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May 8, 2009

Via E-Mail

Lisa M. Fowlkes
Deputy Bureau Chief
Public Safety & Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Nomination of Susan Miller, ATIS President and CEO, for
Membership on the Communications Security, Reliability and
Interoperability Council (CSRIC)

Dear Ms. Fowlkes:

The Alliance for Telecommunications Industry Solutions (ATIS) would like to
nominate Susan Miller, ATIS President and CEO, to represent ATIS on the
Communications Security, Reliability and Interoperability Council (CSRIC).

ATIS is an important stakeholder in the information and communications
technologies' (ICT) industry. ATIS was an active member in and supporter of the
predecessor to the CSRIC – the Network Reliability and Interoperability Council
(NRIC). ATIS served as a member of NRIC II, III, IV, VI and VII, and provided
subject matter expertise to many NRIC Focus Groups over the years.

ATIS has much to contribute to the expected work of CSRIC, particularly the
council's work to develop recommendations pertaining to the security, reliability,
operability and interoperability of wireline, wireless, cable and other voice and
data networks, as well as to develop similar recommendations pertaining to public
safety communications systems. As described more fully below, ATIS is
uniquely situated to support the council's objectives because of its broad
membership and the scope of subject matter expertise available from ATIS staff
and member participants.

ATIS, a not-for-profit technical planning and standards development
organization, develops and promotes technical and operational standards for
communications and related information technologies worldwide using a
pragmatic, flexible, and open approach. Industry professionals representing over
250 companies from all segments of the communications industry, including
wireline, wireless and cable service and equipment providers, as well

Standards that Drive the Business of Communications

as public safety agencies and organizations, actively participate in ATIS' open industry committees, forums and "incubators". ATIS' consensus-based processes and the participation of key industry subject matter experts in ATIS' committees and forums allow ATIS to develop solutions essential to the reliable, secure and effective operation of communications networks, and the promotion of interoperability among different networks and technologies.

Working with the ATIS Board, Ms. Miller directs ATIS' strategic initiatives and oversees the development of standards that are necessary to drive the industry forward with the necessary levels of security, reliability and interoperability. The ATIS Board of Directors, comprised of chief technology officers and senior-most executives from the information and communications industry, also provides strategic direction on issues such as these as well as on other issues facing the ICT industry. The Board, through its Technology and Operations (TOPS) Council, identifies the industry's most pressing technical and operational priorities, and coordinates standardization efforts across the industry to produce interoperable, implementable, end-to-end solutions.

The TOPS Council's ongoing work priorities include issues that are directly related to communications reliability and interoperability. Among these issues are:

- Inter-provider VoIP interconnection: This work analyzes inter-provider call routing scenarios to identify where existing standards do not meet the requirements for successful interconnection and routing, and evaluates functional areas that affect interconnection (Quality of Service, Security, Management, etc.);
- Service oriented networks: This work enables the interoperability and implementation of communications applications and services by facilitating the blending of capabilities from a variety of sources (e.g., Web 2.0/SOA/IMS);
- Next generation carrier interconnection: This work evaluates network-to-network interconnections to ensure seamless interoperability among legacy networks (i.e. circuit switched), IP networks and next generation networks; and
- Pandemic planning: This work will include an assessment of communications networks to support critical services and infrastructure and the development of principles for resolving potential issues such as traffic and load balancing, high call volume and high bandwidth demands to ensure vital communications are maintained during a pandemic disease outbreak.

Many of ATIS' 20 committees and forums also focus on developing key standards and guidelines pertaining to network security, reliability and interoperability. For instance:

- ATIS' Network Reliability Steering Committee (NRSC), which was formed to address issues from NRIC I (then known as the Network Reliability Council), focuses on reliability issues facing communications providers and works closely with Commission staff to address these issues.
- The ATIS Emergency Services Interconnection Forum (ESIF) addresses technical and operational interconnection issues related to E9-1-1 services.

- The ATIS Network Interconnection Interoperability Forum (NIIF) resolves industry-wide issues associated with telecommunications network interconnection and interoperability which involve network architecture, management, testing and operations.
- ATIS' Network Performance, Reliability, and Quality of Service Committee (PRQC) develops standards related to the performance, reliability, and associated security aspects of communications networks as well as the processing of voice, audio, data, image, and video signals, and their multimedia integration.
- The Telecommunications Fraud Prevention Committee (TFPC) of ATIS identifies and addresses fraud vulnerabilities for current and future networks, architectures, services, and products.
- The ATIS Network Interconnection Interoperability Forum (NIIF) resolves industry-wide issues associated with telecommunications network interconnection and interoperability which involve network architecture, management, testing, operations, and facilitates the exchange of information concerning these topics.
- The ATIS Telecom Management and Operations Committee (TMOC) develops operations, administration, maintenance and provisioning standards related to Operations Support System (OSS) and Network Element (NE) functions and interfaces for communications networks.
- ATIS' Wireless Technologies and Systems Committee (WTSC) develops standards and transposes specifications related to 2G, 3G, and evolved 3G wireless services and systems and has been actively involved in the development of specifications related to the commercial mobile alerting system.

Ms. Miller has been active in fostering collaborative relationships with U.S. and international organizations to advance standardization in the ICT industry. She manages ATIS' role as an organization partner within the 3rd Generation Partnership Project (3GPP), which is developing key international wireless standards, and leads ATIS' delegation to the Global Standards Collaboration, which brings together top standards officials from the U.S., Canada, the EU, China, Japan, Korea, Australia and the International Telecommunications Union to identify areas for collaboration and ways to accelerate the development of standards for the ICT industry.

Ms. Miller's contact information is:

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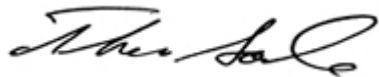
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We appreciate your consideration of our nomination of Ms. Miller to serve on the CSRIC. If you have any questions or require additional information, please do not hesitate to contact me at 202.434.8830.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive, with the first name "Thomas" being more prominent than the last name "Goode".

Thomas Goode
General Counsel