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October 8, 2010

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VIA ELECTRONIC FILING

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

Re: Ex Parte Notification, ET Docket No. 04-35, WC Docket No. 05-271, GN Docket Nos. 09-47, 09-51, 09-137

Dear Ms. Dortch:

On October 6, 2010, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) and its Network Reliability Steering Committee (NRSC) met with representatives from the Public Safety and Homeland Security (PSHS) Bureau to discuss principles surrounding the possible sharing of information pertaining to interconnected VoIP and broadband internet service provider networks. The eight principles outlined in the attached presentation were discussed.

In attendance on behalf of ATIS and its NRSC were: Stacy Hartman, NRSC Co-Chair and Director-Public Policy, Qwest; Robin Howard, NRSC Co-Chair and Network Operations Manager, Verizon; Jackie Voss, ATIS Manager; and Thomas Goode, ATIS General Counsel.

Representing the PSHS Bureau at the meeting were: Jeffrey Goldthorp, Chief of the Communications Systems Analysis Division; John Healy, Associate Chief, Communications Systems Analysis Division; Vernon Mosley, Engineer; and Greg Intoccia, Legal Counsel.

If you have any questions, please contact the undersigned at (202) 434-8830.

Sincerely,

Thomas E. Goode
General Counsel



**Alliance for Telecommunications Industry Solutions
Network Reliability Steering Committee (NRSC)**

**Interconnected VoIP Provider and Broadband ISP
Information Exchange**

October 6, 2010



Network Reliability Steering Committee

- The ATIS NRSC addresses network reliability improvement opportunities in an open, consensus-based environment and advises the communications industry through the development of standards, technical reports, bulletins, best practices, and annual reports.
- To accomplish its mission, the NRSC:
 - Identifies and analyzes potential network reliability issues;
 - Provides industry feedback to the FCC on network reliability and on the FCC's Network Outage Reporting System (NORS) and Disaster Information Reporting System (DIRS); and
 - Serves as an educational resource on network outage trends and the industry's ongoing efforts to resolve network reliability concerns.



Network Reliability Steering Committee

- NRSC members include wireless, wireline and cable companies:
 - Alcatel-Lucent
 - AT&T
 - Cox Communications
 - MetroPCS
 - National Communications System (NCS)
 - Qwest
 - Sprint
 - Telcordia Technologies
 - T-Mobile
 - Verizon
- To facilitate discussions of sensitive outage data related issues, NRSC members have each signed a non-disclosure agreement.



NRSC Work: Broadband

- The NRSC has been examining issues pertaining to the reliability of broadband networks and services.
 - Over the past month alone, the NRSC has held 15 meetings on this issue.
- ATIS and its NRSC has presented a consistent core message pertaining to FCC initiatives around network reliability, resiliency, security and survivability.
 - The FCC should not disrupt industry work to develop standards, specifications and best practices pertaining to network reliability, resiliency, security and survivability.
 - The FCC should work collaboratively with the industry and industry groups such as the NRSC in examining such issues.



General Principles Pertaining to Broadband

Principle 1: Jurisdictional Issues

Jurisdictional issues must be addressed before the FCC adopts any rules pertaining to the reporting of interconnected VoIP and broadband internet service providers.

- The uncertainty surrounding jurisdictional issues must be resolved even before basic definitional issues such as “what is broadband” can be addressed.
- The industry stands ready to work with the FCC once the jurisdictional issues are resolved.



General Principles Pertaining to Broadband

Principle 2: Part 4 Outage Reporting Rules

The FCC's Part 4 outage reporting rules should not be applied to interconnected VoIP providers or broadband ISPs.

- There are significant differences between PSTN and broadband networks, including but not limited to failures and customer impacts.



General Principles Pertaining to Broadband

Principle 3: Information Exchange

ATIS NRSC recognizes the FCC has a desire for visibility into events and conditions in broadband networks that could potentially impact homeland security and public safety.

- Any future guidelines for information exchange on these events or conditions should be voluntary, evolutionary, reasonable, and implemented based on existing measurements that interconnected VoIP or broadband internet service providers utilize to internally monitor and/or track these events or conditions.
- Information exchanged should be electronically submitted using a government-industry mutually agreed upon data format.
- Information exchanged must also be protected as confidential and must comply with existing regulations pertaining to the privacy of customer data.



General Principles Pertaining to Broadband

Principle 4: Government-Industry Collaboration

Broadband information exchange guidelines should be developed through a strong collaborative government-industry relationship, including ATIS-sponsored workshops engaging broader industry representation.

- A process based on this relationship is the most efficient method of developing an industry-supported information exchange structure.
- Industry burden should be evaluated during development to accurately estimate overall industry resource requirements.
- Industry expertise should be leveraged to identify guidelines that provide information on the appropriate components of the broadband network that will provide visibility on events and conditions that may affect homeland security and public safety.

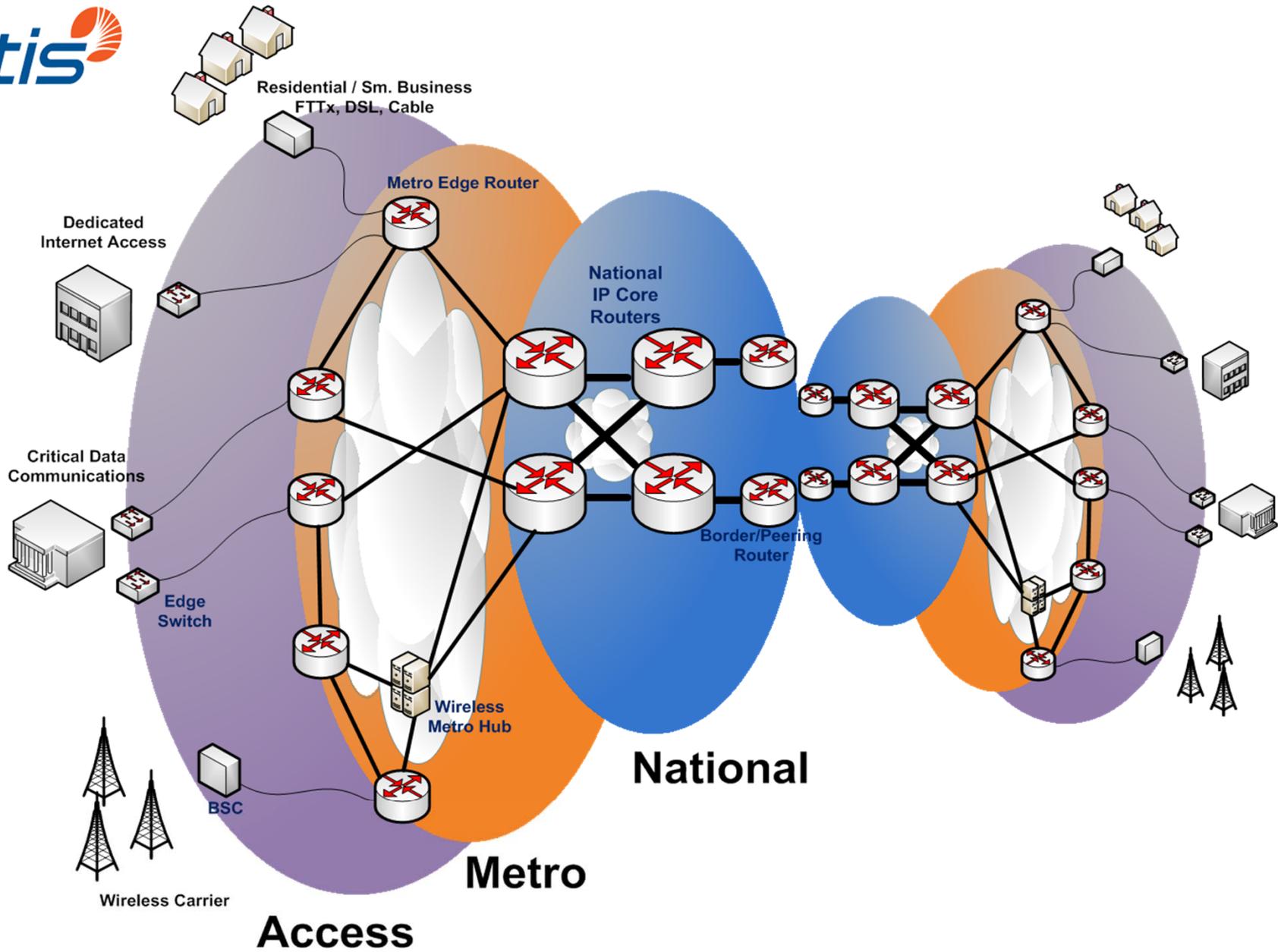


General Principles Pertaining to Broadband

Principle 5: Architecture, Terminology and Definitions

Information exchange guidelines should be developed on a standard network architecture proposal.

- A set of architecture references, such as Access, Metro, and National areas, should be defined as a basis for developing broadband information exchange guidelines, to include standard terminology and definitions.
- Guidelines should be applied neutrally, equally, and consistently regardless of the network components within a broadband network.



Higher Likelihood of Redundancy and Protected Transport →



General Principles Pertaining to Broadband

Principle 6: Thresholds and Timeframes

Broadband information exchange guidelines should establish thresholds and timeframes that are achievable and create a level playing field for all interconnected VoIP and broadband internet service providers.

- Thresholds and timeframes should ensure consistency and clarity for all information provided under these guidelines.
- Differences across industry segments and deployed technologies must be accounted for in any related guidelines.
- These guidelines should also reflect the complex and distributed nature of broadband networks and provide ample time for interconnected VoIP and broadband internet service providers to collect and provide information to the FCC on associated events and conditions.



General Principles Pertaining to Broadband

Principle 7: End Users

An end user's perception of broadband reliability is dependent on the user's selection of product type and category of service, and is also heavily dependent on the end user's equipment, maintenance practices, and technical expertise.

- Broadband information exchange should be limited to events in which there is a total loss of connectivity to the broadband network due to interconnected VoIP and/or broadband internet service provider physical infrastructure failures.



General Principles Pertaining to Broadband

Principle 8: Continued Industry Role

The industry should continue to have a role in evaluating and providing feedback/input on any information and information exchange mechanisms pertaining to interconnected VoIP and broadband internet service providers.

- The NRSC stands ready and willing to assist the FCC.



Contact Information

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