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June 21, 2016

***Via ECFS***

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

*Re: GN Docket No. 15-206, In re Improving Outage Reporting for Submarine Cables  
and Enhancing Submarine Cable Outage Data*

Dear Ms. Dortch:

On Thursday, June 16, 2016, Paula Boyd, Kati Sontaniemi, Jim Lamoureux and Katie Myers (by telephone) of Microsoft Corporation met with Daudeline Meme, Legal Advisor for Commissioner Clyburn, and on Friday, June 17, 2016, Paula Boyd, Jim Lamoureux, and Katie Myers (by telephone) met with Erin McGrath, Legal Advisor for Commissioner O’Rielly. In both meetings, Microsoft was asked about our position in the submarine cable network outage reporting proceeding (GN Docket No. 15-206).

The Microsoft participants noted that although Microsoft had not submitted comments in the proceeding, we were concerned about the potential burdens that might be imposed by reporting requirements. In particular, we cautioned against imposing administrative burdens that might interfere with efforts to restore cable capacity. To the extent outage reporting requirements are in part to incentivize cable operators to restore capacity quickly, we noted that cable operators such as Microsoft, who use submarine cables solely for their own traffic are fully incented to restore capacity as quickly as possible.

Pursuant to the Commission’s rules, a copy of this letter is being filed in the above-referenced docket. Please contact me if you have any questions.

Sincerely,

/S/  
Jim Lamoureux

Cc: Daudeline Memo  
Erin McGrath