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May 14, 2010

Via email

Nicholas_A.Fraser@omb.eop.gov

Nicholas Fraser
Office of Management and Budget
1650 Pennsylvania Avenue, NW
Washington, DC 20503

Judith.Herman@fcc.gov

Judith B. Herman
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Re: Comments on Burden of FCC's Communications Disaster Reporting System
OMB Control No: 3060-1003

Dear Mr. Fraser, Ms. Herman:

The Alliance for Telecommunications Industry Solutions' (ATIS) Network Reliability Steering Committee (NRSC) is pleased to be able to provide comments in response to the Federal Communications Commission's (FCC) request for input regarding the paperwork burden imposed by the FCC's Disaster Information Reporting System (DIRS). ATIS believes that the burden associated with the collection of information under the DIRS is significantly greater than has been estimated and does not fully take into account the internal processes used by industry related to the DIRS.

Background

ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards for information, entertainment and communications technologies. The development of technical and operations standards is done by industry subject matter experts in ATIS' 18 open industry forums and committees, which focus on the issues ranging from the fundamental elements of communications to network reliability and interoperability to the seamless delivery of converged services.

Formed in 1993 at the recommendation of the first Network Reliability and Interoperability Council, the ATIS NRSC strives to improve network reliability by providing timely consensus-based technical and operational expert guidance to all segments of the public communications industry. The NRSC addresses network reliability improvement opportunities in an open environment and advises the communications industry through the development of standards, technical requirements, technical reports, bulletins, best practices, and annual reports. The NRSC is comprised of industry experts with primary responsibility for examining, responding to and preventing outages for communications companies. These subject matter experts are the experts on communications reliability and outage reporting.

The Information Collection Burden Associated with the DIRS

As an initial matter, ATIS notes that the industry supports the DIRS and the collaborative process by which the DIRS was established by the FCC with the significant input of the industry. In fact, ATIS has previously suggested that the process followed by the FCC with regard to the development of the DIRS is a model for the development of future data collection efforts.¹ However, ATIS believes that the burden associated with information collection under the DIRS has been underestimated.

The estimated burden associated with the DIRS, as noted in the request for public input, is 1,650 total hours: 390 hours for new and updated contact information and 1,160 hours for critical information input.² These estimates, which were initially developed in 2007, have not proven to be accurate. Based on some ATIS NRSC members' experience over the past three years in reporting under the DIRS, ATIS believes that estimates fail to take into account the resources required by respondents to search data sources and to complete and review the collection of information.

Under the Paperwork Reduction Act of 1995, the burden associated with an information collection includes the time, effort, and financial resources expended "to generate, maintain, or provide information to or for a Federal agency, including the resources expended for --

- (A) reviewing instructions;
- (B) acquiring, installing, and utilizing technology and systems;
- (C) adjusting the existing ways to comply with any previously applicable instructions and requirements;
- (D) searching data sources;
- (E) completing and reviewing the collection of information; and
- (F) transmitting, or otherwise disclosing the information."³

¹ See Letter from ATIS to Paul de Sa, Chief of the FCC's Office of Strategic Planning and Policy Analysis, dated September 23, 2009.

² *Notice of Public Information Collection Being Reviewed by the Federal Communications Commission under Delegated Authority, Comments Requested*, 75 Fed Reg 12239 (Mar 5, 2010). While the notice references a total burden of 1,650 hours, ATIS notes that the figures for new and updated contact information and critical information input appear to add to 1,550 hours.

³ Paperwork Reduction Act of 1995, 44 U.S.C. 3502.

However, ATIS notes that, based on the experience of some of its NRSC members, the estimate of the data collection burden imposed by this system does not take into account all relevant and necessary efforts associated with this data collection.

- For instance, significant time is necessary to search data sources and to complete and review outage data. Because the DIRS is activated for specific counties in a disaster area, service providers must uniquely identify county-specific infrastructure within the disaster area, ascertain the specific DIRS-required statuses of that subset of infrastructure and collect specific data as required by the DIRS templates on the affected infrastructure. Additional time is required for the service provider to download the DIRS spreadsheet, and create a tab delimited file containing the data for upload to the DIRS. In some cases, large data files must be broken into separate spreadsheets before they may be uploaded, requiring more time.
- It is also important to note that some information required under the DIRS process is collected and/or organized solely for use in the DIRS reporting. The collection of this type of data requires significant resources and time and does not appear to be included in the estimated reporting burden.
- Finally, this estimate does not take into account additional requests that may be made by the FCC related to, but not specified in, the DIRS. For example, significant additional time is required for wireless service providers to prepare coverage maps depicting infrastructure status. These maps are provided to the FCC at its request during a DIRS activation, although not provided via the DIRS system.

When these efforts are considered, ATIS believes that total annual burden associated with DIRS reporting would significantly exceed the estimate that has been provided.

Finally, ATIS notes that it is very important to accurately assess the burden of outage data collection efforts, particularly in light of the new, similar data collections that may be developed. For example, ATIS notes that Recommendation 16.6 of the FCC's *Connecting America: The National Broadband Plan* calls for the expansion of outage reporting requirements to broadband service providers. ATIS is also aware that the collection of data regarding communications outages may be discussed as part of other pending or future proceedings related to communications network reliability and resiliency.

ATIS recognizes that the FCC has a valid need to collect information about communications outages and notes that the industry has been providing this information on either a voluntary or mandatory basis for many years. ATIS and its NRSC look forward to the opportunity to continue their collaborative efforts with the FCC on reliability issues.

If there are any questions regarding these comments, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is written in a cursive style with a large initial "T" and a long, sweeping underline.

Thomas Goode
General Counsel