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October 13. 2023

Via Email
Robert Osborn
Director, Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Re: ATIS NRSC Recommendations for Improvements to California Major Service Interruption
     Reporting Portal

Dear Mr. Osborn:

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Network
Reliability Steering Committee (NRSC), hereby provides input on the California Major Service
Interruption Reporting Portal (Portal). Based on ATIS NRSC members' experience with outage
reporting in California, ATIS NRSC is pleased to provide recommendations to the California
Public Utilities Commission (CPUC) to improve the collection of outage reporting information
from telecommunications service providers via the Portal.

Background

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.

Location Information Required in CA MSI Reporting Portal

General Order 133-D, Section 4 (c) requires telecommunications carriers to submit reports regarding Major Service Interruptions to the CPUC's Communications Division (CD) and Office of Ratepayer Advocates (ORA) or their successor divisions when the carrier files outage reports with Federal Communications Commission's (FCC) Network Outage Reporting System (NORS).[1] A carrier must submit a report to the CPUC when a communication disruption or outage meets the FCC's reporting threshold and involves communications in California, regardless of whether those affected communications independently meet the FCC's reporting threshold.[2] Carriers must also input information about each major service interruption into the California Major Service Interruption Reporting Portal (Portal). The Portal requires information that is not required by the FCC and that is not reported in NORS, including the following information (hereafter referred to as "Location Information"):

- Name of Facility
- Latitude/Longitude
- County(ies)
- Zip Code (5-digit)

ATIS NRSC notes that there are challenges associated with the information requested on the Portal. First, the data in the carriers' records may not match the data in CPUC Portal (for example, the county listed in Portal may differ from what is available from the providers' tools, which makes it challenging to enter the data into the portal). Second, the Portal makes it unnecessarily challenging to enter some of the Location Information noted above for multi-site outages. The Portal requires filers to select the county, then choose the city and wait for all cities in that county to display, then choose the city and then wait for all zip codes in those cities and counties to display.

ATIS NRSC Recommendation: To address these concerns, ATIS NRSC recommends that the CPUC consider modifying its Portal to allow filers to select "Other" under "Affected City." ATIS NRSC recommends that, once the county has been selected, a list of different cities, including a checkbox for "Other," should be displayed. If "Other" is selected, filers should be able to enter City and ZIP Code information in a free form box, which would permit filers to more accurately reflect the location according to their data.

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[1] General Order 133-D, Section 4(c)(ii) of the CPUC Rules Governing Telecommunications Services.
[2] *Id*. According to the CPUC Service Quality Standards Reporting FCC Network Outage Reporting System Format, filers are to email the NORS report to the CD and ORA.

Multi-Site Outages

The Portal does not support notifications regarding outages that affect multiple sites in California. If there is more than one affected facility, the Portal does not allow filers to provide, for example, multiple Latitudes/Longitudes.

ATIS NRSC Recommendation: ATIS NRSC recommends that a checkbox be added to the Portal to allow filers to indicate if the Location Information is "Multi-Site." If "Multi-Site" is selected, filers should not be required to complete the Latitude/Longitude fields. ATIS NRSC recommends that the CPUC add a text box to the Portal to allow filers submitting Multi-Site filings to explain why the location information is not included. ATIS NRSC further recommends that CPUC incorporate a drop-down menu for the "Reason for No Geographical Information" field to allow filers to indicate whether the outage is a "Multi-Site." Adding the drop-down menu should make it easier for CPUC to analyze this data in a consistent manner.

Reducing Unnecessary Burdens and Inputting Errors

The CPUC has removed certain functionality from the Portal that ATIS NRSC believes has unnecessarily increased reporting burdens and inputting errors. Filers previously were able to save reports in the Portal without entering Location Information at any stage of the reporting process and were not required to complete all requested fields in order to save the report. Subsequently, any information input into the "Reason for No Geographical Information" field during notification or initial should not be deleted by the filing system.

ATIS NRSC Recommendations**:** ATIS NRSC recommends that the CPUC allow filers to save reports without entering Location Information. ATIS NRSC further recommends that the information from previously-filed reports in a series (e.g., notification, initial) that has been input in the filing fields (e.g., "Facility Name" and "Reason for No Geographical Information") should carry over into the subsequent reports. These recommendations would reduce inputting errors and unnecessary burdens to filers.

Reopening Closed Final Reports

ATIS NRSC notes that filers must, on occasion, update or revise final NORS outage reports. The FCC NORS permits those submitting reports to do this. However, the Portal does not currently allow filers to revise final reports submitted via the Portal.

ATIS NRSC Recommendation: ATIS NRSC recommends that the CPUC allow a filer to revise final reports submitted via the Portal if the filer has revised its final NORS outage report.

If there are any questions about this matter, please do not hesitate to contact the undersigned.

Sincerely,

Thomas Goode
ATIS General Counsel

cc: Kwang Choi, California Public Utilities Commission
        Anil Balivada, California Public Utilities Commission
        Vijay Sinha, California Public Utilities Commission
        Dorris Chow, California Public Utilities Commission
        Hien Vo, California Public Utilities Commission
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