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July 10, 2013

Via Email

Jeffery 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 Recommendations - DIRS User Manual Version 3 and
Update to DIRS Quick Reference Guide

Dear Jeff:

On behalf of its Network Reliability Steering Committee (NRSC), the Alliance for Telecommunications Industry Solutions (ATIS) is writing to provide recommendations for changes to the Disaster Information Reporting System (DIRS) User Manual, Version 3, and to provide a new revision of the DIRS Quick Reference Guide that has been developed by the NRSC and that was previously sent to you on February 28, 2012.

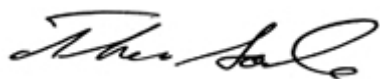
Recommended Changes to the DIRS User Manual, Version 3. The NRSC recommends that the Commission consider the following changes:

1. *Section 3, Remote Access Devices (RAD):* The NRSC notes that there is an inconsistency between the DIRS online system and the User Manual regarding the COMMON LANGUAGE Location Identifier (CLLI) code. Section 3 of the User Manual references the "CLLI of Switch/Geographic Area" while the online field references the "CLLI of Management Area"). To resolve this inconsistency, the NRSC recommends removing "Geographic Area" from the reference to the CLLI in Section 3 of the User Manual.
2. *Rough Estimates of TSP and Outside Plant Data:* When upcoming changes to DIRS are documented in the next version of the DIRS User Manual, the NRSC recommends the addition of text acknowledging the Commission's awareness that data provided at the state level for the number of Telecommunications Service Priority (TSP) circuits and the number of customers out of service related to outside plant problems will be rough estimates due to data availability.

DIRS Quick Reference Guide. The DIRS Quick Reference Guide was developed and originally submitted to the Commission on February 28, 2012, by the NRSC as part of its initiative to identify possible enhancements to DIRS from a user perspective. The NRSC has recently updated this guide. To provide guidance and clarification to users on points of process and procedure throughout a DIRS activation, the NRSC recommends the new version be published as a supplement to the existing DIRS User Manual and joint National Communication System, (NCS) and FCC Standard Operating Procedure.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive, with the first name "Thomas" being more prominent than the last name "Goode".

Thomas Goode
General Counsel

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



Disaster Information Reporting System (DIRS) Quick Reference Guide

Version 1

[Insert Date]

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1. Background and Purpose

The purpose of this document is to provide communications providers with guidance and background information on the FCC's Disaster Information Reporting System (DIRS). It is intended to provide clarification for DIRS users on points of process and procedures. It supplements information captured in the DIRS User Manual and the National Communications System (NCS)/Federal Communications Commission (FCC) Standard Operating Procedure (SOP).¹

DIRS was designed to voluntarily collect information on the status of communications assets during a disaster. The information is used by Federal Agencies (*e.g.*, Federal Emergency Management Agency (FEMA)) to guide restoration efforts by providing situational awareness of communications status in a disaster area. DIRS is a voluntary, web-based system that communications providers, including wireless, wireline, broadcast, and cable providers, can use to efficiently report communications infrastructure status and situational awareness information during times of crises. Communications providers will make every effort to provide accurate and timely information, given that their first priority is always the restoration of service.

DIRS is only to be activated for major disasters (*e.g.*, category 2 hurricanes). To improve the utility of DIRS and facilitate Federal restoration efforts, the FCC will disseminate DIRS information to other Federal agencies (including NCS) that are authorized participants on the Emergency Support Function-2 (ESF-2) team.

During less significant disasters, if a federal agency such as the FCC needs information on the status of communication assets, DIRS-Lite may be used. DIRS-Lite has been designed for use during these lesser cases.² It is a limited data collection effort aimed at determining the status of major wireline/wireless assets (*e.g.*, switches, PSAPS) that occurs via e-mail and phone calls.

2. Confidentiality

Because the information that communications providers voluntarily input in DIRS is sensitive, for national security and/or commercial reasons, DIRS filings are treated as presumptively confidential. DIRS reports capture weaknesses in and damage to the national communications infrastructure. The release of this sensitive information to the public could potentially facilitate terrorist targeting of critical infrastructure and key resources. Furthermore, DIRS filings may contain a communications provider's confidential information that may be considered a trade

¹ It is recommended that this document be periodically reviewed for accuracy and completeness, and revised as necessary based on issues identified during DIRS exercises and activations.

² Similar to DIRS, DIRS-Lite is voluntary. DIRS-Lite activation does not supersede the requirement of filing outage reports via Network Outage Reporting System (NORS) as specified in established FCC rules. For more information on DIRS-Lite, refer to the DIRS-Lite Standard Operating Procedures at http://transition.fcc.gov/pshs/docs/Standard_Operating%20Procedures_DIRS-Lite.pdf.

secret and/or sensitive commercial or financial information. Public availability of this information could also competitively harm communications providers by revealing information about the types and deployment of equipment on their network and/or by disclosing traffic patterns across their network.

3. Participation and Registration

Communications providers that choose to participate in DIRS will need to register each user that will be submitting DIRS reports during a disaster. Communications providers can complete the registration process by accessing DIRS at <https://www.fcc.gov/nors/disaster/>³ and going to the “New User Page.” During the registration process, the user’s contact name, company name, phone number, cell phone number, mobile/pager number, and e-mail address will be requested. This information will be secured by the FCC and protected from public release.

4. Activation Process

When DIRS is activated, the FCC will send an email to Network Outage Reporting System (NORS)/DIRS coordinators and inputters notifying them of the activation. The e-mail will also: (1) include the geographic area related to the DIRS activation; (2) note whether wireless coverage maps will be required; and (3) state when the FCC would like the initial report and subsequent daily reports to be submitted.

The information requested by the FCC during a DIRS activation will be consistent for each communications provider sector (*e.g.*, wireline, wireless, broadcast, and cable system operator). The FCC may occasionally need special information for an event; such requests will be made to the industry or to a specific communications provider sector (rather than to a specific communications provider).

4.1 Reporting in NORS during a DIRS Activation

In the case of a DIRS activation, the FCC will require, at a minimum, the filing of a separate NORS report for each state affected by the disaster. This NORS report should include all impacts that meet FCC outage reporting criteria for all outage categories. For areas affected by the disaster that are not included in the declared DIRS disaster area and for large scale disaster events where there has been no DIRS activation, the FCC also permits the filing of a single NORS report.

4.2 Data Submission in DIRS

Communications providers having no impacted assets in the designated disaster area should submit a positive response to the FCC indicating no impact has been identified. Once the FCC

³ Providers can also access DIRS via Online Filing on the Commission’s main webpage under the “Business & Licensing” menu **or** on the Public Safety and Homeland Security Bureau webpage at: <http://transition.fcc.gov/pshs/services/cip/dirs/dirs.html>.

has been notified, it is not necessary for these communications providers to submit data unless their assets are subsequently impacted.

Participating communications providers that have impacts within the declared disaster area may choose to voluntarily submit information in DIRS. There are separate templates for each communications sector to submit information on the status of their communications equipment, restoration efforts, power (*i.e.*, whether they are using commercial power, generator or battery), and access to fuel.⁴ In addition to information submitted in DIRS, additional data may be required from some communications sectors (*e.g.*, coverage maps for wireless communications providers).

Communications providers having impacted assets in the designated disaster area should submit the initial DIRS status report in the prescribed DIRS template, as well as any additional information requested by the FCC. Following the initial DIRS report, providers should update their reports on a daily basis and electronically submit them to the FCC by the time specified in the DIRS activation notice. Communications providers should continue to provide report updates until they have received a DIRS deactivation notice or their assets have been restored in the designated disaster area. At that time, the communications provider does not have to provide further status updates.

5. Deactivation Process

When the situation in the disaster area begins to return to normal, DIRS will be deactivated. Factors that will be considered in deactivating DIRS include:

- DIRS reporting indicates near full recovery of communications infrastructure and services.
- DIRS reporting indicates either that no further recovery, or only slow recovery, of damaged infrastructure is possible.
- Communications providers have announced that normal operations have resumed.

In some unique instances, the FCC may elect to deactivate portions of the disaster areas earlier than others.

When the FCC has made the determination to deactivate DIRS in the disaster area or portions of the disaster area, it will send an email to all communications provider NORS/DIRS contacts, informing them that DIRS has been deactivated or which portions of the disaster area have been deactivated. The email will contain the date on which the last DIRS report is required. At the conclusion of a DIRS activation, communications providers have the option to continue reporting impacts in DIRS until the issue(s) is fully resolved.

⁴ For more information on use of DIRS, refer to the DIRS user manual available at http://www.fcc.gov/pshs/disaster/disaster_manual.pdf.