Office of the General Counsel
U.S. Department of Homeland Security
Washington, DC 20528

Homeland Security

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

April 23, 2014

RE: GN Docket No. 13-5, Technology Transitions,
GN Docket No. 12-353, AT&T Petition to Launch a
Proceeding Concerning the TDM-to-IP Transition

Dear Ms. Dortch,

On behalf of the Department of Homeland Security's Office of Emergency Communications (OEC), we hereby submit a written *ex parte* communication summarizing key points made by OEC Director, Ronald T. Hewitt, during the April 17-18 Workshop on Technology Transitions and Public Safety.

Should you require any further information, please do not hesitate to contact the undersigned.

Respectfully submitted,

Rosalind K Allen

Rosalind K. Allen
Attorney-Advisor

Homeland Security

Technology Transitions and Priority Services

GN Docket Nos. 13-5 and 12-353

Ronald T. Hewitt
Director
Office of Emergency Communications

April 23, 2014

Office of Cybersecurity and Communications (CS&C): Vision and Mission

Vision

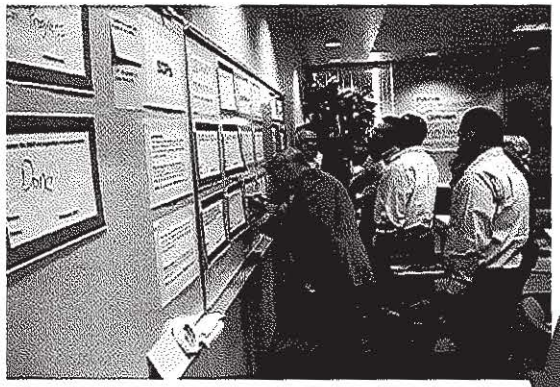
- A secure and resilient national information technology and communications infrastructure.

Mission

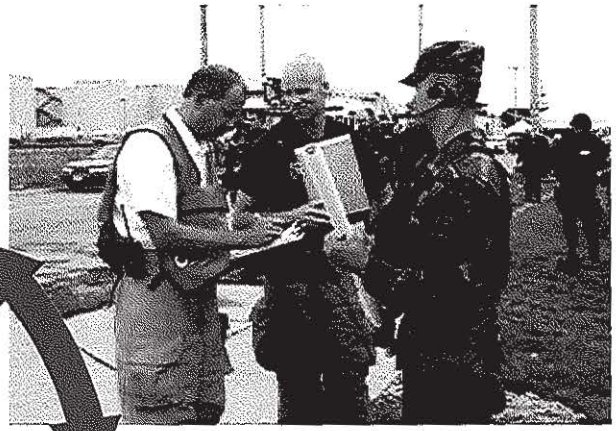
- Responsible for enhancing the security, resiliency, and reliability of the Nation's cyber and communications infrastructure.
- CS&C actively engages the public and private sectors as well as international partners to prepare for, prevent, and respond to catastrophic incidents that could degrade or overwhelm these strategic assets.

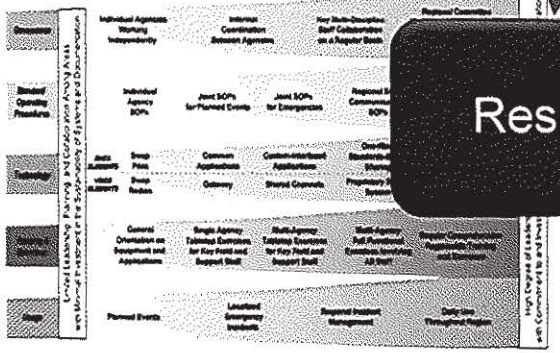
Office of Emergency Communications (OEC)

OEC supports and promotes communications capabilities used by emergency responders and government officials to keep America safe, secure, and resilient. OEC is the Federal lead in supporting Priority Services programs.



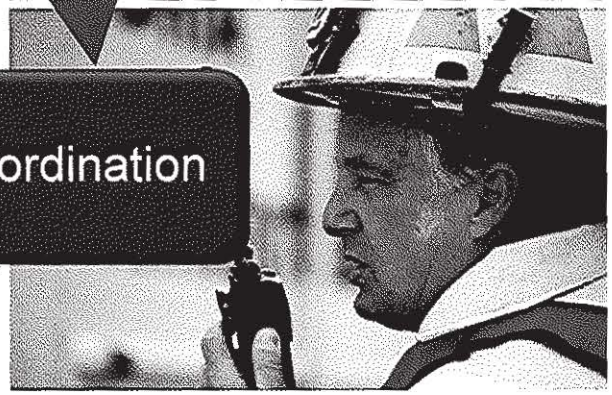
Planning and Preparedness





Response

Coordination



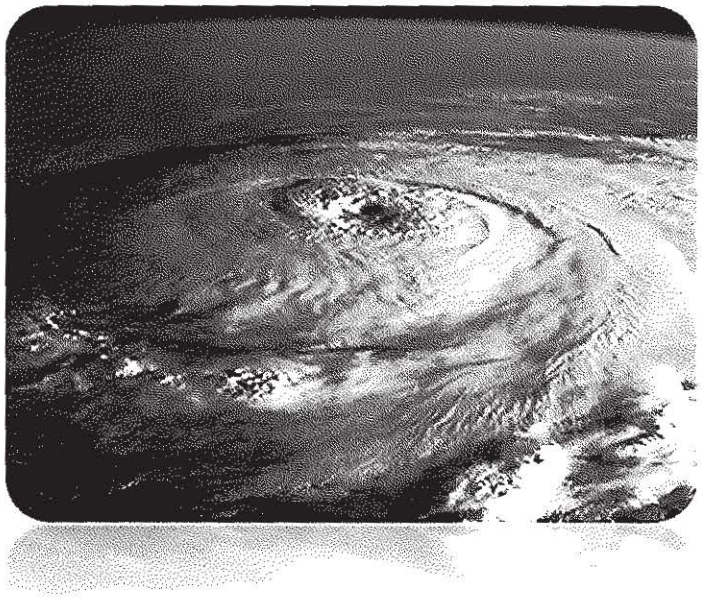
Priority Services

- Priority Services programs provide national security and emergency preparedness (NS/EP) and public safety users with the ability to communicate on telecommunications networks during times of congestion.
  - **Government Emergency Telecommunications Service (GETS)** provides priority voice over commercial wireline networks.
  - **Wireless Priority Service (WPS)** provides priority voice over commercial cellular networks.
  - **Next Generation Networks (NGN) Priority Services** is a technology insertion for voice, data, and video over commercial IP networks.
  - **Telecommunications Service Priority (TSP)** is priority restoration and provisioning of NS/EP telecommunications services.

World Trade Center Attack
Response and Recovery – September 11, 2001

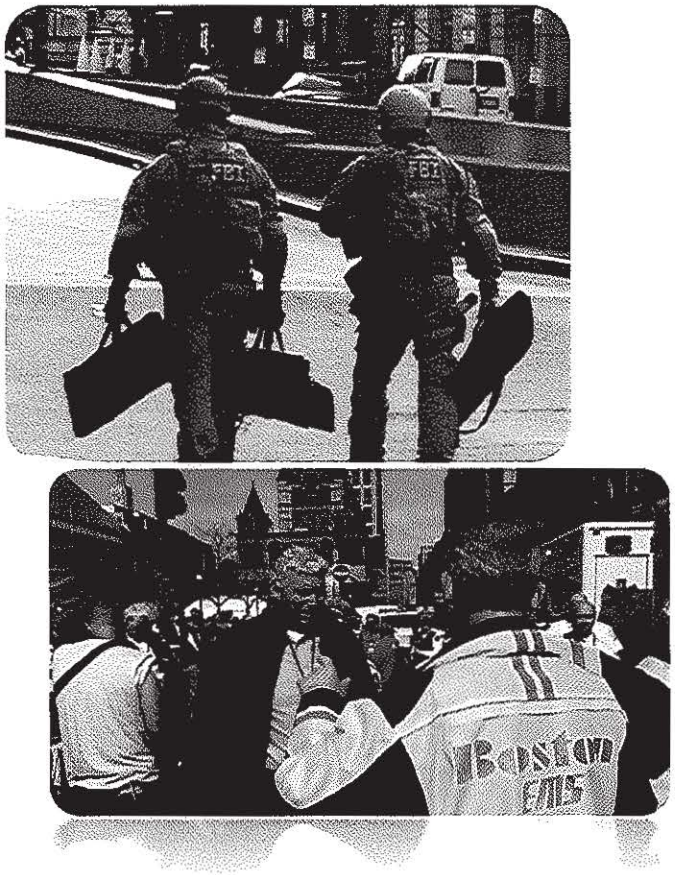
- 10,000 GETS calls attempted into/out of/within New York City and Washington, D.C. areas and 18,000 worldwide with 95% completion rate.
- TSP helped Wall Street restore damaged circuits and install new ones to support the financial services sector.
- White House directed development of WPS.

Hurricane Sandy - East Coast Corridor
October 29, 2012



- Networks saturated with public calling out of the storm damaged area to families, friends, hotels, etc.
- Over 18,000 critical response and recovery calls were placed via GETS with a 99% completion rate. Over 14,000 WPS calls were completed with a 98% completion rate.
- OEC processed over 200 TSP requests for priority provisioning and restoration to aid in response and recovery efforts.

Boston Marathon Bombing Response and Recovery – April 15, 2013

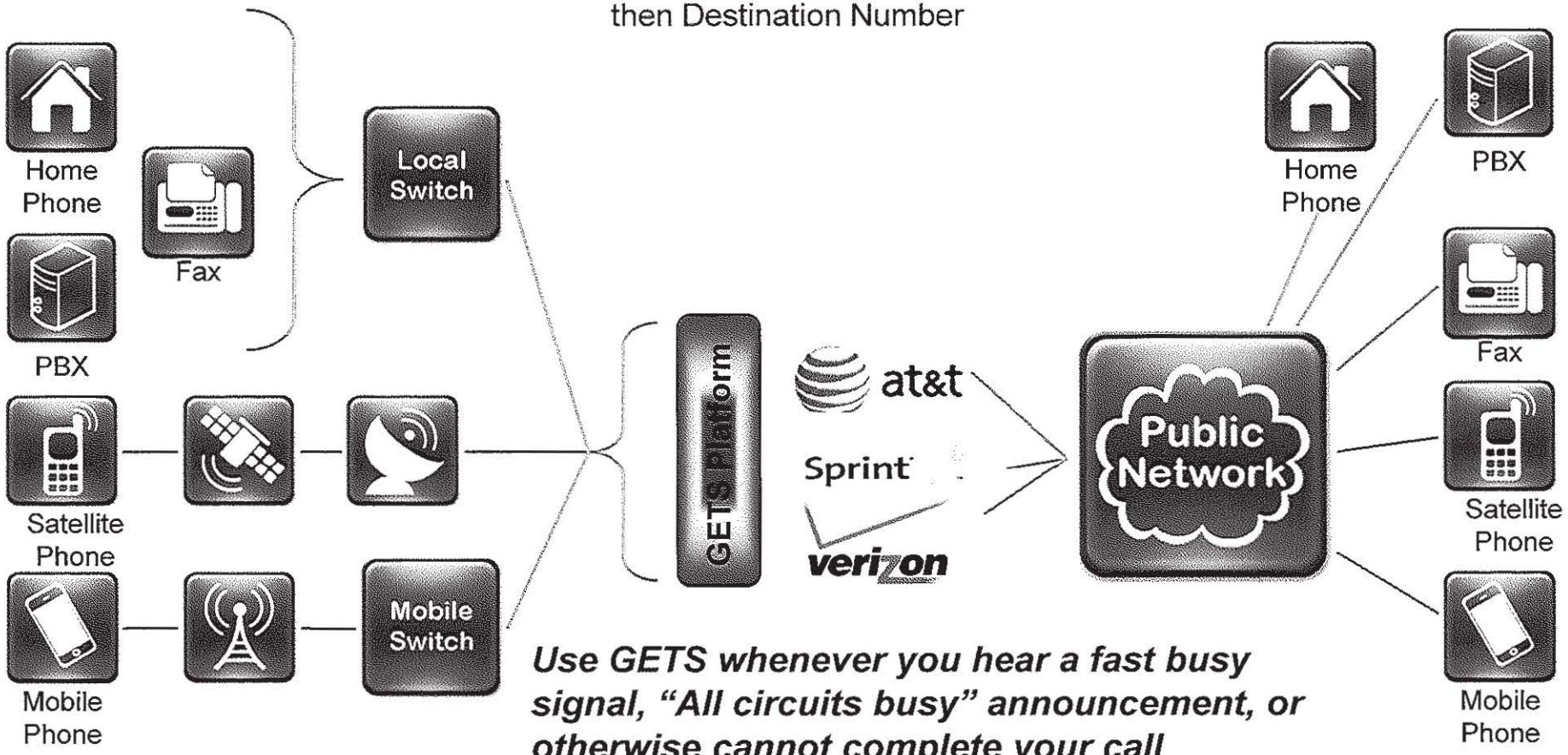


- Emergency responders used GETS and WPS when phone lines became congested in the first hours after the bombing.
- Over 280 critical response and recovery calls were placed via GETS with a completion rate of 99%.
- OEC expedited 152 WPS enrollment requests.
- 93% of calls made with WPS were completed.*

*During peak congestion on enhanced CDMA networks

How GETS Works

1. Dial GETS Access Number from any phone (1-710-627-4387)
2. Network routes call to a GETS Carrier. As you are prompted, enter your PIN then Destination Number
3. Network routes your call to the Destination Number



Use GETS whenever you hear a fast busy signal, "All circuits busy" announcement, or otherwise cannot complete your call

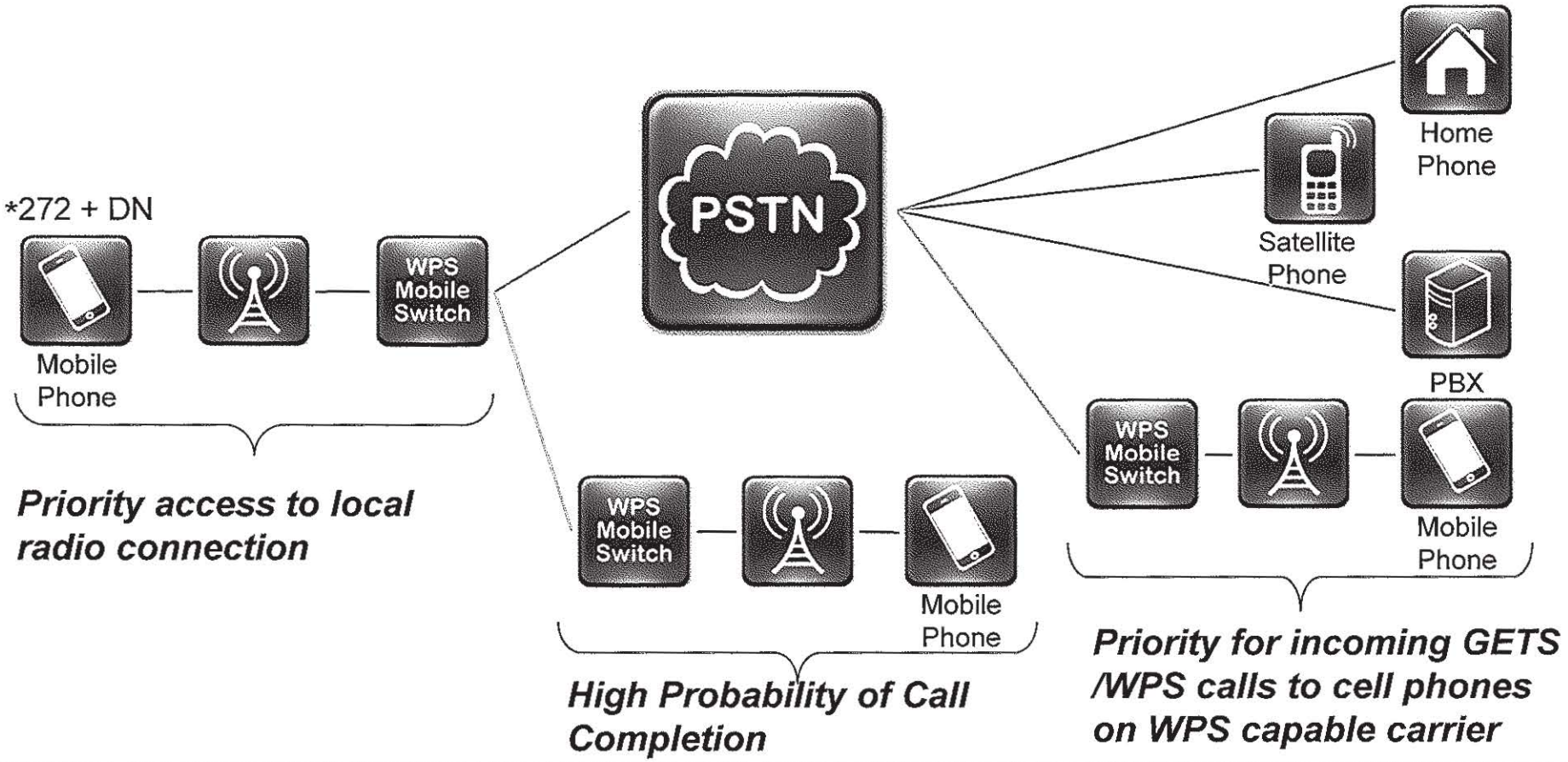
GETS Local Coverage

Tier 1	Tier 2	Tier 3
AT&T	Cincinnati Bell	East Ascension Telecom
CenturyLink	Frontier	Intelliquent
Verizon	Hawaiian Tel	GTA (Guam)
	TDS	Matanuska Telephone
	tw telecom	Micronesia (FSM)
	Windstream	Pioneer Telephone Co
	Claro (Puerto Rico)	Shenandoah Tel
	Fairpoint	Ben Lomand
		Cox Communications

- The above Local Exchange Carriers provide GETS features such as queuing and alternate carrier routing to GETS long distance carriers.

How WPS Works

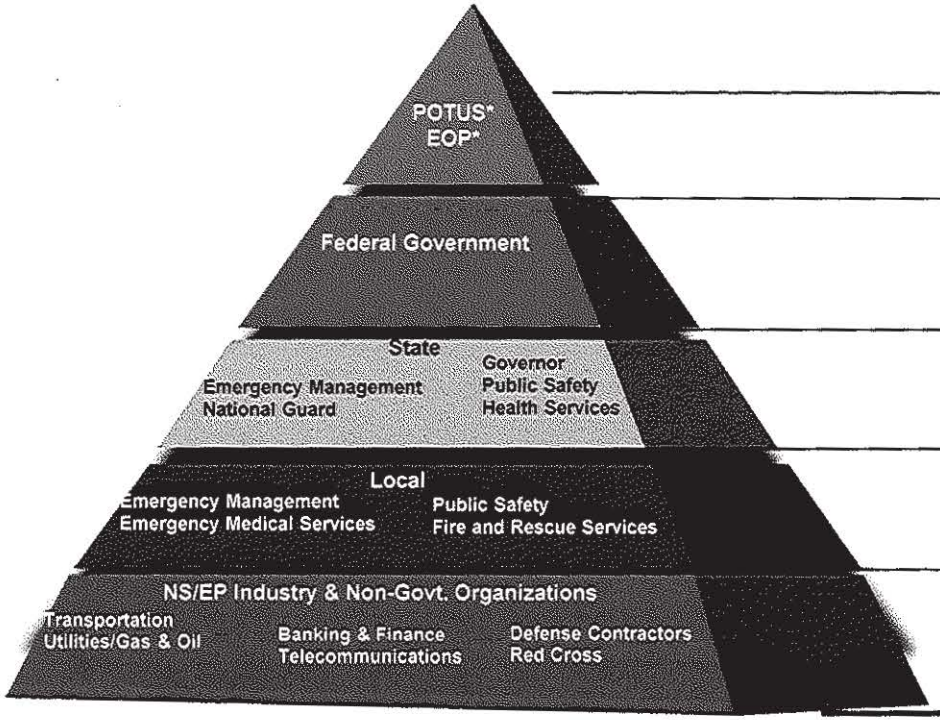
1. WPS is an add-on feature subscribed on a per-cell phone basis – works with existing cell phones in WPS equipped networks
2. To make a WPS call, enter *272 followed by the destination number, then press SEND



GETS/WPS Uses

- GETS and WPS are used for national security communications and to supplement public safety communications during times of network congestion.
  - Maintain communications with leadership
  - Contact off-duty personnel on their home/cell phones
  - Communicate with response personnel that do not have radio access
  - Discuss sensitive information that may not be appropriate for radio broadcast
  - Access teleconferencing capabilities

Priority Telecommunications Services Users

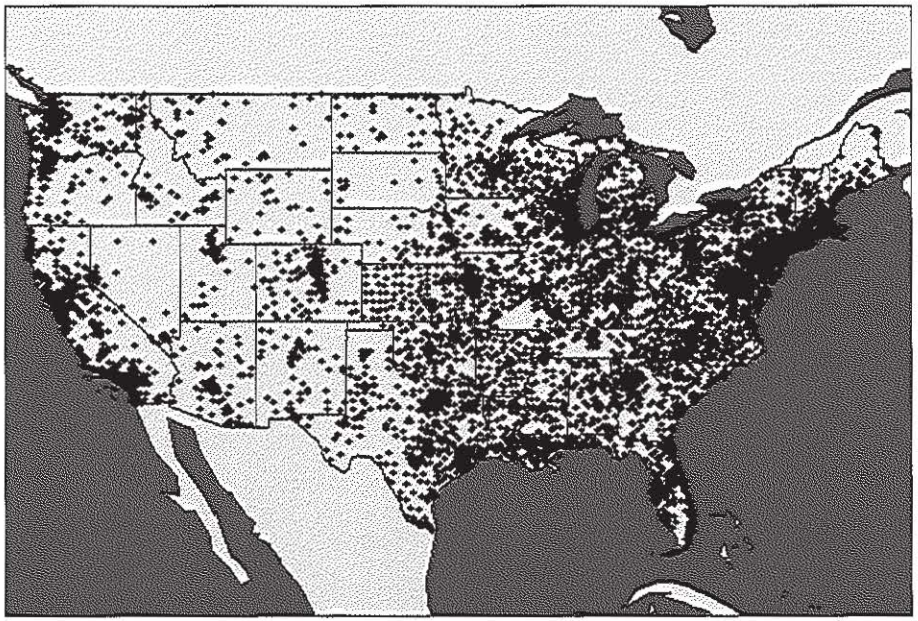


	GETS	WPS	TSP
	918	173	55
	110,049	58,810	105,274
	39,885	8,953	15,774
	68,248	13,327	33,783
	91,885	36,916	124,329
Total:	310,985	118,179	279,215

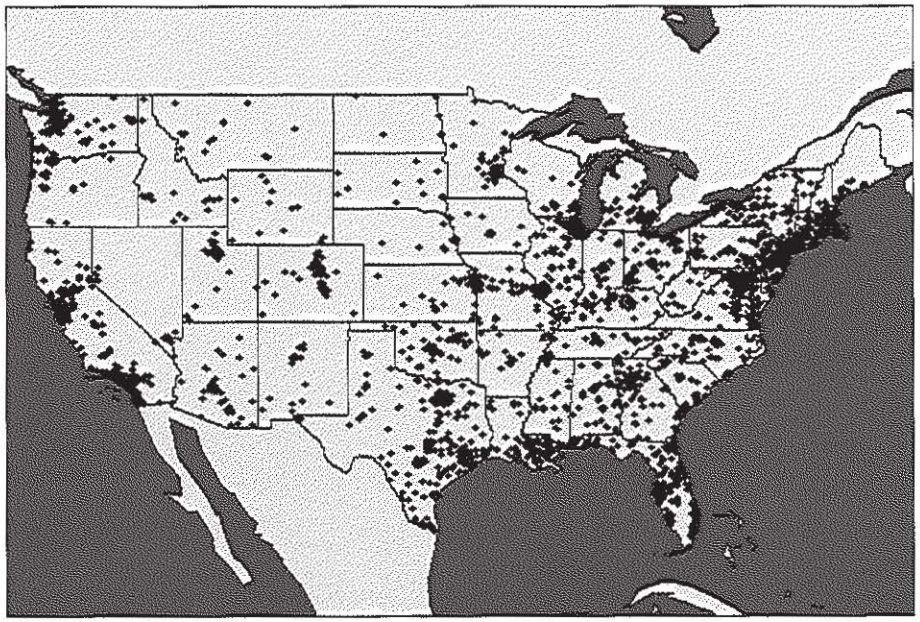
*President of the United States
*Executive Office of the President

Data as of Mar 31, 2014

Geographic Distribution of GETS/WPS Users



CONUS Distribution of GETS Users



CONUS Distribution of WPS Users

9,568 POCs/Organizations

- 310,985 total GETS cards

3,541 POCs/Organizations

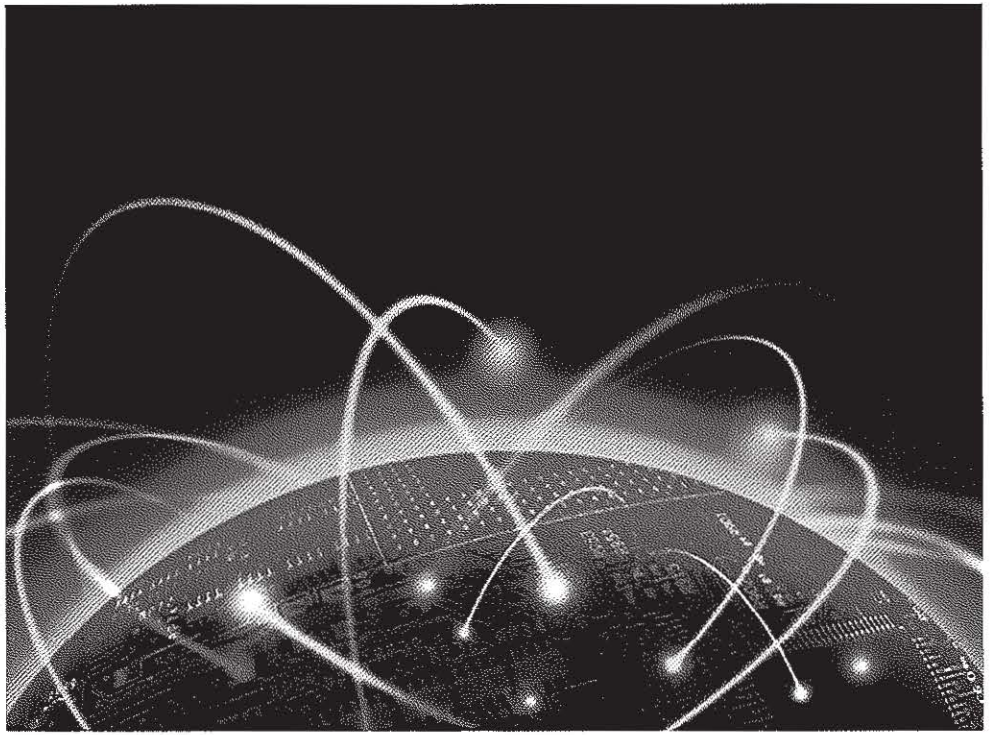
- 118,179 total WPS phones

Data as of Mar 31, 2014

Next Generation Network Priority Services (NGN-PS)

- The NGN-PS program is working to ensure that priority services will continue to operate as networks evolve. Transition to NGN priority services will be seamless for users.

- NGN-PS is also developing new capabilities to support priority voice, data, and video on evolving networks.



NGN-PS Program Structure

- Defines, develops and deploys priority in packet-switched networks.
- Provides for capabilities in multiple acquisition projects.

Phase	Capability
1	**Implement priority voice capability** **Increment 1:** Implement priority voice capability in the major core networks (AT&T, Verizon, and Sprint) **Increment 2:** Implement priority voice communications capability in the wireless access networks **Increment 3:** Implement priority voice communications capability in the wireline access networks (Telecommunications carriers and Cable) (Not Funded)
2	**Implement priority video service capability** (Not Funded)
3	**Implement priority data service capability** (Not Funded)

FCC Technology Transition Experiments

Modify Treatment of Priority Services in Network Transitions Proceeding[1]

- Priority Services should be treated as a "condition" of experiments just like all other NS/EP communications

- Need to preserve legacy NS/EP services (including GETS and WPS) unless and until a seamless transition to an IP platform can be accomplished

[1] Order, Report And Order And Further Notice Of Proposed Rulemaking, Report And Order, Order And Further Notice Of Proposed Rulemaking, Proposal For Ongoing Data Initiative, GN Docket 13-5 (January 31, 2014).

Modify Treatment of Priority services in Network Transitions Proceeding (cont'd)

- Current status: Priority Services are treated as a "presumption" that could be rebutted.
- Unclear why Priority Services are treated differently from all other NS/EP communications.
- Could infer potential rationales from text:
  - Priority Services are voluntary, so treating as absolute "condition" is inappropriate. But most if not all NS/EP communications services are voluntary, provided by carriers under contract to agency.
  - Priority Services are further along with IP transition, but this is not the case. We are only in the beginning phases of transition.

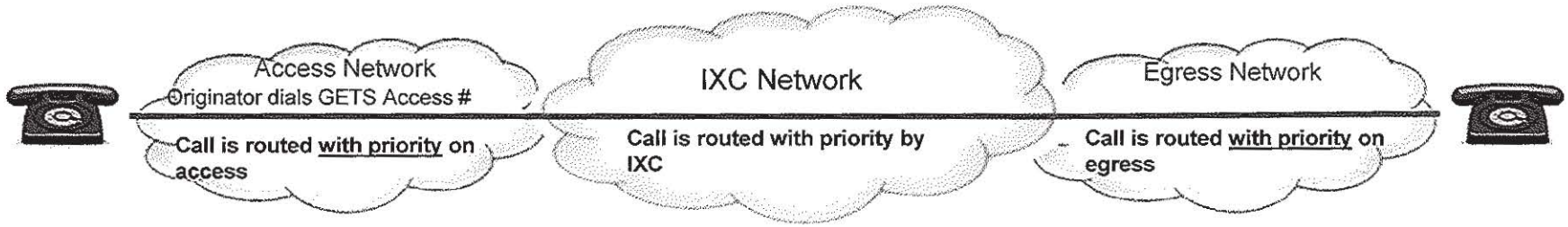
Concerns with AT&T's Experiment Proposal

- Proposed experiment will allow a GETS/WPS call to initiate, but will only begin Priority Services in the long-distance segment of a call
  - GETS is designed as a ubiquitous program that gives priority in homes and businesses which allows NS/EP calls a high probability of completion no matter where the responder may be
  - US Government currently contracts with AT&T LEC for Priority Services features (queuing and priority identity) in the local exchange

Concerns with AT&T Experiment Proposal

- Under the AT&T proposal, GETS priority features will not be available in all cases at the local portion of the calls, which will impact the access and egress of both GETS and WPS calls, and significantly diminish today's GETS and WPS functionalities.

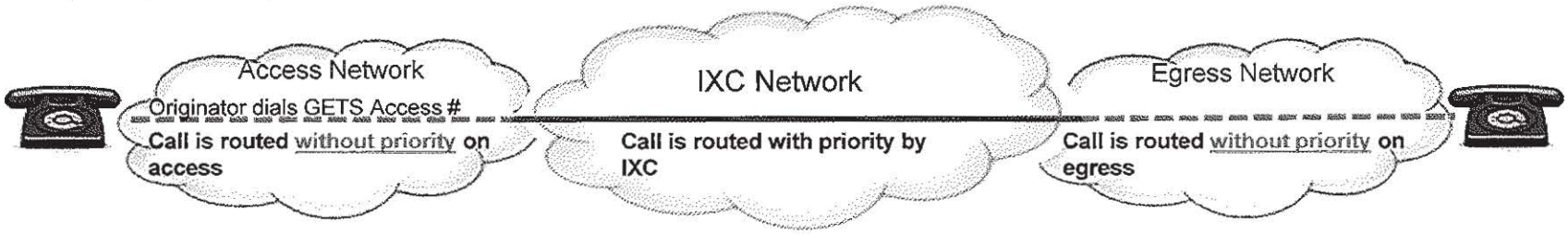
TDM Access/Egress (Current):



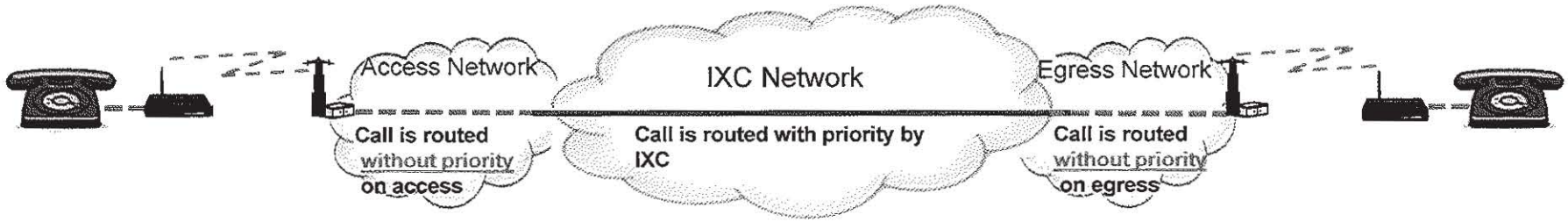
Concerns with AT&T Experiment Proposal

GETS Priority Scenarios in AT&T's Proposal for Wire Center Trials

U-Verse Access/Egress (Proposed):



Wireless Home Phone Access/Egress (Proposed):



Other Recommendations

- Priority Services Capabilities Should be Mandatory in the Post-IP Transition Environment:
  - Mandatory Priority Services capabilities will greatly benefit the small, but critical community of GETS/WPS users
  - Leverage service providers' capabilities to manage a dynamic technical evolution