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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: *In the Matter of Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket No. 15-80; and *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket No. 04-35.

Dear Ms. Dortch:

On August 24, 2015, Joe Marx, Cathy Carpino and I of AT&T Services, Inc. (AT&T), met with Jeffery Goldthorp, John Healy, Brenda Villanueva, Scott Mackoul, Michael Caiafa, Julia Tu, Lisa Hartigan, and Eric Schmidt of the FCC's Public Safety and Homeland Security Bureau. Attending the meeting via telephone were John Chapa and Jason Decuir of AT&T, and Theodore Marcus and Jerome Stanshine of the Bureau. The purpose of the meeting was to discuss various proposals contained in AT&T's July 16th comments.¹

Consistent with these comments, we explained that, in AT&T's experience, OC3s are typically used for enterprise local loop and access services and thus reporting based on OC3 outages is more likely to capture outages on the edge of the network, rather than outages in the core of the network. Because these outages are normally captured by the various other outage criteria (e.g., 900,000 user-minutes), outage reporting based on OC3s would be largely redundant, and increasing the threshold to OC12s would give the FCC different visibility into network outages. Further, we discussed our proposal to report on outages based on the provisioned working capacity of the circuit (i.e., the percentage of the circuit dedicated to voice channels).

We also discussed the Commission's proposal to require providers to report a simplex event as an outage if the simplex event is not resolved within 48 hours. We reiterated our opposition to this proposal, detailed in our comments, and we explained why those same concerns exist if the Commission modified its proposal from 48 hours to three days. In addition, staff asked whether we could support defining a "significant degradation" to a PSAP as one in which at least 80% of the trunks serving that PSAP are disabled. Staff agreed that, in practice, this proposal would only apply to PSAP trunk groups with at least 5 members. Staff also asked how long AT&T would require to implement this proposal if adopted. AT&T is still analyzing what changes it would have to make to its systems in order to comply with such a revised rule. We will supplement the record at a later date with this information.

¹ Available at <http://apps.fcc.gov/ecfs/document/view?id=60001116209>.

In accordance with the Commission's rules, this letter and the attached presentation are being filed in the above-referenced dockets via the FCC's Electronic Comments Filing System.

Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to be "J. M. F." with a stylized flourish at the end.

Cc (via electronic mail): Mr. Jeffery Goldthorp
Mr. Michael Caiafa
Ms. Lisa Hartigan
Mr. John Healy
Mr. Scott Mackoul
Mr. Theodore Marcus
Mr. Eric Schmidt
Mr. Jerome Stanshine
Ms. Julia Tu
Ms. Brenda Villanueva