

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matters of

International Comparison and Survey Requirements in the Broadband Data Improvement Act)	GN Docket No. 09-47
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Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act)	GN Docket No. 09-137
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A National Broadband Plan for Our Future)	GN Docket No. 09-51
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COMMENTS – NBP PUBLIC NOTICE #3

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission’s (Commission) *Public Notice* released September 4, 2009, in the above referenced dockets. ATIS’ comments highlight the work of the ATIS Network Reliability Steering Committee (NRSC) that may be of interest to the Commission in its consideration of telework. As noted in its comments on the Commission’s *Notice of Inquiry* on the development of a national broadband plan, ATIS urges the Commission to consider the technical standards work done by the industry through organizations such as ATIS in its examination of broadband issues.¹

¹ See Comments of the Alliance of Telecommunications Industry Solutions, GN Docket No. 09-51, filed June 8, 2009.

I. Background

ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. Industry professionals from more than 250 communications companies from all segments of the information and communications technology (ICT) industries actively participate in ATIS' 18 open industry forums. ATIS' forums and committees focus on issues ranging from the fundamental elements of offering communications services such as ordering and billing, to network security, reliability and interoperability of current and next generation technologies, to seamless delivery of converged services such as IPTV over multimedia platforms.

II. Discussion

In the *Public Notice*, the Commission seeks information on telework programs. The Commission acknowledges that telework may transform the way we work and may have positive financial and environmental impacts. The Commission also correctly notes the value of telework in increasing output during natural disasters, outbreaks of disease, and other events that limit employees' ability to be physically present at a particular location.² ATIS agrees with the Commission regarding the benefits of telework and notes the work that has been done by the communications industry through the ATIS NRSC to ensure that the communications networks and services that are necessary for telework are available.

² *Public Notice* at p.1.

The ATIS NRSC strives to improve network reliability by providing timely consensus-based technical and operational expert guidance to all segments of the public communications industry. The NRSC addresses network reliability improvement opportunities in an open environment and advises the communications industry through the development of standards, technical requirements, technical reports, bulletins, best practices, and annual reports.

Among the best practices developed by the industry are key best practices specifically related to the provision of service and the maintenance of business continuity in the event of a pandemic outbreak. On August 31, 2009, the ATIS NRSC released the *NRSC Pandemic Checklist*, a compilation of 56 existing and newly-developed best practices to ensure business continuity in the event of a pandemic outbreak. The NRSC considered how individual elements of a pandemic can affect the intrinsic vulnerabilities in each of the eight components of the information and communications technology infrastructure: environment, power, hardware, software, network, payload, ASPR (Agreements, Standards Policy and Regulations; abbreviated as Policy) and human.³

While the checklist was prepared for use by the communications sector, the NRSC considered the potential for a pandemic's larger, more widespread impact. Beyond the public communications network, the NRSC recognized that a pandemic could affect connecting networks, such as Public Safety Answering Points (PSAPs) and enterprises. Among the best practices included on the checklist are the following:

³ See Eight Ingredient Framework, *ATIS Telecom Glossary 2007* (ATIS-0100523.2007). The Eight Ingredient Framework "is used for understanding and mastering vulnerabilities, identifying disciplines, decomposing attributes, preparing for new technologies, and other studies that support network, security, and emergency preparedness."

- **Virtual Workforce Connectivity Protection:** To accommodate the expected enlarged virtual workforces' capacity demands, enterprises should preemptively prepare by increasing available bandwidth, and implementing policies for shared use of limited resources.
- **Network Operation Center (NOC) Communications Remote Access:** Network Operators and Service Providers should consider the need for remote access to critical network management systems for network management personnel working from distributed locations (e.g., back-up facility, home) in the event of a situation where the NOC cannot be staffed (e.g., pandemic).
- **Remote Access for Technical Support:** Network Operators and Service Providers should consider allowing equipment suppliers or 3rd party service providers remote secured access to vital hardware components in order to provide real-time feedback and suggestions on device enhancements and performance during a crisis (e.g., reroute traffic during overload).
- **Telecommuting:** Network Operators, Service Providers, and Equipment Suppliers should, as part of business continuity planning, identify employees that can perform their tasks from home and consider provisions for allowing them to do so.
- **Telecommuting Infrastructure:** Network Operators, Service Providers, and Equipment Suppliers should consider sizing their remote access capabilities for employees to accommodate increased usage during a pandemic, or other crisis situations.
- **Virtual Collaboration:** Network Operators, Service Providers, and Equipment Suppliers should consider utilizing virtual collaboration and remote meetings during a pandemic or other crisis situations by providing remote services and size these services to accommodate the anticipated load.

Similarly, the NRSC has developed a checklist for use by the communications industry to prepare for hurricanes. Like the pandemic checklist, the *NRSC Hurricane Checklist* provides valuable information regarding best practices that will help promote the availability of communications networks (for telework and other services) and the maintenance of business continuity.

The ATIS *NRSC Pandemic Checklist* and *NRSC Hurricane Checklist* are publically available for free on the ATIS NRSC website at: <http://www.atis.org/nrsc/docs.asp>.

III. Conclusion

Consistent with ATIS' recommendation that the Commission's broadband policy should reflect the technical work that has been done by the industry, ATIS submits these comments to reflect the work of its NRSC to improve network reliability and to facilitate the availability of networks for all communications services including telework programs.

Respectfully submitted,

By: 

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Dated: September 22, 2009