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June 27, 2019

Via Email  
Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Implementation and Efficacy of the Wireless Resiliency Cooperative Framework  
*Ex Parte*, PS Docket No. 11-60

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS) has further input regarding the April 1, 2019, *Public Notice* seeking comment on the industry's Wireless Resiliency Cooperative Framework (Framework). These comments represent input from ATIS' Network Reliability Steering Committee (NRSC).

ATIS notes that the participating service providers are committed to working together, particularly during natural disasters and other events. The Framework and other best practices developed over the years have been successful in promoting resiliency. ATIS appreciates and supports the Commission's assessment of "lessons learned" in the wake of the devastating 2017 and 2018 hurricane seasons. As CTIA explained, this success is directly related to the flexibility afforded by the Framework and other best practices.<sup>1</sup> This flexibility is critical because no two disasters, even of the same type, will have the same impact, and different service providers and different networks will face different challenges. Therefore, ATIS recommends that the Commission not establish regulatory mandates that would restrict this flexibility. In particular, ATIS supports the comments made by AT&T and CTIA opposing the introduction of additional roaming requirements,<sup>2</sup> and opposes comments of NTCA and RWA with regard to mandatory bilateral roaming, testing, and implementation.<sup>3</sup>

ATIS agrees with AT&T that comments do not demonstrate that there is a need for additional requirements or metrics to be incorporated into the Framework.<sup>4</sup> However, ATIS believes that some comments, particularly those issues raised by the deaf and hard of hearing community, may warrant additional consideration by the industry.<sup>5</sup> ATIS believes that the industry should be

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<sup>1</sup> CTIA Comments at pp. 6-7.

<sup>2</sup> AT&T Comments at p. 4, CTIA Comments at pp. 6-7.

<sup>3</sup> NTCA & RWA Comments at pp. 2-4.

<sup>4</sup> AT&T Comments at p. 4.

<sup>5</sup> See Reply Comments of Consumer Groups (Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), National Association of the Deaf (NAD), Hearing Loss Association of America (HLAA), Association of Late-

afforded the opportunity to address these matters, in accordance with the cooperative nature of the Framework, before the Commission considers taking action or creating new regulatory requirements.

ATIS acknowledges the importance of mutual aid efforts and notes that the record demonstrates the success of existing collaborative efforts. However, ATIS notes that mutual aid is only one aspect of network resiliency. Service providers must also implement their own emergency preparedness plans and take steps to enhance the resiliency of their own networks in the first instance. ATIS believes that the Emergency Preparedness and Response Checklist may be a useful tool.<sup>6</sup> This checklist includes Best Practices relevant to mutual aid and other issues that would aid service providers in preparing for network-impacting natural disasters and other events.

In its comments to the January 3, 2019, *Public Notice* on the Framework, ATIS provided input on the existing collaborative efforts with power companies.<sup>7</sup> In addition to the National Coordinating Center for Communications (NCC) and Communications Information Sharing and Analysis Center (Comm ISAC) efforts noted in ATIS' comments,<sup>8</sup> coordination between communications and power providers is occurring in other venues such as:

- New England Comms Power Summit hosted by Comcast
- Tri-sector Executive Working Group (consists of the communications, electric and finance stakeholders)
- State Emergency Operations Centers (service restoration)
- FEMA Regional Emergency Communications Coordination Working Groups (RECCWGs)

Finally, ATIS responds to the comments made by the Association of Public-Safety Communications Officials-International, Inc. (APCO) recommending that the Commission require wireless providers to establish a database of service providers' and emergency communications centers' (*i.e.*, Public Safety Answering Points) contact information.<sup>9</sup> ATIS notes that it is developing requirements for such a contact database. This group recently completed its work to streamline and standardize communications between providers and Public Safety Answering Points. ATIS welcomes continued participation by APCO in this work.

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Deafened Adults, Inc. (ALDA), National Association of State Agencies of the Deaf and Hard of Hearing, Inc. (NASADHH), National Association for State Relay Administration (NASRA), and California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (CCASDHH)).

<sup>6</sup> Available at no charge from < [https://www.atis.org/01\\_committ\\_forums/nrsc/documents/](https://www.atis.org/01_committ_forums/nrsc/documents/)>.

<sup>7</sup> ATIS Comments at p. 3, PS Docket No. 11-60 (February 8, 2019).

<sup>8</sup> ATIS Comments at pp 3-4, PS Docket No. 11-60 (February 8, 2019).

<sup>9</sup> APCO Comments at p. 2.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas E. Goode". The signature is written in a cursive style with a large, prominent initial "T".

Thomas E. Goode  
ATIS General Counsel

cc: John Healy, Public Safety and Homeland Security Bureau  
Jeffery Goldthorp, Public Safety and Homeland Security Bureau