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December 16, 2011

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

**Re: Outage Reporting – PS Docket No. 11-82**

Dear Ms. Dortch:

On December 15, 2011, Rick Chessen, Loretta Polk and Steve Morris of the National Cable & Telecommunications Association (NCTA) met with Lauren Kravetz, Jeffrey Goldthorp, Vernon Mosley, and Gregory Intoccia of the Public Safety and Homeland Security Bureau to discuss the above-referenced docket.

NCTA encouraged the Commission to move forward with establishing an outage reporting regime for interconnected Voice over Internet Protocol (VoIP) services that would focus on reporting of “hard down” outages. We explained that such an approach would provide the Commission with valuable outage data, but would be far less burdensome and less expensive to implement than the proposal in the Notice of Proposed Rulemaking because it would eliminate the need for significant investment in new equipment to monitor and report performance metrics (such as packet loss and jitter) at a geographically granular level. We expressed support for reducing the burden further by adopting a streamlined version of the rules applicable to circuit-switched services, with VoIP providers submitting fewer reports for each qualifying outage.

Consistent with NCTA’s August 2011 comments in this proceeding (at 9-11), we also encouraged the Commission not to impose mandatory reporting obligations on providers of broadband Internet access or backbone services and to pursue an approach based on public-private sector collaboration instead. Limiting any mandatory rules to VoIP services would be far less burdensome to NCTA’s members than a regime that applied mandatory reporting obligations to broadband services as well.

Ms. Marlene H. Dortch  
December 16, 2011  
Page 2

Please do not hesitate to call should you have any questions regarding this filing.

Respectfully submitted,

**/s/ Steven F. Morris**

Steven F. Morris

cc: L. Kravetz  
J. Goldthorp  
V. Mosley  
G. Intoccia