

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Improving the Resiliency of Mobile Wireless Communications Networks)	PS Docket No. 13-239
)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies)	PS Docket No. 11-60
)	

COMMENTS OF THE VERMONT PUBLIC SERVICE BOARD

I. INTRODUCTION

On September 27, 2013, the Federal Communications Commission issued a Notice of Proposed Rulemaking to consider measures to promote transparency to consumers as to how mobile service providers compare in keeping their networks operational in emergencies. The Vermont Public Service Board (VPSB) submits these comments in response to the NPRM.

The NPRM raises a number of specific questions for comment. Generally, these questions address whether there would be value to consumers and policy makers if mobile service providers were required to provide information related to outages that have occurred in the event of a disaster. Under the NPRM, this information would include the percentage of their network sites that are operational in each county.

The VPSB supports the proposals in the NPRM. As the Commission and carriers have observed in the past, much of the telecommunications marketplace is competitive. Consumers have the option to select carriers based upon a range of factors, including the service offering, price, and the quality of service. Consumers often do not, however, always have readily

available information concerning the quality of service. This became apparent in the aftermath of several recent storm events in which consumers learned to their surprise that not all landlines worked. Similarly, consumers have little or no information on the likely reliability of their cellular service during such natural disasters.

Both consumers and competitors will benefit from any measures that disclose information that can help them make informed choices between carriers. For customers that view reliability of cellular service as important, information on which carriers had a relatively higher percentage of cellular locations operational during a storm event would be useful in selecting carriers. The VPSB recognizes that this information is imperfect --- outage differences between carriers may not necessarily reflect different policies on network resilience. Nonetheless, it is more valuable than having no information at all.

It is also likely that, if carriers know that consumers have access to information on network performance during outage events, carriers will have an incentive to improve the resiliency of their networks. Since outage information provided to consumers has the potential to alter consumer behavior, carriers would, in turn, be likely to upgrade their resilience in response to avoid losing customers. Overall, this result is beneficial.

For the reasons stated, the VPSB supports the proposed rule.

Respectfully submitted,

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