



December 7, 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex parte Notice: *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*, PS Docket No. 11-82

Dear Ms. Dortch:

This is to inform you that on December 5, 2011, Anthony Jones and Glenn Reynolds, representing USTelecom, met with the following staff of the Commission's Public Safety and Homeland Security Bureau in connection with the proceeding identified above: Jeffery Goldthorp, Lauren Kravetz, John Healy, Vernon Mosley and Greg Intoccia.

During this meeting, USTelecom discussed with staff steps that could be taken to more closely align any reporting requirements with the Commission's stated goal of ensuring that consumers have reliable access to emergency services. USTelecom stated that most commenters in this proceeding had urged that if the Commission were to adopt outage reporting requirements, any such requirements be limited to a complete loss of interconnected VoIP service. USTelecom concurs with this position and, accordingly, urged that any reporting be limited to significant outages of non-redundant network elements that affect a 911 special facility or prevent an interconnected VoIP provider's subscribers from accessing emergency services.¹ Limiting reporting requirements to such occurrences would be a more reasonable and less costly approach to achieving the Commission's stated goals than the requirements proposed in the *Notice of Proposed Rulemaking* in this proceeding that far exceeded providers' current abilities and procedures. USTelecom also urged the Commission to modify the proposed notification timelines in order both to reduce the burden on providers and to minimize the potential for such notification obligations to interfere with providers' efforts to restore service.

¹ Industry members suggest that a significant outage be defined as one potentially affecting at least 900,000 user minutes of interconnected VoIP service that results in a complete loss of service, as proposed in the NPRM.

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Pursuant to Commission rules, please include a copy of this notice in the record of the proceeding identified above.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn T. Reynolds". The signature is fluid and cursive, with a long horizontal stroke at the end.

Glenn T. Reynolds

cc: Jeffery Goldthorp
Lauren Kravetz
John Healy
Vernon Mosley
Greg Intoccia