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October 31, 2013

**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: ATIS NRSC Recommendations for Planned Maintenance Cause Codes

Dear Jeff:

On behalf of its Network Reliability Steering Committee (NRSC), the Alliance for Telecommunications Industry Solutions (ATIS) is writing to provide recommendations for defining the new Planned Maintenance cause codes that the Commission will be incorporating into its Network Outage Reporting System (NORS). The NRSC recommends that these cause codes be included as subcategories in a separate category (**Planned Maintenance**), and proposes the following definitions:

**Planned Maintenance to Upgrade the System:** Outage occurred during scheduled maintenance to upgrade the system or network element. The system or network element upgrade was completed successfully within expected times; however, FCC outage reporting thresholds were met.

**Planned Maintenance to Fix Known Problems:** Outage occurred during scheduled maintenance to fix known problems. The known problems were resolved successfully; however, FCC outage reporting thresholds were met.

**Planned Maintenance – Failed:** Unexpected condition caused the planned maintenance activity to fail; however, FCC outage reporting thresholds were met.

**Planned Maintenance – Went Longer than Expected:** The planned maintenance activity was completed successfully; however, due to unexpected conditions, planned maintenance took longer than expected.

In addition to these definitions, the NRSC also recommends the FCC consider adding a fifth cause code: **Planned Maintenance – Other**.

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Thank you for your consideration of these items. Please contact me if additional information is necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive, with the first name "Thomas" being more prominent than the last name "Goode".

Thomas Goode  
General Counsel

cc: John Healy, Associate Division Chief, Cybersecurity and Communications Reliability  
Division