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December 7, 2020

Marlene Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: PS Docket Nos. 11-60 and 13-75

Dear Ms. Dortch:

On October 29, 2020, the Alliance for Telecommunications Industry Solutions (ATIS) sent the attached letter to James Wiley of the Federal Communications Commission's (Commission) Public Safety and Homeland Security (PSHS) Bureau. As requested by Commission staff, a copy of this letter has been filed in the proceedings noted above.

If there are any questions about this matter, please do not hesitate to contact the undersigned.

Regards,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive.

Thomas Goode
ATIS General Counsel

Cc: Jennifer Holtz, Public Safety and Homeland Security Bureau
Emily Caditz, Public Safety and Homeland Security Bureau



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October 29, 2020

James Wiley
Public Safety and Homeland Security Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: National PSAP Contact Database

Dear James:

The Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) is writing to provide additional input regarding third-party efforts to develop a national Public Safety Answering Point (PSAP) contact database. ATIS NRSC would support the voluntary adoption of a national database as long as issues related to liability and cost are appropriately addressed. Such a national database would reduce cost to PSAPs and service providers alike. Without such a national database, individual service providers must maintain their own databases.

We understand that the Commission maintains its own PSAP database and that there are public safety industry efforts underway within the National Emergency Number Association (NENA), and possibly other entities, to develop such a database that includes PSAP contact information. While ATIS NRSC is not directly involved in these development initiatives, ATIS NRSC has collaborated with the public safety industry on the processes that should be used to facilitate consistent outage reporting specifically for 9-1-1 service-impacting outages to the PSAP community. The ATIS report on [Service Providers: Outage Reporting Structure and Potential Types of 9-1-1 Outages](#), and associated template, provide guidance on standardized content and delivery. ATIS's report on [Standard Operating Procedures \(SOP\) for Updating Public Safety Answering Point \(PSAP\) Outage Contact Information](#) provides information on how PSAP contact information is to be collected.

ATIS NRSC strongly believes that the use of any database by service providers must be voluntary. Until service providers are able to determine the integrity and stability of the information provided in such a database, they may reasonably choose to continue to maintain their own PSAP contact databases. Additionally, some service providers may choose to maintain a separate contact database for other public safety business requirements.

As ATIS NRSC has previously noted, a significant challenge to industry adoption of a national PSAP database is the potential for liability associated with reliance on the database. The database would include contact information for PSAPs that would be provided, and regularly updated, by the PSAPs. This information would be made available to service providers, which would use this information to identify the appropriate contacts for outage notifications required under Part 4 of

the Commission's rules. Service providers are concerned that, if a provider were to fail to appropriately contact a PSAP because of inaccurate or out-of-date contact information in the database, the provider could be found to be in violation of the Commission's Part 4 rules. Instead, providers would continue to use their own databases so that they can better and more directly control the quality of the information.

To address this issue, ATIS NRSC urges the Commission to adopt a safe harbor for any national PSAP database that may be developed. This safe harbor would protect carriers from potential liability for any violations of the Commission's rules stemming from the provider's reliance on information from the database.

Another significant challenge related to the use of a database relates to its cost. ATIS NRSC believes that cost is a significant factor in determining how broadly a national database would be used. To encourage broad use, ATIS NRSC believes the database would need to be made available at little or no cost to industry and must be less expensive than current processes.

ATIS NRSC hopes this provides the Commission with clarity on ATIS NRSC's views on the necessity of implementation of a safe harbor and consideration of cost impacts for service providers and assists the Commission in its efforts to ensure that PSAP notification is accomplished in a timely and efficient manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

Thomas Goode
ATIS General Counsel