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July 26, 2011

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

Re: Ex Parte – In the Matter of the Proposed Extension of Part 4 of the Commission’s Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers Notice of Proposed Rulemaking, PS Docket No. 11-82

Dear Ms. Dortch:

On July 22, 2011, representatives of AT&T Services, Inc. (AT&T), specifically Joseph Marx – AVP, Federal Regulatory, Jim Bugel – AVP, Federal Regulatory, and the undersigned met with Jeff Goldthorp, Vernon Mosley, Gregory Intoccia and Jane Kelly of the Public Safety and Homeland Security Bureau to discuss the pending Notice of Proposed Rulemaking (NPRM) in the above referenced docket.

In the NPRM, the FCC proposes to extend the current Part 4 outage reporting requirements to interconnected VoIP and broadband Internet service.¹ The purpose of this meeting was for AT&T to gain clarification of the outage thresholds proposed and to discuss AT&T’s preliminary view of the NPRM with staff.

AT&T stated that the thresholds proposed in the NPRM appeared to be quality of service metrics rather than outage thresholds. AT&T also noted that, by using quality of service metrics, the proposed rules for measuring an interconnected VoIP service outage appeared to assess a higher standard on VoIP service providers than wireline or wireless service providers today. In response, staff expressed interest in alternative metrics, however, suggested that any alternatives proposed be specific not just to the measurements but the rationale behind the metrics.

¹ See In the Matter of the Proposed Extension of Part 4 of the Commission’s Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers, *Notice of Proposed Rulemaking*, PS Docket No. 11-82; FCC 11-74 (May 13, 2011).



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Lastly, AT&T proposed allowing VoIP and Broadband Internet Service providers to submit reports for VoIP and broadband service outages on a voluntary basis to allow the FCC to determine if the correct information is being collected, as well as to allow providers to implement new processes for collection of the data. The FCC indicated a voluntary process has not proven beneficial in the past but that it would be open to a longer implementation timeline.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif

cc: Jeff Goldthorp
Vernon Mosley
Gregory Intoccia
Jane Kelly