



August 26, 2020

**VIA E-MAIL**

Caroline Thomas Jacobs, Director  
Wildfire Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94105

**Re: Draft Wildfire Safety Division Geographic Information System Data Reporting Requirements and Schema for California Electrical Corporations**

Dear Ms. Jacobs:

By way of this letter, CTIA responds to your invitation to provide feedback on the Draft Wildfire Safety Division (“WSD”) Geographic Information System (“GIS”) Data Reporting Requirements and Schema for California Electrical Corporations (“Reporting Requirements”), which were presented at the WSD Workshop on Data Schema and Safety Culture Assessment on August 12, 2020. In particular, CTIA addresses Section 3.6.2 of the Reporting Requirements. Section 3.6.2 directs the electric investor owned utilities (“IOUs”) to submit detailed information to WSD, including GIS coordinates, regarding “critical facilities,” the definition of which includes communication carrier infrastructure,<sup>1</sup> within their respective service territories.

Specifically, Section 3.6.2 of the Reporting Requirements sets forth 23 separate data points that an IOU must provide with respect to each “critical facility.” Included among these data points are parcel APN, address, and longitude and latitude. In other words, the IOU must list detailed location information with respect to each piece of communication carrier infrastructure in its service territory. Such information is highly confidential, and its release

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<sup>1</sup> Communication carrier infrastructure has been defined to include selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites.

could afford a bad actor a map to all critical telecommunications facilities within the state, to the extreme detriment of California's public safety.<sup>2</sup>

In this regard, CTIA notes that the Reporting Requirements recognize the confidential nature of certain of the information being submitted by the IOUs and direct the IOUs to augment each data item description with:

“...confidentiality concerns and any special notes about circumstances/purposes for which the data should not be used. For each feature class, include a list of fields that are confidential, and explain why the data in those fields are confidential.”<sup>3</sup>

However, as the detailed location information regarding communication carrier infrastructure will be obtained from the IOUs, this places the onus on the IOUs to delineate why this information is confidential. CTIA submits that the IOUs should not be the arbiters of what communication carrier infrastructure information should be afforded confidential protection. As addressed above, release of this type of information could have severe public safety consequences.<sup>4</sup>

In order to address this situation and in light of the stated purpose for the required information - to provide the WSD with important asset and risk data that will be used to monitor and evaluate utility safety, wildfire risk reduction, and compliance activities<sup>5</sup> - CTIA requests that Section 1 of the Reporting Requirements be modified to state that the location specific communication carrier infrastructure information submitted by the IOUs to the WSD pursuant to Section 6.2 will not be disseminated beyond internal Commission personnel. Such limited dissemination will not impinge on the WSD's ability to “monitor and evaluate utility safety, wildfire risk reduction, and compliance activities.”

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<sup>2</sup> See Proposed Decision Adopting Baseline Showings Necessary to Qualify for Consideration of Confidential Treatment, R. 14-11-001 (July 26, 2020), p. 7 (“Indeed, the public disclosure of highly sensitive information that could disable the State's electrical, gas, water, transportation or telecommunications systems could be devastating to the safety of the entire population.”).

<sup>3</sup> Reporting Requirement, Section 2.4, p. 3.

<sup>4</sup> For example, wireless cell sites are under increasing attack from anti-5G conspiracy theorists and anarchist groups such as “The 325 Group,” which posted detailed instructions on “How to Destroy Cell Phone Towers.” See <https://325.nostate.net/2020/02/13/pdf-how-to-destroy-cell-phone-towers/>; Cell towers have been under attack throughout Europe due to conspiracy theories linking 5G to COVID-19. See <https://arstechnica.com/tech-policy/2020/04/how-a-5g-coronavirus-conspiracy-spread-acrosseurope/>

<sup>5</sup> Reporting Requirements, Section 1, p. 1.

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Respectfully submitted:

/s/ Benjamin J. Aron

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