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Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 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 Tuesday, December 3, 2013, I spoke over the phone with Jeffrey Neumann from Commissioner Pai's office concerning the above-referenced matter, which is presently on the Commission's December 12, 2013, Open Meeting Agenda.

We discussed the certification process as proposed by staff in the upcoming order. Specifically, I expressed concern that the order appears to give the Public Safety and Homeland Security Bureau too much discretion to second guess the reasonability of alternative measures taken by carriers to certify compliance. Instead, the certification process should be more of a data collection process to get visibility into best practices utilized by carriers.

Sincerely,

/s/ Joseph P. Marx

cc:  
Jeffrey Neumann