

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Resilient Networks)	GN Docket No. 25-223
)	
Amendments to Part 4 of the Commission’s Rules)	PS Docket No. 15-80
Concerning Disruptions to Communications)	
)	
New Part 4 of the Commission’s Rules Concerning)	ET Docket No. 04-35
Disruptions to Communications)	

To: The Commission

**COMMENTS OF
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION
(NRECA)**

The National Rural Electric Cooperative Association (“NRECA”) submits these Comments in response to the Federal Communications Commission’s (“Commission”) *Third Further Notice of Proposed Rulemaking* in the above-captioned matter (“*Third Further Notice*”), inviting comments on the proposed modernization of the Commission’s Disaster Information Reporting System (“DIRS”).

I. INTRODUCTION

NRECA is the national service organization for nearly 900 not-for-profit rural electric cooperatives that provide electric power to 56% of the nation’s landmass, including approximately 42 million people in 48 states. Rural electric cooperatives serve 88% of the counties of the United States, including 92% of the nation’s 353 persistent poverty counties.

Rural electric cooperatives were formed to provide safe, reliable electric service to their member-owners at the lowest reasonable cost. They are dedicated to improving the communities

in which they serve, and the management and staff of rural electric cooperatives are active in rural economic development efforts. Electric cooperatives are private, not-for-profit entities that are owned and governed by the members to whom they deliver electricity, are democratically governed, and operate according to the seven Cooperative Principles.¹ All of NRECA's electric distribution cooperatives are small business entities as defined by the U.S. Small Business Administration.

In addition to providing safe, reliable electric service to their member-owners at the lowest reasonable cost, the nation's rural electric cooperatives are committed to promoting the deployment of advanced telecommunications capabilities within the rural communities and areas in which they serve, and electric cooperatives are playing a crucial role in the development of broadband infrastructure to serve rural unserved and underserved locations. Over 200 rural electric cooperatives currently are working to provide these much-needed broadband services themselves or through partnerships with affiliated or unaffiliated ISPs.

As providers of essential electric service to consumers in the majority of U.S. counties, NRECA's electric cooperative members have many decades of hard-won experience responding to disaster-related electric service outages. Those electric cooperatives that provide facilities-based voice service are now subject to the Commission's mandatory DIRS reporting requirements established in the *Second Report and Order*.²

¹ The seven Cooperative Principles are: Voluntary and Open Membership, Democratic Member Control, Members' Economic Participation, Autonomy and Independence, Education, Training, and Information, Cooperation Among Cooperatives, and Concern for Community.

² *In the Matter of Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket Nos. 21-346 and 15-80, ET Docket No. 04-35, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 24-5 (rel. Jan. 26, 2024); 47 CFR § 4.18.

NRECA commends the Commission for undertaking this much-needed effort to modernize and streamline DIRS reporting and agrees with most of the proposals described in the *Third Further Notice*. At the same time, NRECA urges the Commission to recognize that, during a disaster, operators of electric service infrastructure must already devote a large portion of their limited resources to restoring vital electric service to residents. Considering the critical need to restore electricity during a disaster, NRECA respectfully proposes that any obligation an electric utility may have to file daily DIRS reports be suspended until such time as the cooperative has reestablished electric service throughout its coverage area.

NRECA also suggests that a modernized DIRS system should be configured to obtain relevant information from satellite voice providers that are affected by a disaster.

NRECA's Comments focus on three main points:

- 1. NRECA Supports the Commission's Initiative to Streamline and Modernize DIRS.**
- 2. The Commission Should Adopt an Exemption from DIRS Reporting for Electric Utilities While They Are Restoring Electricity.**
- 3. The Commission Should Retain the DIRS Reporting Mechanism Applicable to Satellite Providers.**

II. COMMENTS

- 1. NRECA Supports the Commission's Initiative to Streamline and Modernize DIRS.**

NRECA commends the Commission for undertaking an initiative to simplify and streamline DIRS reporting. NRECA supports nearly all the proposals in the *Third Further Notice* that would simplify and streamline DIRS reporting, including redesign of the DIRS user interface and reconsideration of the current array of ten separate service-specific worksheets. The Commission properly notes that the current DIRS reporting framework is cumbersome and

inefficient, requiring many providers to complete a series of overlapping data fields.³ Newly effective DIRS mandatory reporting obligations, together with the increasing frequency and intensity of disasters that are likely to trigger DIRS reporting requirements,⁴ means that the DIRS framework must be made as efficient and useful as possible.

The Commission proposes to implement a system requiring providers to input core information, including location and number of subscribers affected, only once. Based on the services provided, the modernized system would present the provider with only those fields relevant to the provider. NRECA certainly supports this common-sense approach.

Except for the Satellite worksheet fields (further discussed below), NRECA also supports the Commission's specific proposals to eliminate or modify certain information fields, as set forth in paragraph 13 of the *Third Further Notice*. NRECA agrees with the Commission's suggestion that eliminating or modifying these worksheets and fields would reduce the time burden associated with both manual and batch DIRS filing.⁵ NRECA believes that doing so would not meaningfully affect public safety or disaster recovery.

NRECA also supports the Commission's proposal to eliminate the requirement for mandatory DIRS filers to submit a final report within 24 hours of DIRS deactivation.⁶ Unless such reports are found to substantially improve the Commission's (or public safety officials') situational awareness – beyond what is obtained through daily DIRS reports – the final report requirement should be eliminated.

2. The Commission Should Adopt an Exemption from DIRS Reporting for Electric Utilities While They Are Restoring Electricity.

³ See *Third Further Notice*, ¶¶ 10-11.

⁴ *Id.*, ¶ 10.

⁵ *Third Further Notice*, ¶ 13.

⁶ *Id.*, ¶ 18.

Throughout the *Third Further Notice*, the Commission is properly mindful of the burden of mandatory DIRS reporting on affected providers. The Commission recognizes that daily DIRS reporting imposes a substantial burden on providers during a difficult time, both amid a disaster and during the recovery period.

NRECA acknowledges and agrees that DIRS information can enable the Commission, public safety officials and the public to better assess the scope of outages and disaster-related service disruptions when they occur, potentially enabling support for alternative means of communication, among other benefits. Nevertheless, NRECA urges the Commission to recognize that providers of both electric and communications services – unlike providers of communications services alone – are likely to be more severely and broadly affected in the event of a disaster, and that their primary focus must be to restore critical electric service to their communities. An electric utility working feverishly to restore electric service should not be distracted unduly by a requirement to submit a daily report to the Commission about its ancillary voice service.⁷

During these “all hands on deck” events, electric cooperative personnel work tirelessly around the clock to restore electric power as quickly and safely as possible, under stressful, demanding – and often dangerous – conditions, so that communities can again have access to heating, lighting, refrigeration, communications, and the numerous other necessities of life powered by electricity. Further, because all of NRECA’s electric distribution cooperatives are small businesses, their lineman often work double duty to restore electric and communications services. Executive staff, too, wear multiple hats in both the electric and communication businesses. For these reasons, NRECA and its members believe that diverting electric cooperative

⁷ Indeed, until electric service is restored, it may be impracticable to undertake DIRS reporting, as Internet service may well be unavailable.

personnel from this critical mission in the middle of a disaster to fill out an online DIRS form each day would be a wasteful and ill-advised allocation of critical resources.

Accordingly, NRECA respectfully requests that the Commission adopt an explicit exemption from mandatory DIRS reporting for entities that also provide electric utility service,⁸ to the extent the electric service continues to be affected by the disaster.

3. The Commission Should Retain the DIRS Reporting Mechanism Applicable to Satellite Providers.

While NRECA generally supports the Commission's proposals in the *Third Further Notice*, NRECA does not agree with the apparent proposal to remove satellite service from the DIRS reporting framework. The *Third Further Notice* proposes to "[e]liminate the Satellite worksheet, which we believe is unnecessary because no satellite service providers have ever made a DIRS filing."⁹ It is unclear from that statement whether the Commission's modernization effort would exclude satellite data altogether. NRECA opposes any such exclusion.

As the Commission is certainly aware, low-earth orbit (LEO) satellite services such as Starlink have begun directly offering voice telephony services. (Starlink's "Direct to Cell" service is marketed by Starlink as "A Cellphone Tower in Space."¹⁰) As a result, there is reason for LEO voice service providers to be fully subject to mandatory DIRS reporting requirements, and information about their satellite system, affected areas, and recovery periods may be very useful to the Commission, public safety officials, and the public.

⁸ The proposed exemption should extend to any electric utility subsidiary that provides voice service and is subject to DIRS requirements.

⁹ *Third Further Notice*, ¶ 13.

¹⁰ Starlink Direct to Cell webpage, <https://www.starlink.com/us/business/direct-to-cell> (last accessed Sept. 22, 2025).

Simply because satellite providers have never filed a DIRS report does not mean they will not need to do so in the future, and the DIRS system should be configured to gather relevant information should a disaster affect a covered satellite system and their customers. To be sure, conventional land-based disasters such as hurricanes, floods and wildfires are unlikely to directly affect a satellite fleet. But other events may well do so, including a powerful solar storm, a “Kessler Syndrome” ablation cascade,¹¹ or a disaster of a type yet unknown. In such a situation, public safety officials, the Commission and consumers deserve to have the best information available. The Commission’s modernized DIRS system should be configured to obtain it.

III. CONCLUSION

NRECA appreciates the opportunity to submit the above Comments.

Respectfully submitted,

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¹¹ Mike Wall, “Kessler Syndrome and the Space Debris Problem,” Space.com, July 14, 2022.
<https://www.space.com/kessler-syndrome-space-debris> (last accessed Sept. 22, 2025).

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