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November 11, 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Notice

PS Docket Nos. 11-60, 10-92
EB Docket No. 06-119

Dear Ms. Dortch:

On November 9, 2011, Allen Gillette, Senior Vice President for Engineering at Generac Power Systems, Inc. ("Generac"); Robert Heller, Director, Business Development, Energy, at Generac, and the undersigned, Counsel to Generac, met in separate meetings with Amy Levine, Senior Counsel and Legal Advisor to Chairman Genachowski; Louis Peraertz, Legal Advisor to Commissioner Clyburn; Mark Stone, Chief of Staff to Commissioner Copps, and John Healy, Associate Division Chief of the Public Safety and Homeland Security Bureau's Cybersecurity and Communications Reliability Division. The presentation made by the Generac representatives during the meetings noted above is attached to this letter.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter and the presentation made during the meetings is being filed for inclusion in the above-referenced dockets.

Respectfully submitted,

/s/ Ari Q. Fitzgerald

Ari Q. Fitzgerald
Counsel to Generac

Attachment

cc: Amy Levine
Louis Peraertz
Mark Stone
John Healy

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Generac Overview

FCC 11/09/11

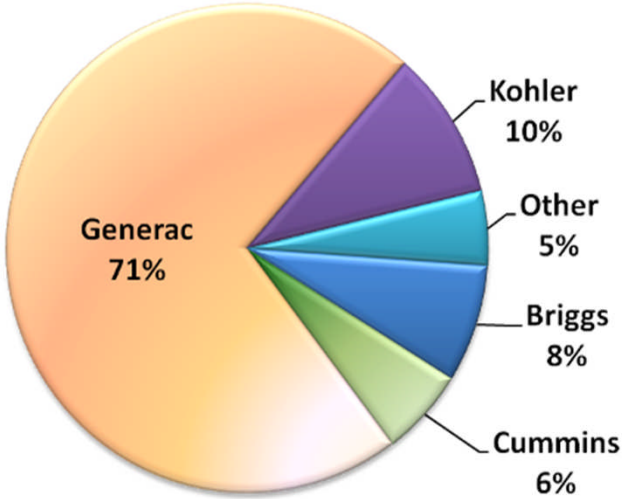
- ***Key Company Facts***
- ***Product Offering***
- ***Telecom Networks***

GENERAC®

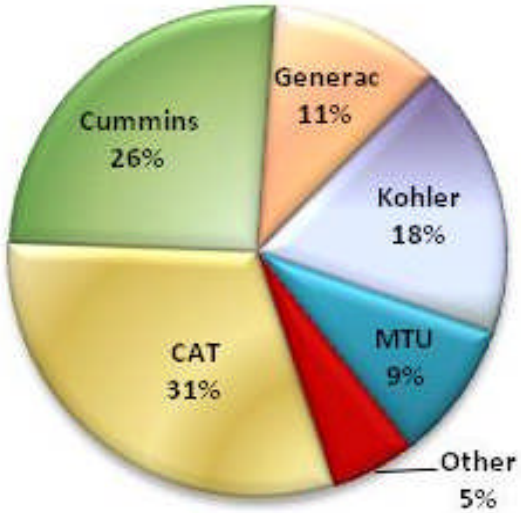
US Standby Power Market

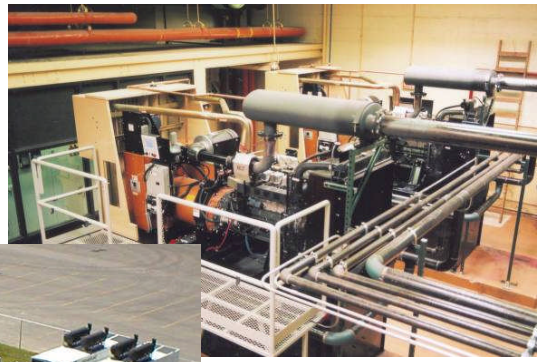
GENERAC

2010 Residential



2010 Industrial





Source: Frost & Sullivan, SBI, Generac Management

Broad Product Line

GENERAC®

End markets

Residential

Light Commercial/Retail

Telecom

Healthcare

Municipal

Industrial/Manufacturing

Power

0.8kW ⟷ 9,000kW

Product type

Portable

Residential standby

Industrial and light commercial standby

Fuel

Gasoline | Natural gas | Liquid Propane | Bi-Fuel™ | Diesel

Telecom Networks

GENERAC

Require high quality, reliable power at all times

- Batteries for instantaneous & short-term outage protection – not suited for extended outage protection
  - Found at all telecom "nodes"
  - Typically offer 2-4 hours of backup runtime
  - Established support infrastructure
- Generators are the solution for extended outage conditions.
  - Typical throughout wireline networks
  - Found at less than 20% of wireless sites (varies by carrier network/strategy)
  - Offers 2-7 Days of backup runtime (limited by fuel supply)
  - Established installation, fueling, maintenance & service infrastructure

Back up Critical in Emergencies

GENERAC

- No ‘one size fits all’ solutions, but . . .
  - “sufficient number of appropriately fueled, strategically located, dependable, on-site emergency backup power systems throughout their network infrastructure” would do more for assuring stable emergency & non-emergency communication for carriers than any other item under consideration.
- Where standby is possible (e.g., non-pole mounted situations) permanent standby is generally preferable to mobile standby, although both have their place.
  - If it is difficult or impossible to get fuel to a site in an emergency it will be difficult or impossible to get a mobile generator to that site
- Consider the merits of
  - Natural gas solutions where possible, bi-fuel & dual fuel solutions where possible and where they bring additional value

Back up Critical in Emergencies

GENERAC

- Generac believes that stakeholders in the communications industry should collaborate to develop industry best-practices for the provision of service during emergencies, and that such best practices should include backup power where possible.
- Generac would prefer to see voluntary industry efforts achieve adequate backup levels.
- Contrary to the assertions made in some comments to the FCC:
  - Generac is not requesting strict or inflexible rules that would result in wasted resources or create unnecessary redundancies, and
  - Generac has not proposed the adoption of specific rules governing network reliability, resiliency, or continuity.