



August 15, 2022

Kathryn Condello, Vice Chair  
Communications Sector Coordinating Council

Re: ATIS NRSC Input to CISA Questions on Continuity of the Economy

Dear Kathryn:

On behalf of the Alliance for Telecommunications Industry Solutions (ATIS), thank you for reaching out to the ATIS Network Reliability Steering Committee (NRSC) for its input to the questions on the continuity of the US economy posed by the National Risk Management Center at the Cybersecurity and Infrastructure Agency (CISA). ATIS NRSC, which provides timely consensus-based technical and operational expert guidance on network reliability and outage reporting issues, has reviewed the questions and is pleased to offer its input below.

One question that CISA poses is, should a “Significant Event” occur, which 5 or 6 Critical Infrastructure Sectors would need to be brought back online prior to any others so organizations can function at minimum viability?<sup>1</sup> ATIS NRSC notes that the telecommunications sector is heavily reliant on the energy sector. While the telecommunications industry does have significant back up power capabilities that could allow some minimum availability for periods of time, the industry is significantly dependent on the availability of commercial electric service to restore communications services. Other Critical Infrastructure Sectors, such as the Water and Wastewater Systems, may also be necessary. Depending on the circumstances, water utilities, as well as police and fire services, may need to be restored before telecommunication networks can be repaired and telecommunication services can resume. ATIS NRSC notes that it is also essential that communication service providers can travel safely to restore service. This includes the need to safely transport personnel, equipment, and materials, including fuel.

CISA also asks whether organizations maintain resiliency plans relevant to “Significant Events,” or major disruptive/adverse events.<sup>2</sup> ATIS NRSC notes that communications service providers do maintain resiliency plans to address disruptive events such as natural disasters.

Supplementing these plans are other industry resources, such as:

- The Wireless Resiliency Cooperative Framework, which was recently mandated by the FCC for facilities-based mobile wireless service providers,<sup>3</sup> sets out a five-pronged approach for enhancing coordination during an emergency: providing for reasonable

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<sup>1</sup> CISA question 4.

<sup>2</sup> CISA question 9.

<sup>3</sup> *Report and Order and Further Notice of Proposed Rulemaking*, PS Docket No. 21-346 and 15-80, ET Docket No. 04-35 (released July 6, 2022).

roaming under disaster arrangements when technically feasible; fostering mutual aid among wireless providers during emergencies;

- Covered 911 Service Providers must provide annual 911 reliability certifications to the FCC pursuant to Section 12.4(c) of the FCC's rules. In these certifications, Covered 911 Service Provider must confirm, among other things: (1) that they have conducted diversity audits of critical 911 circuits to PSAPs and eliminated single points of failure; (2) whether they provision, test and maintain back up power for central offices; and (3) that they have conducted diversity audits of the aggregation points that they use to gather network monitoring data in each 911 service area and of the monitoring links between aggregation points and NOCs for each 911 service area; and have implemented physically diverse aggregation points and monitoring links.
- Industry Best Practices developed by ATIS NRSC and the FCC's Communications Security, Interoperability Council (CSRIC) also play an important role in communications disaster preparation and planning. The Industry Best Practices Database, available at <https://bp.atis.org>, lists 1098 best practices developed by subject matter experts based on practical experience.
- ATIS NRSC has also developed guidance to assist the industry in preparing for and responding to events. The ATIS NRSC Emergency Preparedness and Response Checklist (ATIS-0100019 (2022-01)), for example, provides guidance regarding preparedness for and response to a wide array of emergency situations, including hurricanes and wildfires. The ATIS NRSC Disaster Roaming Guide and Resource (ATIS-0100054) provides guidance that wireless service providers can use as a checklist of procedures and available resources to facilitate roaming during disasters. The ATIS NRSC Pandemic Checklist (ATIS-0100018(2021-02)) includes voluntary industry Best Practices and relevant links that can be used in preparation for a pandemic event. This checklist was updated recently to reflect learnings from Ebola and COVID-19 outbreaks.<sup>4</sup>
- Some state public service commission's require communications service providers to have resiliency plans in place for specific events. The California Public Utilities Commission, for example, requires telecommunications service providers to establish plans for planned power outages (i.e., Public Safety Power Shut-offs).
- Network outages associated with cyber events are reportable to the FCC through its Network Outage Reporting System (NORS).

CISA seeks comment on whether the resiliency plans are based on an "all hazards" approach or developed for specific threats.<sup>5</sup> ATIS NRSC notes that some industry guidance, such as industry Best Practices, are directed at both general issues and specific threats (such as fire and

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<sup>4</sup> These documents are available at no charge from <https://www.atis.org/committees-forums/nrsc/>.

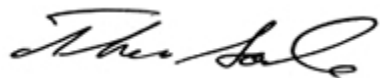
<sup>5</sup> CISA question 10.

pandemic). Similarly, ATIS' guidance addresses both general issues (emergency preparedness and disaster roaming) and specific threats (pandemic).

CISA asks whether organizations' resiliency plans specify how they may work with federal, state, and local partners in preparation for, or in the aftermath of, a significant or adverse event.<sup>6</sup> ATIS NRSC notes that there are a number of venues in place that promote coordination between federal, state and local governmental stakeholders and the communications industry. One example is the Communications Coordination Group (CCG), which holds weekly meetings to share Best Practices and other information between all levels of government, critical infrastructure owners and operators, and key non-government organizations to improve emergency communications. The CCG also holds weekly industry-only calls to allow the industry to discuss a broad range of issues related to the resiliency of communications networks. In addition, each of the ten (10) Federal Emergency Management Agency (FEMA) regions host plenaries that allow communications service providers and state Emergency Operations Centers (ESF 2 function) representation to discuss disaster planning and preparation. During these meetings, stakeholders discuss communications updates, challenges and best practices from a State, local, Tribal and Regional perspective and develop potential regional actions. CISA's Regional Resiliency Assessment Program (RRAP) also offers guidance on network resilience and assists industry with the identification of strategies to enhance resiliency. Finally, ATIS NRSC notes that, after a disaster declaration by FEMA, a field office is established to facilitate coordination and cooperation among local municipalities, ESF 2 representatives, FCC staff, and other critical stakeholders.

ATIS NRSC appreciates the opportunity to provide its input to CSCC on this important issue. If there are any questions, please let me know.

Sincerely,



Thomas Goode  
ATIS General Counsel

Cc: Robert Mayer, CSCC Chair  
Carolyn Brown, Lumen, ATIS NRSC Co-Chair  
Chris Oberg, Verizon Wireless, ATIS NRSC Co-Chair  
Glenn Reynolds, ATIS Vice President of Technology Policy and General Relations  
Jackie Wohlgenuth, ATIS Director of Global Standards Development  
Michelle Kelley, ATIS Coordinator

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<sup>6</sup> CISA question 11.