

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

Comments of WTA – Advocates for Rural Broadband

WTA – Advocates for Rural Broadband (“WTA”) submits these comments on some of the issues raised in the Commission’s Notice of Proposed Rulemaking with respect to streamlining the Commission’s disaster reporting system – Disaster Information Reporting System (“DIRS”).¹ WTA is a national trade association representing approximately 400 small, rural local telecommunications carriers. The typical WTA member company serves fewer than 5,000 customers per service area and has fewer than 50 employees. WTA’s members provide voice, broadband and other communications-related services to some of the most remote, rugged, sparsely populated, and expensive-to-serve areas of the United States, and have been at the forefront of providing advanced services to these very difficult to serve territories. WTA

¹ *Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*, FCC 25-45, released August 6, 2025, 90 Fed. Reg. 42355 (Sept. 2, 2025) (hereafter cited as “*NPRM*”).

appreciates the critical role that DIRS plays in keeping the Commission and other federal, state and local government officials informed on the status of communications networks when disasters strike.

Streamlining the DIRS reporting requirements is important to WTA's members, who do not have any "surplus staff" to deal with regulatory burdens, particularly when disasters strike. And the large rural areas served by WTA's members are not immune from tornados, hurricanes, floods, wildfires or earthquakes, all of which have affected some of our members. And when such disasters occur, filling out unnecessary paperwork detracts from efforts to keep the network operating or restoring service if the network goes down.

The *NPRM*'s proposals seek to balance the need to get critical information to the Commission and public safety officials with regard to the status of communications networks, while minimizing the burdens imposed on telephone companies.² The proposal to simplify DIRS reporting by having the filer answer a few questions on the types of services and facilities affected in the disaster area, and then only have to provide relevant information once,³ should help minimize the DIRS reporting burdens. WTA also supports the *NPRM*'s proposal to eliminate the filing of a final report.⁴ Given the uncertainty and unknowns that will still exist right after the end of the DIRS reporting period, information on things like estimations of completion of repairs is unlikely to be reliable, and thus not very helpful.

The *NPRM* also asks whether there are some types of information included in DIRS that could be publicly-disclosed without compromising national security or commercially sensitive

² *NPRM* at ¶ 10.

³ *NPRM* at ¶ 11.

⁴ *NPRM* at ¶ 18.

information.⁵ The information that gets submitted into DIRS certainly includes information that should not be publicly disclosed, such as connectivity provided to public safety entities and FirstNet. At the same time, WTA does not believe there would be any real benefits from public disclosure of any of the information in DIRS, since the public at-large would not find that information to be useful,⁶ and any third-party assessments of the data are unlikely to be helpful. Given the risks of harmful disclosure and the absence of any benefits, WTA would urge the Commission to keep in place its policy of not publicly disclosing any of the DIRS information.

Respectfully submitted,

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Date: October 2, 2025

⁵ *NPRM* at ¶ 25.

⁶ Nor is it clear how members of the public, who were without service as a result of the disaster, would access any such publicly-available information.