

NRSC Outage Reporting Bulletin

Monday, November 20, 2006

The ATIS Network Reliability Steering Committee (NRSC) has been actively involved with the Federal Communication Commission (FCC) outage reporting processes since they were put into place in 1991. During that time, the NRSC has attempted to communicate to industry on outage trends and to facilitate the sharing of information that could lead to improved network reliability.

A recent development that the NRSC has become aware of through communications with the FCC is that the Commission has observed that the two hour reporting requirement appears to be violated routinely. Data since the inception of the Part 4 rules shows that, for all outages other than DS3-Simplex, over 30% of outages are filed more than two hours late. This figure does not vary significantly with time, size of outage, type of outage or type of carrier. For example, relatively large outages of all kinds are reported more than two hours late about 34% of the time. If DS3-Simplex were added to the mix, the percentage of late outages would grow.

The FCC's Part 4 Outage Reporting rules require that notifications be filed for outages within two hours of their discovery as reportable events. This rule is intended to provide the Commission and, by extension, the Department of Homeland Security and the telecommunications industry as a whole with timely information about emerging patterns of activity in the Nation's communications infrastructure. Using this information, DHS and the FCC can make judgments concerning the appropriate Federal response, if any. This is critical to industry as well as in the case of a failure that is propagating through the United States telecommunications network, such as a defective software patch or terrorist activity.

The outage process is designed to be simple at the Notification stage. Notifications can be brief and they do not require that every field be completed. It is recognized that certain information will only become known after a more careful postmortem is done.

The NRSC encourages all service providers to examine their process for FCC reportable outages, with particular attention to the Notification stage. It is in the best interests of both Government and Industry to work together to provide timely notifications of outages so that a high level of network reliability can be maintained in the telecommunications network of the United States.