



Federal Communications Commission
Washington, D.C. 20554

May 6, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: Ex Parte Presentation, *Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Dkt. Nos. 13-239; 11-60

Dear Ms. Dortch,

On April 28, 2015, members of the Federal Communications Commission's Public Safety and Homeland Security Bureau (PSHSB) and Wireless Telecommunications Bureau (WTB) met with representatives from CTIA—The Wireless Association (CTIA) (collectively "Participants"). The PSHSB representatives were: Ret. Adm. David Simpson, Chief, PSHSB; Lisa Fowlkes Renee Roland, Lauren Kravetz, John Healy and the undersigned. The WTB representatives were: Roger Sherman, Chief, WTB; Charles Mathias, and Johanna Thomas. The following individuals represented CTIA: Tom Power, Senior Vice President and General Counsel; Tom Sawanabori, Senior Vice President and Chief Technology Officer; Scott Bergmann, Vice President, Regulatory Affairs; and Brian Josef, Ass't Vice President, Regulatory Affairs.

The Participants generally discussed the 2013 *Notice of Proposed Rulemaking* in the above-captioned docket,¹ the goal of promoting transparency in order to improve the resiliency of wireless communications networks, and the need to ensure that the agency and communities, including state and local governments, first responders and consumers, are well-educated on the reliability and resiliency of mobile wireless networks serving those communities. In this vein, the Participants discussed the possibility of developing resiliency indicators that could facilitate communication between communities and their wireless providers about the readiness of commercial networks to survive and/or recover from likely disasters. The Participants discussed the possibility of alternative forms of informational disclosures that could be used to promote transparency of the wireless resiliency measures that service providers incorporate in various manners today, as suggested in the *Notice*.²

¹ *Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 13-239 and 11-60, Notice of Proposed Rulemaking, 28 FCC Rcd 14373, at para. 1 (2013) (*Notice*).

² *Id.* at 14393-94, paras. 58-59.

Representatives of the PSHSB and WTB also noted the importance of continued wireless deployment and the recent steps the Commission has taken to enhance deployment opportunities. They noted that standardized wireless resiliency transparency disclosures at a more granular level can serve as a powerful tool for communities and consumers in their emergency preparations and responses.

The Participants discussed possible elements of disclosure concerning wireless resiliency, including:

- Quantitative metrics for gauging the reliability and resiliency of the network (in coverage, capacity, and service performance) and for defining baseline service levels under normal operating conditions.
 - E.g., metrics for the deployment and use of batteries, fixed and portable generators, and/or other power-generating technologies to preserve the continuous operation of critical network facilities in the event of commercial power loss.
- Disclosure and notification practices – including dissemination of information regarding challenges specific to wireless networks – of any measures for ensuring network reliability, such as disclosure and notification with respect to :
 - Consumer outreach.
 - Measures designed to maintain continuous operation of critical network facilities in the event of a failure of power-generating technologies, such as securing access to mobile assets like “cells on wheels” and deployable generators.
 - Strategies to modulate or reinforce power loss mitigation efforts by the forecast and actual scale of the event(s) causing loss of power; ranging from events causing local loss of power to more wide scale catastrophic scenarios.
 - Hardening critical facilities.
 - Employing disaster recovery protocols, such as prioritized restoration of the most critical facilities.
 - Measures designed to preserve critical public safety functions (*e.g.*, access to 911, alerting, priority services) in all operating conditions, including during periods of network congestion.

Sincerely,

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cc: Participants