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December 20, 2013

Jeffery Goldthorp (Jeffery.goldthorp@fcc.gov)
Chief, Communications Systems Analysis Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Input on Possible Revisions to Part 4

Dear Jeff:

On behalf of the Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC), we are pleased to provide the input below regarding issues that may be under consideration by the Federal Communications Commission (FCC) in its review of the outage reporting rules in Part 4 of the FCC's rules.

ATIS NRSC appreciates the opportunity to provide this input. ATIS believes that there are opportunities to reduce the burdens associated with the FCC's outage reporting obligations, while maintaining and improving the quality of the information provided to the FCC.

CAMA TRUNK OUTAGES THAT IMPACT PSAPS

The FCC has asked for input regarding the possible new reporting requirements associated with CAMA trunks. ATIS NRSC generally opposes the imposition of any new reporting requirements on CAMA trunks for the following reasons:

- Such reporting would be redundant to existing reporting obligations. Communications providers are already required to report outages that affect 911 special facilities, which include the loss of communications to PSAPs and to 911 call processing capabilities.
- Trunk failures may not result in outages that impact PSAPs given the existence of diverse facilities in some instances.
- Such reporting would unnecessarily increase the burden on the industry (and to the FCC) by significantly increasing the number of reports that must be filed and analyzed. Additionally, because CAMA trunks are not alarmed but rather make use of other methods such as auto email notifications to provide failure notifications, the collection of this data cannot be easily automated and would need to be compiled manually.

- Finally, given the transition of the PSTN and the evolution of the network away from legacy equipment such as CAMA trunks, ATIS NRSC does not believe that such reporting is warranted and notes therefore that any value from such reporting will continue to diminish over time.

ATIS notes that the FCC seeks input on criteria that could be used should CAMA trunk failure reporting be required. ATIS believes that these criteria should not be adopted for reasons noted below:

- *Reporting based on the percentage of CAMA trunks that are out of service/busied out:* ATIS notes that, because CAMA trunks are not alarmed, it is difficult to determine the percentage of trunks impacted, especially in real time.
- *Reporting based on traffic loading (when there is some minimum percentage of traffic on the trunks):* The NRSC notes that this criterion would require reporting when more calls than PSAP trunks (or calling positions) are available. Traffic loading is dependent on the capacity purchased by the PSAP and is a decision outside of the service provider's control.
- *Reporting when trunks are 100% utilized:* ATIS NRSC notes that some PSAPs have only one trunk, which would mean that any failure would be reportable. As noted with regard to the proposed traffic loading criterion, the decision regarding the number of trunks falls outside of the service provider's control.

While ATIS does not believe that CAMA trunk failure reporting is necessary or beneficial, it notes that, if the FCC believes that there is value in this information, a CAMA trunk cause code could be created within NORS. ATIS would be happy to provide additional information regarding this code.

FACILITY COUNTS

ATIS NRSC supports the FCC's recognition that the use of DS3s as a unit of measure in the reporting rules is outdated and is seeking input regarding a more appropriate unit of measure. The NRSC:

- Recommends that reporting be based on the number of OC48 outages, but would also support the use of a higher unit of measure.
- Strongly opposes the use of a unit smaller than an OC3.
- Notes there are still open issues pertaining to the FCC's authority to regulate broadband that must be resolved before consideration can be given to the adoption of any criteria that are based on gigabits per second or bandwidth.

1350 DS3 USER MINUTE THRESHOLD

The NRSC appreciates that the FCC is looking for input regarding the appropriateness of the 1350 DS3 user minute threshold. Regarding this threshold, ATIS provides the following input:

- The 1350 DS3 threshold is not appropriate and should be revisited.
- The FCC's assumption that one DS3 equals 672 voice units is an accurate portrayal of usage; ATIS recommends instead that, based on current usage, one DS3 be considered the equivalent of 28 end-users as described in the ATIS standard entitled *Analysis of FCC Reportable Service Outage Data Version 2* (ATIS-0100021).

DS3 SIMPLEX

The NRSC notes that the FCC is considering revising its reporting thresholds for DS3 simplex events and is seeking input regarding the appropriate thresholds. ATIS NRSC strongly recommends that:

- Simplex events not be reportable.
- If the FCC maintains a requirement for the reporting of these events, it not be done on a DS3 level. As explained above, this reporting should be minimally done on an OC48 level.
- The minimum reportable outage period not be reduced below the current limit of five (5) days.

COUNTING WIRELESS USERS POTENTIALLY AFFECTED

The FCC is also seeking input on potentially simplifying the calculation required to determine the number of wireless users affected by an outage. Under the current reporting rules, wireless companies must estimate the simultaneous call capacity and multiply this number by a concentration factor of 8. The NRSC:

- Recommends that this reporting requirement be simplified and that wireless carriers be allowed to utilize historical calling data to calculate potential users' impact.
- Recommends that, as an alternative to the existing calculation, the FCC consider allowing wireless carriers to use maximum Busy Hour Call Attempts (BHCA) and removing the existing multipliers (i.e., 8x, etc.);
- Notes that, while reporting based on macro cell site outages may be appropriate, reporting based on femtocells or and other small cell outages would not be appropriate and should not be implemented.
- Suggests that this reporting requirement, and the calculation of affected end-users, be revisited as technology continues to evolve.

WIRELESS CALL ALLOCATION TO PSAPS

The FCC is also seeking input regarding the methodology used by wireless carriers to determine the number of users allocated to a PSAP. ATIS NRSC is gratified that the FCC has indicated that it is satisfied with the method used today by wireless carriers to make this determination and:

- Notes that, as the FCC is aware, wireless carriers do not count "all users" on the mobile services switching center (MSC) but rather consider 911 outage events to occur when 50 or more location management units (LMUs) are down in a metropolitan area (i.e., 50 LMU = 30,000 customers).
- Agrees that this methodology should not be changed but recommends that carriers have the flexibility to modify it as wireless technology evolves.

SPECIAL OFFICES AND FACILITIES

The FCC has asked for input regarding the reporting of outages affecting special offices and facilities. ATIS agrees that the current rules and definitions surrounding special offices and facilities are confusing and outdated, and supports:

- Clarifications and updates of these rules to reflect the retirement of the National Communications System (NCS) and transfer of its function to the Office of Emergency Communications (OEC) within the Department of Homeland Security (DHS).
- The possible elimination of these rules and establishment of alternate procedures for the reporting of relevant special office/facility outages by carriers directly to the DHS.
- Due to the sensitivity of critical infrastructure information, an exemption from any disclosure of NORS data to States for this information.

AIRPORT REPORTING REQUIREMENTS

The FCC is also seeking input regarding whether it should revise its rules to require the reporting of outages affecting only large airports and airports where FAA is affected. The NRSC:

- Supports the FCC's efforts to minimize reporting requirements by limiting reporting for outages related to airports where FAA circuits are not affected.
- Recommends that the FCC limit such reporting to: (1) outages affecting large hub airports, which are defined by the FAA to include those that account for at least 1% of the total U.S. passenger enplanements;¹ and (2) airports where FAA circuits are affected.
- Urges the FCC to work with the FAA to compile and maintain and readily-available list of these airports for use by carriers in reporting appropriate outages.
- Given the small number of such outages that have been reported, would support the elimination of the requirement.

OTHER NRSC RECOMMENDATIONS

The NRSC recommends that the FCC modify the reporting timeframes for communications providers to report outages to make these requirements consistent with the timeframes for VoIP outage reporting. ATIS NRSC proposes therefore that the reporting rules be revised to:

- Require the submission of a Notification Report:
 - Within 240 minutes of discovering an outage of at least 30 minutes duration that potentially affects a 911 special facility on any facility that the carrier owns, operates, leases, or otherwise utilizes; or
 - Within 24 hours of an outage of at least 30 minutes duration on any facility that the carrier owns, operates, leases, or otherwise utilizes, that potentially affects: at least 900,000 user minutes and results in complete loss of service; or any special offices and facilities.
- Eliminate the requirement for the filing of an Initial Outage Report.
- Require the submission of a Final Outage Report within 30 days of discovering the outage.

The NRSC also recommends that the FCC continue to treat outage reporting data as confidential under the Freedom of Information Act (FOIA) and, as previously noted, believes that sharing of

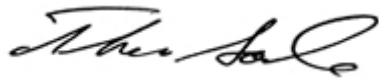
¹ See http://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/categories/ (last viewed December 11, 2013).

this data with states not be permitted unless there are safeguards in place to protect this important data.²

ATIS NRSC strongly believes that the modifications described above will provide a more accurate representation of network reliability and reduce the burden on all stakeholders without compromising the quality of the reports.

We appreciate the opportunity to provide this input and would be happy to provide additional information and/or to answer any questions you may have regarding these matters.

Sincerely,

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

Thomas Goode
ATIS General Counsel

² See, e.g., ATIS' Comments and Reply Comments to the Petition of California Public Utilities Commission and the People of the State of California for Rulemaking on States' Access to the Network Outage Reporting System (NORS) and a Ruling Granting California Access to NORS (RM-11588, ET Docket No. 04-35), filed March 4 and March 19, 2010, respectively.