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February 15, 2012

Via Email

Jeffrey Goldthorp  
Chief, Communications Systems Analysis Division  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: ATIS NRSC DIRS Expansion Recommendations – Broadband and Video  
Services

Dear Jeff:

The Alliance for Telecommunications Industry Solutions' (ATIS) Network Reliability Steering Committee (NRSC) has discussed the issue of the possible expansion of the Disaster Information Reporting System (DIRS) to broadband and video services and reviewed the information ("the draft template") provided by John Healy on February 6, 2012. Currently, the NRSC is unable to reach consensus among its members regarding this possible expansion.

As has been noted by the NRSC and many others in the industry, there are significant unresolved issues pertaining to the Commission's authority to expand outage reporting to broadband and video services. In addition, NRSC members have noted that there are technical challenges associated with reporting on common thresholds and/or metrics related to broadband and video outage data.

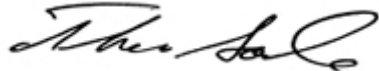
Based on the above, the NRSC urges the FCC to reconsider the expansion of DIRS to include broadband and video services. ATIS NRSC is aware, however, that the Commission is considering moving forward with this expansion despite industry concerns. ATIS NRSC's review of the draft template has identified issues that warrant further consideration by the Commission:

1. In the draft template, under the County column, would companies have the flexibility to modify the aggregation level to fit the data that is available?

2. The NRSC understands that DIRS is utilized to report daily customer impact due to major failures of communications infrastructure as opposed to a means of collecting “numbers of customers down” for reasons outside of the communication providers’ control. The “Total Number of ... Customers Down” columns on the draft template appear to violate this concept.
3. Certain information being requested may not be technically or operationally feasible for reporting entities to collect.
4. The definition of “Broadband Access” for wireline and wireless service in terms of minimum kilobits per second (kbps)/megabits per second (mbps) has not been established.

Thank you for your consideration of the above-mentioned items; please contact me if additional information is necessary.

Sincerely,



Thomas Goode  
General Counsel

cc: John Healy, Associate Division Chief, Cybersecurity and Communications Reliability  
Division