

**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 April 1, 2019, in the above-referenced docket. ATIS is pleased to have the opportunity to provide feedback on the implementation and efficacy of the *Wireless Resiliency Cooperative Framework (Framework)*. ATIS’ feedback reflects input from ATIS members with on-the-ground experience with disaster preparation and recovery efforts.

**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' Network Reliability Steering Committee (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 Public Safety and Homeland Security Bureau seeks feedback on the implementation and effectiveness of each prong of the *Framework*.<sup>1</sup> Under this voluntary framework, the signatories commit to: making reasonable roaming arrangements during disasters when technically feasible; fostering mutual aid during emergencies; enhancing municipal preparedness and restoration; increasing consumer readiness and preparation; and improving public awareness and stakeholder communications on service and restoration status. As a general

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<sup>1</sup> *Public Notice* at p. 2.

matter, ATIS NRSC members believe that the *Framework* provides helpful guidance and has been effective at accelerating restoration activities over the last three years. Wireless providers already apply the lessons learned from those events to their own disaster preparedness and recovery efforts, and to their relationships with other service providers, local governments and other stakeholders like electric utilities. Therefore, while it makes sense for signatories to continue to compare their lessons learned in implementing the *Framework*, ATIS NRSC members recommend no additional changes to the *Framework* at this time.

The Bureau seeks input regarding the *Framework's* roaming commitments. Under the *Framework*, wireless providers consider disaster-specific roaming when: “(i) a requesting carrier’s network has become inoperable and the requesting carrier has taken all appropriate steps to attempt to restore its own network, and (ii) the home carrier has determined that roaming is technically feasible and will not adversely affect service to the home carrier’s own subscribers.”<sup>2</sup> As wireless providers are in the middle of their transitions from 2G and 3G technologies to 4G LTE and 5G, the flexibility in the *Framework* enables service providers to approach roaming issues nimbly, subject of course to the technical limitations of their networks and customers’ devices. ATIS NRSC believes that the roaming guidance provided in the *Framework*, as well as other industry guidance including the ATIS NRSC Emergency Preparedness and Response Checklist,<sup>3</sup> has been valuable and effective. After each hurricane during the 2017-18 season, ATIS NRSC members reviewed roaming opportunities and found existing arrangements were adequate.<sup>4</sup> ATIS NRSC members agree with the *Framework*

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<sup>2</sup> *Public Notice* at p. 3 (citing *Wireless Resiliency Framework* at p.2).

<sup>3</sup> ATIS-0100019. This document is available on a complimentary basis from <https://www.atis.org/docstore/product.aspx?id=25649>.

<sup>4</sup> While roaming was affected by Hurricane Maria, this was due to the widespread devastation to the island’s infrastructure, including loss of commercial power.

signatories that “indicated that while existing roaming agreements in place prior to an emergency event continue to be recognized without modification, they do not maintain formal roaming agreements that are specific or limited for *Framework* activated events.”<sup>5</sup> Therefore, ATIS NRSC does not believe that evaluation metrics or automatic roaming agreements are necessary.

The *Public Notice* seeks comment on the *Framework*’s commitment to share physical assets and necessary consultation where feasible during and after disasters through mutual aid arrangements with other wireless providers.<sup>6</sup> Among the issues on which comment is sought was how the Commission should measure the effectiveness of mutual aid during emergencies.<sup>7</sup> ATIS NRSC members’ experience has been that existing mutual aid efforts have been effective. The telecommunications industry has a long history of voluntarily collaborating to assist with restoration efforts and it is a well-established best practice that service providers and others should enter into mutual aid agreements to assist them in disaster situations.<sup>8</sup> In fact, ATIS NRSC members are unaware of any instances in which mutual aid requests were not fulfilled.<sup>9</sup> Absent some indication of widespread challenges, ATIS NRSC does not believe that it is necessary to develop standardized methods of examining or measuring the efficacy of mutual aid efforts.

Feedback is also sought on the industry’s commitment in the *Framework* to work with local governmental representatives and public safety subject matter experts to develop best practices to facilitate coordination before, during, and after emergencies and disasters in order to maintain and restore wireless service continuity.<sup>10</sup> On the issue, the *Public Notice* asks about the

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<sup>5</sup> *Public Notice* at p. 3

<sup>6</sup> *Public Notice* at pp. 4-5.

<sup>7</sup> *Public Notice* at p. 5.

<sup>8</sup> See Best Practice 11-9-1031.

<sup>9</sup> In 2018 alone, there were 62 disasters affecting 48 states.

<sup>10</sup> *Public Notice* at pp. 5-6.

sufficiency of existing local coordination best practices, including those recommended in the *Framework*.<sup>11</sup> The *Framework* signatories describe many of their state and local government coordination efforts and the lessons learned from those efforts—many of which will depend as much on commitments by states and localities as on the signatories’ efforts. ATIS NRSC believes that the existing industry best practices are sufficient and notes that the industry works with the Communications Security, Reliability and Interoperability Council (CSRIC) and the Commission to ensure that these best practices remain actionable and relevant. ATIS NRSC members also work with CSRIC and the Commission to develop and edit industry best practices as necessary to reflect the evolving ecosystem. In addition to the best practices noted in the *Framework*, there are also other industry best practices related to communications with local authorities and other stakeholders.<sup>12</sup>

Finally, the Bureau seeks information on whether changes should be made to the *Framework* regarding infrastructure and preparedness.<sup>13</sup> Among the issues on which input is sought related to this topic is to what extent would deployment of a specific number of temporary assets based on a metric, such as county subscriber population, improve service restoration time.<sup>14</sup> ATIS NRSC opposes this proposal. Disasters are complex and fluid situations. While pre-positioning equipment based on the existing county’s population may be beneficial in some situations, it could hinder restoration in others, particularly when there are large scale destructive events and/or when populations shift due to voluntary or mandatory evacuations. Smaller, more remote areas may bear the brunt of a particular disaster, and service providers need as much flexibility as possible to shift resources where their customers and

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<sup>11</sup> *Public Notice* at p. 6.

<sup>12</sup> See e.g., Best Practices 11-09-1058 and 11-10-0462.

<sup>13</sup> *Public Notice* at pp. 7-8.

<sup>14</sup> *Public Notice* at p. 8.

networks require it. Decisions regarding how to best prepare for disasters, including where to position equipment, should be left to service providers who are in the best position to determine the condition of their own network and how best to deploy their resources to meet the needs of customers. As ATIS has noted above, there are also existing tools that provide guidance on disaster preparation, such as the ATIS NRSC Emergency Preparedness and Response Checklist, as well as the service providers' own preparedness and recovery practices.

### **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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