March 18, 2013

<u>**Via E-mail**</u>
John Healy
Associate Division Chief
Cybersecurity and Communications Reliability
Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

    Re: ATIS NRSC Recommendations for NORS and
           NORS User Manual Version 7

Dear John:

Below are changes to the Network Outage Reporting System (NORS) and to the associated NORS User Manual Version 7 recommended by the Alliance for Telecommunications Industry Solutions' (ATIS) Network Reliability Steering Committee (NRSC).

1.   **Suggested NORS Updates**

- The NRSC recommends that NORS be updated to allow reports to contain a semi-colon in text fields. Alternatively, if this update is not made, the Sections 4 and 5 of the NORS User Manual should be updated to reference this limitation.

- The NRSC recommends modifications to two cause codes in order to make them more applicable to VoIP. The NRSC would like the Commission to consider incorporating these changes in NORS and subsequently in Section 7, Descriptions of Root Cause, Direct Cause and Contributing Factors, of the NORS User Manual. They are noted below:

    > **Procedural - Service Provider**
    > **Inadequate Routine Maintenance/Memory ~~Back Up~~ or Data Backup**
    > Failure could have been prevented/minimized by simple maintenance routines.

The resulting recovery action was delayed/complicated by old or missing program/office data ~~tapes or~~ disk drives, routers, servers, etc.

Traffic/System Overload
~~Common Channel~~ Signaling Network Overload
~~SS7~~ Signaling system/network overload associated with (true) high traffic loads congesting ~~STP/SCP processors~~ signaling network elements or the SS7 link network. If the overload was associated with ~~STP/SCP~~ signaling ~~message~~ traffic handling congestion, false or reactivated link congestion, inappropriate or incorrect ~~SS7~~ network management message(s), protocol errors, etc., then consider the problem to be a software design fault.

2.   **Suggested NORS User Manual Updates**

- Section: 2.4, Upload XML File – The second sentence should reference Section 2.15 instead of Section 2.13. "*This screen allows you to submit outage reports in XML format. There is a utility provided to help you prepare XML files (see Section 2.~~13~~15).*" This change reflects the addition of new sections by the Commission, which resulted in the renumbering of Section 2.13 to 2.15.

- Section 2.7, Report List - The NRSC recommends that the first sentence be modified to highlight that the list is limited to a date range of 50 days (*e.g.*, "*NORS can print out a list of outages in a spreadsheet format for a set of dates, limited to a date range of 50 days (based on the date the notification was filed).*")

- Section 5, Fields on the Initial, Draft, and Final Report Forms - The NRSC recommends that "Type of Entity Reporting Disruption" section include as the third sentence the following text: "*Companies are not able to change the entry on the Initial Report regardless of what appears on the Notification.*" Currently, the only method to change this field is to withdraw the report and re-file it. Doing so could cause the Commission to view the report as late.

Thank you for your consideration of the above-mentioned items. Please contact me if additional information is necessary.

Sincerely,

Thomas Goode
General Counsel

cc: Jeffrey Goldthorp, Chief, Communications Systems Analysis Division