



April 27, 2016

VIA ELECTRONIC FILING

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

**Re: Ex Parte Presentation, Improving Resiliency, Reliability and Continuity of
Mobile Wireless Communications Networks, PS Docket Nos. 13-239 and 11-60**

Dear Ms. Dortch:

The wireless industry has long been committed to effective network resiliency, disaster preparation, and recovery initiatives to sustain and support consumers' wireless communications during and after emergencies and disasters. Coordination and preparation by wireless providers, consumers and stakeholder agencies, are critical to robust resiliency and the ability to maintain communications, as are carrier efforts to address and enhance network reliability. Today, wireless industry leaders are taking the next step in promoting wireless continuity and information sharing before, during, and after disasters and emergencies.

Wireless providers, AT&T, Sprint, T-Mobile, US Cellular, and Verizon, together with CTIA®, are pleased to announce the Wireless Network Resiliency Cooperative Framework ("Framework"), a voluntary initiative that will enhance coordination and communication to advance wireless service continuity and information sharing during and after emergencies and disasters. Importantly, the Framework includes an effort to improve consumer education that will enable consumers to be better prepared for future disasters, and that the enhanced industry collaboration will facilitate greater network resiliency and faster restoration of service and these commitments obviate the need for legislative action or inflexible rules that could have unintended consequences. To that end, the Framework contains five prongs to enhance coordination:

- (1) Providing for reasonable roaming under disasters arrangements when technically feasible;

- (2) Fostering mutual aid during emergencies;
- (3) Enhancing municipal preparedness and restoration;
- (4) Increasing consumer readiness and preparation; and
- (5) Improving public awareness and stakeholder communications on service and restoration status.

Individual carriers are constantly modifying and improving their resiliency and recovery programs, aided in part by recommendations from relevant government-private sector partnerships including the FCC's Communications Security, Reliability and Interoperability Council ("CSRIC") and CTIA's Business Continuity and Disaster Recovery Certification Program. The Framework is consistent with – and builds upon – CSRIC recommendations. As a first order of business, during an emergency or disaster, a wireless provider should focus its continuity and restoration plans and resources on its own networks, services, and subscribers. But wireless continuity requires the active involvement of multiple parties – not only wireless carriers, but wireline carriers, government agencies at all levels, PSAPs, and consumers. The Framework will do much to advance these efforts. The Framework also will permit carriers sufficient flexibility to tailor network resiliency and continuity of service plans to the unique needs of individual localities given that the types of disasters and emergencies that could impact networks and services can vary greatly depending on geographic location.

The following provides further elaboration on the specific prongs of the Framework:

Providing for Roaming Under Disasters (RuDs). Wireless carriers commit to working with other wireless carriers to implement reasonable roaming arrangements for the duration of an event if existing roaming arrangements and call processing methods do not already achieve it. RuDs would apply when the National Response Coordination Center (NRCC) activates Emergency Support Function # 2 (ESF-2) for a given emergency or disaster and the FCC activates the electronic Disaster Information Response System (DIRS), where: (i) a requesting carrier's network has become inoperable and the requesting carrier has taken all appropriate steps to attempt to restore its own network, and (ii) the home carrier has determined that roaming is technically feasible and will not adversely affect service to the home carrier's own subscribers. Such arrangements will be limited in duration and contingent on the requesting carrier taking all possible steps to restore service on its own network as quickly as possible.

Fostering Mutual Aid During Emergencies. Wireless carriers commit to the sharing of physical assets and necessary consultation where feasible during and after disasters through establishing mutual aid arrangements with other wireless carriers. As noted above, carriers should first manage their own network needs during an emergency, and then provide aid to others, if requested. Mutual aid arrangements may be triggered when the NRCC activates ESF-2 for a given emergency or disaster and the FCC activates the electronic DIRS.

Enhancing Municipal Preparedness and Restoration. By June 1, 2016 (the first day of hurricane season), wireless carriers will convene with a select number of local government representatives' public safety subject matter experts to develop best practices to facilitate coordination before, during, and after emergencies and disasters in order to maintain and restore wireless service continuity.

Improving Public Safety Awareness Regarding Service and Restoration Status. Wireless carriers will provide relevant up-to-date contact information for a carrier/PSAP contact database, subject to an agreement by all participating entities that such data be kept confidential. State Emergency Operations Center ("State EOC") representatives will then be able to address inquiries to the appropriate carrier point of contact. When the NRCC activates ESF-2 and the FCC activates the electronic DIRS for a given emergency or disaster, State EOC inquiries will promptly be relayed to the carrier's designated representative.

Increasing Consumer Readiness and Preparation. Wireless carriers commit to conducting consumer education designed to ensure consumers are properly prepared for emergencies and disasters. In particular, CTIA will work with consumer focused groups to develop a Consumer Readiness Checklist and outreach strategies to disseminate it. These outreach tools will include public service announcements, informational pamphlets, and social media ranging from YouTube videos to Tweets and other effective ways to improve consumer preparedness for disasters and other emergencies.

Improving Public Awareness Regarding Service and Restoration Status. When the NRCC activates ESF-2 and the FCC activates the electronic DIRS for a given emergency or disaster, wireless carriers will support the FCC making DIRS data regarding the total number of cell sites out of service (calculated consistent with established DIRS practices) publicly available on its website on an industry-aggregated, county-by-county basis for any geographic area defined in a DIRS activation notice. As this aggregate data represents a snapshot in time, for each county entry, the Commission notice should identify the time the most recent data was submitted, and promptly revise the data it publishes whenever it receives updated information from a carrier. These actions will ensure that the public has the most up-to-date information and will enhance coordination between the wireless industry and relevant stakeholders.

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The Commission and the wireless industry share the crucial objective of ensuring the resiliency and reliability of wireless networks. As such, the wireless industry has made, and will continue to make, substantial efforts to develop and implement effective network resiliency, disaster preparation, and recovery initiatives to sustain wireless communications during and after disasters. The Framework will enhance coordination among wireless carriers and all key stakeholders, improving information sharing and making wireless network resiliency more robust.

Respectfully Submitted,

/s/ Joan Marsh

AT&T Services, Inc.

/s/ Charles McKee

Sprint

/s/ Grant Spellmeyer

US Cellular

/s/ Scott Bergmann

CTIA®

/s/ Steve Sharkey

T-Mobile USA

/s/ William H. Johnson

Verizon