

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Improving 911 Reliability

PS Docket No. 13-75

**Comments of Alaska Communications**

Alaska Communications<sup>1</sup> hereby responds to the Public Notice<sup>2</sup> (the “Public Notice”) issued by the Public Safety and Homeland Security Bureau (the “Bureau”) in the above-captioned proceeding, which seeks comment on the continuing vitality of the Commission’s rules regarding the reliability of the nation’s 911 networks, and potential changes to those rules.

**Introduction and Background**

The state of Alaska encompasses roughly 1/6 of the total land area of the nation, yet its population is only about 740,000 people, more than half of whom live in Anchorage, Fairbanks, and Juneau. The other half are clustered in small and remote communities that dot approximately 570,000 square miles of largely inaccessible wilderness. Alaska Communications serves as the ILEC, not only in Anchorage, Fairbanks, Juneau, and their surrounding rural areas, but also in approximately 50 Bush communities, ranging in size from a few dozen to perhaps over 1,000 people.<sup>3</sup>

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<sup>1</sup> In these comments, “Alaska Communications” signifies the incumbent local exchange carrier (“ILEC”) operating subsidiaries of Alaska Communications Systems Group, Inc. (ACS of Alaska, LLC; ACS of Anchorage, LLC; ACS of Fairbanks, LLC; and ACS of the Northland, LLC), which provide 911 services to end user customers within their respective study areas in Alaska.

<sup>2</sup> *Improving 911 Reliability*, PS Docket No. 13-75, Public Notice, “Public Safety and Homeland Security Bureau Seeks Comment on 911 Network Reliability Rules,” DA 18-612 (rel. June 13, 2018).

<sup>3</sup> Alaska’s “Bush” communities are those that are isolated geographically from the infrastructure customarily available throughout most of the nation, including the areas in and around Alaska’s three largest population centers, Anchorage, Fairbanks and Juneau. These Bush communities lack infrastructure resources commonly available elsewhere in the state, and the nation as a whole. Bush communities are generally inaccessible by road, and are not

The perspective of Alaska Communications on this issue has been shaped by its experience in meeting the unique challenges of delivering 911 service in these rural and remote communities. In many cases, remoteness makes it difficult or impossible for first responders to appear quickly. Many lack police and fire responders, let alone a resident doctor, and medical care is most commonly delivered using broadband telemedicine services, or in extreme cases, following evacuation by airplane to an urban hospital. These communities generally do not have PSAPs available to process 911 calls or send out first responders in any event.

### **Discussion**

*Effectiveness of the Current 911 Reliability Rules, and Possible Alternatives.* In the Public Notice, the Bureau seeks comment on the effectiveness of its current 911 reliability rules, as well as on whether the Commission should replace its existing 911 reliability rules with a more flexible requirement that Covered 911 Service Providers to take “reasonable measures” to ensure the reliability of their 911 networks.<sup>4</sup>

Alaska Communications believes that no change is necessary. At the time the rules were adopted, the rules had a beneficial effect by focusing the attention of covered service providers on the implementation, resilience, and reliability of 911 service across their respective networks, and that the rules remain effective today.

Alaska Communications faces challenges in providing 911 service that may be unique in the nation. To better serve Alaska’s sparsely distributed rural and remote communities, and

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connected to the state’s power grid. People, as well as goods and services, must arrive by plane, barge, snow machine, all-terrain vehicle, or other off-road transportation means. Communications services in these communities generally rely on satellite or terrestrial point-to-point microwave transport links to Anchorage, Fairbanks, or Juneau.

<sup>4</sup> Public Notice at 2.

recognizing the importance of this service, Alaska Communications has programmed all of its switches statewide to respond when a customer dials “911,” even in communities where there is no designated PSAP or statewide default answering point. In those cases, a 911 call is automatically routed to an office of the state troopers, ensuring that someone will answer, even from hundreds of miles away, who can marshal resources to assist.<sup>5</sup>

Even so, Alaska Communications often lacks facilities for connecting remote communities, not only for 911 services, but for telecommunications services generally. Instead, long haul transport must be purchased from a third-party provider to connect these remote communities with the Alaska Communications or other networks serving urban Alaska. Obviously, where Alaska Communications itself has no facilities, the LEC can hardly be expected to provide diverse routing options. Moreover, the vast distances, challenging climate, impassable terrain, high cost, and other challenges may effectively prohibit deployment of physically diverse alternatives to these small communities. The Commission’s rules favoring physical diversity of 911 critical 911 circuits<sup>6</sup> cannot conjure such diversity into being where it simply does not exist.

Similarly, the backup power rules are workable because they are narrowly tailored to apply only to each central office that “directly serves a PSAP.”<sup>7</sup> Alaska Communications meets

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<sup>5</sup> See generally 47 C.F.R. § 64.3002.

<sup>6</sup> E.g. 47 C.F.R. §§ 12.4(c)(i)(1)(C) (requiring Covered 911 Service Providers to certify whether they have “[e]liminated all single points of failure in critical 911 circuits or equivalent data paths serving each PSAP”); 12.4(c)(ii)(A) (requiring Covered 911 Service Providers to describe “alternative measures to mitigate the risk of critical 911 circuits that are not physically diverse”).

<sup>7</sup> 47 C.F.R. § 12.4(c)(2). A central office “directly serves a PSAP” if the central office “hosts a selective router or ALI/ANI database, provides equivalent NG911 capabilities, or is the last service-provider facility through which a 911 trunk or administrative line passes before connecting to a PSAP,” 47 C.F.R. § 12.4(a)(4)(i)(B).

the backup power requirements in all central offices that are subject to the 911 reliability rules.

But, Alaska Communications would face substantial challenges if it were required to supply *all* of its central offices with similar levels of backup power. In Bush communities, fuel and other supplies can only be replenished through off-road transportation means, such as delivery by plane, barge, snow machine, or all-terrain vehicle. Moreover, central offices in the Bush are typically off the state's power grid and lack access to reliable sources of commercial power. Generally, the *primary* source of power may be a generator that would serve as a backup in many other contexts. Because the scope of the rule is limited to central offices that "directly serve a PSAP," however, Alaska Communications is able to comply.

The Commission's 911 reliability rules thus successfully accommodate these challenges by blending specific target metrics with the opportunity for Covered 911 Service Providers to explain "alternative measures" they have employed in light of specific obstacles to achieving full implementation of the circuit diversity, central office backup power, and diverse network monitoring goals of the Commission's rules.<sup>8</sup> There is thus no need to abandon this model in favor of the inherently ambiguous "reasonable measures" rule on which the Bureau seeks comment. Indeed, such an ambiguous rule could undermine the reliability goals the rules seek to achieve, if Covered 911 Service Providers were to repeatedly alter their approaches based on their perceptions of what successive future Enforcement Bureau or Commission officials may view as "reasonable" in this context.

*Utility of the Certification Process.* The Bureau seeks comment on whether the Commission's rules should continue to require annual filing of 911 reliability certifications.<sup>9</sup>

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<sup>8</sup> See, e.g., 47 C.F.R. § 12.4(c)(1)(ii)(A).

<sup>9</sup> Public Notice at 2.

Alaska Communications agrees that the exercise of preparing the initial certification may have produced valuable and comprehensive analysis of Covered 911 Service Providers' facilities and strategies for delivering 911 service. The content of Alaska Communications annual certifications, however, has varied little since that initial filing. As such, Alaska Communications supports the Bureau's proposal to reduce the filing frequency to a biannual or triannual period. Nevertheless, such a long, multi-year cycle could increase the risk that a Covered 911 Service Provider might inadvertently overlook the due date of the filing when it does arrive. Therefore, if the Commission makes this change, Alaska Communications encourages the Commission to publish "reminder" notices sufficiently in advance of the due date in order to facilitate compliance.

In addition, Alaska Communications believes that there is no continuing need for a corporate officer to certify a Covered 911 Service Provider's annual reliability reports and that the Commission should reduce the burden of its rules by eliminating that requirement. The principal benefit of that requirement was to ensure that 911 reliability issues received immediate high-level attention from executive management of Covered 911 Service Providers. But, with 911 reliability now broadly understood and incorporated into network engineering and planning activities at all levels, the signature of a corporate officer is no longer necessary. Certainly, Title 47 is filled with Commission rules that do not require annual compliance certifications from a corporate officer, yet those rules remain enforceable in full against the service providers to which they apply. The 911 reliability rules should be no different.

**Conclusion**

For the foregoing reasons, Alaska Communications urges the Commission to amend its 911 reliability rules as described herein.

Respectfully submitted,

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