



**Verizon Wireless**  
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Washington, D.C. 20005

May 14, 2007

Allison E. Zaleski  
Office of Management and Budget  
Room 10236 NEOB  
Washington, DC 20503

**Re: Communications Providers Emergency Contact Information, OMB  
Control Number 3060-1003.**

Dear Ms. Zaleski:

By this letter, Verizon Wireless hereby submits comments on the Paperwork Reduction Act review referenced above. In particular, the Federal Communications Commission (“FCC” or “Commission”) has requested Office of Management and Budget (“OMB”) review of the FCC’s plans to implement a Disaster Information Reporting System (“DIRS”) to collect information on a voluntary basis from communications service providers during times of declared emergencies.<sup>1</sup> Verizon Wireless opposes the approval of this information collection reporting process unless the information to be collected through DIRS is deemed presumptively confidential.

Verizon Wireless voluntarily provided network status information to the FCC after hurricanes Katrina, Rita and Wilma in 2005. Verizon Wireless has worked with the FCC and the Department of Homeland Security to devise a disaster reporting process that will meet the needs of the government and not interfere unduly with carrier recovery efforts. Verizon Wireless plans to participate voluntarily in the FCC’s disaster reporting program, subject to the concerns raised in these comments.

The data the FCC proposes to collect include coverage maps updated daily to reflect the state of each carrier’s coverage in disaster affected areas; information about switch status, including switch location and switch status; and information about cell sites, including number of sites in the affected area, number of sites affected by the disaster, the reasons why sites are down, and the number of sites operating on backup power. The Commission plans to aggregate the data it receives from carriers and make aggregated reports available to first responders through the Department of Homeland Security.

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<sup>1</sup> 72 Fed. Reg. No 49, pages 11876-11877.

In its request to OMB, the Commission states that it is not requesting confidential information, and states, “If the Commission requests respondents to submit information that they believe is confidential, respondents may request confidential treatment of such information under 47 C.F.R. § 0.459 of the Commission’s Rules.”<sup>2</sup>

Verizon Wireless disagrees with the Commission that the information to be collected by the FCC is not confidential. The information that the Commission plans to collect is non-public sensitive information that should be presumed confidential. In particular, the information pertaining to switch location is routinely kept confidential for security reasons. The information regarding daily coverage maps, switch status, cell site status, and power status is all competitively sensitive information that Verizon Wireless routinely protects.

Verizon Wireless also disagrees that carriers should be required to request confidential treatment of the information submitted each time a carrier submits information. During a declared emergency, the Commission plans to request the information listed above on a daily basis. Therefore, requiring carriers to request confidential treatment of the information provided pursuant to the procedures set forth in Section 0.459 of the Commissions rules each time a carrier provides information to the FCC would impose a significant burden on carriers. Given that the information is being requested on a voluntary basis and during times when carrier resources are being stretched to restore service as quickly as possible, carriers may choose not to provide information or may not provide information as often as the Commission would like if required to submit a confidential request each time information is provided.

Rather than require carriers to submit confidentiality requests each time information is submitted and face uncertainties as to whether the information provided will be kept confidential, the Commission should adopt a presumption that the information provided to the FCC is presumed to be confidential and may only be sought pursuant to the procedures set forth in 47 C.F.R. § 0.461. Adopting a presumption of confidentiality would eliminate the burden associated with filing confidentiality requests with each submission of information carriers make and would therefore make carriers more likely to provide the information requested by the FCC in a timely manner. Moreover, a

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<sup>2</sup>

*Id.*

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presumption of confidentiality would be consistent with the treatment of outage report information collected by the Commission under Part 4 of the Commission's rules.<sup>3</sup>

Respectfully submitted,



Andre J. Lachance

Senior Counsel

cc: John Healy, FCC  
Judith B. Herman, FCC

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<sup>3</sup>

47 C.F.R. § 4.2.