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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: Transmittal of NRSC Best Practices Task Force Recommendations

Dear Jeff:

The Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) has reviewed the industry Best Practices (BPs) developed under the auspices of the Network Reliability and Interoperability Council (NRIC). The review has identified certain BPs that may benefit from further review, modification and/or updating by the Communications Security, Reliability and Interoperability Council (CSRIC).

The attached spreadsheet includes more information about the BPs in question. It includes four sub-sheets, which categorize BPs based on the actions recommended by the NRSC and provide specific detailed information about each BP.

- The "Specific Referral" sheet identifies BPs that the NRSC recommends be reviewed by a specific CSRIC Working Group.
- The "Remove Reference" sheet identifies BPs that include unnecessary and outdated references that should be removed.
- The "Change Reference" sheet identifies BPs that include references that should be modified and/or updated.
- The "Modify BP" sheet identifies BPs that should be revised for clarity
 or to conform to the BP Tutorial that was created by the NRSC and
 distributed to the CSRIC III Working Groups.
- The "Multi" sheet identifies other BPs that should be revised or deleted.
- The "FCC DB" sheet includes a correction to a BP that is truncated on the FCC online Best Practices database.

Letter to J. Goldthorp July 5, 2012 Page 2 of 2

ATIS NRSC requests FCC consideration of these recommendations. The NRSC recognizes that some of these recommendations should be referred to the CSRIC for its review and consideration or for review and consideration by relevant CSRIC Working Groups. If you would like ATIS NRSC to send these recommendations directly to the CSRIC, please let us know.

Finally, ATIS NRSC recommends that the taglines associated with industry Best Practices be removed. ATIS NRSC members have indicated that they do not believe that these taglines are used by the industry. Moreover, given the lack of consistency in tagline content and the ability to search the Best Practices databases by specific terms, the taglines add no value to the Best Practices. ATIS NRSC believes that the removal of the taglines is a non-substantive change that does not require CSRIC review/input.

If there are any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Thomas Goode

ATIS General Counsel

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

Stacy Hartman, CSRIC III Steering Committee Chair, Director, Federal Public Policy, CenturyLink

Attachment