

**Before the
Federal Communications Commission
Washington, DC 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 NTCH, INC.

NTCH, Inc. (“NTCH”), by its attorney, hereby offers these comments in connection with the above-captioned proceeding. NTCH applauds the Commission’s effort to improve resiliency of wireless networks during major emergencies and to enhance consumer choice. However, NTCH urges the Commission to use a per-municipality reporting metric, rather than per-county, for reporting the percentage of operational sites. In lieu of, or in addition to, the measures proposed in the NPRM, NTCH would also urge the Commission to require wireless providers to provide daily network statistics.

I. The Commission Should Use a Per-Municipality Model for Determining a Service Area’s Percentage of Operational Sites

The Commission should adopt a per-municipality reporting metric, rather than a per-county metric, when requiring public disclosure of percentages of operational sites. Municipalities, rather than counties, generally have to coordinate relief efforts with emergency services during a disaster. Because emergency personnel generally respond to emergencies on a per municipality basis, reporting operational sites on this more granular level would be more useful and would

still allow the Commission to expand or contract the scope of reporting as the disaster unfolds, preserving a clear baseline for making comparisons among providers.

Reporting percentages of operational sites on a per-municipality basis will also provide a more fair representation of the extent and significance of service outages. Reporting percentages of operational sites on a per-county basis could create a misleading picture of the outage when disasters only affect a smaller geographic area. For example, if a disaster were to disrupt one small discrete area of a county, a carrier may lose operation in its only cell site in that county (100% outage), while another carrier with more sites in the county that loses operation in that small area would report a lower outage percentage because it has many other cell sites in undisrupted areas of the county. This would create facially conflicting and misleading data about how bad the damage in the affected area actually is. A more granular approach would provide clearer and more reliable data.

II. The Commission Should Require Wireless Providers to Provide Daily Statistics on Dropped or Blocked Calls

In lieu of, or in addition to, the requirements proposed by the NPRM, the Commission should require all wireless providers to publicly disclose, on a daily basis, the amount of calls that are dropped or blocked from their network. Daily network statistics would be invaluable to consumers trying to make decisions about the reliability of carriers during emergencies. It would also be a tool for the Commission and first responders to assess in real time the affect of the disaster. Requiring this information to be disclosed would also provide a competitive incentive for wireless providers to improve their service and, as a result, be more prepared in the event of an emergency.

NTCH currently discloses network statistics on a daily basis voluntarily. NTCH, which does business as “Clear Talk,” voluntarily provides the public with information on number of call attempts, percentage of dropped calls, and percentage of blocked calls, among many other things. This information is not difficult to provide and would be a minimal burden for providers. The benefit to consumers of providing these network statistics would greatly outweigh their costs and the information would be far more useful to consumers than a percentage of operational cell sites during an emergency.

III. Conclusion

NTCH understands how important it is to have reliable service during times of emergency, and applauds the Commission’s effort to improve the resiliency of wireless networks during disasters. However, NTCH urges the Commission to require the reporting on a per-municipality basis, and to require providers to submit daily network statistics, regardless of whether or not there is an ongoing emergency.

NTCH, Inc.

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