



April 16, 2013

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Ex Parte

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

Re: Notice of Oral Ex Parte Communications, PS Docket Nos. 13-75, 11-60

Dear Ms. Dortch:

On June 19, 2013, Nneka Ezenwa Chiazor, Kevin Green, Mark Montano, Gregory Romano, and Robert Schaeffer of Verizon met with Jeff Goldthorp, John Healy, Eric Schmidt, Michael Connelly, Julia Tu, and Cecilia Mateo of the Public Safety and Homeland Security Bureau and Bill Richardson of the Office of General Counsel to discuss the pending Notice of Proposed Rulemaking (NPRM) in the above referenced dockets.

At the meeting, we explained the benefits of an annual certification program centered on a core set of practices that would be developed by industry and other stakeholders. We discussed why current best practices require updating and refining by stakeholders before they could form the basis for a certification. We explained that this process would not create undue delays in starting such a program, particularly when CSRIC Working Group 10 has recently reviewed 911 best practices.

In addition, we described the network design reviews of PSAP trunking and ALI links for diversity that Verizon is undertaking for all the PSAPs it serves. Each review has required about 40 hours of engineering time, on average, which does not include the time for any remediation. In particular, these reviews require manual efforts to collate information from various different systems, and then automated assessments of diversity are performed. Engineers manually review the details of the assessments and together with design engineers, determine appropriate remediation, if any. The costs of subsequent reviews are unclear at this time, although they may require slightly less time to complete. Nonetheless, such reviews would still require a significant effort.

Furthermore, we discussed how Verizon provides backup power for its COs and the average cost estimates for generators (i.e., approximately \$1 million for fixed and \$300,000 for portable) included in our comments. We explained a number of reasons why it is not accurate to assume that generator costs would be significantly lower for smaller COs (e.g., portable generators are in many cases sized to be flexible to serve varying sizes of COs, including larger COs).

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Finally, we discussed why the Commission's PSAP notification rule should provide flexibility with respect to the manner of notification and how the rule should acknowledge the tradeoff between an immediate notification to the PSAP and the amount of information that can be conveyed to the PSAP at that time.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

Neta Chazor