



February 18, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Improving 911 Reliability, PS Docket No. 13-75 and Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket No. 11-60

Dear Ms. Dortch,

On February 12, 2014, the undersigned and Jerry Piper representing Cambridge Telephone Company, the Idaho Telecom Alliance and WTA – Advocates for Rural Broadband, met with Lauren Kravetz, Eric Schmidt, Ken Brady, Zachary Gold, Michael Connelly, John Healy, Jane Kelly, and Jeff Goldthorp, all of the Public Safety and Homeland Security Bureau’s Cybersecurity & Communications Reliability Division to discuss issues in the noted proceeding.

Mr. Piper and I explained that WTA represents more than 250 small, rural telecommunications carriers providing high quality voice, data and video services in the United States and that WTA members serve some of the most rural and hard-to-serve communities in the country and are providers of last resort to these communities. We also pointed out that in small rural communities, telcos are greatly involved in emergency communications planning and execution. In the case of Cambridge Telephone, Mr. Piper noted that the company serves the local public safety access point (PSAP) using an IP connection.

Mr. Piper explained that as a local telecom provider within the state of Idaho he would be involved in the implementation of the “*Idaho Enhanced/Next Generation 911 Plan*” which was prepared for the Idaho Emergency Communications Commission. The *Plan* will promote collaboration between all PSAPs with regard to network, governance, procurement, and implementation within the state. During the discussion, we also sought clarification on the FCC’s circuit diversity audits as well as the network monitoring requirements since there appear to be some differences between the FCC’s *911 Reliability Report and Order* and the *Idaho Enhanced/Next Generation 911 Plan*. We also discussed the possibility of the Bureau hosting a webinar for WTA members to answer additional questions regarding the certification and reporting requirements.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record regarding this proceeding referenced above.

Respectfully submitted,

/s/

Derrick B. Owens
Vice President of Government Affairs

cc: Eric Schmidt
Ken Brady
Zachary Gold
Michael Connelly
John Healy
Jane Kelly
Jeff Goldthorp
Lauren Kravetz