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Via Email

Jeffrey Goldthorp
Chief, Communications Systems Analysis Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NRSC Input on Proposed DIRS-Lite Data Collection

Dear Jeff:

The Alliance for Telecommunications Industry Solutions' Network Reliability Steering Committee (NRSC) is pleased to provide its input on the Commission's proposed collection of communications outage data under a "DIRS-Lite" system. The NRSC's input ([underlined, blue text](#)) is interleaved into the text from your presentation to the NRSC at its April 2010 meeting.

In addition, in response to your request, attached hereto is a list of NRSC member company contact information to be used in connection with DIRS-Lite reporting.

Slide 2 - Why DIRS-Lite

- FEMA (or some other government agency) may need information on communications status even when a national ESF-2 has not been stood up (e.g., North Dakota floods).
 - [The NRSC recommends that "government agency" refer only to Federal government agencies.](#)
 - [The NRSC also recommends that the information submitted for DIRS-Lite be treated as confidential in the same manner as information submitted for DIRS and as outlined in the FCC's September 11, 2007, Public Notice \(DA-07-3871\) \(noting that "\[b\]ecause the information that communications companies input to DIRS is sensitive, for national security and/or commercial reasons, DIRS filings shall be treated as presumptively confidential upon filing."\)](#)
 - [The NRSC recommends a periodic \(i.e. annual\) evaluation of the effectiveness of DIRS-Lite.](#)

Slide 2 - Why DIRS-Lite (cont'd)

- Very limited information is needed.
 - [The NRSC recommends that the limited information collected be consistent for all service providers within each industry segment \(e.g. wireless, wireline, cable\).](#)

Slide 3 - Data Collected in DIRS –Lite

[The NRSC recommends that the data definitions be clarified, e.g. does “CLLI code of switches” mean the CLLI code of wireline switches as defined in the DIRS User Manual, and does “out” mean “Down - Completely Down or at least 98% of the call processing is down” also as defined in the DIRS User Manual?](#)

Wireline Carriers

- CLLI code of switches/STPs that are out
- Names of PSAPs that are out
- Estimated users out of service
- Major facilities out of service (> 192 DS3)
- Very short status description of the effects of event (e.g., “No major equipment out”)

Wireless Carriers

- CLLI code of MSCs/STPs that are out
- Total cell sites out in disaster area
- Very short status description

Slide 4 - Caveats on Information Collected

- What is asked for may change depending on the emergency.
 - [The NRSC recommends that any additional data elements requested be limited to those already collected for DIRS or NORS.](#)
- If there is information that a company thinks could be relevant but is not directly asked for, please provide that information.
- [The NRSC recommends that information collected over weekends or holidays be limited to significant status changes and that all other DIRS-Lite reporting be suspended.](#)

Slide 5 - Information NOT Collected

[The NRSC recommends that wireless coverage maps be added to the list below.](#)

- Power status of any asset
- Customers out by switch
- Digital Loop Carrier (or Remote Terminal) information
- Reasons cell sites are out
- Any information by county
- PSAPs that are functioning
- Blocked calls

Slide 6 - When and How Often Are Reports Due

- Reports will be due once daily but any major change to the status can be called in at any time.
- The time when information is due will be given out during initial communications.
- The reports should be e-mailed or called in.
 - [The NRSC strongly supports this method of reporting.](#)

Slide 7 - How Will You Be Notified

- One or two designated contacts from the major carriers will be contacted via phone
 - Please provide John Healy with those people that we should use ([see attached list](#)).
 - [The NRSC notes that companies may have different preferences as to contact procedures \(e.g. Network Operations Centers versus individual contacts\).](#)
- An e-mail will also provide the information that is to be collected, the location of the disaster, times when information is due.

If there are any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Thomas Goode
ATIS General Counsel

Attachment #1 (NRSC Member Company Contact Information)

NRSC Member Company Contact Information

AT&T

Primary: John Chapa
Office: (210) 222-4580
Jc8943@att.com

Alternates:
Percy Kimbrough
Office: (210) 222-3291
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Sandy Bubeck
Office: (951) 715-8394
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Cox Communications

Primary: Mark Peay
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Mark.peay@cox.com

Alternate: Mark Adams
Office: (404) 449-2635
Mark.adams@cox.com

Qwest

Primary: Stacy Hartman
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Cell: (303) 946-1060
Stacy.Hartman@qwest.com

Alternate: Jeff Hubbard
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Cell: (720) 373-0304
Jeff.Hubbard@qwest.com

Sprint

Primaries: Mike Fingerhut
Office: (202) 607-0624

Allison Growney
Office: (703) 585-7673

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Verizon and Verizon Business

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Robin.howard@verizon.com

Alternate: Ken Dausy
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