



Federal Communications Commission
Washington, D.C. 20554

June 3, 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 May 19, 2015, members of the Federal Communications Commission's Public Safety and Homeland Security Bureau (PSHSB) and Wireless Telecommunications Bureau (WTB) met with representatives from Competitive Carriers Association (CCA) (collectively "Participants"). The PSHSB representatives were: Ret. Adm. David Simpson, Chief; Jeff Goldthorp, Renee Roland, John Healy, Kelley Chittenden and the undersigned. The WTB representatives were Charles Mathias, and Johanna Thomas. The following individuals represented CCA: Rebecca Thompson, General Counsel; Sean Spivey, Assistant General Counsel; and Bradley Blanken, Vice President Industry Development.

The Participants generally discussed the 2013 *Notice of Proposed Rulemaking* in the above-captioned docket¹ and the goal of promoting transparency in order to improve the resiliency of wireless communications networks. PSHSB representatives discussed the need to ensure that the agency and communities, including state and local governments, first responders and consumers, are well-educated on the physical reliability and resiliency of mobile wireless networks serving those communities. In this vein, the Participants discussed the possibility and challenges 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 and implementation hurdles 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 The Participants discussed the value to different stakeholders of having predefined and clearly articulated resiliency protocols and procedures as well as their possible

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.

uses and the costs versus benefits of implementing indicators in sparsely populated, high-cost service areas.

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, particularly those communities that are prone to disaster scenarios. The Participants also discussed the need to balance the value of any disclosures against the commercial and security interests carriers have in protecting proprietary information about their networks.

The PSHSB and WTB representatives 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.

The PSHSB and WTB representatives discussed qualities that could make resiliency disclosures practical and valuable for communities, including:

- Accurately defining elements of resiliency and conveying their importance in resiliency planning.
- Once the elements are defined, developing disclosures for each element that are appropriately detailed for the target audience (e.g., consumers, governments, first responders).

- Conveying a provider's current level of resiliency and any desired future state of resiliency, if applicable.
- Promoting better real-time outage information in the event of a disaster.

Sincerely,

____/s/____

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cc: Participants