



March 23, 2015

VIA ELECTRONIC FILING

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

**Re: Notice of *Ex Parte* Communication
PS Docket No. 13-239: Improving the Resiliency of Mobile Wireless
Communications Networks
PS Docket No. 11-60: Reliability and Continuity of Communications
Networks, Including Broadband Technologies**

Dear Ms. Dortch,

On March 19, 2015, D. Van Fleet Bloys, Sade Oshinubi, and the undersigned of PCIA – The Wireless Infrastructure Association (“PCIA”) met with Admiral David Simpson, Lisa Fowlkes, Renee Roland (via telephone), John Healy, and Michael Saperstein of the Public Safety and Homeland Security Bureau to discuss the Commission’s next steps in the above-referenced proceeding.

Consistent with its comments in the above-captioned dockets,¹ PCIA outlined the diverse concerns each individual communications provider must evaluate to deploy and maintain a reliable network. PCIA underscored the heterogeneous nature of today’s wireless networks, with its high degree of redundancy to ensure survivability of service in the event of a facility outage. PCIA also highlighted the ongoing efforts of the wireless infrastructure industry to provide additional network reliability through the utilization of neutral-host, shared backup power solutions.

PCIA emphasized that during any disaster or emergency, a multitude of factors can affect attempts to restore wireless service in the affected area, including access to public rights-of-way and provision of power and backhaul. In many cases, restoration involves factors outside of a communications provider’s direct control. PCIA further explained that providing redundant backhaul and backup power solutions can be met with specific state and local legal and regulatory barriers, including aesthetic and noise-related concerns. Therefore, increased

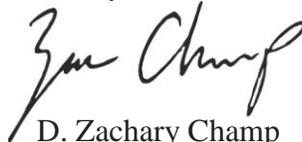
¹ Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 13-239, 11-60 (filed Jan. 17, 2014); Reply Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 13-239, 11-60 (filed Feb. 18, 2014).

understanding and cooperation by localities is integral to deploying resilient and reliable wireless networks.

The parties also discussed the potential for publically available network resiliency metrics that wireless providers could provide to a number of parties, including consumers, government officials and regulatory bodies, and public safety entities. PCIA understands and appreciates the interest in better understanding the various inputs that affect the resiliency and reliability of wireless networks. However, as noted above, today's wireless networks are inherently complex. Should the Commission choose to adopt metrics to measure network resiliency, any output data must fully account for the variety of factors necessary to deploy, maintain, and restore wireless services, including careful coordination with public and private entities. Informed and rational consumer choice can only be achieved with a clear and complete picture of providers' network resiliency and operational status, including factors within and without the communications providers' control.²

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter will be filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,



D. Zachary Champ
Director of Government Affairs
PCIA – The Wireless Infrastructure Association
500 Montgomery St., Suite 500
Alexandria, VA 22314

CC: Adm. David Simpson, Lisa Fowlkes, Renee Roland, John Healy, Michael Saperstein

² See Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 13-239, 11-60 (filed Jan. 17, 2014) at 2,6; see also Letter from Alexander Blake Reynolds, PCIA – The Wireless Infrastructure Association, to Marlene H. Dortch, Secretary, FCC, PS Docket Nos. 13-239, 11-60 (filed Aug. 5, 2014).