

December 20, 2011

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Written *Ex Parte* Communication, PS Docket No. 11-82

Dear Ms. Dortch:

On Monday, December 19, 2011, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Brian Josef, Assistant Vice President, Regulatory Affairs, CTIA-The Wireless Association®, met with Lauren Kravetz, Greg Intoccia, Michael Connelly, and Vernon Mosley of the Federal Communications Commission's Public Safety and Homeland Security Bureau. During the meeting, CTIA and Bureau Staff discussed the Commission's Broadband Outage Reporting proceeding.

The parties discussed how best to achieve the Commission's goal of ensuring reliable access to emergency services through reporting regulations in the event of a full, or "hard outage," occurring to interconnected VoIP service. CTIA addressed the reasonableness of reporting requirements for interconnected VoIP service, relative to broader rules proposed in the Commission's Notice of Proposed Rulemaking. In this vein, CTIA noted the potential for such regulations to be less onerous and less costly. CTIA underscored that providers' highest priorities in an outage are resolving the cause of the interruption and restoring service as quickly as possible. Accordingly, any reporting requirements should be narrowly tailored and manageable.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef

cc: Lauren Kravetz
Greg Intoccia
Michael Connelly
Vernon Mosley