



1401 H Street NW
Suite 600
Washington DC
20005-2164

Tel (202) 326-7300
Fax (202) 326-7333
www.usta.org

July 20, 2004

**SUMMARY OF
EX PARTE PRESENTATION**

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWA325
Washington, DC 20554

**Re: New Part 4 of the Commission's Rules Concerning Disruptions to
Communications, ET Docket No. 04-35**

Dear Ms. Dortch:

On July 19, 2004, David Kanupke and I, representing the United States Telecom Association (USTA), Karen Possner, representing BellSouth Corporation, and Archie McCain, representing BellSouth Telecommunications, Inc., met with Jeffery Goldthorp, Whitey Thayer and John Healy of the Network Technology Division of the Federal Communications Commission's Office of Engineering and Technology. The purpose of the meeting was to discuss the status and direction of the proceeding regarding service outage disruptions, ET Docket No. 04-35.

USTA expressed concern that the Commission may vote on an order before it has taken adequate time to consider all of the comments and reply comments filed in this docket. Consistent with its prior filings in this proceeding, USTA emphasized its objections to proposed reporting thresholds for outages affecting SS7 ISUP messages, DS3s, airports, tandems and E911 services. USTA repeated concerns about the increased regulatory and economic burdens that the proposed reporting requirements would impose on carriers as well as concerns about public disclosure of critical infrastructure information contained in outage reports. Finally, USTA explained its proposed alternative to the common metric proposed by the FCC, which is to rely on blocked call counts or on affected network access lines, if blocked-call data is unavailable.

Ms. Marlene Dortch
July 20, 2004
Page 2 of 2

In accordance with Section 1.1206(b)(2) of the Federal Communications Commission's rules, I am filing this letter electronically with your office for inclusion in the public record. Please feel free to telephone me at (202) 326-7223 with any questions.

Sincerely,



Indra Sehdev Chalk
Corporate Counsel

cc: Jeffery Goldthorp
Whitey Thayer
John Healy