In the Matter of	**)**	
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Public Safety and Homeland Security	**)**	PS Docket No. 11-60
Bureau Seeks Comment on Wireless	**)**	
Service Providers' Safety Measures for	**)**	
their Customers During Disasters	**)**	

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 March 26, 2021, in the above-referenced

docket. In the *Public Notice*, the Federal Communications Commission's (Commission) Public

Safety and Homeland Security Bureau (Bureau) seeks comment on efforts of mobile service

providers to improve network resiliency in order to prepare a report to Congress. ATIS'

comments provide information on how mobile service providers address and improve network

reliability in the event of natural disasters.

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,

wireline, and VoIP 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 4G Long-Term Evolution (LTE) and 5G New Radio (NR) 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 Commission's 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. The NRSC also collaborates with public safety associations and works with the Commission to provide input on the Network Outage Reporting System (NORS) and Disaster Information Reporting System (DIRS). NRSC participants are the industry subject matter experts on communications network reliability and outage reporting.

II.   COMMENTS

In the *Public Notice,* the Bureau seeks comment on service providers' safety measures for their customers during natural disasters, including wildfires. The Bureau asks how mobile service providers have addressed and improved network reliability in the face of natural disasters

and seeks information on what steps wireless mobile providers have taken to ensure network resiliency.[1]

ATIS NRSC notes that one important way that wireless service providers work to improve network reliability is through their participation in collaborative efforts such the ATIS NRSC. As noted above, the NRSC enhances network resiliency by facilitating discussions of network outage trends to determine root causes and propose ways in which future outages may be mitigated. The NRSC has worked on a broad array of issues impacting all types of communications networks, including issues that affect primarily wireless networks. Most recently, the NRSC completed a review of wireless outage reporting. At the request of the Commission, the NRSC examined wireless outage reporting trends to determine the cause of an uptick in these reports. The NRSC determined that this increase was not reflective of changes to network reliability but rather to a change the Commission made to its rules related to the calculation of potentially affected users. The NRSC recommended changes to the Commission's rules to address this matter.

The NRSC also works closely with the Commission and its Federal Advisory Committees on wireless issues, particularly the Communications Security, Reliability and Interoperability Council (CSRIC). The NRSC collaborates with the Commission to examine network outage trends and provide recommendations, offer guidance regarding the development and use of Best Practices, and provide input on the Commission's Network Outage Reporting System and DIRS. ATIS NRSC has worked closely with the Bureau on these systems to ensure that they can provide useful, relevant information to the Commission without unnecessarily

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[1] *Public Notice* at pp. 1- 2.

burdening providers or distracting the industry from the key task at hand – maintaining and/or restoring service to consumers.

The NRSC also works to develop and maintain industry Best Practices, which are another important tool available to service providers, including wireless service providers, to promote network resiliency and reliability. Best Practices allow the industry to pool its expertise to identify and thoroughly examine potential challenges and recommend ways to resolve or mitigate these challenges. Best Practices are widely adopted and implemented and appropriately flexible. The voluntary nature of Best Practices allows providers to determine, based on expert evaluations, risk assessments, and/or other considerations, how and whether to apply these practices. This flexibility is important because no two disasters are alike, and a single disaster can affect different service providers in very different ways. The ATIS NRSC believes that Best Practices are very effective in fostering network reliability and resiliency. On behalf of the industry, ATIS maintains a list of Best Practices at https://bp.atis.org/search/. These practices can be searched by keywords, including Emergency Preparedness, Disaster Recovery and Business Continuity, as well as by network type.

The NRSC *Emergency Preparedness and Response Checklist* is another tool that promotes greater network reliability and resiliency during disasters.[2] This Checklist, developed initially in response to Hurricane Katrina as the NRSC *Hurricane Preparedness Checklist*, described Best Practices that are useful to a wide array of emergency situations. These Best Practices are broken down by category – Non-Event Specific (31 Best Practices), Pre-Event (257

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[2] ATIS NRSC *Emergency Preparedness and Response Checklist* (ATIS-0100019), approved March 1, 2019. The NRSC *Pandemic Checklist* (ATIS-0100018(2021-02)), approved February 8, 2021, also fosters network reliability for wireless (and other) networks by providing guidance on steps that should be considered to prepare and respond to pandemics.

Best Practices), and Restoration (77 Best Practices) – and provide guidance on issues ranging from risk assessment to security to power and fuel. This checklist is available at no charge from the ATIS NRSC webpage https://www.atis.org/committees-forums/nrsc/.

The NRSC *Disaster Roaming Guide and Resource* is another tool available to the wireless industry to foster network reliability during disasters. This document provides a guide that wireless service providers can use as a checklist of procedures and available resources to facilitate roaming during disasters. The *Disaster Roaming Guide and Resource* includes Best Practices that address mutual aid roaming between wireless providers and provides guidance to wireless providers regarding contacting other providers to formulate roaming agreements during disasters and informing federal authorities when roaming agreements during disasters are invoked. This guide is also available at no charge from the ATIS NRSC webpage https://www.atis.org/committees-forums/nrsc/.

The Wireless Resiliency Framework, a voluntary industry commitment to promote resilient wireless communications and situational awareness during disasters, is another important tool in fostering wireless network resiliency.[3] This framework sets out five (5) prongs to enhance coordination during emergencies: (1) providing for reasonable roaming under disaster arrangements when technically feasible; (2) fostering mutual aid among wireless providers during emergencies; (3) enhancing municipal preparedness and restoration by convening with local government public safety representatives to develop Best Practices, and establishing a
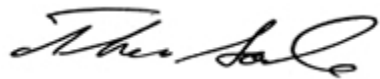
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[3] This voluntary framework was developed by CTIA, AT&T, Sprint, T-Mobile, U.S. Cellular, and Verizon to enhance coordination and communication to advance wireless service continuity and information sharing during and after emergencies and disasters.

provider/PSAP contact database;[4] (4) increasing consumer readiness and preparation through development and dissemination with consumer groups of a Consumer Readiness Checklist; and (5) improving public awareness and stakeholder communications on service and restoration status, through Commission posting of data on cell site outages on an aggregated, county-by-county basis in the relevant area through DIRS. ATIS NRSC believes that this framework has been effective at promoting wireless network resiliency.

III.   CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Public Notice* and urges the Bureau to consider the input above.

Respectfully submitted,

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[4] The Bureau released a *Public Notice* seeking comment on a national 911 call center contact information database. ATIS has done significant work to standardize outage notifications to PSAPs and has expressed support for "little or no cost" database and associated safe harbor.