

February 18, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: *Ex Parte* Presentation, Improving Resiliency, Reliability and Continuity of
Mobile Wireless Communications Networks, PS Docket Nos. 13-239 and 11-60**

Dear Ms. Dortch:

On February 12, 2015, Scott Bergmann, Brian Josef, and Matthew Gerst of CTIA–The Wireless Association® (“CTIA”), met with Admiral David Simpson, Lisa Fowlkes, Jeffery Goldthorp, Lauren Kravetz, Renee Roland (via telephone), Mike Saperstein, and Eric Schmidt of the Public Safety and Homeland Security Bureau to discuss the Commission’s next steps in the above-referenced proceeding.

During the meeting, the parties discussed the Bureau’s stated goals of how best to provide relevant network status information to affected consumers and stakeholder agencies before, during and after disasters, and carrier efforts to address and enhance network reliability. CTIA noted its strong agreement that resiliency and reliability of wireless networks are extremely important to wireless consumers and to public safety, particularly during times of emergency. Further, CTIA explained that wireless providers prepare for and address disaster situations such as hurricanes, tornadoes and ice storms throughout the country each year. CTIA highlighted that, just as no two emergencies are the same, each wireless provider must address network reliability issues that are unique to their network. CTIA explained that each wireless provider has disaster and emergency preparedness plans that pertain to its unique network and apply to the particular emergency. CTIA’s Business Continuity and Disaster Recovery Certification Program, with its emphasis on planning, preparedness and partnership, has been a key driver to assist carriers in planning for network resiliency and restoration.

CTIA emphasized that any further inquiry in this proceeding should account for the redundancy and diversity that are core wireless network design principles, as well as network elements that assist with business continuity and restoration, such as cells on wheels (“COWs”), cells on light trucks (“COLTs”), and generators on a trailer (“GOATs”). The parties also discussed the need for intelligent coordination, education and outreach to wireless consumers, public safety, and stakeholders at the local, state and federal levels.

Finally, CTIA reiterated its past concerns that the 2013 proposed rule requiring the dissemination of the percentage of operational cell sites during and immediately after major

disasters in counties where the Commission has activated the Disaster Information Reporting System (“DIRS”) would neither help consumers compare how different carriers are able to withstand and recover from disaster conditions, nor create new incentives for carriers to harden their networks.

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions to the undersigned.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef

cc: Adm. David Simpson
Lisa Fowlkes
Jeffery Goldthorp
Lauren Kravetz
Renee Roland
Mike Saperstein
Eric Schmidt