August 31, 1993

Mr. Ervin S. Duggan
Commissioner
Federal Communications Commission
Room #832
1919 M Street, N. W.
Washington, D. C. 20554

Dear Commissioner Duggan:

I'm pleased to send you the first quarterly report on network reliability compiled by the Exchange Carriers Standards Association as part of our charge from the FCC's Network Reliability Council.

Compared to the baseline year (April 6, 1992, to April 5, 1993) all the statistical indicators show that network reliability remained stable during the first quarter.

ECSA's Network Reliability Steering Committee is giving this quarterly report wide distribution throughout the industry, the media and appropriate Congressional representatives and staff.

As part of our support of the industry's commitment to network reliability, we also distribute weekly the preliminary outage reports which carriers file with the Commission. These reports, and the subsequent final reports submitted 30 days later, outline the causes of outages and, equally important, specific responses taken to preclude similar outages in the future.

The industry's commitment to network reliability extends well beyond the tracking and macro-analysis of FCC reportable outages.

More than 500 industry representatives attended the two-day symposium, "Network Reliability: A Report to the Nation," sponsored in June by the Network Reliability Council. More than 1,000 of the NRC's 1,000-page compendium of technical papers on reliability—including many "best practices" for outage prevention—have been distributed.
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Many exchange and interexchange carriers and manufacturers have formed action teams to analyze the NRC report and identify those "best practices" which will benefit their daily operations. As Paul Henson noted at the symposium, many of the "best practices" identified already are widely used in the industry.

Committee T1-Telecommunications and the Network Operations Forum (NOF), both sponsored by ECSA, are actively addressing reliability issues identified in the NRC report.

ECSA is committed to a long-term program of support of network reliability. In addition to the quarterly and annual outage analyses, we are organizing a seminar on network reliability at the Western ComForum in Dallas, February 7-9, 1994. ECSA also has proposed a reliability seminar at the SUPERCOMM '94 trade exposition in April.

Also, the Network Operations Forum is expanding its program for rigorously testing SS7 networks through its internetwork interoperability test plan (IITP). The IITP is a broad-based industry effort involving hardware and software manufacturers, local and interexchange carriers. Test networks in company laboratories are linked by T1 carrier lines to simulate a SS7 network. A series of planned failures are introduced into the simulated network to gain valuable information on potential vulnerabilities and restoration scenarios. The results are shared widely under non-disclosure agreements.

ECSA also is expanding eligibility for membership and seats on our Board of Directors so that we provide an even greater industry representation in our work. Following our Annual Meeting in Boston on October 5, we will expand membership to include all domestic providers of telecommunications services with a plant investment in switching and/or
transport. We'll also announce a change in our name to better define our role as "Problem Solvers to the Telecommunications Industry."

The ECSA Network Reliability Steering Committee also has expanded its membership to bring in more exchange carriers, interexchange carriers, manufacturers and large users, thus broadening the base of industry participation and cooperation.

On behalf of the industry, I commend this first quarterly report to you. The report, and the other initiatives I've detailed above, clearly demonstrate the industry's cooperative commitment to network reliability.

Sincerely,

George L. Edwards
ECSA President

Enclosure