

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendments to Part 4 of the Commission’s	)	
Rules Concerning Disruptions to	)	PS Docket No. 15-80
Communications	)	
	)	PS Docket No. 13-75
Improving 911 Reliability	)	
	)	ET Docket 04-35
New Part 4 of Commission’s Rules Concerning	)	
Disruptions to Communications	)	

**SUPPLEMENTAL FAILSAFE COMMUNICATIONS INC.
COMMENTS REGARDING DIRS / NORS**

FailSafe Communications Inc. respectfully submits these brief supplemental comments in response to the Public Safety and Homeland Security Bureau’s September 29, 2026 Public Notice concerning accurate and complete reporting in the Network Outage Reporting System (“NORS”). The Bureau’s latest guidance reinforces an additional aspect of the methodology FailSafe has previously placed before the Commission.

On September 25, 2026 the Bureau emphasized that providers must take reasonable steps to discover outages affecting 911 and 988 services. Providers are expected to design their systems to provide prompt internal notification of events that could lead to an outage.¹ FailSafe responded on September 28, 2026 explaining how observations already available within intelligent signaling networks can provide visibility into unsuccessful 911 and 988 call attempts and other conditions potentially indicative of service impairment.²

The September 29, 2026 Public Notice addresses another aspect of the same problem: once an outage is discovered, providers must accurately determine and report what happened.

1 Public Notice, *Communications Providers Must Comply With 911 and 988 Outage Notification Obligations*, DA 26-1033, at 3 (Sept. 25, 2026). The Bureau states both that the 30 minute notification period follows discovery and that providers have an obligation to take reasonable steps to discover outages. FCC Filing 09-25-26

2 Supplemental Comments of FailSafe Communications Inc. at 2 to 3 (Sept. 28, 2026). FailSafe explained that signaling information can identify unsuccessful emergency call attempts, relevant providers and geographic concentrations without requiring replacement of existing 911 infrastructure. FailSafe Filing 09-28-26

The Bureau emphasizes that NORS reporting should provide meaningful incident descriptions, specific root cause information, and the best available estimate of affected users.³ Providers must use the best information reasonably available and refine reports as more accurate information becomes available.⁴ It also emphasizes the need to investigate and identify the most precise root cause supported by available information, including where an outage originates on facilities operated by another provider.⁵ These objectives are again, closely related to the methodology FailSafe has described to the Commission.

I. THE SAME DATA TO DISCOVER AN OUTAGE CAN HELP DESCRIBE IT

Intelligent signaling networks contain information concerning communications activity regardless of whether an associated voice call ultimately completes. As FailSafe explained almost a year ago in its October 2, 2025 comments, such observations can supplement indirect estimates with hard information about actual calling events.⁶ The same network visibility that can help a provider discover an outage can also help the provider describe that outage accurately – and do so in an automatic and machine readable format. As discussed below, this strategy might also position the Bureau to eventually introduce signaling information as an input to an AI system in order to correlate that data with other events and draw even more meaningful conclusions.

The Commission may be aided by viewing Diagram 1 (attached). Signaling observations provide machine readable information useful in identifying unsuccessful call attempts, geographic concentrations of failures, and identification of providers associated with particular calls. Such observations can therefore inform, corroborate, refine, and update information used by providers in satisfying their NORS reporting obligations. An additional benefit is that information derived in this fashion often scales downward to individual callers because it focuses on actual calls, not estimates.

This last distinction is important. In instances where *actual intelligent signaling network observations* are reasonably available, they can provide additional evidence with that providers can use in to improve their regulatory estimates and better understand the real world effects of an outage on actual people.

³ Public Notice, *Guidance for Filing in the Network Outage Reporting System (NORS)*, DA 26-1047, at 5 (Sept. 29, 2026). FCC 09-29-26 NORS Filing

⁴ *Id.* at 2 to 3. The Bureau directs providers to use the best estimate reasonably available and update the figure as more accurate information becomes available. FCC 09-29-26 NORS Filing FCC 09-29-26 NORS Filing

⁵ *Id.* at 4. The Bureau directs providers to select the most precise root cause supported by available information and explains that an outage beginning on another provider's network does not eliminate the obligation to conduct a reasonable investigation. FCC 09-29-26 NORS Filing

⁶ Comments of FailSafe Communications, Inc. at 2 (Oct. 2, 2025). FailSafe contrasted estimated outage effects with information obtainable from actual network activity and unsuccessful calls. FailSafe 10-2-25 NORS Comments

II. DISCOVERY AND REPORTING CAN USE THE SAME INFORMATION

Taken together, the Bureau’s September 25 and September 29 Public Notices illustrate a progression:

1. First, discover the outage. 2. Second, determine what happened, where, root cause, and who it affected. 3. Provide prompt, accurate, non-duplicate and meaningful reports.

Information available within intelligent signaling networks not only has a place in this process, it positions regulators for the future as well. Diagram 2 (attached) portrays what might be possible.

“Phase II” on that diagram envisions data from the *Intelligent Signaling Networks* reported to DIRS and NORS – but then combined with additional data sources within an AI-driven analysis engine. FailSafe envisions many new applications of this combination of data and believes the technology to implement Phase II is clearly on the horizon.

CONCLUSION

With this filing we underscore our previous comments. Better network visibility can also produce better outage discovery, and better outage reporting. The Bureau’s September 29, 2026 guidance further demonstrates the practical importance of the principles that FailSafe has embraced.

FailSafe encourages the Commission to focus not only current DIRS / NORS reporting, but also to consider how machine readable, automatic reporting that builds upon *intelligent signaling networks* can segue into future AI applications, which better describe outages and bolster public safety.

Respectfully submitted,

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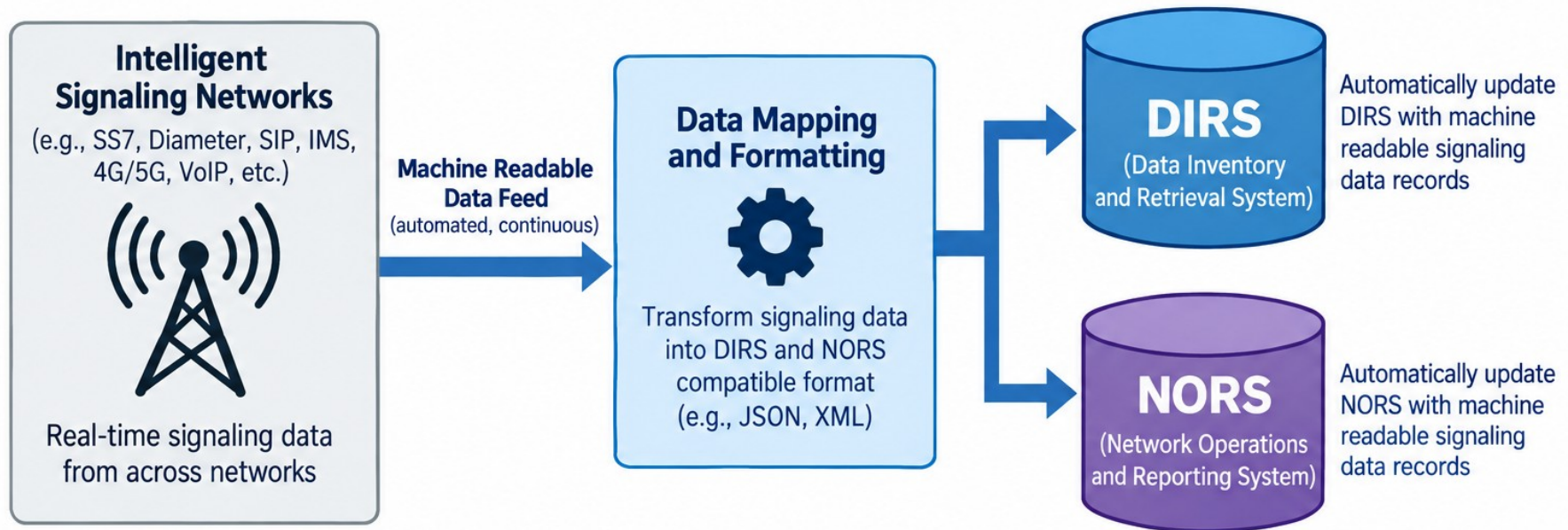
Eddie M. Pope
General Counsel
FailSafe Communications, Inc.
Texas Bar #16135500

September 30, 2026

DIAGRAM 1

Intelligent Signaling Network Data

Automatic and Machine Readable Updates to DIRS and NORS



Key Advantages

Real-time, accurate
and consistent data

Reduces manual reporting
and data collection

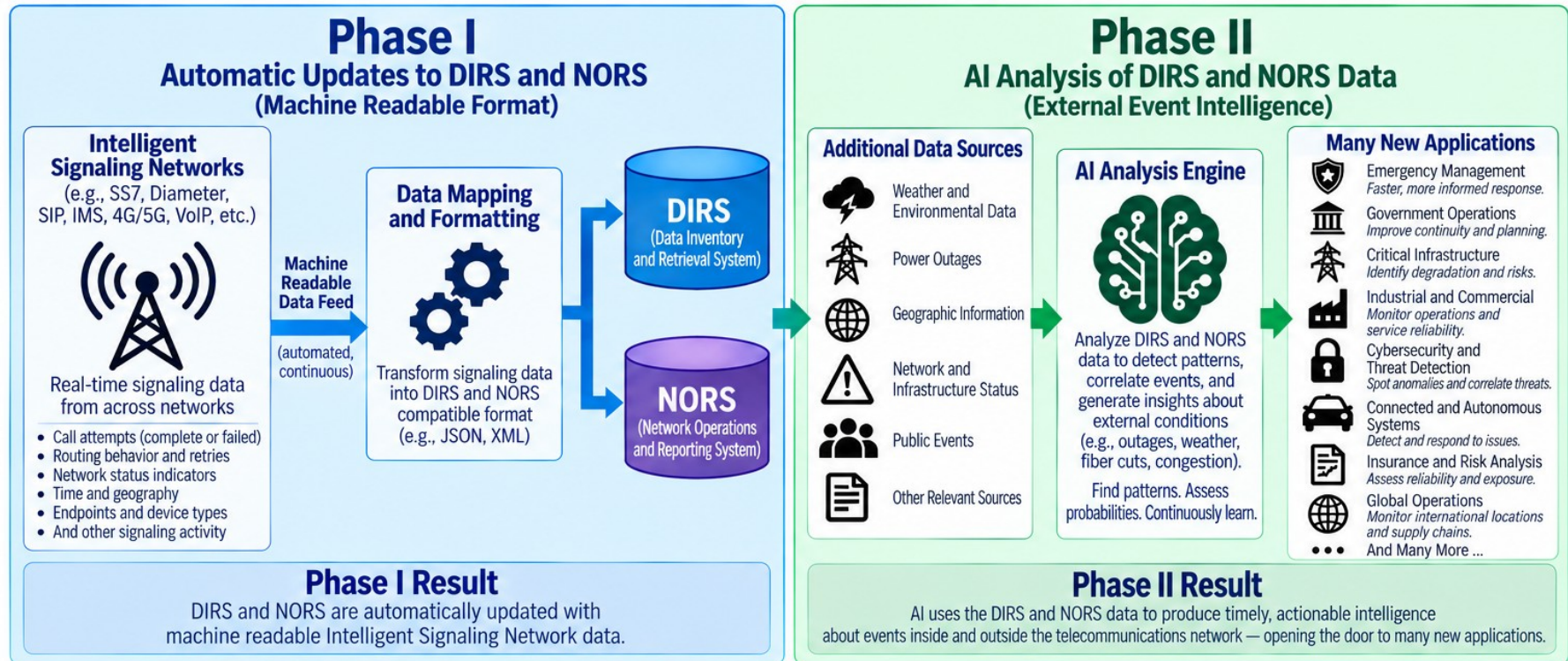
Improves network visibility
and supports faster response

DIAGRAM 2

From Intelligent Signaling Network Data to AI Insights

Turning Network Observations Into Real-World Intelligence

Automatically collect and process signaling data, then apply artificial intelligence to discover patterns, correlate external events, and enable many new applications.



U.S. PATENT APPLICATION
No. 19/814,638
Filed September 21, 2026

Systems and Methods for Artificial Intelligence Use of Intelligent Signaling Network Data

SAME DATA. GREATER INSIGHT. A MORE RESILIENT AMERICA.

By bringing together Intelligent Signaling Network data and artificial intelligence, we can turn invisible network events into real-world understanding — and help build safer communities, stronger infrastructure, and a more resilient future.



**EARLIER INSIGHTS.
STRONGER COMMUNITIES.
BRIGHTER TOMORROWS.**