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June 27, 2013

**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
12<sup>th</sup> Street Lobby – TW-A325  
Washington, D.C. 20554

**Re: Ex Parte – Improving 9-1-1 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies, Notice of Proposed Rulemaking, PS Docket No. 13-75; and PS Docket No. 11-60**

Dear Ms. Dortch:

On June 25, 2013, representatives of AT&T Services, Inc. (AT&T)—specifically, Joseph Marx, Michael Goggin, Mike Tan and the undersigned—met with representatives of the Public Safety & Homeland Security Bureau—specifically, Jeff Goldthorp, John Healy, Eric Schmidt, Cecilia Mateo, and Joel Thomas—via teleconference to discuss the pending Notice of Proposed Rulemaking (NPRM) in the above referenced dockets.<sup>1</sup>

The purpose of the meeting was for AT&T, at the request of the Bureau, to provide additional information on its Diversity Analysis Reporting Tool (“DART”), which monitors physical and logical diversity of critical circuits in AT&T networks, including 9-1-1 circuits and ALI/ANI links. During this discussion, AT&T discussed general cost assumptions regarding DART, including capital costs, operation/maintenance, and analysis/remediation of data outputs. AT&T noted that, after the initial development of the tool is complete, there are minimal incremental costs to operating and maintaining DART. We emphasized that these minimal incremental costs, however, do not include the costs of analyzing and remediating any identified lack of circuit diversity. And we noted that any additional cost information provided to the FCC associated with AT&T’s DART would have to be provided under confidential treatment.

At the Bureau’s request, AT&T provided additional details of our central office back up power standards. As we explained to the Bureau staff, all AT&T ILEC central offices have back-up battery arrangements, which are required to have a minimum of 4-hour battery reserve time when the Central Office has a permanent onsite backup generator. In AT&T ILEC central offices

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<sup>1</sup> See Improving 9-1-1 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket No. 13-75; PS Docket No. 11-60, *Notice of Proposed Rulemaking*, FCC 13-33 (March 20, 2013).

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without permanent on-site generators, the battery reserve is based upon either the minimum 4-hour reserve or the travel time to safely transport a temporary generator to the central office (whichever is greater). AT&T indicated that in some cases, depending on location of its central office, reserve time can generally range from 8 to over 24 hours in extremely remote locations. AT&T also noted that approximately 2,200 AT&T central offices serve over 3,200 PSAPs in AT&T's ILEC in-region footprint.

Pursuant to section 1.206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceeding.

Sincerely,

**/s/ Anisa A. Latif**

cc: Jeffrey Goldthorp  
John Healy  
Eric Schmidt  
Cecilia Mateo  
Joel Thomas