



1200 G Street, NW
Suite 500
Washington, DC 20005

P: 202-628-6380
F: 202-393-5453
W: www.atis.org

Chairman
John Donovan
AT&T

First Vice Chairman
Nick Adamo
Cisco Systems

Second Vice Chairman
Thomas Sawanobori
Verizon

Treasurer
Joseph Hanley
Telephone and Data
Systems

President & Chief
Executive Officer
Susan M. Miller
ATIS

Vice President of
Finance & Operations
William J. Klein
ATIS

February 8, 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 – VoIP

Dear Jeff:

The Alliance for Telecommunications Industry Solutions' (ATIS) Network Reliability Steering Committee (NRSC) is writing to provide input regarding the possible expansion of the Disaster Information Reporting System (DIRS) to Voice over Internet Protocol (VoIP) services.

The NRSC is proposing an approach to DIRS expansion that would allow relevant information to be provided for infrastructure impacts that affect VoIP. These recommendations would minimize changes to the DIRS templates and combine reporting for infrastructure that carries VoIP with reporting for infrastructure that carries traditional voice service. The NRSC believes these recommendations are consistent with the voluntary nature of DIRS and would provide the Commission with status and situational awareness information during times of crisis.

The NRSC is recommending that the Commission:

- 1) Rename the "Wireline Digital Loop Carrier" tab to "Remote Aggregation Devices (RAD)."
 - a. Add a column between Column C and D entitled "Service Affected" that includes a drop down menu with checkboxes for "Voice," "VoIP," and "Both."
 - b. Rename the Column C "Number of DLC Down" to "Number of RAD Down."
- 2) Rename the "Wireline Switch" tab to "Voice Switch."
 - a. In "Voice Switch" tab, under Column B, "Type of Equipment," add the option "Soft Switch" to the drop down menu.

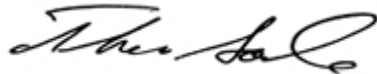
- 3) Rename the “Wireless MSC-STP” tab to “Wireless MSC-STP-Voice.”
 - a. In “Wireless MSC-STP-Voice” tab, under Column B, “Type of Equipment,” add the option “MSS-Mobile Soft Switch” to the drop down menu.

An attachment has been included that illustrates these recommendations (see Attachment #1).

ATIS NRSC is also reviewing the possible expansion of DIRS to broadband and video services with a goal to provide some feedback by February 15, 2012.

We appreciate the opportunity to provide this input.

Sincerely,



Thomas Goode
General Counsel

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

Remote Aggregation Devices

Remote Number (only for Update)	CLI of Switch/Management Area	Number of RAD Down	Service Affected	Number of Working Numbers Down	State	Notes
			Voice VoIP Both			

Wireless MSC-STP-Voice

Report Number (only for Update)	Type of Equipment	CLLI	Status	Power Access	Generator Available	Latitude	Longitude	Address	City	State	Notes
---------------------------------	-------------------	------	--------	--------------	---------------------	----------	-----------	---------	------	-------	-------

MSC-Mobile Switching Center
STP-Signaling Transfer Point
MSS-Mobile Soft Switch