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Via E-Mail

Michael Amato
Program Manager
Communications Division
California Public Utilities Commission
505 Van Ness Ave.
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Re: Automating the Implementation of Major Service Interruption Reporting Portal

Mr. Amato:

The Communications Division (CD) has recently instructed providers to manually complete outage reports through an online portal. The Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) is writing to urge the California Public Utilities Commission's CD to develop an electronic data interface as an additional option for reporting Major Service Interruption (MSI) reports through the MSI Reporting Portal.

By way of background, ATIS is a technology and solutions development organization that works to address key issues facing the information and communications technology (ICT) industry. ATIS' industry committees develop industry standards, guidelines, best practices and technical reports that promote reliability and ensure the seamless introduction of new technologies.

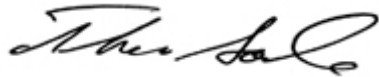
ATIS NRSC has significant experience with network outage reporting and provides important input to the Federal Communications Commission (FCC) regarding its Network Outage Reporting System (NORS) and Disaster Information Reporting System (DIRS). ATIS NRSC believes that efforts should be undertaken to reduce the burden of outage reporting so that, in times of emergency, providers are not required to focus resources on completing outage reports and can continue to focus on restoring network services. Requiring providers to manually complete outage reports imposes significant burdens on all service providers and raises the possibility of human inputting errors.

To reduce this burden and minimize the potential for inputting errors, ATIS NRSC strongly supports the implementation of an automated process for the submission of outage reports, similar to the process offered by the FCC for NORS and DIRS. While ATIS NRSC understands and appreciates that the CD has implemented an interim solution aimed at reducing the burden of outage reporting, ATIS believes that a reporting process that permits the automated submission of reports via an electronic data interface would be beneficial to all stakeholders. ATIS therefore supports CD efforts to develop such an interface.

ATIS NRSC would be happy to provide more information or to set up a virtual meeting to discuss this matter. We would be particularly interested in learning about the proposed time frame for the development of the automated reporting process and whether ATIS NRSC can assist the CD by providing input on any beta versions prior to their implementation (similar to the way that NRSC members provide input to the FCC regarding changes to its NORS and DIRS interfaces).

Please let me know if you have any questions regarding this matter or would like additional information.

Sincerely,



Thomas Goode
General Counsel

Cc: Michael Picker, President
James Ralph, Chief for Policy and Legal
Nidhi Thakar, Chief for Strategy and External Affairs
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