

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
)	PS Docket No. 15-80
Amendment of the Commission’s Rules)	
Concerning Disruptions to)	
Communications)	

**REPLY COMMENTS
OF
NTCA–THE RURAL BROADBAND ASSOCIATION**

NTCA–The Rural Broadband Association (“NTCA”)¹ hereby submits these reply comments in response to the Public Notice in the above-captioned proceeding.² NTCA shares commenters’ general agreement that the training materials clearly incorporate the information required by the Commission’s Second Report and Order in this docket to be used by public safety entities with access to the Commission’s Network Outage Reporting System (“NORS”) and Disaster Information Reporting System (“DIRS”). As NTCA recommended in earlier comments in this docket, however, the Commission needs to ensure sufficient safeguards are in place to mitigate the risk of information contained in providers’ NORS and DIRS filings being

¹ NTCA represents approximately 850 independent, community-based telecommunications companies and cooperatives that provide communications services in the most rural portions of America. All NTCA service provider members are full service rural local exchange carriers and broadband providers, and many also provide wireless, video and other competitive services to their communities.

² *Public Safety and Homeland Security Bureau Seeks Comment on Exemplar Training Materials Related to the Commission’s Sharing of Network Outage Reporting System and Disaster Information Reporting System Data with Participating Agencies*, Public Notice, PS Docket No. 15-80, DA 22-8222 (rel. Aug. 4, 2022) (“Public Notice”).

accessed or disclosed in an unauthorized manner.³ Accordingly, NTCA encourages the Commission to make the few modifications to the materials noted below to help ensure the confidentiality of the information submitted by providers into NORS and DIRS.

As an initial matter, NTCA agrees with commenters that the training materials incorporate all of the Commission’s requirements for participating agencies’ access to NORS and DIRS data.⁴ NTCA does, however, encourage the Commission to modify the language on page 8, paragraph 4 of the training materials to state, “Communications providers *are requested* to submit outage information into DIRS....” This language will better reflect the voluntary nature of providers’ submission of information into DIRS.

NTCA also encourages the Commission to edit the training materials to establish the need for agencies to safeguard the information contained in NORS and DIRS. As CTIA and USTelecom noted in their comments, “[t]o help preserve the sensitive nature of NORS and DIRS filings, the Commission adopted a number of thoughtful safeguards, including training requirements to foster the proper handling of this data by staff of participating agencies.”⁵ That said, NTCA suggests additional steps, one being the removal of “Confidential” from pages 16-18 of the materials to avoid any confusion regarding what information can be disclosed and the

³ See Comments of NTCA – The Rural Broadband Ass’n, PS Docket No. 15-80 (Apr. 30, 2020), pp. 1-2.

⁴ See 47 C.F.R. § 4.2. See also Letter from CTIA and USTelecom – the Broadband Ass’n to Marlene H. Dortch, Secretary, FCC, PS Docket No. 15-80 (Aug. 24, 2022), p. 1 (“These materials present a thorough overview of the five program elements that participating agencies are required to address in their training materials.”) (“CTIA/USTelecom Comments”); Comments of NCTA – The Internet and Television Ass’n, PS Docket No. 15-80 (Aug. 24, 2022), p. 1 (“The materials are effective in explaining the process for accessing this data and the safeguards that relevant personnel must follow when they obtain access to the data.”).

⁵ CTIA/USTelecom Comments at p. 1, citing *Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, Second Report and Order, 36 FCC Red 6136 (2021) (“Second Report and Order”) at ¶ 105.

method for doing so because all information contained in NORS and DIRS is confidential. Similarly, as ATIS recommends, the Commission should strengthen the training materials' emphasis on the confidential nature of the information submitted in NORS and DIRS.⁶

Finally, NTCA recommends the Commission modify the first bullet point on page 18 of the training materials to state, "You may share NORS/DIRS information with your agency's contractors ..." in lieu of "any individual outside your agency" to make clear the distinction between disclosing information to a contractor versus to the public. This recommended edit is also consistent with ATIS' suggestion that the Commission reorganize the text on slide 19 to better highlight confidentiality certifications required by participating agencies.⁷

NTCA appreciates the opportunity to comment on the draft training materials and encourages the Commission to continue taking steps to ensure that anyone with access to NORS and DIRS safeguards the sensitive information submitted by providers, whether through internal access or sharing of information as needed to facilitate service restoration.

Respectfully submitted,



By: /s/ Tamber Ray
Tamber Ray
Brian Ford

4121 Wilson Boulevard, Suite 1000
Arlington, VA 22203
703-351-2000 (Tel)

⁶ See Comments of The Alliance for Telecommunications Industry Solutions ("ATIS"), PS Docket No. 15-80 (filed Aug. 24, 2022), p. 5.

⁷ *Id.*