

**SEPARATE STATEMENT OF  
COMMISSIONER JONATHAN S. ADELSTEIN**

*Re: New Part 4 of the Commission's Rules Concerning Disruptions to Communications; ET Docket No. 04-35, Notice of Proposed Rule Making*

I recognize that a discussion of mandatory reporting requirements for wireless and satellite providers is not embraced by everyone in industry. But I believe the time is right to look at this important issue. As we have heard today, our country continues to increasingly rely on alternative technologies for communications. Events over the past several years dictate that this Commission has access to accurate and immediate information when there are significant disruptions to our nation's communications systems.

There has been a significant effort by a number of industry representatives to work with a voluntary system for outage reporting. And that effort should be applauded. It is unclear, though, if the voluntary trial was truly successful in that it may not have provided the depth and breadth of information we really need. That concerns me, and makes this item all the more necessary.

I am pleased that we also explore in today's item improved methods for reporting disruption information electronically. These new procedures would apply to all providers subject to outage reporting requirements. This is a positive step forward that will hopefully simplify the process for both industry and the Commission staff responsible for reviewing such filings.