

# NENA

## The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

November 7<sup>th</sup>, 2011

RE: PS Docket No. 11-82, *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.*

Dear Mr. Chairman:

On behalf of NENA: The 9-1-1 Association and its more than 7,000 members across North America, I write to once again to support the Commission's efforts to improve 9-1-1 service by ensuring that adequate and timely data is available on network outages is available to the Commission.

As I know you are aware, snowstorms this past Winter caused widespread outages in broadband and VoIP networks in the immediate vicinity of Washington, D.C. As a consequence of these outages, some citizens of Montgomery County, Maryland, and Fairfax County, Virginia were unable to access 9-1-1 during and after the storms. Had the outage reporting rules proposed by the Commission in this docket been in place at that time, your staff could have used carrier-supplied data to inquire into the causes of these outages and work with carriers and PSAP personnel to manage and resolve them quickly. In addition, post-outage analysis could have been made available to carriers working to develop and implement best practices for outage avoidance and mitigation. Although NENA is acutely aware of the costs such a reporting requirement would impose upon broadband network operators and VoIP providers, we consider it important that the Commission have first-hand, self-reported data, rather than second- or third-hand media reports upon which to base its analysis and conclusions.

More generally, broadband network and VoIP service provider outage data could better inform the Commission's ongoing efforts to identify aspects of the 9-1-1 ecosystem that may require additional regulatory attention. As the Commission works to ensure that consistent and high-quality emergency calling service is available to consumers, the shift toward broadband access networks and IP-mediated originating services will necessitate a like shift in the Commission's regulatory focus. As NENA has repeatedly asserted, consumers have a right to expect that emergency calling service will be available, regardless of the type of access network or originating service they choose to purchase. Extending the Commission's Part 4 Outage Reporting Rules to cover broadband access networks and interconnected VoIP providers is a sensible and measured first step toward ensuring that consumers' rightful expectations in this regard will not be disappointed.

Sincerely,



Trey Forgety  
Director of Government Affairs