



**TABLE OF CONTENTS**

I. INTRODUCTION AND SUMMARY .....2

II. THE COMMISSION SHOULD REFRAIN FROM UNNECESSARY  
ACROSS-THE-BOARD REGULATION OF THE 9-1-1 ECOSYSTEM AND  
INSTEAD TARGET ITS EFFORTS TOWARD THE GAPS IDENTIFIED IN ITS  
MULTISTATE 9-1-1 OUTAGE REPORT .....4

III. THE COMMISSION SHOULD PURSUE MEANINGFUL BEST PRACTICES TO  
FLEXIBLY AND COMPREHENSIVELY ADDRESS GAPS RATHER THAN  
ADOPT PREMATURE AND OVERLY BROAD ADDITIONAL RULES.....5

IV. THE COMMISSION ALREADY HAS IN PLACE STRONG 9-1-1  
ACCOUNTABILITY REQUIREMENTS FOR MOBILE WIRELESS PROVIDERS .....7

V. THE PROPOSED RULES ARE POORLY SUITED TO THE ROLE OF WIRELESS  
PROVIDERS IN THE 9-1-1 ECOSYSTEM AND THE COMMISSION SHOULD  
NARROW THE SCOPE OF THOSE PROPOSALS .....10

VI. CONCLUSION.....13

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

In the Matters of	)	
	)	
911 Governance and Accountability	)	PS Docket No. 14-193
	)	
Improving 911 Reliability	)	PS Docket No. 13-75

To: The Commission

**COMMENTS OF CTIA—THE WIRELESS ASSOCIATION®**

CTIA—The Wireless Association® (“CTIA”) hereby submits the following comments in response to the above-captioned Notice of Proposed Rulemaking seeking to expand Commission rules imposing 9-1-1-specific accountability measures.<sup>1</sup> While CTIA and its members share the Commission’s commitment to advancing 9-1-1 reliability and resiliency, CTIA respectfully notes that:

- FCC efforts to address 9-1-1 reliability and resiliency should be evidence-based and refrain from unnecessary and redundant across-the-board regulation of the 9-1-1 ecosystem, given that the Commission already has in place strong 9-1-1 accountability requirements for Commercial Mobile Radio Service (“CMRS”) providers.
- The *Notice* is largely intended to address other elements of the 9-1-1 ecosystem, not CMRS providers. There simply is no basis to impose an additional layer of CMRS 9-1-1 accountability regulation.

Accordingly, the Commission should decline its two major proposals to (1) expand the definition of “covered 9-1-1 service providers” to include CMRS providers and (2) impose additional notification and certification requirements over the current regulations that exist for mobile wireless providers. The Commission instead should pursue the cooperative approach that exists

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<sup>1</sup> *911 Governance and Accountability*, Policy Statement and Notice of Proposed Rulemaking, 29 FCC Rcd. 14208, (2014) (“*Notice*”).

today among the Commission, the wireless industry, and public safety to utilize the Communications Security, Reliability, and Interoperability Council (“CSRIC”) and other relevant groups to identify best practices for enhancing 9-1-1 service reliability.

## I. INTRODUCTION AND SUMMARY

CTIA shares the FCC’s commitment to ensuring Americans’ “access to reliable and resilient 911 communications service.”<sup>2</sup> Mobile wireless providers have a long history of improving public safety communications, developing and deploying E911 solutions, and working with Public Safety Answering Points (“PSAPs”) and public safety officials to help improve the safety of wireless consumers. The “Roadmap for Improving E911 Location Accuracy” (“Roadmap”), developed by the four nationwide carriers, the Association of Public-Safety Communications Officials (“APCO”), and National Emergency Number Association (“NENA”), led to the Commission’s new 9-1-1 indoor location accuracy framework and is just the latest example.<sup>3</sup> Text-to-911 is another.<sup>4</sup> And CTIA members’ continued work in the CSRIC to advance the security and reliability of 9-1-1 communications remains significant and ongoing.<sup>5</sup> Reliability of

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<sup>2</sup> *Id.* ¶ 1.

<sup>3</sup> *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, FCC 15-9, PS Docket No. 07-114 (rel. Feb. 3, 2015) (“*9-1-1 Location Accuracy Fourth Report & Order*”) (adopting into rules an indoor location accuracy framework based in large part on the Roadmap).

<sup>4</sup> *See Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, Second Report and Order and Third Further Notice of Proposed Rulemaking, 29 FCC Rcd. 9846 (2014) (“[T]he progress already made by the four signatories to the Carrier-NENA-APCO Agreement by January 2014 illustrates the technical feasibility of text-to-911 implementation for other CMRS providers, including small and rural providers.”) (internal quotation omitted).

<sup>5</sup> *See e.g.*, FCC, *Communications Security, Reliability and Interoperability Council IV*, <http://www.fcc.gov/encyclopedia/communications-security-reliability-and-interoperability-council-iv> (last visited Mar. 23, 2015); CSRIC IV Working Group Descriptions and Leadership (updated Oct. 23, 2014), <http://transition.fcc.gov/bureaus/pshs/advisory/csric4/CSRIC%20IV%20Working%20Group%20Descriptions%2010%2023%2014.pdf> (describing Working Group 1 – NG911, Working Group 9

service is central to mobile wireless providers' 9-1-1 operations – and the Commission's existing rules already provide for CMRS 9-1-1 accountability. As detailed below, a new layer of proposed 9-1-1 regulations imposed on mobile providers will not further these goals.

By way of background, this proceeding follows on the heels of the *2013 9-1-1 Resiliency Order*, which adopted reliability rules for “covered 9-1-1 service providers” – entities (typically ILECs) that provide 9-1-1 service to PSAPs under a direct contractual relationship.<sup>6</sup> That order required covered 9-1-1 service providers to certify compliance with a series of best practices developed by CSRIC or make a showing of alternative measures sufficient to ensure 9-1-1 reliability. The current *Notice* significantly expands on the *2013 9-1-1 Resiliency Order* by proposing to expand the scope of covered service providers and proposing additional regulation of these providers notwithstanding that they are already subject to rules that are tailored to their specific role.

The *Notice* also follows the Public Safety and Homeland Security Bureau (“Bureau”)’s *Multistate 9-1-1 Outage Report* detailing a seven-state “sunny day” outage that occurred in April 2014.<sup>7</sup> As the Commission considers ways it might advance 9-1-1 reliability and resiliency goals, it should take stock of gaps that the Bureau’s report identified, gaps that do not suggest the need for additional regulation of mobile wireless providers. Next, the Commission should take

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– Infrastructure Sharing During Emergencies, Working Group 10 – CPE Powering); Communications Security, Reliability, & Interoperability Council Members (Dec. 2, 2014), [http://transition.fcc.gov/bureaus/pshs/advisory/csric4/CSRIC\\_Membership\\_022315.pdf](http://transition.fcc.gov/bureaus/pshs/advisory/csric4/CSRIC_Membership_022315.pdf) (including several representatives of CMRS providers).

<sup>6</sup> *Improving 911 Reliability, Reliability and Continuity of Communications Networks, Including Broadband Technologies*, Report and Order, 28 FCC Rcd. 17476 (2013) (“*2013 9-1-1 Resiliency Order*”).

<sup>7</sup> *April 2014 Multistate 911 Outage: Cause and Impact*, Report and Recommendations, Public Safety Docket No. 14-72, PSHSB Case File Nos. 14-CCR-0001-0007 (rel. Oct. 17, 2014), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-330012A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-330012A1.pdf) (“*Multistate 9-1-1 Outage Report*”).

into account the existence of current 9-1-1 and network outage rules that already place the appropriate level of regulatory accountability on mobile wireless carriers and other Originating Service Providers (“OSPs”).

In light of the Bureau’s *Multistate 9-1-1 Outage Report* and the existing rigorous safeguards, the Commission should refrain from extending and expanding “covered service provider” regulation to CMRS providers already subject to extensive 9-1-1 regulation and network outage reporting obligations that demand accountability and require wireless carrier reliability for wireless 9-1-1 calls. Rather, the Commission should pursue the cooperative approach that exists today among the Commission, the wireless industry, and public safety to utilize CSRIC and bodies like the newly created Task Force on Optimal PSAP Architecture to identify best practices and ways to improve 9-1-1 service.

**II. THE COMMISSION SHOULD REFRAIN FROM UNNECESSARY ACROSS-THE-BOARD REGULATION OF THE 9-1-1 ECOSYSTEM AND INSTEAD TARGET ITS EFFORTS TOWARD THE GAPS IDENTIFIED IN ITS MULTISTATE 9-1-1 OUTAGE REPORT**

The *Notice* identifies the April 2014 multistate 9-1-1 outage as the basis for its proposals but seeks to extend new layers of 9-1-1 reliability regulation to elements of the 9-1-1 ecosystem – including mobile wireless providers – that had no involvement in the outage and are already subject to accountability requirements. The Commission’s proposals to impose new requirements on mobile wireless providers are not justified by the findings in the *Multistate 9-1-1 Outage Report*.

A review of the *Multistate 9-1-1 Outage Report* does not identify any issues stemming from mobile wireless providers’ role in 9-1-1. Rather, the April 9, 2014 event was caused by a coding error in software designed to keep track of the trunk assignment for 9-1-1 calls assigned

to PSAPs around the country.<sup>8</sup> The problems were not sourced to OSPs such as mobile wireless providers that are responsible for originating and transmitting 9-1-1 calls, with location and other information, to a selective router. Instead, they occurred on the other side of the selective router, where 9-1-1 service providers and sub-contractors route and deliver 9-1-1 calls to the appropriate PSAPs.

The *Multistate 9-1-1 Outage Report* identified certain policy implications that are not directly relevant to mobile wireless providers' role as OSPs or in any event are already covered by existing CMRS 9-1-1 accountability requirements, as discussed below in Part III.<sup>9</sup> The *Multistate 9-1-1 Outage Report* called for the development of NG911 transition best practices, with CSRIC charged with developing such practices; sought enhanced coordination and improved situational awareness among different elements of the 9-1-1 ecosystem; and recommended further FCC action on reliability "as necessary."<sup>10</sup>

### **III. THE COMMISSION SHOULD PURSUE MEANINGFUL BEST PRACTICES TO FLEXIBLY AND COMPREHENSIVELY ADDRESS GAPS RATHER THAN ADOPT PREMATURE AND OVERLY BROAD ADDITIONAL RULES**

The proposals in the *Notice* are premature and overly broad. The Commission adopted the *2013 9-1-1 Resiliency Order* only 15 months ago, and it is just now being implemented with the first annual best practices certification due October 15, 2015.<sup>11</sup> That order envisioned that the Commission would gain experience with the 9-1-1 reliability rule before it looked to expand

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<sup>8</sup> *Id.* at 3.

<sup>9</sup> These issues include challenges posed by new entrants in the market as a result of NG911 system implementation, lack of adequate safeguards with new technology, the need for 9-1-1 capabilities to be distributed, the importance of communications in light of emerging, new 9-1-1 business relationships, VoIP vulnerabilities, and accountability in a transitional environment. *See Id.* at 19-25.

<sup>10</sup> *Id.* at 25-26.

<sup>11</sup> *Improving 9-1-1 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, 80 Fed. Reg. 10,618 (Feb. 27, 2015).

on it. The Commission established that it would conduct a review in five years to consider whether to revise the covered best practices or extend the resiliency rules to additional entities.<sup>12</sup> Nonetheless, the *Notice* declares that 9-1-1 accountability must be addressed now as a result of the Bureau's *Multistate 9-1-1 Outage Report*.<sup>13</sup> Whereas the *2013 9-1-1 Resiliency Order*'s certification standards were "based on best practices identified by CSRIC as critical or highly important,"<sup>14</sup> the *Notice* proposes rules without such guideposts. The *Notice* pursues enforceable rules, but no fewer than five times the Commission asks whether to invite CSRIC or another body to develop best practices to implement the Commission's vision for 9-1-1 reliability and resiliency.<sup>15</sup> An immediate move to regulation, therefore, will not serve the public interest. Instead, the Commission should pursue this work within the CSRIC and/or the Task Force on Optimal PSAP Architecture to identify best practices and ways to improve 9-1-1 service.

In addition, the *Notice*'s proposal to expand the scope of "covered 911 service providers" under Section 12.4 in response to the *Report* is unnecessarily broad. A mobile wireless provider would be required to certify that it takes "reasonable measures" – not defined – to provide reliable 9-1-1 service with respect to parts of its network "it uses to process and route 911 calls,"

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<sup>12</sup> *2013 9-1-1 Resiliency Order* ¶ 159.

<sup>13</sup> *Notice* ¶ 41.

<sup>14</sup> *2013 9-1-1 Resiliency Order* ¶ 4.

<sup>15</sup> See *Notice* ¶ 52 ("Would it be helpful for an advisory committee such as CSRIC to develop recommendations regarding the types of 911 network changes that should require public notification?"); *id.* ¶ 55 ("[S]hould CSRIC be charged with developing additional best practices or recommendations with respect to the discontinuance, reduction, or impairment of existing 911 services?"); *id.* ¶ 61 ("Would it be helpful for an advisory committee such as CSRIC to develop best practices and recommendations that would serve as a basis for a certification of compliance with best practices for new 911 capabilities and services? For example, should CSRIC be charged with recommending guidelines for the reliability and security risk analysis proposed above?"); *id.* ¶ 70 ("Should CSRIC be charged with developing recommendations on these topics?"); *id.* ¶ 72 ("What role could advisory committees such as CSRIC play?").

for example mobile positioning centers and gateway mobile location centers.<sup>16</sup> The *Notice*, however, contains no discussion of why another layer of regulation is warranted for mobile wireless providers already subject to significant 9-1-1 and network outage regulation. Rather, it primarily addresses the feasibility of extending certification requirements to entities that otherwise are not subject to Commission regulation, such as “agents and sub-contractors of covered 911 service providers” and providers of new IP-based services.<sup>17</sup> The Commission should pursue meaningful best practices to flexibly and comprehensively address these issues, rather than the *Notice’s* overly broad regulation as applied to mobile wireless providers.

#### **IV. THE COMMISSION ALREADY HAS IN PLACE STRONG 9-1-1 ACCOUNTABILITY REQUIREMENTS FOR MOBILE WIRELESS PROVIDERS**

The *Notice* does not consider the fact that the Commission’s existing rules already hold mobile wireless providers and others accountable for reliable 9-1-1. Section 20.18 of the Commission’s rules imposes significant obligations to provide 9-1-1 service, with granular performance metrics, and Section 4.9 requires timely network outage reporting and notification that together result in meaningful accountability for reliable wireless 9-1-1 service. The Commission cites to no evidence suggesting that these rules are failing to serve their purpose. Indeed, the Commission quite recently recognized in the *Wireless E911 Location Accuracy Fourth Report & Order* that the existing rules “establish clear milestones that gauge progress and ensure that there is clear accountability for all CMRS providers.”<sup>18</sup> Thus, there is no basis to

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<sup>16</sup> *Notice* ¶¶ 44, 42. The *Notice* exempts CMRS providers’ call origination network generally, such as individual cell sites. *Id.* ¶ 42.

<sup>17</sup> *Notice* ¶¶ 42, 57.

<sup>18</sup> *See 9-1-1 Location Accuracy Fourth Report & Order* ¶ 6.

expand the definition of a covered service provider under Section 12.4 in this proceeding to include CMRS providers.<sup>19</sup>

The Commission's current 9-1-1 CMRS regulatory framework imposes a panoply of rules that obviate the need to overlay the proposals found in the *Notice*. In particular, CMRS providers must comply with the following rules:

- All Calls. CMRS providers “must transmit all wireless 911 calls ... to a Public Safety Answering Point.” 47 C.F.R. § 20.18(b).
- TTY. CMRS providers also must be capable of providing TTY access to 9-1-1 for persons with speech or hearing disabilities. 47 C.F.R. § 20.18(c).
- Text-to-911. CMRS providers must have the capability to route a text-to-9-1-1 to the same PSAP that a 9-1-1 voice call would be routed. 47 C.F.R. § 20.18(n).
- Call-back Number and Location Information (“ANI” and “ALI”). For calls to 9-1-1, CMRS providers must also provide the caller's telephone number and location. 47 C.F.R. § 20.18(d)-(t). The Commission recently modified the location accuracy requirements for both indoor and outdoor calls, imposing even more granular performance metrics and several reporting and certification requirements.<sup>20</sup>
- Network Outage Reporting and PSAP Notification. CMRS providers must submit Network Outage Reporting System (“NORS”) reports for outages on their facilities if there is a loss of communications to a PSAP or Mobile Switching Center (“MSC”) switches or ANI/ALI services are lost for 30 minutes and potentially affect 900,000 user minutes. In such events, the CMRS provider notifies as soon as possible any official who has been designated by a 9-1-1 facility as the contact person for communications outages.<sup>21</sup>

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<sup>19</sup> Although the *Notice* identifies a single, two-hour wireless incident, *Notice* ¶ 25, there is no evidence of a growing trend of wireless 9-1-1 outages.

<sup>20</sup> See generally *9-1-1 Location Accuracy Fourth Report & Order*.

<sup>21</sup> CMRS providers must submit a report to the NORS of an outage “on any facilities that they own, operate, lease, or otherwise utilize” lasting at least 30 minutes if there is a loss of communications to a PSAP potentially affecting 900,000 user minutes and no re-route for all end-users is available, or there is a loss of 9-1-1 call processing in one or more E911 tandems/selective router for 30 minutes, or one or more end-office or MSC switches or host/remote clusters is isolated from 911 service for 30 minutes and potentially affect 900,000 user minutes or there is a loss of ANI/ALI for 30 minutes and potentially affect 900,000 user minutes. In such an event, the CMRS provider will notify as soon as possible any official who has been designated by a 911 facility as the provider's contact person for communications outages. 47 C.F.R. §§ 4.9(e), 4.5.

- Enforcement. If appropriate, the FCC has enforcement authority. 47 U.S.C. § 208.

These provisions, taken together, establish clear CMRS accountability for the reliable provision of 9-1-1. The *Notice* itself recognizes that the obligation to transmit all 9-1-1 calls, coupled with the duty to notify designated PSAP officials of disruptions, ensures that CMRS and other service providers “must be accountable for reliable service and responsive in the event of an outage.”<sup>22</sup> For mobile wireless providers and others, it is unclear what – if anything – another layer of redundant accountability regulation atop existing requirements would accomplish, other than to increase costs that will be passed on to all consumers. Extending Section 12.4 to mobile wireless providers is unwarranted and unwise.

Further, the proposal to revise Section 12.4 with a general reasonableness standard and certification – in place of specifics related to circuit diversity, central-office backup power, and diverse network monitoring – is similarly misplaced.<sup>23</sup> The *Notice* fails to identify any benefit to be achieved through the imposition of a separate oversight regime applied to mobile wireless providers already subject to the accountability provisions identified above.

In many ways, the rulemaking is getting ahead of Commission best practices. The better course here is to maintain the proactive collaboration that exists today among the Commission, the wireless industry, and public safety by working within CSRIC and other bodies, including the Task Force on Optimal PSAP Architecture, to identify best practices and ways to improve 9-1-1 service.

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<sup>22</sup> *Notice* ¶ 19.

<sup>23</sup> *Id.* ¶ 44.

**V. THE PROPOSED RULES ARE POORLY SUITED TO THE ROLE OF WIRELESS PROVIDERS IN THE 9-1-1 ECOSYSTEM AND THE COMMISSION SHOULD NARROW THE SCOPE OF THOSE PROPOSALS**

It is apparent that the *Notice's* specific rule proposals were not crafted with CMRS providers in mind. This disconnect underscores why the Commission should exclude mobile wireless providers from any further consideration.

*Major Change Notification.* The proposal lacks adequate specificity and, in any event, fails to explain the reasoning behind applying the “major change” concept to CMRS providers and other OSPs that do not interface with PSAPs. The *Notice* proposes a 60-day notification requirement ahead of any “major change” in 9-1-1 service, with the intent of promoting transparency for the general public and enhancing cooperation across the 9-1-1 ecosystem.

There are several problems with the proposal. First, the *Notice* proposes to classify nearly every “change in network architecture” as a “major change.”<sup>24</sup> This would seem to swallow a wide array of network activities, the vast majority of which are intended to upgrade service for all of a carrier’s users and thus are not 9-1-1-centric. In an effort to refine this definition, it asks whether CSRIC should develop guidance<sup>25</sup> – and makes clear that the proposal does not reflect any best practices, in contrast to the approach taken in the *2013 9-1-1 Resiliency Order* where the Commission responded to best practices that CSRIC developed and deemed “critical or highly important” to address specific needs.

Further, to the extent this proposal is tied to 9-1-1 operations, the *Notice* fails to explain what the 60-day general public notice period could accomplish, as it is not clear what the public would add with respect to modifications to those operations. As for wireless provider coordination with the 9-1-1 ecosystem, there is no evidence that wireless carriers have failed to

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<sup>24</sup> See *id.* at Appendix A.

<sup>25</sup> *Id.* ¶ 52.

engage in adequate information sharing with relevant 9-1-1 partners when they make changes. The 60-day waiting period can only slow innovative changes and advancements in the 9-1-1 space.

Finally, the *Notice* itself seems to recognize that the “major change” proposal may not be necessary as applied to the entire 9-1-1 ecosystem. Its primary concern appears to be that “an increasing number of covered 911 service providers are not ILECs” subject to existing network change notification requirements, and it expressly asks whether the rule should apply only to “ILECs and/or [systems service providers] providing 911 services directly to PSAPs.”<sup>26</sup> As these questions suggest, the “major change” proposal is unnecessary in the context of mobile wireless providers.

***Discontinuance, Reduction or Impairment.*** Similarly, mobile wireless providers already have substantial obligations under FCC rules regarding provision of service and discontinuance, including regulations that require provision of 9-1-1, along with granular metrics that relate to location accuracy and call delivery.<sup>27</sup> The Commission points to no evidence that mobile wireless providers are discontinuing service in a way that threatens PSAPs or consumers’ ability to access 9-1-1. While the Commission may have concerns about discontinuance, reduction, or impairment in other elements of the 9-1-1 ecosystem, there is no basis for such concern in the case of CMRS providers.<sup>28</sup>

***New IP-Based 9-1-1 Services.*** Nor is there a purpose to subjecting CMRS providers to the proposed certification process for “new services.” Rather, the intent of the proposal is to bring new NG911 providers under Commission oversight. As the *Notice* itself observes:

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<sup>26</sup> *Id.* ¶¶ 49, 51

<sup>27</sup> *See supra* Section III.

<sup>28</sup> *See Notice* ¶ 53.

[T]he increasing diversity of entities offering or planning to offer NG911 services increases the challenge of ensuring that all providers of such services will be capable of meeting appropriate standards of reliability and accountability. It is important that we set clear and consistent expectations with respect to the level of performance that providers of these services will be expected to achieve.<sup>29</sup>

The proposal does not address OSPs and the Commission should refrain from imposing a new rule like this on CMRS providers and other carriers in light of existing regulation.<sup>30</sup>

***Situational Awareness and Coordination.*** The *Notice's* proposal for new situational awareness and coordination requirements is likewise inappropriate in the case of CMRS providers. First, as the *Notice* observes, existing rules trigger CMRS outage reporting and notifications to designated PSAP officials pursuant to the requirements of Part 4.<sup>31</sup> The *Notice* provides no suggestion that these rules are inadequate and no evidence of a communications breakdown involving CMRS outages. Additional rules will increase compliance costs ultimately shouldered by consumers, with no commensurate increase in awareness or coordination. In addition, widespread sharing of proprietary information as envisioned in the *Notice* could create competitive injury. The Commission should carefully weigh whether there is a basis to pursue this proposal and, absent compelling evidence, refrain from taking action.

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<sup>29</sup> *Notice* ¶ 57.

<sup>30</sup> The Commission also should avoid actions that might inhibit the ability of state and local authorities to manage 9-1-1 services efficiently and effectively, especially in the transition to NG911. For example, the *Notice* proposes to establish a NOC at each PSAP, which could have the unintended consequence of limiting the ability of state and local governments to realize the efficiency gains from shared NG911 technologies. Instead, the Commission should encourage the CSRIC to identify best practices at the state and local level to address the issues identified in the *Report* without imposing additional and unnecessary requirements on mobile wireless providers.

<sup>31</sup> *Notice* ¶ 69.

## VI. CONCLUSION

For the reasons stated above, the Commission should refrain from extending new 9-1-1 accountability rules to CMRS providers, which are already subject to significant and extensive 9-1-1 and network outage reporting and notification requirements that ensure the provision of reliable and resilient service.

Respectfully submitted,

CTIA- THE WIRELESS ASSOCIATION®

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