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VIA ECFS

February 22, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of 2010 Biennial Regulatory Review of Regulations
Administered by the Public Safety and Homeland Security Bureau –
PS Docket No. 10-270*

Dear Ms. Dortch:

Qwest Communications International Inc. (Qwest) submits these reply comments in response to the Federal Communications Commission's (Commission) December 30, 2010 *Public Notice* seeking comments as part of its 2010 Biennial Review of Telecommunications Regulations.¹ Qwest is filing these limited reply comments to note its support for the Alliance for Telecommunications Industry Solutions' (ATIS) proposed modification of the data collection requirements pertaining to the reporting of communications outages as articulated in ATIS' comments in the above-captioned proceeding.²

Qwest was actively involved in the development of the proposed modifications and agrees with ATIS that the Commission's implementation of these modifications pursuant to its Biennial Review will better facilitate the Commission's receipt of viable information pertaining to outages while also reducing carriers' significant burden in producing this information. Specifically, Qwest supports ATIS' recommendation that the Section 4.9 requirement of the Commission's rules requiring initial Notifications within 120 minutes be limited to outages resulting from vandalism or terrorism. For other outages, the Commission should develop a new

¹ See *Public Notice*, "Commission Seeks Public Comment in 2010 Biennial Review of Telecommunications Regulations," FCC 10-204, rel. Dec. 30, 2010.

² Alliance for Telecommunications Industry Solutions Comments, PS Docket No. 10-270 (filed Jan. 31, 2011).

Ms. Marlene H. Dortch
February 22, 2011

Page 2 of 2

reporting time frame. This will ensure that the outages that formed the basis for this requirement, *e.g.*, those resulting from terrorist acts, are not lost in the vast volume of reports currently filed pursuant to the requirement.³ And this modification will allow carriers to focus on determining the scope of the outage and resolving the outage.

Qwest agrees with ATIS that its proposed modification will be a good first step in what will hopefully be a productive dialogue between the Commission and the industry as to the best manner in which to collect data pertaining to outages while minimizing the reporting burden on carriers.⁴

Sincerely,

/s/ Harisha J. Bastiampillai

cc: Attached Certificate of Service

³ *Id.* at 4-5.

⁴ *Id.* at 6.

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **REPLY**
COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC. to be: 1) filed
via ECFS with the Office of the Secretary of the FCC in PS Docket No. 10-270; and 2) served
via e-mail on the FCC's duplicating contractor, Best Copy & Printing, Inc. at fcc@bcpiweb.com.

/s/ Richard Grozier

February 22, 2011