



Federal Regulatory Affairs
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June 18, 2013

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

Re: *Improving 9-1-1 Reliability*, PS Dkt. No. 13-75; *Reliability and Continuity of Communications Networks, Including Broadband Technologies*; PS Dkt. No. 11-60

Dear Ms. Dortch:

On June 14, 2013, Todd Lewis, Assistant Vice President, Network Management, Ken Mason, Vice President Government and Regulatory Affairs, and the undersigned of Frontier Communications met with Jeffery Goldthorp, Lauren H. Kravetz, and Cecilia Mateo of the Commission's Public Safety and Homeland Security Bureau. In the meeting the participants discussed the concepts Frontier presented in its comments responding to the Commission's *Notice of Proposed Rulemaking*.¹

With respect to network auditing, Frontier's comments recommended an audit period of at least three years.² Frontier confirmed this position in the meeting and advised that any compliance requirement involving network auditing should be based upon audit completion by 2016. The extended compliance timeframe is necessary to ensure that carriers have sufficient time to complete the required auditing in an economically-feasible manner. Frontier clarified that it would have to devote nine full-time employees simply to the task of auditing in order to complete all necessary audits within a year and that it is not economically feasible for Frontier to do so. Frontier also confirmed that despite network auditing, some single points of failure are unavoidable due to geographic limitations.

On the subject of backup power requirements, Frontier reiterated that it is currently complying with best practices.³ Frontier raised concerns over what the Commission would consider as a "Central Office" for purpose of complying with any new backup power requirements. Frontier

¹ *In re: Improving 9-1-1 Reliability*, PS Dkt. Nos. 13-75; *Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Dkt. No. 11-60, *Notice of Proposed Rulemaking*, FCC 13-33 (rel. Mar. 20, 2013) ("*NPRM*"). Comments of Frontier Communications, PS Dkt. Nos. 13-75, 11-60 (filed May 13, 2013) ("Frontier Comments").

² Frontier Comments at 9.

³ *Id.* at 11-12.

currently has 2,689 host and remote offices that could be considered “central offices” due to their switching capabilities.⁴ Classifying all of these as central offices with the same backup power requirements would create a significant economic compliance burden.

The parties also discussed the *NPRM*’s proposed PSAP notification rules. Frontier explained that in an outage situation it has a database of escalating contact names that it uses to contact the appropriate party at the PSAP. Frontier also explained that PSAPs monitor their networks very closely and often quickly contact Frontier if there is any sign of a network disturbance. Frontier believes that if the Commission were to revise its rules on PSAP notification it should prioritize phone calls to the PSAP as the first line of communication, which is in accordance with Frontier’s practice. Such contact should be made within 60 minutes of knowledge of the outage. In the event that a service provider cannot reach the PSAP contact(s) by phone, it should then use electronic mediums, such as e-mail, in a best-efforts attempt to alert the PSAP contact. Any rules should also make clear that any communication whereby a PSAP first contacts the service provider (before the service provider can contact the PSAP) satisfies the service provider-PSAP contact under the Commission’s rules.

Pursuant to Section 1.1206(b) of the Commission’s rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

Sincerely,



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Vice President, Federal Regulatory Affairs
Frontier Communications
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cc: Jeffrey Goldthorp
Lauren H. Kravetz

⁴ We note that not all of these offices provide service to Public Safety Answering Points (“PSAPs”).