



**TELECOMMUNICATIONS
INDUSTRY ASSOCIATION**

HEADQUARTERS

2500 Wilson Boulevard
Suite 300
Arlington, VA 22201-3834
+1.703.907.7700

D.C. OFFICE

10 G Street, N.E., Suite
550 Washington, DC 20002
+1.202.346.3240 MAIN
+1.202.346.3241 FAX

tiaonline.org

September 15, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: *Ex Parte* Submission – EB Docket No. 06-119; PS Docket Nos. 10-92,
11-60, 11-82**

Dear Ms. Dortch:

On September 13, 2011, Mark Uncapher and Brian Scarpelli of TIA met with Jeffery Goldthorp, Assistant Bureau Chief, Cybersecurity and Communications Reliability; John Healy, Telecommunications Specialist, Communications Systems Analysis Division; Gregory Intocchia, Legal Counsel, Cybersecurity and Communications Reliability; Jane Kelly, Attorney Advisor; Vernon Mosley, Senior Engineer; all of the Federal Communications Commission's (Commission) Public Safety and Homeland Security Bureau (PSHSB), to discuss the above-noted proceedings.

TIA discussed its positions consistent with its filings on the reliability and continuity of communications networks, including broadband technologies,¹ as well as its filing on the proposed extension of Part 4 of the Commission's rules regarding outage reporting to interconnected voice over internet protocol (VoIP) service providers and broadband internet service providers (ISPs).²

Related to the FCC's Notice of Inquiry into the reliability and resiliency of the Nation's communications networks, the parties discussed issues related to possible backup power requirements. In particular, TIA noted that it does not believe that a uniform backup power requirement should be imposed, because such a requirement would erode the flexibility for network operators to make decisions based on the needs of particular sites.

¹ See Comments of TIA, PS Docket Nos. 11-60, 10-92, EB Docket No. 06-119 (filed Jul. 7, 2011).

² See Comments of TIA, PS Docket Nos. 11-82 (filed Aug. 9, 2011).

On the topic of the Commission's proposed extension of outage reporting requirements noted above, TIA first discussed ways in which the Commission could mitigate unnecessary burdens and costs to reporting entities through such means as voluntary reporting for interconnected VoIP providers and broadband ISPs. TIA also reiterated its position that any extended reporting requirements should apply only to licensed network operators, and not equipment vendors of which the network is comprised.

The parties present also discussed possible metrics that could be used for the purposes of determining whether an "outage" has occurred, and what the minimum level of these metrics should be. TIA urged for the use of criteria that employs thresholds which lie at a significant loss of functionality for primary uses, far away from temporary degradations in service that still allow for basic uses. Furthermore, TIA discussed the types of equipment that its members manufacture which can be used to monitor communications networks for outages.

Pursuant to Section 1.1206 of the Commission's rules,³ this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Mark Uncapher

Mark Uncapher
Director, Regulatory and Government Affairs

Brian Scarpelli
Manager, Government Affairs

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10 G Street N.E.
Suite 550
Washington, D.C. 20002
(202) 346-3240

cc: Jeffery Goldthorp
John Healy
Gregory Intoccia
Jane Kelly
Vernon Mosley

³ 47 C.F.R. § 1.1206