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September 2, 2010

Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Public Notice, DA 10-1245, released July 2, 2010

ET Docket No. 4-35; WC Docket 05-271, GN Docket Nos. 09-47, 09-51, 09-137

Ex parte communication pursuant to Section 1.1206 of the Rules

Dear Madame Secretary:

The National Emergency Number Association (“NENA”) supports the opening of a proceeding to consider the extension of network outage reporting to interconnected VOIP and Broadband Internet Service providers (“BISPs”). As we move to broadband networks, public safety/9-1-1 will grow more dependent on these systems and we must make sure we can rely on them. We believe outage reporting will help in that effort.

NENA supported in 2004 the extension of reporting to wireless and satellite providers meeting certain criteria.¹ We agree generally with the comments of Intrado and several state public utility commissions that VOIP providers and BISPs should report major disruptions in much the same fashion as now provided in Part 4 of the Rules. We recognize, as do these commenters, that “any new outage reporting requirements [should] appropriately address IP-based provider characteristics.”²

¹ Reply Comments, ET Docket No. 04-25, June 24, 2004. The FCC adopted expanded rules later in that year. Report and Order and Further Notice of Proposed Rulemaking, FCC 04-188, released August 19, 2004.

² Reply Comments, Massachusetts Department of Telecommunications and Cable, August 16, 2010, 2.

NENA looks forward to participating in any proceeding to consider extension of outage reporting, as recommended by the National Broadband Plan.

Sincerely,

James R. Hobson

cc: Jennifer Manner, PSHSB/FCC