

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reliability and Continuity of	)	PS Docket No. 11-60
Communications Networks, Including	)	
Broadband Technologies Effects on	)	
Broadband Communications Networks of	)	
Damage or Failure of Network Equipment	)	
or Severe Overload	)	

**REPLY COMMENTS OF THE ALLIANCE FOR  
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf its Network Reliability Steering Committee (NRSC), hereby submits these reply comments in response to the *Public Notice* released June 13, 2018, in the above-referenced docket. ATIS’ reply comments recommend that the Commission allow the industry to continue to collaborate on the development of the Public Safety Answering Point (PSAP) database and also notes the need for PSAPs to verify and update (as needed) their contact information in the database.

The *Public Notice* solicited comment on a number of issues, including on a PSAP database. In its comments, the Association of Public-Safety Communications Officials-International (APCO) acknowledged the industry commitment to establishing a provider/PSAP contact database<sup>1</sup> and noted that it is “open to” exploring the viability of the Commission establishing and maintaining the database.”<sup>2</sup> As ATIS noted in its comments, the NRSC is

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<sup>1</sup> APCO Comments at p.2

<sup>2</sup> APCO Comments at pp. 2 and 3, n.9.

collaborating with other key stakeholders regarding the development of such a database.<sup>3</sup> The NRSC Situational Awareness for 9-1-1 Outages Task Force (NSA-TF), which is examining this issue and includes collaboration from APCO, the National Association of State 911 Administrators (NASNA), and the National Emergency Number Association (NENA), and others, continues to work this matter. ATIS believes that it is premature for the Commission to establish a database while this industry work continues. The industry should be allowed to continue its work on this important project. Given the industry approval, and recent publication of the PSAP notification template and associated report, ATIS is confident this collaborative effort will be successful.<sup>4</sup>

APCO also requested in its comments that the Commission clarify that the responsibility to establish and maintain the database rests with the carriers.<sup>5</sup> The NRSC supports the development of a PSAP contact database and is currently working through the NSA-TF to determine the best format of the database, but notes that some responsibility also lies with PSAPs to maintain current contact data. In order for the database to provide accurate and useful information, PSAPs must verify and update (as needed) their contact information in the database. Otherwise, the database may contain inaccurate or outdated information for which carriers cannot assume responsibility.

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<sup>3</sup> ATIS Comments at p.3.

<sup>4</sup> The PSAP notification template and associated report, *Service Providers: Outage Reporting Structure and Potential Types of 9-1-1 Outages*, are available from [http://www.atis.org/01\\_committ\\_forums/nrsc/](http://www.atis.org/01_committ_forums/nrsc/).

<sup>5</sup> APCO Comments at p.3.

### III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Public Notice* and urges the Commission to consider the recommendations above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode".

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