

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

In the Matter of )  
 )  
Improving 9-1-1 Reliability ) PS Docket No. 13-75  
 )

**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. ATIS is the main developer of industry standards related to network reliability, including reliability of 9-1-1 networks, and is pleased to have the opportunity to respond in this proceeding. ATIS comments below recommend that the Commission consider modifying its 9-1-1 reliability rules to remove unnecessary burdens.

**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's Public Safety and Homeland Security Bureau (Bureau) seeks comment on the Commission's rules regarding the reliability of the nation's 9-1-1 networks. In particular, the Bureau seeks input on the effectiveness of its 9-1-1 network reliability rules that, among other things, require covered 9-1-1 providers to take reasonable measures to ensure 9-1-1 circuit diversity, certify annually to their performance of these measures, and to notify Public Safety Answering Points (PSAPs) of network outages affecting 9-1-1 service.<sup>1</sup>

### **1. New Rules for NG9-1-1 Would be Duplicative and Are Not Needed**

ATIS NRSC members also do not see a need to revise the existing requirements to address transitional and Next Generation 9-1-1 (NG9-1-1) networks. NRSC members believe

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<sup>1</sup> *Public Notice* at p. 1.

that the Commission’s current 9-1-1 reliability requirements adequately encompass transitional and NG9-1-1 networks. In addition, an existing Communications Security, Reliability and Interoperability Council (CSRIC) working group – Working Group 1 Transition Path to NG9-1-1 – has been established to examine ways in which the Commission may further the NG9-1-1 transition and enhance the reliability and effectiveness of NG9-1-1 through routing redundancy and maintenance and mitigate against the threat of outages to both legacy 9-1-1 and NG9-1-1 systems. The industry self-polices via the development of collaborative industry Best Practices, many of which promote the reliability and resiliency of 9-1-1 networks, including transitional and NG9-1-1 networks. Finally, as noted above, the Commission’s NORS data has identified no negative outage-related trends as the industry continues to transition to NG9-1-1.

## **2. Suggested Changes to Existing Reliability Rules**

The Bureau seeks comment on possible alternatives to the existing 9-1-1 reliability rules.<sup>2</sup> ATIS NRSC would support the implementation of a more general “reasonableness” requirement under which covered 9-1-1 service providers would be required to take reasonable measures to ensure the reliability of their 9-1-1 networks, but without specific mandates related to 9-1-1 circuit diversity, availability of central office backup power, diverse network monitoring, etc. This requirement, which should apply to all covered 9-1-1 providers including those operating legacy, transitional and NG9-1-1 networks, would provide covered 9-1-1 service providers with greater flexibility in network administration, while facilitating network resiliency. ATIS NRSC believes that such an approach could also leverage the significant work that the industry has done to develop voluntary industry Best Practices

ATIS NRSC, however, would oppose any effort to require covered 9-1-1 service

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<sup>2</sup> *Public Notice* at p. 2.

providers to certify to implementation of certain Best Practices. As ATIS has said many times, the defining characteristics of Best Practices is their collaborative and voluntary nature, and their ability to continually evolve to meet new technical, business, and consumer expectations. Best Practices cannot and should not be considered to be universally applicable mandates. The decision regarding whether or not to implement a Best Practice is made based on expert evaluation, risk assessment, customer needs and expectations, and/or other considerations. Furthermore, the success of Best Practices is due to the voluntary, consensus-based environment in which they are created, which allows industry experts to collaborate and continually update existing and/or develop new Best Practices to account for current technology and network growth.<sup>3</sup>

### **3. Annual Certification Requirement Should Be Eliminated, or At Least, Modified**

The *Public Notice* also asks whether the Commission should eliminate or modify its annual certification requirement.<sup>4</sup> ATIS would support the elimination of this requirement, noting that there is no evidence that this requirement has had any significant impact to network reliability or resiliency. Alternatively, should the Commission decide to retain the certification requirement, ATIS NRSC recommends that the Commission consider modifying the rule to require certification less frequency than on an annual basis (e.g., biennially, triennially or even every five (5) years). The requirements in the rules will remain intact, so an annual certification isn't needed to protect 911 network reliability. This would reduce the burdens associated with the Commission's reliability rules, while still providing appropriate assurances that industry is aware of and in compliance with these regulations.

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<sup>3</sup> See ATIS Reply Comments, April 20, 2015, PS Docket No. 14-193, PS Docket No. 13-75.

<sup>4</sup> *Public Notice* at p. 2. Also see 47 CFR § 4.9(h).

#### 4. ATIS Suggests Various PSAP Notification Improvements

The Bureau seeks comment on the effectiveness of its current PSAP notification requirements.<sup>5</sup> The Bureau notes that ATIS NRSC has created a model PSAP notification template and asks for feedback on this template.<sup>6</sup> As explained in its June 29<sup>th</sup> *ex parte* in this docket, ATIS has completed its initial work on this matter and published two related deliverables: (1) a report entitled *Service Providers: Outage Reporting Structure and Potential Types of 9-1-1 Outages*, which provides guidance to all types of service providers that report service-impacting outages to the PSAP community and recommends standardized content and delivery; and (2) a companion template that facilitates the delivery of necessary, actionable information to PSAPs in a consistent manner and format. These documents are available at no charge from the ATIS NRSC website at: [http://www.atis.org/01\\_committ\\_forums/nrsc/](http://www.atis.org/01_committ_forums/nrsc/). ATIS supports the use of this report and associated template, believing that they will increase the utility of PSAP notifications, while minimizing confusion and reducing the reporting-related burdens. ATIS believes that this report and template could and should be used to standardize how all service providers notify PSAPs of 9-1-1-related outages. ATIS also notes that it is working with other industry stakeholders to examine possible development of a single national database of PSAP contact information for use by all carriers required to make PSAP notifications, which should further facilitate communications with PSAPs.

Finally, the Bureau also seeks information on ways to streamline PSAP notifications by reducing the number of PSAP notifications for the same outage event.<sup>7</sup> NRSC members have

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<sup>5</sup> *Public Notice* at pp 3-4.

<sup>6</sup> This joint initiative was led by the NRSC and included participation by the Association of Public-Safety Communications Officials (APCO), the National Association of State 911 Administrators (NASNA), and the National Emergency Number Association (NENA).

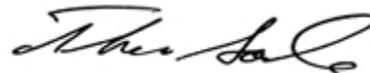
<sup>7</sup> PN at p. 3.

several recommendations to reduce unnecessary and/or duplicative reports. One recommendation is to modify 47 CFR §4.3 to eliminate references to “non-affiliated entities.” As currently written, the definitions in this section apply to providers as well as to affiliated and non-affiliated entities, resulting in duplicative outage reporting. Moreover, the Commission should consider allowing PSAPs to opt-out of outage notifications if the PSAP determines that these are not necessary and/or too burdensome to support. Finally, the Commission should also consider reducing or eliminating the need for providers to report the failure of location determination equipment, including Phase II equipment.<sup>8</sup>

### **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,



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<sup>8</sup> See 47 CFR §4.5(e)(4).