

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

In the Matter of)	
)	
Amendments to Part 4 of the Commission’s)	PS Docket No. 15-80
Rules Concerning Disruptions to)	
Communications)	

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Notice of Proposed Rulemaking (NPRM)*, released January 19, 2022, in the above-referenced docket. As directed by the Federal Communications Commission (Commission), the Public Safety and Homeland Security Bureau (PSHSB or Bureau) seeks comment on potential safeguards in connection with the sharing of Network Outage Reporting System (NORS) and Disaster Information Reporting System (DIRS) data with agencies acting on behalf of the Federal government, U.S. states and/or territories, the District of Columbia, and Tribal Nations, that have a “need to know” (“reviewing agencies”). ATIS urges the Bureau to safeguard sensitive NORS and DIRS service provider data by: (1) adding a header and footer to NORS and DIRS reports noting that these reports contain confidential information, may not be tampered with and are subject to other restrictions based on Commission rules and orders; and (2) adding a “confidentiality” watermark to reports that are printed by reviewing agencies pursuant to the Commission’s *Second Report and Order* in this docket.¹

¹ *Second Report and Order*, PS Docket No. 15-80, 366 FCC Red 6136 (2021).

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.

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 NORS and 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 additional safeguards to protect NORS and DIRS that will be shared with reviewing agencies pursuant to the *Second Report and Order*. Specifically, the Bureau seeks input on whether to include confidential notifications, headers and footers, or watermarks on the read-only reports.² As noted below, ATIS NRSC believes that additional safeguards are appropriate to protect NORS and DIRS data. However, ATIS NRSC strongly urges the Bureau to ensure that any new safeguards do not negatively impact the permissions and capabilities of reporting entities (i.e., inputter and coordinator permissions/capabilities). Service providers have established processes to submit, review and manage their NORS and DIRS filings and must continue to have the same ability to enter, read and access data as they do today.

A. Headers/Footers

The *Public Notice* asks about the effectiveness of adding headers or footers to all pages of NORS and DIRS reports specifying that the data is “confidential.”³ ATIS NRSC supports this proposal and recommends that, in addition to specifying that the data is confidential, the header or footer should specify that the data may not be tampered with and should note further that there are additional restrictions on use and distribution of the data and that reports may be modified and/or withdrawn by the reporting entity after being accessed by reviewing agencies.⁴ ATIS also recommends that a footer be added to NORS and DIRS reports to identify the name of the reviewing agency. ATIS NRSC believes that an appropriate header and footer would serve as an

² *Public Notice* at p. 2.

³ *Public Notice* at p. 2.

⁴ For example, the header could state: “This report contains CONFIDENTIAL data and may not be tampered with. This data is subject to restrictions on use and distribution. See *FCC Second Report and Order*, PS Docket No. 15-80, for more information. Please note that the data in this report may be modified or withdrawn by the reporting entity.”

effective and important reminder of existing obligations, would help minimize unintentional misuse or inappropriate distribution of this sensitive data and, in the event of misuse or inappropriate distribution, would help identify the reviewing agency that accessed the report. Moreover, ATIS NRSC sees no downside to the inclusion of such a header and footer in NORS and DIRS reports.

B. Watermarks

The Bureau in the *Public Notice* seeks input on the feasibility of including a watermark on documents printed from the NORS/DIRS database by reviewing agency.⁵ ATIS NRSC supports the use of a “confidential” watermark for reviewing agencies. Given the importance of protecting NORS/DIRS data from unauthorized use or distribution, ATIS NRSC supports the inclusion of a watermark in NORS and DIRS reports, along with a header and footer. The watermark, which should simply indicate that the report is “confidential,” would prevent the misuse of selected portions of the NORS and DIRS reports. Further, it would complement the header and footer, which would provide more information on use and distribution restrictions.

ATIS NRSC also supports the Bureau’s proposal to ensure that the watermark can be displayed regardless of where the NORS/DIRS reports are printed by converting the report to a locked Portable Document Format (PDF).⁶ However, ATIS NRSC notes that it is important that any watermark not impact the ability of reporting entities to enter, aggregate, or sort NORS or DIRS data.⁷ Therefore, ATIS NRSC believes that a separate level of access should be established for reviewing agencies associated with the reviewing agency representative’s login-assigned

⁵ *Public Notice* at p. 3.

⁶ *Public Notice* at p. 3.

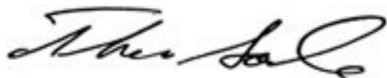
⁷ ATIS NRSC notes that the Commission’s NORS and DIRS already offer different levels of access for filers for inputters, which have access to only those reports they file, and coordinators, which can access all reports filed by their organization. ATIS NRSC further notes that the Commission appears to acknowledge that a different level of access is necessary for these reviewing agencies, given that the *Second Report and Order* provides specific restrictions (such as read only access) on reviewing agencies that are not applicable to reporting entities.

privileges. This would allow the Commission to place watermarks and lock reports viewed by these agencies, while permitting continued access to unlocked reports by reporting entities. If the Bureau is unable to distinguish between reports created by reviewing agencies (locked with a watermark) and those created by reporting entities (unlocked with no watermark), ATIS NRSC recommends inclusion of a removable watermark (for example in a Word or Excel document) that specifies that the document is confidential and also that the watermark should not be removed (“Confidential Information – Do Not Remove Watermark”).

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,



Thomas Goode
General Counsel
Alliance for Telecommunications Industry Solutions
1200 G Street, NW
Suite 500
Washington, D.C. 20005
(202) 628-6380

March 9, 2022