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December 6, 2018

Via Email

Jeffery Goldthorp
Associate Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ATIS NRSC Feedback on 2019 DIRS Changes

Dear Jeff:

The Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) has reviewed the changes proposed to the Disaster Information Reporting System (DIRS) for 2019. The enclosed document provides input from the NRSC offers feedback on the addition optional fields including the projected restoration date for the MSC, and why the PSAP is not receiving calls, and the extent to which DIRS provides awareness about end-user experience with wireline services during a disaster.

NRSC appreciates the Commission's ongoing work to improve DIRS. The NRSC is willing to provide additional information or to review a further draft of proposed changes to DIRS.

If you have any questions, please do not hesitate to contact me.

Sincerely,

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

Tom Goode
ATIS General Counsel

cc: John Healy, Associate Chief, Public Safety and Homeland Security Bureau,
john.healy@fcc.gov
Andis Kalnins, NRSC Co-Chair (Verizon), andis.i.kalnins@verizon.com
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Attachment

Response to FCC Proposals

- ***FCC Proposal #1- Projected Restoration Information:*** *For the Wireline Switch, DLC, and PSAP reports, we are thinking of adding a data field that states that the projected restoration date for the MSC is: 1 day from now, 2 to 3 days from now, in the next 7 days, longer than a week, or unknown. This field would be discretionary – i.e., the DIRS filing could be submitted even if it is left blank.*
- **NRSC Response:**
 - **Proposal Questions:**
 - Does the “Wireline Switch” report refer to the “DIRS Major Equipment Disaster Report” template?
 - Does “DLC” report refer to the “Remote Aggregation Devices/Distribution Disaster Report” template?
 - Does the “PSAP” report refer to “Wireline PSAP Disaster Report” template?
 - Can the FCC clarify the discrepancy that the “Wireless MSC-STP-Voice” template is not under major equipment?
 - **NRSC Recommendation:** NRSC recommends that this data field not be added to DIRS as it would not provide meaningful information to the FCC and/or other government agencies for the following reasons:
 - Discretionary completion of this field would be based on conservative estimates and would not likely be accurate, if even reported, especially during the early days of the disaster.
 - Severe damage may result in service provider decision not to restore the equipment at that location.
 - Equipment restoration is dependent on factors outside of service providers’ control, such as access to the disaster areas, safety of restoration personnel, etc.
 - Even though the equipment may not be restored, temporary service restoration could occur by deployment of temporary equipment or through mutual aid with other service providers.
 - Reports may be required prior to a service provider being able to assess the damage and project restoration times.
- ***FCC Proposal #2- End User Experience:*** *We are seeking to improve the extent to which DIRS provides awareness about end-user experience with wireline services during a disaster. We would like to find ways to use the data we are already collecting in DIRS for this purpose.*
- **NRSC Response:**
 - Major Equipment Template (DIRS User Manual, page 19) indicates number of subscribers down due to equipment failure, i.e. number of working numbers down, number of VoIP subscribers down, number of video subscribers down, number of broadband access users down, in the areas served by the failed equipment.
 - New Remote Aggregation Devices Template (DIRS User Manual, page 24) indicates number of RAD down due to equipment failure, i.e. number of RAD down, number of working numbers served, number of working numbers down.
 - Estimating the impact on an individual user cannot be determined using this data. Overall impact on the total number of end users served by the equipment can be described using this data.
- ***FCC Proposal #3- Why PSAP is Out -*** *The wireline carrier may know why the PSAP is not receiving calls, e.g., evacuated. We propose to add this optional data field to DIRS.*
- **NRSC Response:**
 - Any information provided in this field could be based on information that the service provider cannot verify; for this reason, the NRSC believes that the field would not be populated in those cases.
 - Alternatively, the NRSC suggests that the FCC rely on the notes field for further clarification on why the PSAP is not receiving calls.

Additional Feedback Regarding the DIRS Process and System

- Public dissemination of separate cable and wireline data compromises service provider identity/confidentiality. NRSC requests feedback from the FCC on how difficult it would be to aggregate service providers given it is provided in different reports in DIRS.
- The current DIRS Standard Operating Procedure (SOP) is out of date. Without an updated SOP it is difficult for government agencies and industry to understand how, why, when, and where DIRS should be activated, what data should be collected, what data should be disseminated, to what agencies and to the public, and when DIRS should be deactivated. ATIS NRSC has previously requested that this document be updated.

NRSC's Input on Sharing Geospatial Data Specifications

- KML/KMZ files must be provided in non-editable format.
- Files submitted to the FCC must be in a format that does not disclose the author/source of underlying data used to create the map files.
- The NRSC did not reach consensus on the dBm level for Shape Files.
- An industry group should develop recommendations on sharing geospatial data specifications.