

March 23, 2020

Christopher C. Krebs
Director
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Department of Homeland Security
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Director Krebs,

The undersigned associations represent construction contractors, manufacturers, and distributors who build and maintain a wide range of utilities and other facilities that are essential to the viability of America’s economy. Member companies of these associations provide the manpower and equipment needed to build, repair, and maintain the infrastructure needed for water and wastewater infrastructure, gas distribution, broadband, electric, as well as the nation’s surface transportation system.

These associations appreciate the Cybersecurity and Infrastructure Security Agency’s Guidance on Essential Critical Infrastructure Workforce, and we are seeking further guidance for the infrastructure construction industry. CISA’s list of “Essential Critical Infrastructure Workers” will help state and local authorities protect their communities and ensure critical services.

Construction of broadband, natural gas, and electric power and public works construction of roads, highways, and water and sewer infrastructure projects are critical to our nation’s ability to deliver medical supplies and services, clean water, and energy to the American people, especially as we address this pandemic. Ensuring that Americans are connected must also be a priority. Any shutdown of our industries will impair the ability to maintain American infrastructure and will impact the economic viability of the entire nation, not to mention countless businesses.

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



Representing the construction entities who build and repair the vast majority of infrastructure systems on this list, we strongly encourage CISA to include our industries on the list of essential infrastructure services. These include workers needed for:

- Communications infrastructure, including privately-owned and maintained communication systems, supported by technicians, operators, call-centers, wireline and wireless providers, cable service providers, satellite operations, Internet exchange points, and manufacturers and distributors of communications equipment;
- Personnel responsible for infrastructure construction and restoration, including contractors for construction and engineering of fiber optic cables;
- Maintaining restoring the generation, transmission, and distribution of electric power, including call centers, utility workers, reliability engineers and fleet maintenance technicians;
- Generating transmission, and electric distribution facilities;
- Work on regional transmission organizations, and balancing authorities;
- Provide mutual assistance personnel;
- Providing IT and OT technology;
- Repairing water and wastewater conveyances and performing required sampling or monitoring services;
- Maintaining communications infrastructure, including wireline and wireless providers, cable service providers, satellite operations, Internet Exchange Points, and manufacturers and distributors of communications equipment;
- Infrastructure construction and restoration, including contractors for construction and engineering of fiber optic cables;
- Providing site work to ensure the availability of transportation, energy and communications;
- Ensuring the effective removal, storage, and disposal of residential and commercial solid waste and hazardous waste;
- Building and repairing natural gas distribution facilities;
- Drilling and transporting natural gas for use as end-use fuels or feedstocks for chemical manufacturing or for use in electricity generation;
- Natural gas transmission and distribution pipelines, including compressor stations;
- Petroleum transmission pipelines and product storage;
- Crude oil storage facilities, pipeline, and marine transport;
- Petroleum drilling, extraction and transporting, end-use fuels or feedstocks for chemical manufacturing;
- Underground storage of natural gas;
- Natural gas processing plants;
- Liquefied Natural Gas (LNG) facilities;
- Propane gas dispatch and control rooms and emergency response and customer emergencies, including propane leak calls; and
- Propane gas service maintenance and restoration, including call centers.
- Work on underground natural gas storage facilities.

The vast majority of this construction is contracted out, and ensuring the viability of the builders of this infrastructure must be considered “essential” as America responds to this pandemic. We thank you for your consideration.



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