

**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)	

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Public Notice* released June 13, 2018, in the above-referenced docket. The Public Notice seeks input regarding the effectiveness of the Wireless Resiliency Cooperative Framework (Framework). Given ATIS’ focus on network reliability and resiliency, ATIS is pleased to provide its input below.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the

Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the Long Term Evolution (LTE) and LTE-Advanced wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' NRSC was formed in 1993 at the recommendation of the first Network Reliability and Interoperability Council. The NRSC strives to improve network reliability by providing timely, consensus-based technical and operational expert guidance to all segments of the public communications industry. The NRSC addresses network reliability improvement opportunities in an open environment and advises the communications industry through the development of standards, technical requirements, reports, bulletins, Best Practices, and annual reports. The NRSC is comprised of industry experts with primary responsibility for examining, responding to, and mitigating service disruptions for communications companies. NRSC participants are the industry subject matter experts on communications network reliability and outage reporting.

II. COMMENTS

In the *Public Notice*, the Commission seeks input on how to measure the Framework's use and effectiveness.¹ ATIS supports efforts to facilitate use of the Framework. The Framework is an example of the voluntary cooperative efforts that exist among service providers. There is a history of voluntary cooperation among service providers, particularly during natural disasters, to exchange mutual aid and permit roaming. These efforts began without the need for Commission regulation and long before the Framework was established. ATIS believes that this cooperation would continue even if there were no Framework.

The *Public Notice* also seeks input on measuring enhancements to municipal

¹ *Public Notice* at p.2.

preparedness and restoration, including a PSAP database.² ATIS notes that the NRSC Situational Awareness for 9-1-1 Outages Task Force has been actively working to address this issue since May 2017. NRSC has developed, in conjunction with the Association of Public-Safety Communications Officials (APCO), the National Association of State 911 Administrators (NASNA), and the National Emergency Number Association (NENA) a deliverable entitled *Service Providers: Outage Reporting Structure and Potential Types of 9-1-1 Outages*, which provides recommendations for standardized content and delivery which will help reduce confusion associated with notifications independent of the service provider type. Additional efforts will include Best Practices for collecting, managing, and utilizing PSAP and carrier contact information to ensure timely delivery of outage-related information. Work also continues on the development of a PSAP contact information database.

Another issue raised in the *Public Notice* is whether backhaul providers should be encouraged to participate in the Framework and work cooperatively with other stakeholders to develop a process for sharing restoration information during disasters based on a prioritized list of circuits or on those circuits designated for high traffic during emergencies.³ ATIS NRSC does not believe that there is a need to extend the Framework to backhaul providers. While there were challenges during Hurricane Maria in getting real-time information from backhaul providers, ATIS believes that these challenges were very much related to the circumstances of this particular natural disaster, and do not warrant changes to the Framework.

The Commission also asks whether backhaul providers have access to contact information from emergency response agencies and power companies for emergency response, network restoration, and continuity of operations, and whether they share such contact

² *Public Notice* at p.2.

³ *Public Notice* at p. 3

information with other Framework signatories, affected carriers, and the Commission.⁴ ATIS notes that contact information for response agencies, and power and utility companies is available under the Emergency Support Function (ESF) #2 – Communications, which facilitates coordination with telecommunications and information technology industries regarding restoration and repair of telecommunications infrastructure, protection, restoration, and sustainment of national cyber and information technology resources, and oversight of communications within the Federal incident management and response structures. ATIS notes that the Communications Information Sharing and Analysis Center (COMM ISAC) is another resource for contact information. Finally, ATIS notes that contracts between service providers and backhaul providers would generally specify contact information and escalation procedures.

⁴ *Public Notice* 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".

Thomas Goode
General Counsel
Alliance for Telecommunications Industry
Solutions
1200 G Street, NW
Suite 500
Washington, DC 20005
(202) 628-6380

July 16, 2018