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September 3, 2024

Ms. Nicole Ongele  
Federal Communications Commission  
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**RE: OMB Control Number: 3060-1003, *Communications Disaster Information Reporting System (DIRS)*; FCC Docket Nos. PS 21-346, 14-80, and ET 04-35**

Dear Ms. Ongele:

Competitive Carriers Association (“CCA”)<sup>1</sup> hereby submits comments on the above-captioned information collection<sup>2</sup> related to the Commission’s rules requiring certain providers, including wireline and wireless providers, to report on network infrastructure during emergencies.<sup>3</sup> CCA and its members take disaster preparedness and restoration very seriously and support the Commission’s efforts to improve visibility into the operational status of networks to aid disaster response officials in performing critical tasks during emergencies. However, in adopting rules requiring providers to file reports in the Commission’s Disaster Information Reporting System (“DIRS”) while DIRS is activated in a provider’s service area, the Commission did not adequately consider the related burdens and additional costs placed on carriers who have not previously filed DIRS reports. For many small and non-nationwide carriers, meeting this requirement is a considerable undertaking requiring significant time and resources. CCA urges the Commission to more thoroughly consider these challenges and revise its cost and burden estimates, particularly for small and non-nationwide providers.

While some larger providers opted to file DIRS reports on a voluntary basis during emergencies over the years, many small and non-nationwide carriers did not—opting instead to direct their limited resources towards active repair and restoration efforts. While DIRS reports

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<sup>1</sup> CCA is the nation’s leading association for competitive providers and stakeholders across the United States. Members range from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers, as well as vendors and suppliers that provide products and services throughout the communications ecosystem.

<sup>2</sup> *Information Collections Being Reviewed by the Federal Communications Commission*, OMB 3060–1003; FR ID 234948, 89 Fed. Reg. 62735 (Aug. 1, 2024).

<sup>3</sup> *Resilient Networks*, Second Report and Order and Second Further Notice of Proposed Rulemaking, PS Docket No. 21-346, et al. (rel. Jan. 26, 2024) (“Second Report and Order”).

can undoubtedly provide useful information regarding the status of communications networks during emergencies, many smaller providers determined that developing systems capable of collecting the breadth of information required by DIRS reports was a costly endeavor that would risk diverting valuable resources from active efforts to restore needed services to customers. Small and non-nationwide providers operate with limited resources and must frequently make strategic decisions about where to invest those resources to best meet the needs of their customers.

Since the Commission adopted rules requiring all communications providers to participate in DIRS reporting, small and non-nationwide carriers have directed significant efforts towards developing and implementing systems to enhance information collection and report preparation. Some providers, however, are concerned that the work required to collect and report network status information is significantly burdensome and more time-intensive and costly than the Commission's estimates. For example, some providers are experiencing delays and unforeseen costs as a result of the following factors:

- Some carriers' network information tracking systems were initially designed and implemented with a focus on repair and restoration efforts, rather than reporting. These systems were designed to alert the carrier to what network elements are down and require immediate attention. DIRS reporting requires carriers to modify these systems to provide a more comprehensive status of the network, including elements that are not impacted.
- Carriers must make considerable efforts with respect to advance inventory of equipment required by DIRS reporting, system integration, and testing.
- Carriers must implement internal processes to ensure all necessary personnel have access to DIRS information and reporting capabilities.
- Some carriers are evaluating whether the use of additional vendor services or modified use of existing vendor services can aid in DIRS report preparation.

In assessing the costs and burdens on affected providers for complying with mandatory DIRS reporting, the Commission neglected to adequately estimate the costs small and non-nationwide providers would incur to implement the processes and capabilities required to file DIRS reports. In the *Second Report and Order*, the Commission acknowledged that mandatory DIRS reporting may pose a greater burden on smaller entities but did not attempt to estimate how great that burden may be. With respect to the burden, the Commission only argued that it would not be unduly burdensome, given the significant public safety benefits such reports would provide.<sup>4</sup> In its later discussion surrounding estimated annual costs to providers, the Commission suggested that actual costs might actually be less than its estimate, given that the estimate "includes service providers that are currently voluntarily participating [in DIRS reporting] and already incurring the reporting costs without changes in rules for mandated

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<sup>4</sup> *Id.* at ¶ 17.

subject providers.”<sup>5</sup> As the Commission noted, however, “smaller providers often [do] not elect to voluntarily participate in DIRS reporting,”<sup>6</sup> and are therefore incurring these significant costs now. The Commission must meaningfully consider the costs and burdens on small and non-nationwide carriers.

Given the challenges to small and non-nationwide carriers filing DIRS reports for the first time, some providers are concerned that they will not be able to complete all the requirements necessary to comply with the rules by November 30, 2024.<sup>7</sup> To enable providers to implement the processes required to meet their DIRS reporting obligations, the Commission should extend the implementation date to 90 days after OMB approval for small and non-nationwide providers. CCA understands the Commission’s desire for the rules to take effect before the 2025 hurricane season when disaster reporting is most critical, and a 90-day extension would establish an implementation date well before the start of the hurricane season.

CCA and its members share the Commission’s view that DIRS reporting can be a valuable tool to aid in restoration efforts during emergencies. However, the Commission should revise its burden and cost estimates on small and non-nationwide providers who have not previously filed DIRS reports. The significant costs and efforts incurred by these providers necessitates a longer implementation timeframe.

Respectfully submitted,

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<sup>5</sup> *Id.* ¶ 34.

<sup>6</sup> *Id.* ¶ 11.

<sup>7</sup> *Id.* ¶ 36.