



Financial Services Sector Coordinating Council

for Critical Infrastructure Protection and Homeland Security

September 23, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: FSSCC Comments on Docket No. 11 – 82; The Proposed Extension of Part 4 of the Commission’s Rules Regarding Outage Reporting Over Internet Protocol Service Providers and Broadband Internet Service Providers

The Financial Services Sector Coordinating Council for Critical Infrastructure Protection and Homeland Security (“FSSCC”) appreciates the opportunity to comment on the Federal Communications Commission Notice of Proposed Rule Making to extend Part 4 of the Commission’s Rules regarding outage reporting to interconnected voice over internet protocol (VoIP) service providers and broadband internet service providers.

The FSSCC was established in 2002 in response to the September 11, 2001 attacks and at the request of the U.S. Treasury Department in harmony with several Presidential Directives requiring sector-specific Federal departments and agencies to identify, prioritize, and protect United States critical infrastructure and key resources and to establish partnerships with the private sector. The FSSCC currently has 52 member associations and financial institutions representing clearinghouses, commercial banks, credit rating agencies, exchanges/electronic communication networks, financial advisory services, insurance companies, financial utilities, government sponsored enterprises, investment banks,, retail banks, and electronic payment firms. The financial services sector has had a long-standing interest in enhancing telecommunications reliability and resiliency and has worked in partnership with the communications sector explaining our requirements and the criticality of resilient communications to the financial sector, describing the important need for route/cable information from providers and working collaboratively on the development of best practices and strategies to mitigate risks.

According to the notice, this extension will allow the FCC to monitor and analyze the reliability of these systems and work with network operators to prevent future outages. Members of the FSSCC believe that having metrics on outages is important for several reasons.

First, it is important that industry and FCC have a set of consistent metrics on outages so that root cause issues can be identified and continuous improvement can be achieved. Presently, it is often difficult to isolate Internet related connectivity issues.

Second, financial institutions increasingly rely on VoIP and other broadband services for core services and remote computing. In response to an event or crisis, financial institutions recover and resume critical operations by using VoIP and other broadband services. Recent events (e.g., Virginia earthquake, Hurricane Irene) reveal our dependence on telecommunications services and how disruptions can have significant impacts. With IP-based telecommunication being the new norm, it is important to have information on outages so that the FCC and ultimately financial institutions and other customers have a better understanding of the risks and potential impact.

Third, expanding outage reporting sends a signal to developers of emerging telecommunications technologies to design security and resiliency features into their products. The FSSCC strongly encourages ISPs to adopt practices that better protect networks, manage incidences, and address our long-standing concerns with Internet congestion during a time of crisis, including pandemics where large percentages of workers may telecommute.

Fourth, expanded outage reporting information could help financial services to comply with regulatory requirements mandating that financial institutions implement robust business continuity plans.

The financial services sector stands ready to work with the FCC in developing the reporting criteria for various service types that will be beneficial and required. You are welcome to contact me (jane.carlin@morganstanley.com or John Carlson (john.carlson@morganstanley.com), Co-chair of the FSSCC Policy Committee, if you need anything further. Thank you for the opportunity to comment.

Sincerely,

Jane D. Carlin
Chairperson of the Financial Services Sector Coordinating Council
Managing Director of Morgan Stanley