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VIA ELECTRONIC FILING

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

Re: *Improving Outage Reporting for Submarine Cables and Enhancing Submarine Cable Outage Data*, GN Docket No. 15-206

Dear Ms. Dortch:

On October 13, 2015, in connection with the above-referenced proceeding, Jonathan Kriegel, the President and Chief Executive Officer of DOCOMO PACIFIC, Inc. ("DPI"), James Hofman, DPI's Chief Legal Officer, and the undersigned of Wiley Rein LLP, counsel to DPI, met with Jeffery Goldthorp, Theodore Marcus, Mike Saperstein, and Peter Shroyer with the Cybersecurity and Communications Reliability Division, Public Safety and Homeland Security Bureau, and Denise Coca, David Krech, and Gabrielle Kim with the Policy Division, International Bureau.

During this meeting, we discussed the recent outage experienced by PTI Pacifica, Inc., d/b/a IT&E ("IT&E"), which operates the only submarine cable system between Guam and the primary inhabited islands that comprise the Commonwealth of the Northern Mariana Islands ("CNMI"), including Saipan, Rota and Tinian. This outage, which was the result of a cut in IT&E's undersea cable just offshore between the islands of Saipan and Tinian, resulted in a loss of all DPI's cellular (both 2G and 3G) and Internet service, including the ability of residents to call emergency services. We also explained DPI's efforts to help IT&E repair its undersea cable as well as its microwave facilities, which had been inoperative for some time and thus unavailable even for low bit-rate service.

DPI expressed its support for the Commission's proposals to extend outage reporting requirements to undersea cable licensees. As DPI explained, requiring undersea cable licensees to report outages would help the industry develop best practices in addressing outages. It also would ensure that operators of undersea cable systems collect and report information about system outages and planned repairs. Even if such information is considered confidential for purposes of the Commission's outage reporting rules, operators would be more readily able to keep

system users informed of the extent of the outage and associated repair efforts – comprehensive information that DPI had difficulty obtaining from IT&E during its recent outage.

While it currently leases capacity on IT&E's submarine cable system, DPI also explained during the meeting that it is exploring whether to deploy a second undersea system that would provide much-needed redundancy between Guam and the CNMI. DPI indicated that it supports extending network outage reporting to undersea cable licensees, both in its capacity as a current user as well as a potential operator of a submarine cable system.

Pursuant to 47 C.F.R. § 1.1206 of the Commission's rules, please include this ex parte filing in the above-referenced docket.

Sincerely yours,

Bennet W. Ross

BLR:rw

cc: Jeffery Goldthorp
Theodore Marcus
Mike Saperstein
Peter Shroyer
Denise Coca
David Krech
Gabrielle Kim