overall theme is that service providers can do a better job communicating and coordinating with public safety agencies like mine, in order to provide assistance when we can, or to preplan the availability and use of deployable assets such as Satellite COLTs, COWs, etc. We always try to learn from incidents like this, and I welcome the assistance of the Commission and other government agencies.

A public hearing such as this will no doubt be invaluable to Public-Safety agencies and ultimately the public that we serve.

Thank you again for the opportunity to participate in this hearing. I welcome any questions you have and I am happy to assist however I can with your efforts to improve the reliability of our nation’s emergency communications.

Captain Jack Varnado
Communications Division