



September 6, 2013

Ex Parte

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

Re: Improving 9-1-1 Reliability, PS Docket No. 13-75

Dear Ms. Dortch:

This is to inform you that on September 4, 2013, representatives from USTelecom and member companies met with Louis Peraertz, Legal Advisor to Chairwoman Clyburn, in connection with the proceeding identified above. The following industry representatives attended this meeting: Nneka Chiazor and Mark Montano of Verizon; Anisa Latif of AT&T; Malena Barzalai of Windstream; Stacy Hartman of CenturyLink; and Anthony Jones and the undersigned of USTelecom.

During the meeting, the industry representatives discussed the potential adoption of a certification requirement relating to critical 911 reliability practices. We emphasized that any practices associated with such a requirement need to be directly related to ensuring 9-1-1 reliability, reasonably achievable, and not unnecessarily burdensome. The practices themselves should be voluntary so that carriers have sufficient flexibility to implement reliability practices best suited to individual circumstances. We expressed concern that this proceeding involved highly technical issues and it was imperative that the Commission develop a full record to support any practices it might identify.

The industry representatives emphasized the following points:

– Practices for circuit auditing should provide flexibility and allow providers to establish appropriate auditing practices and permit the use of logical audits and sampling. In-person or physical audits of assets for diversity would be exceedingly burdensome and provide little benefit over such alternatives.

– Practices associated with back-up power should not exceed 24 hours and should allow flexibility to use various power alternatives. In light of the Commission's prior recognition that 24-48 hours is typically sufficient to restore commercial power, a longer standard is likely to add little to public safety while potentially adding significant burdens to those companies seeking to

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meet such standards. The industry representatives also questioned the benefits of sharing with PSAPs sensitive back-up power information that pertains to carriers' overall networks.

– It is important that any new certification requirement provide adequate time for evaluation and preparation. The length of time that would be reasonable will necessarily depend on the practices included and how much burden is imposed on the companies to complete their review for conformance.

Pursuant to Commission rules, USTelecom is filing this notice in the docket identified above.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn T. Reynolds". The signature is written in a cursive style with a prominent flourish at the end.

Glenn T. Reynolds

c: Louis Peraertz