

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	GN Docket Nos. 09-47, 09-51, 09-137
)	PS Docket Nos. 06-229, 07-100, 07-114
Public Safety, Homeland Security, and)	WT Docket No. 06-150
Cybersecurity Elements of the National)	CC Docket No. 94-102
Broadband Plan)	WC Docket No. 05-196
)	
)	DA 09-2133
)	NBP Public Notice #8



COMMENTS

The National Telecommunications Cooperative Association (NTCA)¹ submits these comments in response to the Federal Communications Commission (Commission or FCC) September 28, 2009 Public Notice seeking comment on public safety, homeland security, and cybersecurity as part of the National Broadband Plan (Public Notice).² NTCA rural telco members are keenly interested in promoting public safety, homeland security and cybersecurity within their service territories. NTCA assists in furthering the Commission’s goals to increase public safety, homeland security and cybersecurity by providing educational seminars, such as

¹ NTCA is a premier industry association representing rural telecommunications providers. Established in 1954 by eight rural telephone companies, today NTCA represents 585 rural rate-of-return regulated telecommunications providers. All of NTCA’s members are full service rural local exchange carriers (LECs) and many of its members provide wireless, cable, Internet, satellite and long distance services to their communities. Each member is a “rural telephone company” as defined in the Communications Act of 1934, as amended (Act). NTCA’s members are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

² *Public Safety, Homeland Security, and Cybersecurity Elements of the National Broadband Plan*, Pleading Cycle Established for Comment, GN docket Nos. 09-47, 09-51, 09-127; PS Docket Nos. 06-229, 07-100, 07-114; WT Docket No. 06-150; CC Docket No. 94-102; WC docket No. 05-196, DA 09-2133, Public Notice (rel. Sep. 28, 2009) (Public Notice).

National Telecommunications Cooperative Association

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the Commercial Mobile Alert System (CMAS) webcasts, and by participating in the Commission-sponsored advisory committee, Communications Security, Reliability and Interoperability Council (CSRIC).

I. EDUCATION IS KEY TO SUCCESSFUL IMPLEMENTATION OF THE CMAS PROGRAM AND OTHER PUBLIC SAFETY ALERT SYSTEMS.

The Commission seeks comment on what actions must the Commission or other entities take to ensure interoperability among public safety broadband systems.³ The Commission also asks how broadband technologies can improve the effectiveness of emergency alerts for rural Americans.⁴ The Commission can ensure better interoperability and increase effectiveness for emergency alerts in rural areas by continuing to support public safety educational efforts, such as NTCA's CMAS webcast, and by sponsoring advisory committees, such as the CSRIC.

A. NTCA Educational Webcasts Enhance Knowledge About the CMAS Emergency Alert for Public Safety in Rural Areas.

One key program the Commission should continue supporting to enhance public safety, especially in rural areas, is the Commercial Mobile Alert System (CMAS) being implemented by the Commission, the U.S. Department of Homeland Security (DHS), and the Federal Emergency Management Agency (FEMA), which is part of DHS. In October 2009, the Alliance for Telecommunications Industry Solutions (ATIS) announced release of its ATIS/TIA Federal Alert Gateway to CMSP Gateway Interface Specification, which is the list of "C" interface specifications for the commercial mobile service (CMS or wireless) provider/alert gateway interface and part of the new Commercial Mobile Alert System (CMAS) wireless emergency alert program. This voluntary national alert system, created as part of Congress' Warning, Alert and Response Network Act (WARN Act), is designed to provide timely and accurate emergency

³ Public Notice, p. 2.

⁴ *Id.* at 3.

warnings of natural disasters, terrorist attacks, war situations, and other hazards, down to the county level.⁵ The WARN Act “requires the Commission to adopt rules allowing any CMS provider to transmit emergency alerts to its subscribers; requires CMS providers that elect, in whole or in part, not to transmit emergency alerts to provide clear and conspicuous notice at the point of sale of any CMS devices that they will not transmit such alerts via that device; and requires CMS providers that elect not to transmit emergency alerts to notify their existing subscribers of their election.”⁶

Wireless service providers will have a limited time to reconfigure their networks with DHS’ new “C” Interface specifications so they can participate and transmit the national, regional, state and local emergency alerts. NTCA sponsored a webcast seminar on CMAS on May 13, 2008 and is sponsoring an updated webcast on December 8, 2009 to educate its members on the “C” carrier interface specifications issued by DHS and FEMA. Also discussed during the webcast will be how CMAS integrates into the DHS’ overarching emergency alert program, called the Integrated Public Alert and Warning System (IPAWS).

The CMAS webcast will cover the “C” Interface specifications for commercial mobile service (CMS) providers, CMAS implementation timeline, the role of DHS/FEMA as the Alert Aggregator and the Alert Gateway, and FEMA’s IPAWS program. Also covered will be the use of common alert protocols, format and language restrictions of alerts, geo-targeting at the county-wide level, accommodations for disabled and elderly persons, crafting notices to subscribers, cost recovery, election time line, and testing procedures. Key DHS, FCC and NTCA staff will analyze the technical and policy questions surrounding the “C” Interface

⁵ Section 602(b), Warning, Alert and Response Network Act (WARN Act), Title IV of the Security and Accountability For Every Port Act of 2006, Pub. L. No. 109-347, 120 Stat. 1884 (2006).

⁶ *In the Matter of The Commercial Mobile Alert System*, PS Docket No. 07-287, FCC 08-184, Third Report and Order (rel. Aug. 7, 2008), ¶ 1.

Specifications and the CMAS program. This interactive webcast is an example of one of NTCA's educational efforts to help its members advance public safety through this important national wireless emergency alert program. NTCA appreciates the Commission's support on CMAS and encourages the Commission to continue supporting educational outreach efforts regarding public safety.

B. The Commission's CSRIC Advisory Committee Offers New Opportunities for Rural Education and Input on Public Safety, Homeland Security, and Cybersecurity.

On October 26, 2009, the Commission announced the formation of the Communications Security, Reliability and Interoperability Council (CSRIC), a new advisory committee designed to provide recommendations to the Commission "regarding best practices and actions ... to ensure optimal security, reliability, and interoperability of communications systems, including telecommunications, media and public safety communications systems."⁷ The CSRIC was created pursuant to the Federal Advisory Committee Act with a charter renewed until March 18, 2011.⁸

CSRIC, headed by Commission staff of the Public Safety and Homeland Security Bureau, currently has 57 members, including rural representation from NTCA. CSRIC's duties also include developing best practices to promote reliable 911 and enhanced 911 (E911) service, recommending ways to improve the Emergency Alert System, and suggesting ways to strengthen collaboration between communication service providers and public safety groups.⁹

NTCA and other rural delegates will be able to better shape national public safety, homeland security and emergency alert policies by bringing the rural perspective to the

⁷ *FCC Announces Membership of the Communications Security, Reliability, and Interoperability Council (CSRIC)*, Public Notice, DA 09-2297 (rel. Oct. 26, 2009) (CSRIC Public Notice).

⁸ 5 U.S.C. Appendix 2; CSRIC Public Notice, p. 1.

⁹ CSRIC Public Notice, p. 2.

Commission's discussions. This committee represents another positive step toward the goal of interoperability among broadband providers of all size and territory. Commission support of NTCA's educational efforts, formation of the CSRIC, as well as other public safety interoperability education measures, will enhance this country's security and shorten the response time to natural and man-made disasters and other emergencies.

II. CONCLUSION

For these reasons, the Commission should continue its support of the Commercial Mobile Alert System (CMAS) and public safety educational efforts such as NTCA's CMAS webcasts. The Commission should also continue its support of the CSRIC, a cross-industry advisory committee of which NTCA is a part.

Respectfully submitted,



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November 12, 2009

CERTIFICATE OF SERVICE

I, Adrienne L. Rolls, certify that a copy of the foregoing Comments of the National Telecommunications Cooperative Association in GN Docket Nos. 09-47, 09-51, 09-137, PS Docket Nos. 06-229, 07-100, 07-114, WT Docket No. 06-150, CC Docket No. 94-102, WC Docket No. 05-196, NBP Public Notice # 8, DA 09-2133, was served on this 12th day of November 2009 by first-class, United States mail, postage prepaid, or via electronic mail to the following persons:

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