

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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In the Matter of Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications)	PS Docket No. 15-80
)	
Improving 911 Reliability)	PS Docket No. 13-75
)	
New Part 4 of Commission’s Rules Concerning Disruptions to Communications)	ET Docket No. 04-35
)	

**Comments in Support of
Competitive Carriers Association Petition for Rulemaking**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in support of the Petition for Reconsideration (Petition) filed by the Competitive Carriers Association (CCA) in response to the Federal Communications Commission’s (Commission) *Second Report and Order* in the above referenced dockets. In its Petition, CCA recommends that the Commission reconsider two aspects of its *Second Report and Order*, namely that the Commission reconsider its rules requiring that: (1) service providers furnish 911 special facilities with all available material information they have about an outage 30 minutes from the time of discovery; (2) service providers use special diligence in gathering and maintaining up to date contact information for the 911 special facilities in areas they serve. ATIS supports this petition and urges the Commission to consider revising its rules as requested by CCA.

I. Introduction

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information and communications technologies (ICT). ATIS' diverse membership includes key stakeholders from the ICT industry – wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' Network Reliability Steering Committee (NRSC) was formed in 1993 at the recommendation of the Commission's first Network Reliability and Interoperability Council. The 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, reports, bulletins, Best Practices, and annual reports. The NRSC is comprised of industry experts with primary responsibility for examining, responding to, and mitigating service disruptions for communications companies. The NRSC also collaborates with public safety associations and works with the Commission to provide input on the Network Outage Reporting System (NORS) and Disaster Information Reporting System (DIRS). NRSC participants are industry subject matter experts on communications network reliability and outage reporting.

II. Comments

A. 30 Minute Reporting

CCA asks the Commission to reconsider its refusal to apply flexibility in the implementation of its 30 minute requirement. If the Commission does not reconsider its decision to not permit such flexibility, CCA recommends that the Commission: (1) at a minimum, start the 30 minute timers when the originating service provider receives notification from its vendor or other underlying provider in the 911 network; and (2) deem originating service providers compliant if they begin notifying affected PSAPs that an outage exists within the 30-minute timeframe, and continue to notify any PSAPs that the originating service providers could not reach before the expiration of the 30 minutes. ATIS NRSC strongly agrees with these recommendations.

ATIS NRSC believes that it is infeasible to comply with the recently-adopted reporting rules. First, ATIS NRSC notes that, until there is notification from a third-party (such as from a vendor or another service provider etc.), originating service providers would not know of an outage or its impact. Even after an originating service provider receives notification of an outage, 30 minutes is a challenging deadline. As ATIS NRSC explained in its comments to the *Third NPRM*, there is limited information available within 30 minutes of discovery. In this very short window of time, providers likely will not know the root cause, the outage's extent, or be able to estimate when service would be restored, and in some cases may not be able to identify the affected PSAPs. Requiring notifications to be filed and reports to be made to PSAPs without sufficient knowledge or time to investigate the outage likely would be confusing to PSAPs and

consumers.¹ ATIS NRSC therefore supports CCA’s recommendation that the Commission reconsider its decision and allow providers to notify PSAPs “as soon as possible.”

Second, ATIS NRSC believes that it is impractical if not impossible to complete the notification of all PSAPs within 30 minutes, particularly when there are widespread outages that may affect large numbers of PSAPs. If the Commission rejects CCA’s recommendation to retain the traditional approach to PSAP notifications, ATIS NRSC supports CCA’s recommendation that originating service providers be deemed compliant if they begin notifying affected PSAPs that an outage exists within the 30-minute timeframe and continue to notify any PSAPs that the originating service providers could not reach before the expiration of the 30 minutes. This is a more reasonable and practical approach that would facilitate timely PSAP notifications, while acknowledging the challenges with completing all notifications within an arbitrary deadline. To facilitate timely notifications, ATIS NRSC also supports CCA’s recommendation that the Commission consider implementation of a PSAP contact information database that can be effectively maintained and updated. This database would be invaluable in facilitating timely notice to affected PSAPs and would also reduce PSAP burdens by giving PSAPs one point of contact, instead of having to interface with multiple industry parties on an annual basis.

¹ ATIS NRSC continues to believe that the Commission should not apply the same deadline to both originating service providers and covered 911 service providers. Given the vastly different roles provided by these entities and the fact that covered 911 service providers have direct relationships with PSAPs and can, in many instances, more quickly detect 911-impacting outages, ATIS NRSC believes that originating service providers should continue to be required to notify PSAPs of outages within their networks that potentially affect a 911 special facility as soon as possible, as currently required by the Commission’s outage rules.

B. PSAP Notifications

CCA also asks the Commission to reconsider its rule requiring service providers use “special diligence” in gathering and maintaining up to date contact information for the 911 special facilities in areas they serve. ATIS NRSC supports this recommendation.

ATIS NRSC agrees with CCA that the new rule would be burdensome and costly to implement. ATIS NRSC continues to believe that the “special diligence” requirement is a confusing, abstract concept that is difficult to implement in the context of the maintenance of PSAP contact information. The Commission’s rules also impose this confusing concept only on service providers even though service providers are not the source of the contact information and must depend on PSAPs to supply this information.

Instead, ATIS NRSC supports CCA’s request that the Commission reconsider its imposition of this burdensome new requirement and instead defer these obligations until the Commission can develop a centralized database of such contact information. As noted in ATIS’ comments to the *Third NPRM*, ATIS NRSC supports the establishment of such a database as well as a safe harbor for service providers utilizing information in the database.

III. Conclusion

ATIS NRSC appreciates the opportunity to provide its input to the CCA Petition and urges the Commission to consider the recommendations above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

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