

**STATEMENT OF JANET BRITTON  
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October 26, 2021

Thank you for the chance to participate in today's field hearing to examine the effects of Hurricane Ida on the Gulf Coast communications networks and to identify what lessons might be learned. Through discussions like these, we can highlight what worked well and what might be done in the future to promote resilient networks and effective restoration and repair efforts.

My name is Janet Britton, and I am the General Counsel of REV Broadband. REV is the parent company of three providers of cutting-edge communications services in Southeastern Louisiana. Our three operating companies – RTC, EATEL, and Vision Communications – are incumbent local exchange carriers (or "ILECs") by history, having served consumers and businesses in this region for more than eight decades. Collectively, we operate one of Louisiana's largest telecommunications networks, with over 2,790 miles of fiber and nearly 400 employees serving more than 60,000 customers.

Given where we sit geographically and our more than 80 years of service in this area, REV is quite familiar with the impact of hurricanes on communications operations. But Hurricane Ida in many respects presented challenges unlike any we have ever seen, with sustained winds at 150 miles per hour at landfall and gusts reported at 172 miles per hour. This storm ravaged a large swath of Louisiana, including Port Fourchon – Louisiana's southernmost port that currently supports 90% of deepwater oil production in the Gulf of Mexico and furnishes approximately 16 to 18% of the oil supply for the United States.

Our network serves Port Fourchon and many of the other areas hit hardest by Ida. In fact, if you look at a map depicting the path of Hurricane Ida, it largely tracks to the route of our own network and serving areas coming up from Port Fourchon and moving north toward Baton Rouge. Attached is an illustration of the path with winds as reported by *The Advocate* on August 30, 2021, along with a map of our fiber facilities in the area. The devastation and ongoing recovery efforts have had a profound impact on the communities we serve – from housing and healthcare to employment and of course connectivity, no aspect of daily life has gone untouched, and in many places concerns persist even nearly two months after the storm struck.

Even as REV itself and the communities more broadly undertake the process of restoring and rebuilding, we have started to process what worked and what could be improved in preparing for future disasters. In the wake of Hurricane Maria in Puerto Rico, then-Commissioner Rosenworcel identified several things that would help in thinking ahead for future disasters. Among those recommendations were the preparation of timely reports and holding of field hearings like the one we are part of today. As she observed, efforts such as these are essential to "a timely and comprehensive investigation of what went right, what went wrong, and how we can be better prepared in the future." At REV, we have undertaken our own assessments in this regard and are grateful to be able to share those as part of today's efforts. We are also deeply thankful to Acting Chairwoman Rosenworcel and Commissioner Carr for their visit several weeks ago to our area and with our team to see firsthand our work to restore and rebuild.

Another recommendation made by Acting Chairwoman Rosenworcel after Hurricane Maria was “to do more to ensure our networks are resilient.” REV could not agree more with this forward-looking approach and, as I will explain later in this statement, our own networks provide a useful case study in how to do so.

With this as backdrop, we at REV have identified several lessons learned that could inform future planning, help providers and communities prepare for disasters, and promote more resilient networks:

1. **Heed Warnings and Prepare for the Worst** – As network providers, we need to be prepared to help keep our employees safe but also to resume operations as soon as possible once immediate hazards have passed so that we can start restoration efforts. Of course, this is complicated when employees might not even have homes to return to for months at a time or at all because of the widespread devastation of the disaster. Being prepared as a provider to supply the basics for employees – food, water, and even housing – is critical to rapid response and sustained efforts thereafter.
2. **Expect Disruptions in the Supply Chain** – We are seeing significant strains in the telecom supply chain right now, with orders taking longer than ever to fulfill and costing more. This is a “macro” issue that affects all kinds of telecom operations, including but not limited to efforts to replace storm-damaged equipment. But even more specifically to disaster recovery, distribution channels for supplies like fuel can be severely affected by storms like Hurricane Ida. For example, we arranged with local fuel suppliers in advance of the storm and for back-up fuel supplies from another distributor located outside of our area as well – and even with all of that advanced planning, we still experienced disruption in procuring fuel supplies. This obviously affected many aspects of our community, but it complicated efforts to keep stand-by generators running and move fleet vehicles.
3. **Coordination Among Companies is Critical to Avoid Exacerbating Problems** – As communications providers, we need help from the power companies and must coordinate closely during restoration. But this must go beyond simple communication; for example, in the rush to restore power, it is important that power companies not make matters worse by cutting intact fiber that is in place or otherwise taking down operational communications facilities in the process of tree trimming or installing replacement poles. Our recovery effort is hampered, and active critical services to 911, EOCs and first responders are put at risk when the power companies damage fiber and take down communications in the process of their own recovery efforts. Ensuring that electric utilities give communications providers greater visibility into where they are undertaking restoration efforts and especially where critical communications and electric infrastructure are collocated is essential to avoid prolonging or even exacerbating the effects of the storm.
4. **Community Assistance is a Critical Component of Recovery** – REV is still operating seven days per week to complete restoration. In the interim, we have established eight community Wi-Fi locations in areas hardest hit so that consumers in those areas have some level of access while the work continues. We understand the importance of the services

we provide, and we do not want consumers to have to drive to parking lots for internet access – we want to put service back in place as soon as we can where people have been able to return to their homes. Providing some basic level of access while we dig out from a historic storm like Ida is important to help our communities get their own feet back under them to start.

There is another aspect of community assistance that is important as well – and one where the FCC can be of particular help. Even for the consumers to whom service has been fully restored, many face significant economic challenges. Their employer may not have reopened or be operating at full capacity, and the widespread damage to the community may have resulted in their position being suspended or terminated. These consumers cannot make effective use of broadband if they cannot afford broadband. Continued and potentially expanded use of programs like the Emergency Broadband Benefit in the event of natural disasters would seem essential to make sure that those most affected can get and stay online, so they can perform work or find new jobs, apply for other assistance as needed, and stay in touch with concerned family and friends.

5. **Support for Building Resilient Networks** – Any network operator’s primary interest and goal after any natural disaster is to restore service as quickly as possible. Of course, we can better focus efforts and mitigate the need for restoration activity by having more resilient networks in place. Our own experience with Hurricane Ida provides a useful case study for this proposition. As I noted earlier in this statement, REV is a holding company for three ILECs that operated independently for decades prior to being brought together. Some of those companies deployed aerial facilities (*i.e.*, hanging fiber or HFC on poles) because that was all they could afford to do, while others primarily buried fiber plant to protect it from the elements and other potential damage. From time to time, those that buried their fiber plant heard questions from some in Washington about why they would do so when using aerial fiber would be less expensive. We would submit that the experience with Hurricane Ida reinforces the wisdom and efficiency of burying this plant, as the buried networks suffered less damage to start and service could be restored much faster and at far less expense than in those areas that rely upon aerial network facilities.

REV believes this case study shows why it is so important to plan ahead and to look at the efficiency of a network over its anticipated lifespan, rather than defining efficiency merely by reference to the initial deployment costs of a network. Once we have finished restoring all of our network facilities, we are hopeful that REV and companies like it can get the support needed to make the entirety of its network more resilient in this manner – and we hope that policymakers will support efforts of this kind through well-crafted policies and funding mechanisms.

Our communities are strong, and we will rebuild better together. REV thanks you again for the opportunity to participate in today’s discussion and for your support and interest since Hurricane Ida struck our communities.

