

March 22, 2020

Christopher C. Krebs  
Director  
Cybersecurity and Infrastructure Security Agency  
U.S. Department of Homeland Security  
245 Murray Lane  
Washington, D.C. 20528-0380

Dear Director Krebs:

The National Utility Contractors Association (NUCA) represents construction contractors, manufacturers, and distributors who build and maintain a wide range of underground facilities and transportation infrastructure. Member companies provide the manpower and equipment needed to build, repair, and maintain the infrastructure needed for water and wastewater infrastructure, gas distribution, broadband, electric and as well as the nation's surface transportation system. Damage prevention is a shared responsibility among all stakeholders in the process. As America continues to respond to the coronavirus, it is imperative that ensuring underground utility services continue uninterrupted is a national priority.

The Cybersecurity and Infrastructure Security Agency (CISA) has provided strategic guidance to promote a national unity of effort and coordinate the overall federal effort to ensure the security and resilience of the Nation's critical infrastructure. In accordance with this mandate, CISA released an initial list of "Essential Critical Infrastructure Workers" to help state and local officials as they work to protect their communities, while ensuring continuity of functions critical to public health and safety, as well as economic and national security.

The guidance provides a list of sectors that are considered "essential critical infrastructure workers," intended to reflect the diversity of industries across America.



Representing those who build all utility infrastructure systems, NUCA strongly encourages CISA to consider our members and their employees to be placed at the top of that list.

Employees in our industry are critically needed to operate and maintain drinking water and wastewater/drainage infrastructure, including those who:

- Repair water and wastewater conveyances and performing required sampling or monitoring services;
- Maintain communications infrastructure, including wireline and wireless providers, cable service providers, satellite operations, Internet Exchange Points, and manufacturers and distributors of communications equipment;
- Responsible for infrastructure construction and restoration, including contractors for construction and engineering of fiber optic cables;
- Maintain, ensure, or restore the generation, transmission, and distribution of electric power, including call centers, utility workers, reliability engineers and fleet maintenance technicians;
- Work on generation, transmission, and electric facilities;
- Work on regional transmission organizations, and balancing authorities;
- Provide mutual assistance;
- Work on IT and OT technology;
- Work on environmental remediation/monitoring;
- Maintain the safety, sanitation, and essential operation of residences;
- Provide site work to ensure the availability of transportation, energy and communications;
- Support to ensure the effective removal, storage, and disposal of residential and commercial solid waste and hazardous waste
- Maintain, ensure, or restore the generation, transmission, and distribution of electric power;
- Build and repair natural gas distribution pipelines; and
- Work on underground natural gas storage facilities.

Ensuring the viability of all underground utility infrastructure must be considered “essential” as America responds to this pandemic. We are requesting that the employers and employees in the American utility construction industry are included in any list of “essential critical infrastructure workers.”

Regards,

A handwritten signature in black ink, appearing to read 'Doug Carlson', with a long horizontal flourish extending to the right.

Doug Carlson  
Chief Executive Officer