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September 18, 2018

**Via Email**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *Ex Parte* – Reliability and Continuity of Communications Networks, Including Broadband Technologies Effects on Broadband Communications Networks of Damage or Failure of Network Equipment or Severe Overload  
PS Docket No. 11-60

Dear Ms. Dortch:

On September 14, 2018 representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) met with Renee Roland, Special Counsel with the Public Safety and Homeland Security Bureau (PSHSB). The purpose of this meeting was to discuss the comments filed by ATIS NRSC in response to the Commission's June 13, 2018, *Public Notice* in the above-referenced docket.

During the meeting, ATIS NRSC provided an update on the work of the NRSC Situational Awareness for 9-1-1 Outages Task Force. This task force has identified areas for future work and is developing a set of requirements. The group is focusing on the possible development of a PSAP database and a standardized process for updating the information in the database.

ATIS NRSC also discussed backhaul providers. ATIS NRSC noted in its comments that it does not believe that there is a need to extend the Wireless Network Resiliency Framework to backhaul providers. The development of industry best practices was discussed, and it was suggested that the industry examine resiliency-related best practices to see if gaps exist vis-à-vis backhaul providers. ATIS NRSC noted its support for industry-driven collaborative efforts to examine whether new best practices are warranted for backhaul providers.

During the meeting it was noted that Association of Public-Safety Communications Officials (APCO) had submitted comments in the docket discussing the need for PSAPs to get real time situational awareness of outages. ATIS NRSC noted that some carriers may face challenges in providing such real-time data. Given these challenges, there are also concerns regarding the usefulness of unverified data.

Finally, methods of measuring the effectiveness of the Framework were discussed. It was noted that a recommendation had been made that, instead of attempting to use numerical metrics to

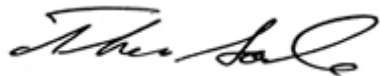
measure reliability, the Commission should monitor participating providers' adherence to the Framework through a confidential annual filing in which service providers provide a narrative response to a standardized set of questions. The NRSC noted that it had not yet discussed this recommendation but would discuss this matter and provide input at a future date.

In attendance representing ATIS NRSC were Andy Gormley (T-Mobile), ATIS NRSC Co-Chair; Andis Kalnins (Verizon), ATIS NRSC Co-Chair; Thomas Goode, ATIS General Counsel; and Jackie Wohlgemuth, ATIS Manager of Global Standards Development.

A copy of this letter is being filed in the above-referenced docket.

If there are any questions, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Goode".

Thomas Goode  
ATIS General Counsel

cc: Renee Roland, Special Counsel, PSHSB