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February 12, 2018

Via Email
John Healy
Associate Chief, Public Safety & Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: NRSC Recommendation to Update the DIRS SOP Document

Dear John:

The Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) has reviewed the Disaster Information Reporting System (DIRS) Standard Operating Procedure (SOP). Given the heavy reliance the industry places on this document for clarifications regarding current activation, reporting, and deactivation procedures for DIRS, ATIS NRSC recommends that steps be taken by the Commission to ensure that the document is up-to-date and publicly available.

First, ATIS NRSC notes that the document appears to be outdated as the last published version is dated June 18, 2009. The DIRS SOP indicates that the document "will be reviewed and/or updated annually." NRSC requests confirmation either that: (1) the June 18, 2009, version is current; or (2) that the document will be updated to contain the most current information. Due to the critical nature of the content of this information, NRSC would appreciate feedback within 90 days regarding this matter.

Second, NRSC recommends that the June 18, 2009, version of the DIRS SOP be made available on the Commission's website, in addition to the Standard Operating Procedures for DIRS-Lite, currently: https://www.fcc.gov/general/disaster-information-reporting-system-dirs-0.

NRSC appreciates the Commission's ongoing work to improve DIRS. As always, the NRSC is willing to assist and/or facilitate review of a draft based on industry input.

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If you have any questions, please do not hesitate to contact me.

Sincerely,

Tom Goode

ATIS General Counsel

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