

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Resilient Networks)	PS Docket No. 21-346
)	
Amendments to Part 4 of the Commission's)	PS Docket No. 15-80
Rules Concerning Disruptions to)	
Communications)	
)	
New Part 4 of the Commission's Rules)	ET Docket No. 04-35
Concerning Disruptions to Communications)	

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Third Further Notice of Proposed Rulemaking (Third FNPRM)*, released August 6, 2025, in the above-referenced dockets. In the *Third FNPRM*, the Federal Communications Commission (Commission) proposed changes to its Disaster Information Reporting System (DIRS) to ensure the system is collecting information useful to disaster response without imposing unreasonable burdens on stakeholders.¹ ATIS appreciates the Commissions' efforts to review its outage reporting rules and consideration of ways that unnecessary outage reporting burdens can be eliminated. In the 18 years since DIRS was launched, the industry has learned a significant amount about DIRS reporting, and ATIS agrees that now is an appropriate time to consider ways to modernize and streamline this system. In these comments, ATIS

- Urges the Commission to make the proposed dynamic DIRS form available for review and input by service providers;

¹ *Third FNPRM* at ¶1.

- Supports the Commission’s proposal to eliminate DIRS worksheets and informational fields that are duplicative or that may not provide sufficient value;
- Agrees that DIRS filers should not have to provide both address and latitude and longitude, but should be able to choose which one to provide for each type of facility/equipment;
- Opposes the collection of more granular wireless data from wireless providers on the location of cell sites that are out of service;
- Supports the elimination of the requirement that mandatory DIRS filers submit a final report within 24 hours of DIRS deactivation;
- Supports exempting Mobile Virtual Network Operators (MVNOs) and resellers from the DIRS filing obligations;
- Notes facilities-based wireless providers should not be required to identify in DIRS which MVNOs utilize their networks within the DIRS activation area;
- Urges the Commission to clarify that its waiver of NORS filing obligations during DIRS activations would apply to DIRS-Lite activations;
- Urges the Commission to consider additional procedural improvements to DIRS, such as allowing service providers to report DIRS impacts beyond the activated counties; and
- Opposes the Commission’s proposed elimination of safeguards from the NORS Participating Agency Certification Form or public disclosure of any information collected in DIRS.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety agencies; and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS’ open industry committees.

Formed in 1993 at the recommendation of the Commission’s first Network Reliability and Interoperability Council, ATIS’ Network Reliability Steering Committee (NRSC) plays a key role in enhancing the reliability of public communications networks by offering timely, expert guidance rooted in industry consensus. Operating in a collaborative and noncompetitive environment, the NRSC identifies opportunities to improve network performance and resilience. It supports the communications sector by developing and publishing a range of resources – including standards, technical requirements, reports, bulletins, best practices, and annual reviews – that help drive consistent and effective reliability improvements across the industry.

II. COMMENTS

In the *Third FNPRM*, the Commission proposes to offer manual DIRS filers the ability to file a single, dynamic form instead of the ten (10) separate worksheets that are currently provided.² ATIS NRSC appreciates the Commission’s efforts to modernize DIRS and reduce unnecessary burdens on the industry and, while the proposed modifications appear to be beneficial, the modifications are difficult to assess in the abstract. The industry needs the opportunity for informed feedback. This is particularly important because changes to DIRS may impact existing DIRS infrastructure and company processes. Over the past 15 years, filers have implemented extensive systems and processes to submit timely and accurate DIRS reports; the industry should be afforded the opportunity to examine and provide input regarding these impacts, which may be significant. ATIS NRSC therefore recommends that the Commission make available, perhaps on the DIRS test server, a mockup of the form, and allow DIRS filers to

² *Third FNPRM* at ¶10.

review, similar to the way the Commission provided examples of its proposed templates for multilingual WEA so the public can provide informed input.³

The Commission also proposes to eliminate DIRS worksheets and informational fields that are duplicative or that may not provide sufficient value for emergency response.⁴ ATIS NRSC supports this proposal because it reduces the burdens to DIRS filers, allowing them to focus on disaster recovery. ATIS NRSC agrees with the Commission that the data it proposes to delete is not useful and, in some cases, is difficult to compile in DIRS format (which is different from the information collected in NORS). ATIS NRSC agrees with the Commission's suggestion to change formats from DS3 to OC3.⁵

Instead of the current approach, under which some worksheets request both the address and latitude and longitude of affected equipment or facilities, the Commission proposes that request location information be provided in only one of these formats for each type of facility or equipment.⁶ ATIS NRSC appreciates the Commission's interest in streamlining this part of the DIRS process, and supports its proposal that filers should not have to provide both address and latitude and longitude, but should be able to choose which one to provide for each type of facility/equipment. ATIS NRSC does not support requiring the use of only one of these indicators because that requirement may have significant impacts on the industry. If the Commission nonetheless wishes to pursue this matter, ATIS NRSC urges the Commission to provide filers with ample implementation time regardless of which indicator is chosen.

³ See *Public Notice*, released February 15, 2024, in PS Docket Nos. 15-91 and 15-94, Appendices C and D.

⁴ *Third FNPRM* at ¶13.

⁵ *Third FNPRM* at ¶13.

⁶ *Id.*

The *Third NPRM* also seeks feedback regarding whether the Commission should collect more granular information in DIRS from wireless providers on the location of cell sites that are out of service.⁷ ATIS NRSC does not support this proposed collection of more granular wireless data. ATIS NRSC believes that the collection of this data is redundant to existing practices. Service providers already provide sufficient data about cell sites with service providers submitting KML pin maps to the Commission. After Hurricane Maria in 2017, DIRS filers have been submitting shape files (GIS polygon maps) as requested by DHS that provide sensitive information about cell site impacts on a very conservative measure of -98db.⁸ Moreover, the collection of additional data appears to run contrary to the stated purpose of this proceeding, which is to “commence a thorough review of DIRS reporting and propose changes to ensure the system is collecting information useful to disaster response without imposing unreasonable burdens on stakeholders.”⁹ If the Commission nonetheless believes there is benefit in the collection of this more granular data, the Commission could consider a voluntary annual collection of this wireless data.

The Commission proposes in the *Third NPRM* to eliminate the requirement for mandatory DIRS filers to submit a final report within 24 hours of DIRS deactivation.¹⁰ ATIS NRSC wholeheartedly supports this proposal. ATIS NRSC previously raised concerns with this requirement; namely, that it is unnecessary and asks for information when conditions may not have stabilized enough to safely assess damage or service availability, making timely and complete reporting impractical. Allowing service providers to focus on repairing and restoring the network, rather than on notifications, is a much better approach. This change is also

⁷ *Third FNPRM* at ¶16.

⁸ This information can only be confirmed by a network wireless carrier, not an MVNO.

⁹ *Third FNPRM* at ¶1.

¹⁰ *Third FNPRM* at ¶18.

consistent with the intent of DIRS, which was adopted to provide a simplified and consistent process for service providers to report communications infrastructure status and situational awareness information during times of crisis.

The Commission also proposes limiting DIRS reporting to facilities-based providers and exempting MVNOs and resellers from the obligation to file DIRS reports.¹¹ ATIS NRSC supports this limitation, agreeing with the Commission that MVNOs lack insight into the underlying facilities-based providers' networks, and therefore are incapable of providing independent DIRS reports. Because the MVNOs must rely on the underlying network providers for the same information, ATIS NRSC supports the Commission's recognition that additional reporting would be redundant.¹²

To maintain situational awareness about the impact of disasters on service to MVNO customers, the Commission proposes to require facilities-based wireless providers to list in their initial report in DIRS which MVNOs utilize their respective networks within the DIRS activation area.¹³ ATIS NRSC does not believe that this information should be provided as part of DIRS, which is activated only during disasters. The Commission should not burden service providers that are in the midst of restoring service during a disaster with additional work that would not necessarily contribute to situational awareness regarding critical infrastructure as DIRS was designed to do.

The Commission seeks comment on ATIS' request that the Commission clarify whether the Commission's waiver of NORS filing obligations during DIRS activations extends to

¹¹ *Third FNPRM* at ¶20.

¹² *Id.*

¹³ *Third FNPRM* at ¶21.

activations of DIRS Lite.¹⁴ ATIS NRSC supports this clarification and urges the Commission to clarify that its waiver would apply to DIRS-Lite activations, and that filers are not required to report in NORS during a DIRS-Lite activation in a given area.

To further streamline DIRS, ATIS NRSC urges the Commission to consider additional procedural improvements to DIRS beyond what it proposed in the *Third FNPRM*. For example, to further the Commission's goal in enacting DIRS to reduce outage reporting burdens during disasters, the Commission should allow service providers to report DIRS impacts beyond the activated counties, extending DIRS related NORS waiver to these counties. Service providers are in a better position to know the impacts of a disaster and will be better able to identify affected geographic areas. Allowing providers to self-report these areas in DIRS will provide the Commission with a more accurate picture of the extent of a disaster, while reducing outage-filing related burdens in the disaster zone.

Additionally, the Commission should consider aligning NORS and DIRS thresholds. The difference in thresholds creates unnecessary confusion for the industry. As an example, the DIRS manual offers no TSP guidance, while NORS requires reporting only for TSP levels 1 and 2. ATIS NRSC believes the Commission should align the DIRS reporting thresholds with the NORS thresholds.

The Commission in the *Third FNPRM* seeks comment on whether eliminating certain provisions from the NORS Participating Agency Certification Form would encourage greater participation by federal and state agencies while still safeguarding confidential information.¹⁵ The Commission seeks comment on its proposals to remove requirements that: (1) simply restate

¹⁴ *Third FNPRM* at ¶22.

¹⁵ *Third FNPRM* at ¶24.

the rules and associated training materials; (2) agencies annually recertify to the terms of access; (3) agencies regularly change user account passwords; and (4) agency employees complete initial and annual security trainings to access NORS and DIRS reports.¹⁶ Given the sensitive nature of this data, ATIS NRSC strongly opposes efforts to diminish protections.

The Commission has previously recognized the sensitive nature of outage reporting data. In its 2004 order mandating NORS, the Commission noted that “[t]he overwhelming majority of the commenting parties, including the Department of Homeland Security (“DHS”), have demonstrated that the outage reports will contain sensitive data...[that] could be used by hostile parties to attack those networks, which are part of our Nation’s critical information infrastructure. The disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity.”¹⁷ As DHS noted in that proceeding, sensitive information, like that included in the outage reports, should be safeguarded. “The same outage data that can be so useful for the purpose to identify and remedy critical vulnerabilities and make the network infrastructure stronger can, in hostile hands, be used to exploit those vulnerabilities to undermine or attack networks.”¹⁸ These concerns over the public release of sensitive outage data are as true today as they were 21 years ago. ATIS NRSC believes that, with broader access to outage reporting data and proposals for more granular reporting, the security of outage reporting data should be enhanced, not diminished.

The Commission also asks whether there are types of information currently included in DIRS filings that could be subject to public disclosure without adversely impacting national

¹⁶ *Third FNPRM* at ¶24.

¹⁷ *Report and Order and Further Notice of Proposed Rule Making*, ET Docket No. 04-35, released August 19, 2004, at ¶3.

¹⁸ *Id.* at ¶30 (citing DHS’ Reply Comments to the *NPRM* in this docket).

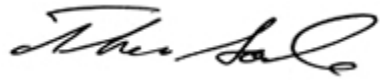
security or commercially sensitive interests.¹⁹ ATIS NRSC does not support public disclosure of any information collected in DIRS. Outage reports often reveal network architecture, market footprint, and redundancy strategies. Malicious actors could use outage data to determine the most effective ways to disrupt emergency communications or to disrupt these communications further during a disaster. Releasing real-time outage data could undermine emergency responses by confusing the public or causing panic. Highly technical outage data, if released without context, may be misunderstood by press and/or public, and confusion stemming from the release of outage reporting information could erode trust in communications networks. This information could also harm consumers, who may erroneously infer a lack of reliability from outage reports and make ill-informed decisions about which service providers or services to choose. Competitors could also exploit this to infer weaknesses, market share, or customer impact, or worse yet, this public disclosure could undermine the cooperative spirit the Commission has encouraged. ATIS NRSC also notes that the Commission already issues aggregated, anonymized outage summaries that inform the public regarding the outage. These summaries provide important information about the outage to the public, while avoiding the release of information that could be misunderstood or misused. ATIS NRSC believes, therefore, that there is no reason for the Commission to release more granular public information, nor would the release of this data benefit the public.

¹⁹ *Public Notice* at ¶25.

III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Third FNPRM* and urges the Commission to consider the recommendations above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

Thomas Goode
General Counsel
Alliance for Telecommunications Industry Solutions
1200 G Street, NW
Suite 500
Washington, D.C. 20005
(202) 628-6380

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