

November 21, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: PS Docket No. 11-82

Dear Ms. Dortch:

On behalf of TechAmerica's approximately 1,000 members, I write to comment briefly in regard to the Federal Communications Commission's ("Commission") Notice of Proposed Rulemaking ("NPRM") concerning extension of the Commission's rules regarding outage reporting to interconnected VoIP service providers and broadband Internet service providers ("ISPs").<sup>1</sup>

TechAmerica's members include VoIP and broadband ISPs, backbone network providers, and companies whose business depends on robust IP networks. TechAmerica, therefore, is always interested in policies that impact the deployment and utilization of IP networks.

TechAmerica supports the Commission's goal of ensuring reliable access to 9-1-1 systems. However, TechAmerica respectfully requests that the Commission not act hastily in its effort to facilitate such access via enhanced reporting obligations, as proposed in the NPRM. Rather, TechAmerica asks that the Commission explore less burdensome alternatives to the proposed rules and work with industry and the public safety community to develop a set of outage reporting criteria that is designed to provide meaningful information about actual service disruptions that affect access to emergency services.

TechAmerica appreciates the Commission's careful deliberation on this matter and welcomes the opportunity to work collaboratively with the Commission on this important endeavor.

Sincerely,

*/s/ Christopher E. Wilson*  
Christopher E. Wilson  
Director and Counsel, E-Commerce and Telecommunications

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<sup>1</sup> *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 (2011).