



1200 G Street, NW  
Suite 500  
Washington, DC 20005

P: +1 202-628-6380  
W: [www.atis.org](http://www.atis.org)

November 19, 2018

Via Email

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

Re: Ex Parte - PS Docket No.15-80; ET Docket No. 04-35; PS Docket No. 11-82

Dear Ms. Dortch:

On November 15, 2018 representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) met with representatives of the FCC's Public Safety and Homeland Security Bureau (PSHSB).

During the meeting, ATIS' comments in the above-referenced docket(s) were discussed, including ATIS' comments pertaining to the confidentiality of NORS data. ATIS noted that its members strongly support maintaining the confidentiality of this data, noting in particular that sensitive data may be included in the root cause and description fields. Sensitive information about the geographic location of key telecom infrastructure, repair and remediation efforts and about customer equipment/services may also be reported in NORS. ATIS noted that it would further discuss this issue with NRSC members and provide additional feedback regarding the confidentiality of NORS data.

It was noted that some information in NORS, such as the fact that an outage had occurred, was less sensitive, but ATIS NRSC leadership explained that there is still a risk to releasing it to the public. In particular, ATIS noted that NORS data may be misleading; as an example, some outage reporting thresholds are based on potential impacts.

The potential sharing of data with state regulatory agencies was also discussed. ATIS NRSC reiterated that it did not object to the sharing NORS data with state agencies as long as this information is appropriately protected. ATIS further restated what it had said in its comments that ATIS previously noted that these protections must include prohibitions against states agencies sharing of such data with: (1) any governmental body that has not certified that it can protect such data; and (2) any private entity, including private contractors that may be working on behalf of state or federal agencies.

The need to train personnel that may receive NORS data on the appropriate use and protection of data was noted. It was noted that a recommendation had been made that ATIS NRSC could perform this training or prepare training materials. ATIS stated that this seemed like something that the NRSC could do effectively, but this matter would need to be discussed by the members. This training could be produced fairly quickly (i.e., months not years) but could not be finalized until after the FCC has issued any new rules regarding the sharing of NORS data.

State access to DIRS data was also discussed. ATIS explained that, if access to DIRS is permitted by state agencies, it should be on the same terms, including necessary protections on the use and access to data, as NORS data access.

ATIS was asked whether it believed that allowing state access to FCC data could reduce state reporting burdens. ATIS noted that it does not believe that sharing would reduce the burden to the industry as states are increasingly asking for different data and/or level of granularity. States that have reporting requirements are unlikely to eliminate these requirements in favor of access to NORS data, though there should be further discussion regarding this option.


Finally, it was noted that ATIS had recommended in its comments that each state have access only to the data related to outages in that state. ATIS was asked whether the industry would rather file state-specific reports, rather than filing single aggregated reports for each outage. ATIS noted that it would discuss this question with NRSC members and provide further input on this issue.

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

In attendance representing the PSHSB were James Wiley; Brenda Villanueva; Julia Tu; and Tiffany Wong. A copy of this letter is being filed in the above-referenced dockets.

If there are any questions, please contact the undersigned.

Sincerely,



Thomas Goode  
ATIS General Counsel

cc: James Wiley, Public Safety and Homeland Security Bureau, [james.wiley@fcc.gov](mailto:james.wiley@fcc.gov)  
Julia Tu, Public Safety and Homeland Security Bureau, [julia.tu@fcc.gov](mailto:julia.tu@fcc.gov)  
Tiffany Wong, Public Safety and Homeland Security Bureau, [tiffany.wong@fcc.gov](mailto:tiffany.wong@fcc.gov)  
Brenda Villanueva, Public Safety and Homeland Security Bureau, [brenda.villanueva@fcc.gov](mailto:brenda.villanueva@fcc.gov)  
Andis Kalnins, NRSC Co-Chair (Verizon), [andis.i.kalnins@verizon.com](mailto:andis.i.kalnins@verizon.com)  
Andy Gormley, NRSC Co-Chair (T-Mobile), [andy.gormley@t-mobile.com](mailto:andy.gormley@t-mobile.com)  
Sarah Gresser, ATIS Coordinator, [sgresser@atis.org](mailto:sgresser@atis.org)  
Jackie Wohlgemuth, ATIS Manager, Global Standards Development, [jwohlgemuth@atis.org](mailto:jwohlgemuth@atis.org)