



November 26, 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 November 25, 2013, the following individuals met with Nicholas Degani, Legal Advisor to Commissioner Pai, and Jeffrey Neumann of the Media Bureau, in connection with the proceeding identified above: Joe Marx, AT&T; Malena Barzalai, Windstream; Stacy Hartman, CenturyLink; and Anthony Jones and the undersigned from USTelecom.

During this meeting, the industry representatives emphasized the importance of flexibility in order to best design their networks to ensure the reliability of 9-1-1 services. We explained that any kind of “one-size-fits-all” approach would fail to recognize the important differences in both networks and geographic considerations that providers evaluate when adopting network practices that best serve the mutual goal of reliability. The industry representatives indicated that they do not oppose a reporting requirement concerning company practices in the area of 9-1-1 network reliability, but stated that it was important that such reporting obligations are appropriately targeted; do not divert resources from either network deployment or from responding quickly to network outages; and maintain appropriate confidentiality of sensitive network information. We specifically expressed concern that auditing requirements that involved significant manual work would be exceedingly burdensome and could extend beyond the amount of time the Commission is considering between certifications. We also encouraged the Commission to ensure that any best practices recommended in the proposed order, such as with respect to back-up power, be well-grounded in established network design best practices.

Pursuant to Commission rules, I am including this notice in the docket of the proceeding identified above.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Reynolds".

Glenn Reynolds
Vice President, Policy

c: Nicholas Degani
Jeffrey Neumann