

**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)	PS Docket No. 15-80
Commission’s Rules Concerning)	
Disruptions to Communications)	
)	
New Part 4 of the Commission’s Rules)	ET Docket No. 04-35
Concerning Disruptions to)	
Communications)	

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits its reply comments in response to the *Third Further Notice of Proposed Rulemaking (Third FNPRM)*, released August 6, 2025, in the above-referenced dockets. ATIS notes that there is broad industry support for many of the issues proposed in the *Third NPRM*, including the elimination of duplicative or unnecessary Disaster Information Reporting System (DIRS) worksheets and informational fields and the elimination of the requirement that mandatory DIRS filers submit final reports within 24 hours of DIRS deactivation. ATIS strongly believes that the existing confidentiality protections of DIRS data should be maintained and opposes proposals to expand access to or the use of DIRS data.

I. REPLY COMMENTS

A. There is Broad Industry Support for Streamlining DIRS

In its comments, ATIS, on behalf its Network Reliability Steering (NRSC), supported the Commission’s proposal on the *Third NPRM* to eliminate DIRS worksheets and informational

fields that are duplicative or that may not provide sufficient value for emergency response.¹

ATIS NRSC is pleased to see broad industry support for the elimination of these worksheets and fields.² As the Association for Broadband Without Boundaries (WISPA) notes in its comments, this change “would reduce the burden of DIRS reporting for both manual and batch filing and improve the value of DIRS by making it more focused on information that will actually provide value to public safety stakeholders and to emergency response and recovery efforts.”³

ATIS NRSC also supported the Commission’s proposal to eliminate the requirement for mandatory DIRS filers to submit a final report within 24 hours of DIRS deactivation.⁴ ATIS NRSC is pleased to see that there is also broad support for this proposal.⁵ ACA Connects correctly notes that “[r]equiring yet another comprehensive report to the Commission, which would repeat information already logged in real-time DIRS submissions, creates an unnecessary administrative exercise.”⁶ NCTA explains that “communications providers often are still completing restoration efforts, particularly when there has been damage to infrastructure, and the requirement to submit a final report can delay and divert critical personnel and resources from those efforts.”⁷

¹ ATIS Comments at p. 4.

² See WISPA Comments at a pp. 3-4, Verizon Comments at pp. 1-2, NCTA Comments at p. 3, USTelecom Comments at p. 7, and America’s Communications Association (ACA Connects) at p. 5 (supporting elimination of seven (7) fields).

³ WISPA Comments at a pp. 3-4 (citing *Third NPRM* at ¶14).

⁴ ATIS Comments at p. 5.

⁵ See ACA Connects Comments at p. 6 NCTA Comments at p. 2, USTelecom Comments at pp. 3-4, CTIA Comments at p. 4, NTCA Comments at p. 3, WISPA Comments at p.4; WTA – Advocates for Rural Broadband Comments at p. 2; and Verizon Comments at pp. 1-2.

⁶ ACA Connects Comments at p. 6.

⁷ NCTA Comments at p. 2. These final reports would not, as the Foundation for Defense of Democracies (FDD) seems to suggest, provide a “definitive record for planning repairs and analyzing outages.” FDD Comments at p. 3.

B. Outage Reporting Data Must Be Protected

In its comments., Public Knowledge (PK) notes that it has repeatedly asked the Commission to make both DIRS and NORS data fully available to the public so that consumers may “‘vote with their feet’ for networks which invest in reliability.”⁸ ATIS NRSC strongly disagrees and notes that the Commission has repeatedly reaffirmed the sensitivity of this data and the potential harm that could come from its release to bad actors.⁹ Nothing has changed that would warrant the Commission making outage reporting data publicly available. NORS¹⁰ and DIRS filings continue to include sensitive details about network outages and restoration timelines, including information regarding the location and status of providers’ equipment and insights into vulnerabilities, outage patterns, and infrastructure dependencies.¹¹ Communications networks remain vulnerable to the release of this sensitive data and its potential misuse, and malicious actors still exist that could exploit this data. In fact, CTIA in its comments notes that “network security and national security concerns are only increasing due to, for example, a spike in criminal activity that has impacted the availability of communications services.”¹²

⁸ PK Comments at p. 2.

⁹ See New Part 4 of the Commission’s Rules Concerning Disruptions to Communications, *Report and Order*, 19 FCC Rcd 16830, 16853 (2004) (*2004 Part 4 Order*), Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications, *Second Report and Order*, 36 FCC Rcd 6136, 6145 ¶ 31 (2021) (affirming presumption of confidentiality for DIRS and NORS reports); Public Safety and Homeland Security Bureau Announces the Launch of Outage Information Sharing and Provides Guidance to Agencies on Applying for Access, PS Docket No. 15-80, DA 22-1031, *Public Notice* (Sep. 30, 2022) (reminding agencies of the confidentiality obligations associated with the NORS and DIRS information itself, as well as the need to maintain the integrity and security of the agency’s log in accounts), Resilient Networks, PS Docket No. 21-346, *Second Report and Order and Second Further Notice of Proposed Rulemaking*, 39 FCC Rcd. 623, 637, at ¶ 24 (2024) (concluding that there is no compelling reason at this time to alter the existing presumption of confidentiality for any reporting information received).

¹⁰ ATIS agrees with T-Mobile that discussion of NORS should occur in a separate proceeding. T-Mobile Comments at p. 4.

¹¹ Even aggregated data can be misinterpreted by the public, create reputational harm, or expose patterns exploitable by adversaries.

¹² CTIA Comments at p. 9.

The release of outage reporting data has other risks as well. DIRS data reflects extraordinary disaster conditions – using this data for consumer choice could penalize providers in disaster-prone areas and mislead the public. Without context, consumers may perceive one provider as less reliable when the disaster was simply more impactful to that providers’ infrastructure and/or that provider faced external factors (site access, power, etc.) that interfered with recovery efforts. As T-Mobile USA, Inc. (T-Mobile) notes, the Commission has previously determined that, given the competitive nature of the communications industry, there is a presumptive likelihood of substantial competitive harm from disclosure of information in outage reports.¹³

PK also recommends that the Commission modify the requirements for access under 47 CFR §4.2 to provide: (1) relevant officials with unrestricted access to historic data more than one year old for purposes of research and to benchmark performance, and with blanket permission to share information with contractors and with other local and state jurisdictions that have demonstrated procedures to safeguard the information; and (2) agencies with access to specific carrier data to issue general “report cards” to the public on the performance of specific carriers, both in specific emergencies and over time.¹⁴ ATIS NRSC opposes these proposals, which would further dilute the existing protections of DIRS data.

Expanding who may be provided with access to this data creates additional opportunities for improper disclosure. As ACA Connects notes, “[i]f any one individual granted access to the data improperly discloses or misuses it, the efforts of all others to protect the data will be

¹³ T-Mobile Comments at p. 5 (citing 2004 Part 4 Order at 16855).

¹⁴ PK Comments at pp. 3-4.

undermined, if not defeated entirely...The more widely confidential data is shared, the greater the risk that at least one recipient will commit such an error.”¹⁵

If the audience for DIRS reports were to expand or elements of the reports made more public, ATIS NRSC agrees with USTelecom that “[p]roviders would be compelled to involve lawyers and outside consultants in preparing these filings to ensure that confidential business information was protected and that the legal and competitive implications of disclosure were carefully managed. This would slow down reporting, reduce the timeliness of the data and chill communications between providers and staff, significantly increase costs, and undermine the Commission’s goal of streamlining and improving the reporting process.”¹⁶

ATIS NRSC strongly disagrees with PK that DIRS data can or should be used to evaluate the performance of service providers. This proposal appears to be based on a misunderstanding of the purpose of DIRS and of the nature of the information provided under this system. DIRS has been designed to provide situational awareness and foster emergency coordination, not as a consumer-facing performance metric. The data in DIRS is a constantly evolving snapshot of the impact of a disaster on communications networks and of restoration efforts, providing situational awareness regarding what is impacted and how long the impacts may last. Drawing inferences regarding performance is not appropriate because each disaster is unique and each service provider’s infrastructure may be impacted differently by the same disaster.

Moreover, service providers already share information with Emergency Operations Centers (EOCs), which satisfies the needs for situational awareness without risking the exposure of sensitive data. ATIS NRSC agrees with Verizon that “[c]ompany-specific DIRS reports are, at best, a supplement to EOC-level information and the real-time discussions that occur between

¹⁵ ACA Connects Comments at p. 10.

¹⁶ USTelecom Comments at p. 6.

service providers, state and local government emergency managers, electric utilities, and other stakeholders in those venues.”¹⁷

Finally, ATIS NRSC agrees with those commenters who note that the fundamental challenge at issue here is not the provisions of the Participating Agency Certification Agreement but a need to better educate agencies on DIRS. T-Mobile, for example, suggests that any perceived lack of participation in the DIRS information sharing regimes is not because the processes are onerous but rather is the result of a lack of awareness on the part of agencies that are eligible to participate.¹⁸ ACA Connects similarly recommends that, “[i]f the Commission wishes to encourage broader sharing of DIRS data with states, the solution is more education and engagement – not a lowering of standards for protecting sensitive information from public disclosure.”¹⁹ ATIS NRSC therefore agrees with T-Mobile that the Commission should look for ways to increase awareness of DIRS sharing rather than making changes that may or may not actually lead to increased participation.²⁰

¹⁷ Verizon Comments at p. 5 (footnote omitted).

¹⁸ T-Mobile Comments at p. 4.


¹⁹ ACA Connects Comments at p. 3.

²⁰ T-Mobile Comments at p. 4.

II. CONCLUSION

ATIS appreciates the opportunity to respond to the comments submitted in response to the *Third FNPRM* and urges the Commission to consider the input above.

Respectfully submitted,

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

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