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March 13, 2014

Via Email

Kathryn Condello
CSRIC IV Working Group 9, Transport Subgroup
Director, National Security / Emergency Preparedness
CenturyLink
4250 N Fairfax St, Mailstop: #5W022
Arlington, VA 22203

Re: ATIS NRSC Response to CSRIC IV WG 9, Transport Subgroup
Request Regarding Transport Outage Data

Dear Kathryn:

On behalf of its Network Reliability Steering Committee (NRSC), the Alliance for Telecommunications Industry Solutions (ATIS) is writing to provide you with information regarding your inquiry about transport outage data. The NRSC has undertaken analyses in the past that include investigations of the root causes of outages affecting DS3/transport circuits.

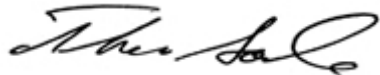
In April 2013, the NRSC published the report contained in *Analysis of Large DS3 FCC Reportable Outages* (ATIS-0100038). This report (available at: <https://www.atis.org/docstore/product.aspx?id=28004>) contains a detailed analysis of direct and root causes for outages affecting more than 1000 DS3s based on NRSC member company data. As stated in this report, the NRSC's findings can be considered relevant for both small and large outages as the root causes of larger outages are not different than those that affect smaller transport elements.

The NRSC also believes that the documentation from its DS3 outage study in 2008 provides useful and applicable information on transport system failures. Though published several years ago, the DS3 study (available at: <http://www.atis.org/NRSC/Docs/NRSC-2008-12-03-DS3Readout.pdf>) includes a detailed examination of outage trends and their root causes. The study also contains recommendations for improvements to the FCC's Network Outage Reporting System, modifications to two existing industry Best Practices, and the adoption of two new Best Practices. The results of this study were incorporated into an NRSC publication from March 2009 titled *NRSC Bulletin No. 2009-2: DS3 Outages* (ATIS-0100045), which addresses DS3s/transport causes (available at <https://www.atis.org/docstore/product.aspx?id=27996>). The bulletin may also be of interest to CSRIC IV Working Group 9.

All the ATIS documents referenced above are publically available on a complimentary basis.

Please do not hesitate to contact me if further information or clarification is needed from the NRSC.

Sincerely,



Thomas Goode
General Counsel

cc: Jay Naillon, CSRIC IV Working Group 9 Chair (jay.naillon@t-mobile.com)
Stacy Hartman, NRSC Co-Chair (stacy.hartman@centurylink.com)
Rick Krock, NRSC Co-Chair (rick.krock@alcatel-lucent.com)
Jackie Voss, ATIS Manager - Global Standards Development
Rebecca Goodman, ATIS NRSC Committee Administrator