

FCC FACT SHEET*

Disaster Information Reporting System (DIRS) Modernization Report and Order 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

Third Report and Order – PS Docket Nos. 21-346 and 15-80; ET Docket No. 04-35

Background: The *DIRS Modernization Report and Order (Order)* adopts changes to DIRS to ensure the system is collecting information that is useful for disaster response without imposing unreasonable burdens on stakeholders. DIRS is a web-based system that collects infrastructure status and service restoration information from communications service providers during and after major disasters. This information allows emergency management officials to more efficiently prioritize disaster response efforts. The *Order* will enhance DIRS’ capabilities while eliminating unnecessary burdens on communications service providers, allowing them to focus more of their resources on service restoration instead of redundant paperwork in those circumstances when every second counts.

What the Order Would Do:

- Reduces DIRS reporting burdens by enabling manual filers to submit a single streamlined, dynamic form instead of multiple worksheets.
- Establishes a “one-click” option for manual filers to easily indicate when there is no change from the previous day’s report.
- Simplifies DIRS reporting requirements by eliminating fields that do not offer significant value to public safety stakeholders.
- Eliminates the requirement for DIRS filers to submit a final report after DIRS is deactivated, which further reduces reporting burdens and enables providers to focus on disaster response and recovery.
- Limits DIRS reporting obligations to facilities-based providers, which will eliminate unnecessary reporting burdens for resellers and mobile virtual network operators (MVNOs) that do not operate communications infrastructure.
- Directs the Public Safety and Homeland Security Bureau to improve the ability of filers to voluntarily submit geographic information about service areas and the locations of facilities that are out of service.
- Establishes mandatory DIRS reporting for public safety voice and broadband network operators on the status of public safety network infrastructure and public safety customer impact.

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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 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)

THIRD REPORT AND ORDER*

Adopted: []

Released: []

By the Commission:

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* This document has been circulated for tentative consideration by the Commission at its May 20, 2026, open meeting. The issues referenced in this document and the Commission’s ultimate resolution of those issues remain under consideration and subject to change. This document does not constitute any official action by the Commission. However, the Chairman has determined that, in the interest of promoting the public’s ability to understand the nature and scope of issues under consideration, the public interest would be served by making this document publicly available. The FCC’s ex parte rules apply and presentations are subject to “permit-but-disclose” ex parte rules. See, e.g., 47 C.F.R. §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves with the Commission’s ex parte rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission’s meeting. See 47 CFR §§ 1.1200(a), 1.1203.

I. INTRODUCTION

1. For nearly two decades, the Federal Communications Commission's (Commission) Disaster Information Reporting System (DIRS) has served as a vital tool that allows service providers to submit critical information about the status of communications infrastructure during disasters. This crucial insight gives emergency managers situational awareness they need to respond to these disasters, which can often cause communications disruptions that prevent the public from calling 911 and public safety officials' from disseminating information to the public. In this *Third Report and Order*, we adopt measures to modernize DIRS by enhancing its capabilities while eliminating unnecessary burdens on communications service providers, allowing them to focus more of their resources on service restoration instead of redundant paperwork in those circumstances when every second counts.

2. The measures we adopt today simplify DIRS reporting for all service providers especially those with limited resources. Manual filers will be able to submit a single, dynamic form instead of multiple worksheets and use a "one-click" option to easily indicate there is no change from the previous day's report. This means that service providers will no longer be required to complete as many as ten different worksheets on each day that DIRS is activated. We also eliminate unnecessary fields and worksheets to ensure we are collecting the information that is most important for emergency response. We further reduce reporting burdens by eliminating the requirement for service providers to file a DIRS final report within 24 hours of DIRS' deactivation and by exempting non-facilities-based providers from DIRS reporting. Recognizing the emergence of public safety voice and broadband networks and the critical connectivity they provide to public safety stakeholders, we require providers of these services to submit DIRS reports on the status of their public safety network infrastructure. We also augment providers' ability to voluntarily submit geospatial information on infrastructure affected by disasters. Together, these changes provide public safety officials with additional information they need while making it easier for service providers to satisfy their reporting obligations.

II. BACKGROUND

3. DIRS was established in 2007 as a voluntary, web-based system to collect infrastructure status and service restoration information from communications service providers during and following major disasters.¹ DIRS is activated by the Commission's Public Safety and Homeland Security Bureau (Bureau) in response to upcoming or ongoing disasters either on its own initiative, or in coordination with state emergency management agencies, the Federal Emergency Management Agency (FEMA), and the Cybersecurity and Infrastructure Security Agency (CISA). The reports filed in DIRS contain information about the status of critical communications infrastructure and affected subscribers that may be without service and unable to reach 911. Because DIRS reports are presumptively confidential,² the Bureau uses aggregated, anonymized data to provide communications status and restoration information for governmental agencies and the public. In 2021, the Commission adopted rules enabling federal, state, Tribal, and territorial agencies with a "need to know" to obtain read-only access to providers' DIRS filings as well as filings in NORS.³

¹ See *Public Safety and Homeland Security Bureau Launches Disaster Information Reporting System (DIRS)*, Public Notice, 22 FCC Rcd 16757 (PSHSB 2007); *Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*, EB Docket No. 06-119, WC Docket No. 06-63, Order, 22 FCC Rcd 10541, 10547-49, paras. 19-21 (2007) (directing the Public Safety and Homeland Security Bureau to continue its work to activate a system and process for communications companies serving areas affected by disasters to voluntarily submit information regarding among other things, the status of their operations, restoration efforts, power availability, and fuel).

² 47 CFR §§ 0.457(d)(1)(vi), 4.2.

³ See *Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket No. 15-80, Second Report and Order, 36 FCC Rcd 6136, 6153-55, paras. 58-62 (2021) (*NORS/DIRS Information*

4. In 2024, the Commission made DIRS reporting mandatory for cable communications, wireless, wireline, and interconnected Voice over Internet Protocol (VoIP) providers.⁴ These providers are required to “[p]rovide daily reports on their infrastructure status from the start of DIRS activation until DIRS has been deactivated” when DIRS is activated in an area where they provide service.⁵ During DIRS activations, these providers must log into DIRS the day after activation is announced and on each subsequent day during which DIRS remains active to complete worksheets applicable to their infrastructure. These providers must also file a Final DIRS Report within 24 hours of DIRS deactivation by filling in a freeform text field.⁶ Network Outage Reporting System (NORS) filing obligations are suspended during DIRS activations for facilities-based cable communications, wireline communications, wireless service, and interconnected VoIP providers that timely report in DIRS.⁷ In an accompanying *Second Further Notice of Proposed Rulemaking*, the Commission proposed additional enhancements to DIRS, among which was whether FirstNet should be subject to reporting requirements in NORS, DIRS, or both systems.⁸

5. Currently, DIRS includes ten different template worksheets for providers to report their infrastructure status, each of which requests information about the provider and its facilities, the operational status of those facilities, and subscriber impacts.⁹ Each worksheet is approximately one page in length and includes multiple fields for providers to complete concerning the type of facilities or equipment that is impacted, general location information, and information about service impacts. There are different worksheets for different services, so providers that offer multiple types of service or that have multiple types of affected infrastructure must complete multiple worksheets. Reports can be submitted via batch filing or manual filing. To utilize batch filing, providers must configure their systems to export data in a DIRS-supported format,¹⁰ whereas manual filing requires providers to manually enter line-item data for each required report. While DIRS is generally activated only for disasters that have major effects on communications, the Bureau may activate “DIRS-Lite,” an informal, voluntary process through which wireline and wireless providers may submit information about the status of major assets to

Sharing Report and Order); see also FCC, *Outage Information Sharing* (May 20, 2025), <https://www.fcc.gov/outage-information-sharing>.

⁴ See *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, 39 FCC Rcd 623, 630, para. 11 (2024) (*Second Report and Order & FNPRM*).

⁵ 47 CFR § 4.18(a); see also *Public Safety and Homeland Security Bureau (PSHSB) Announces Paperwork Reduction Act (PRA) Approval and Compliance Deadline for Mandatory Disaster Information Reporting System (DIRS) Rules*, PS Docket Nos. 21-346 and 15-80; ET Docket No. 04-35, Public Notice, 40 FCC Rcd 534 (PSHSB 2025) (announcing the effective date as Feb. 20, 2025).

⁶ See 47 CFR § 4.18(a)(2); FCC, *Frequently Asked Questions for DIRS at 3-4*, <https://www.fcc.gov/sites/default/files/DIRS-FAQs0425.pdf>.

⁷ See 47 CFR §§ 4.9, 4.18(b).

⁸ *Second Report and Order & FNPRM*, 39 FCC Rcd at 651, para. 60; see also *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, Third Further Notice of Proposed Rulemaking and Order on Reconsideration, 40 FCC Rcd 6313, 6321, para. 15 & n.39 (2025) (*FNPRM and Order on Reconsideration*) (seeking comment on mandatory or voluntary DIRS reporting for public safety networks).

⁹ See FCC, *Disaster Information Reporting System (DIRS) User Guide*, 15-18, 33-42 (Dec. 2023), <https://www.fcc.gov/sites/default/files/DIRS-UserGuide-122023.docx>; see also *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6315, para. 4 (explaining each of the worksheets).

¹⁰ See FCC, *DIRS Upload API Guide* (Dec. 2023), <https://www.fcc.gov/sites/default/files/DIRS-UploadAPI-Guide-0124.docx>.

the Commission by e-mail or phone, for less catastrophic events.

6. In the *Third Further Notice and Order on Reconsideration (FNPRM)*, the Commission undertook its first comprehensive review of DIRS reporting forms and fields since DIRS was created, seeking ways to reduce the burdens of DIRS reporting to providers and increase its value for public safety stakeholders.¹¹ The Commission received 17 comments and six replies.

III. DISCUSSION

A. Simplifying the DIRS User Interface

7. To simplify DIRS for manual filers and make DIRS information more useful to emergency managers, we adopt our proposal to redesign the DIRS interface to replace the ten separate DIRS worksheets with a single, dynamic form as proposed in the *FNPRM*.¹² Instead of completing a series of worksheets that collect overlapping information, manual DIRS filers will respond to initial questions about the services they provide in the DIRS activation area and the impacts to equipment and facilities caused by the disaster. Based upon these responses, manual filers will be presented with questions seeking information applicable only to the services the filer provides. Information that currently appears on multiple worksheets would only need to be entered once.¹³ While, as the *FNPRM* noted, manual filers comprise a minority of providers that submit DIRS reports, many providers that manually file DIRS reports are small- or medium-sized businesses, and so this change will have an outsized effect in reducing burdens for providers whose resources may be most thinly stretched during a disaster.¹⁴

8. The record supports our view that this step will simplify and reduce the time burden associated with manual data entry in DIRS.¹⁵ The National Rural Electric Cooperative Association observes that the current DIRS reporting framework is cumbersome and inefficient with many overlapping data fields.¹⁶ Accordingly, CTIA and others describe this, along with other measures we adopt today, as “common sense changes that would reduce burdens on providers, allowing them to direct resources towards recovery efforts without impacting the actionable information provided to public safety stakeholders through DIRS reports.”¹⁷ The National Association of Broadcasters (NAB) agrees that this redesign “will facilitate filing in DIRS during a disaster[,]”¹⁸ and NTCA adds that it will “benefit public safety agencies by allowing them to more quickly identify the status of communications in their area.”¹⁹ The Competitive Carriers Association (CCA) observes that these changes address a concern that is “particularly acute for small and rural carriers. Such providers often operate with limited engineering and

¹¹ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6318, para. 9. In the earlier *Second Further Notice of Proposed Rulemaking*, the Commission proposed to require FirstNet, the nationwide public safety voice and broadband network, to report outages to the Commission via NORS and DIRS, among other proposals. See *Second Report and Order & FNPRM*, 39 FCC Rcd at 651-653, paras. 60-63.

¹² See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6318, para. 10.

¹³ See *id.* at 6318, para. 11.

¹⁴ See *id.* at 6318, para. 11; see also *id.* at Appendix D.

¹⁵ See, e.g., Competitive Carriers Association Reply at 2 (CCA Reply) (noting that this and other steps proposed in the *FNPRM*, will “meaningfully reduce reporting burdens without diminishing the utility of DIRS for public safety officials”); WTA – Advocates for Rural Broadband Comments at 2 (WTA Comments); ACA Connects Comments at 5.

¹⁶ National Rural Electric Cooperative Association Comments at 3-4 (NRECA Comments).

¹⁷ CTIA Comments at 3-4; see also NRECA Comments at 4; Verizon Comments at 1; WISPA Comments at 3; WTA Comments at 2; AT&T Reply at 2; CCA Comments at 2.

¹⁸ See National Association of Broadcasters Comments at 2 (NAB).

¹⁹ NTCA—The Rural Broadband Association Comments at 3 (NTCA Comments).

operations teams, many of whom are simultaneously engaged in damage assessment, power restoration, and physical repairs.”²⁰ No commenters oppose this proposal or express concern that its adoption would diminish DIRS’s utility.

B. Establishing a “One-Click” Filing Option

9. In the interest of reducing the burdens of required DIRS reporting and encouraging participation for voluntary DIRS filers, we adopt our proposal to establish a “one-click” option on the consolidated worksheet for providers to indicate there is no change in infrastructure status from the previous day’s report.²¹ Commenters agree that this would reduce time spent on manual DIRS entry while preserving the value of DIRS for emergency management officials.²² USTelecom states that a one-click option will “improve the efficiency” of disaster-related data collection,²³ and an individual commenter describes this change as “monumental.”²⁴ In addition to saving time and streamlining DIRS report preparation, NAB believes this change “would facilitate broadcasters’ voluntary participation in DIRS, especially smaller stations.”²⁵ As reflected in these comments, we believe this step will simplify manual DIRS report submission during DIRS activations, while also enabling providers to have more time to focus on the important task of restoring service to their customers.

10. We decline to extend the availability of a one-click-like option to batch filers, in addition to manual filers, as recommended by WISPA – The Association for Broadband Without Boundaries (WISPA).²⁶ To satisfy their DIRS reporting obligations, batch filers already enjoy a streamlined filing process whereby they upload a provider-created spreadsheet to the Commission, the production of which may be automated by network administration systems.²⁷ We disagree with WISPA that implementing the equivalent of one-click filing will enable batch filers to complete their DIRS filing obligation more easily than simply resubmitting the previous day’s spreadsheet. We believe that a one-click (or near one-click) option would require substantially similar effort and time for DIRS batch filers as using the existing spreadsheet upload process, particularly for those users that leverage the DIRS Upload Application Programming Interface (API). Further, in our experience, batch filers are more likely to be larger entities providing service through many facilities in a broader geographic area than manual filer. As a result of the number of facilities on which batch filers report and the dynamic nature of service restoration during and after disasters, DIRS information for batch filers is very likely to change day-over-day, making a one-click option less useful for these types of filers.

11. While no commenter opposes the Commission’s proposal, one commenter requests that the Commission have “a way to ensure that [] providers aren’t actually skipping the daily report and are in

²⁰ CCA Reply at 3.

²¹ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6319, para. 11.

²² See CTIA Reply at 3; ACA Connects Comments at 3-6; Alliance for Telecommunications Industry Solutions Comments at 3-4 (ATIS Comments); CTIA Comments at 2-4; Foundation for Defense of Democracies Comments at 5; National Association of Broadcasters Comments at 2 (NAB Comments); NCTA – The Internet & Television Association Comments at 3-4 (NCTA Comments); NRECA Comments at 3-4; NTCA Comments at 3-4; Verizon Comments at 1-2; WISPA – The Association for Broadband Without Boundaries Comments at 2-4 (WISPA Comments); WTA Comments at 2.

²³ USTelecom—the Broadband Association Comments at 4 (USTelecom Comments).

²⁴ Jacob Kleiner Comments at 1 (Kleiner).

²⁵ See NAB Comments at 2.

²⁶ See WISPA Comments at 3 (WISPA Comments); WISPA – The Association for Broadband Without Boundaries Reply at 5 (WISPA Reply).

²⁷ See *id.*; FCC, *DIRS Upload API Guide* (Dec. 2023), <https://www.fcc.gov/sites/default/files/DIRS-UploadAPI-Guide-0124.docx#:~:text=Navigate%20to%20the%20top%20right,contact%20DIRSHelp@fcc.gov%20> (“The Upload API allows for the bulk upload of data without having to use the DIRS system GUI”).

fact checking their data to see it hasn't changed."²⁸ We recognize this valid concern. As an initial matter, we note that providers are under an obligation to report information truthfully to the Commission.²⁹ To remind providers of the requirement to submit accurate information, we will also add the following language to DIRS, which the user will be required to acknowledge when clicking "submit": "By submitting this Form, you certify that the information you have provided on this Form and the attachments is true and accurate. Filers are responsible for the accuracy of the information they file with the Commission, including any data automatically populated into this Form or its attachments from other Commission databases. Failure to ensure the accuracy of information filed with the Commission may result in enforcement action."³⁰ We believe this language puts providers further on notice that it is their responsibility to verify the accuracy of the information in their reports. We expect that this language will prompt providers to review any existing data before submitting their DIRS report.

C. Eliminating Unnecessary DIRS Fields and Worksheets

12. To further streamline DIRS reporting for both manual and batch filers, we eliminate many DIRS reporting fields and worksheets, as proposed in the *FNPRM*.³¹ The record affirms our view that the worksheets and fields we eliminate today are unnecessary because they are duplicative and/or provide little of actionable value for disaster response. We summarize the remaining DIRS fields that will be mandatory or voluntary to complete in Appendix C.

13. *Eliminate the Inter-exchange Carrier (IXC) Blocking Worksheet.* We eliminate the inter-exchange carrier worksheet, agreeing with ACA Connects which observes that the worksheet "has not proven useful for disaster response."³² No commenters oppose this action.

14. *Eliminate the "Percent of Historical Capacity Available" Field from the Wireless Cell Site by County Worksheet.* We eliminate the "percent of historical capacity available" field from the Wireless Cell Site by County worksheet because this field is redundant as the information it contains can be derived from other reported data. As explained by CTIA, "[t]he Commission has access to the relevant information provided in [this field] through other means, such as by measuring capacity based on the number of sites reported in operation or out of service."³³ We agree, and find that since the Commission has the ability to calculate this percentage from other data reporting in DIRS, it is appropriate to eliminate this field from the worksheet. No commenters disagree with this conclusion.

15. *Consolidate Cable Telephone Subscriber Data Fields.* Rather than eliminate DIRS' reporting fields for cable telephony, as proposed, we consolidate the fields for cable communications providers that request (1) the number of cable telephone subscribers served and (2) the number of VoIP subscribers served with (3) the number of cable telephony subscribers down and (4) the number of VoIP subscribers whose service is down.³⁴ As a result of this action, cable communications service providers will be required to respond to only two prompts: how many cable telephony and/or VoIP subscribers do you serve, and how many of them are without service? Based on data reported in NORS and DIRS over

²⁸ Kleiner Comments at 1.

²⁹ 47 CFR § 1.17; *see also* 18 U.S.C. § 1001.

³⁰ We base this attestation language from another Commission reporting system, the EAS Test Reporting System (ETRS). In ETRS, filers are required to certify to the truthfulness and accuracy of the information they are submitting to the Commission. *See Review of the Emergency Alert System*, PS Docket No. 04-296, Report and Order, 30 FCC Rcd 6520, 6533-34, paras. 27-28 (2015) (establishing that EAS participants must ensure the accuracy of the information).

³¹ *See FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6319-20, para. 13.

³² *See America's Communications Association Comments at 5 (ACA Connects Comments)*.

³³ *See CTIA Comments at 4*.

³⁴ *See FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6319, para. 13 (proposing to eliminate the cable telephony fields).

the past year, cable communications service providers themselves often appear to be unsure whether to report voice outages as VoIP or cable telephony, resulting in inconsistent and unreliable reporting for outages of each type. Moreover, the difference between cable telephony provided via a circuit-switched network and cable telephony provided via VoIP is often not material from an emergency management standpoint. We agree with ACA Connects that eliminating the need for providers to discern between these two types of service in their DIRS reports “would substantially reduce the time burdens associated with DIRS data entry without compromising DIRS’s mission.”³⁵ This action is also consistent with CTIA’s advocacy that we eliminate duplicative fields in DIRS.³⁶ We take this action to improve DIRS reporting efficiency and to save service providers precious time in DIRS reporting when their primary focus is on disaster recovery and restoring service to customers. No commenters oppose this action.

16. *Eliminate Video Subscriber Data Fields from the Cable System and Major Equipment Worksheets.* We remove the fields currently in the cable system and major equipment worksheet that request the number of video subscribers served and the number whose service is down to, consistent with NCTA’s comments, “facilitate more efficient reporting by providers and [to] help maximize the time and resources that are available for network restoration.”³⁷ NAB and ACA Connects support our taking this step because this information is less critical for disaster response,³⁸ and no commenters oppose this action.

17. *Eliminate the “Number of Access Lines” field from the Major Equipment Worksheet.* We eliminate the “number of access lines” field from the existing major equipment worksheet because, as noted in the *FNPRM*,³⁹ this information is addressed by other questions on the same worksheet that are better targeted to gathering useful information. Specifically, the major equipment worksheet requests the “number of working numbers” and the “number of working numbers down.”⁴⁰ While there can be multiple working telephone numbers on a single access line, we do not believe it is necessary for disaster response to collect both types of data. We believe it reasonable to use “working numbers down” as a proxy for affected customers. Moreover, this field, in combination with the “number of working numbers” field, yields important information about how much of a provider’s customer base is without service. ACA Connects supports our eliminating this field step because this information is covered elsewhere on the existing major equipment worksheet,⁴¹ and no commenters oppose our taking this step.

18. *Harmonize Fields on the Interoffice Facilities – TSP worksheet with NORS.* We update the fields on the existing interoffice facilities – TSP worksheet by collecting information about the number of Optical Carrier circuits (or their functional equivalent) affected and eliminating the requirement to report the “number of DS3s affected (down).”⁴² We find this important to keep pace with marketplace changes that have added capacity to today’s high-speed networks. USTelecom – The Broadband Association (USTelecom) supports harmonizing fields that currently exist on this worksheet as we proposed in the *FNPRM*,⁴³ and no commenters disagreed with this modification.

³⁵ ACA Connects Comments at 5; *see also* NCTA Comments at 3 (NCTA Comments).

³⁶ *See* CTIA Reply at 4.

³⁷ NCTA Comments at 4.

³⁸ *See* NCTA Comments at 3-4; ACA Connects Comments at 5.

³⁹ *See FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6319, para. 13.

⁴⁰ FCC, Disaster Information Reporting System (DIRS) User Guide at 22 (2023), <https://www.fcc.gov/sites/default/files/DIRS-UserGuide-122023.docx> (DIRS User Guide).

⁴¹ *See* ACA Connects at 5.

⁴² *See, e.g.*, 47 CFR § 4.9(e)(1)(iii) (requiring NORS reporting when outages reach certain OC3 thresholds). For the avoidance of doubt, we emphasize that we are not eliminating required reporting for circuits that are smaller than an OC3. Required reporting on OC3s or functional equivalents will include DS3s, for example, that are transporting volumes of traffic that are the functional equivalent of an OC3.

⁴³ *See* USTelecom Comments at 7-8.

19. *Make Reporting the Number of Remote Aggregation Devices Voluntary.* We make it voluntary, rather than mandatory, for providers to report the number of remote aggregation devices that are down as provided on the existing remote aggregation devices worksheet.⁴⁴ We find that other fields on the current worksheet, specifically the “number of working numbers served” and “number of working numbers down,” collect more useful information about customer impact and pace of service restoration than the “number of [remote aggregation devices] . . . down” field.⁴⁵ We believe we can further our goal of simplifying DIRS without sacrificing useful information for public safety stakeholders by making this field voluntary. While this will provide an incremental time savings to those providers that elect not to complete this field in DIRS, it will enable providers to continue to share this information. ACA Connects supports our rationale for this conclusion and no commenters object to proceeding in this manner.⁴⁶

20. *Make Broadband Data User Fields Voluntary.* We make the collection of broadband access user information voluntary, rather than mandatory, for all DIRS filers except fixed and mobile broadband providers that are stage 2 recipients of the Uniendo a Puerto Rico Fund and Connect USVI Fund, as we proposed and as supported by NCTA, CCA, and ACA Connects.⁴⁷ This step preserves the collection, on a voluntary basis, of information that is important to public safety stakeholders, as broadband access is a critical lifeline enabling the public to stay informed during disasters and emergencies, while still reducing burdens on providers. As CCA notes, adopting streamlining measures like this “ensure[s] providers can maximize their recovery efforts [while] critical information is shared with relevant emergency management entities.”⁴⁸ The record supports this modification and no commenters disagree with this step.⁴⁹

21. *Retain Voluntary DIRS Reporting for Satellite Providers.* As a means of maintaining visibility into critical infrastructure during disasters, we decline to adopt our proposal in the *FNPRM* to eliminate the fields on satellite services. CTIA stated it “[did] not have any specific concerns about eliminating the satellite worksheet.”⁵⁰ Notwithstanding the fact that Verizon “does not oppose” exempting satellite providers from DIRS reporting, Verizon observes that “wireless and wireline providers’ customers may rely in part on satellite capabilities during DIRS activations” and wireless and wireline providers have limited visibility into the status of satellite providers’ networks.⁵¹ While acknowledging that no satellite provider has ever filed in DIRS, the National Rural Electric Cooperatives Association notes that public safety officials, the Commission, and the public deserve “to have the best information available” in the event of a “powerful solar storm, ‘Kessler Syndrome’ ablation cascade, or a disaster of a type yet unknown[]” affects satellite service.⁵² We agree that it is possible that a disaster that specifically affects satellite services could create a need for the Commission to activate DIRS; however, were we to eliminate the satellite worksheet fields as proposed, we would be unprepared to receive daily infrastructure status updates from satellite operators, even on a voluntary basis. In light of the key role satellite service plays to enable other modes of communications and to support national

⁴⁴ Remote aggregation devices combine network traffic from remote locations and are used to serve many rural communities. See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6315, para. 4.

⁴⁵ DIRS User Guide at 34-35.

⁴⁶ See ACA Connect Comments at 5.

⁴⁷ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6319, para. 13; NCTA Comments at 4; CCA Reply at 3; ACA Connects Comments at 5. Fixed and mobile broadband providers that are stage 2 recipients of the Uniendo a Puerto Rico Fund and Connect USVI Fund are required to report in DIRS. See 47 CFR § 54.1524.

⁴⁸ CCA Comments at 3.

⁴⁹ See ACA Connects Comments at 5; NCTA Comments at 4; CCA Reply at 3.

⁵⁰ CTIA Comments at 3, n.7.

⁵¹ Verizon Comments at 2, n.3.

⁵² NRECA Comments at 7.

security interests, we are persuaded to retain the worksheet.

22. We decline, however to make satellite reporting in DIRS mandatory at this time as recommended by the Foundation for Defense of Democracies in consideration of the increasing threats from China and the importance of these systems to the economy and military operations.⁵³ We believe retaining the worksheet on a voluntary basis strikes the appropriate balance of enabling public safety officials to receive satellite status information through DIRS in the event there is a disaster that impacts satellite service, without burdening satellite providers with mandatory reporting obligations for circumstances that have not yet come to pass in the history of DIRS.⁵⁴ The Commission continues to retain visibility into satellite network status through satellite providers' ongoing mandatory obligation to report outages in NORS.⁵⁵ Our approach ensures that the Commission will remain informed of significant impairments to satellite connectivity, preserves the ability for satellite providers to voluntarily report in DIRS should an unforeseen event warrant such reporting, all while avoiding burdening satellite providers with new mandatory reporting obligations.

23. *Allow Providers Flexibility in Providing Location Information.* We decline to adopt our proposal to improve the utility of DIRS data by requiring providers to submit location information for their affected equipment or facilities in a single format, either street address or latitude and longitude.⁵⁶ While ACA Connects notes submitting "street addresses would be significantly less burdensome than the submission of latitude/longitude data[.]"⁵⁷ no other stakeholder or public safety entity indicates that one format is preferable to the other for any given type of facility or equipment. Instead, industry commenters ATIS, CTIA, NTCA, and Verizon argue that providers should continue to be allowed to select their preferred format for any type of facilities or equipment.⁵⁸ NTCA argues that maintaining our current approach would minimize "the time providers must spend completing DIRS reports."⁵⁹ We find that continuing to allow providers to choose which address format to use for equipment and facilities location reporting is appropriate because, as CTIA points out, equipment located in rural or remote areas may not have a street address at all,⁶⁰ and requiring providers to convert information that they maintain as a street address into a latitude and longitude would, as ATIS observes, result in "significant impacts on the industry."⁶¹

24. We find that previous delegations of authority to the Bureau are sufficiently broad to enable it to implement these modifications, as well as future modifications to DIRS and its fields that may be needed to ensure that the system continues to serve its crucial role in disaster response and recovery. As noted in the *FNPRM*, the Commission has delegated authority to the Bureau "to administer the communications disruption reporting requirements contained in part 4 of this chapter and to revise the

⁵³ See Foundation for Defense of Democracies Comments at 4-5.

⁵⁴ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6319, para. 13 (noting that no satellite providers have ever made a DIRS filing).

⁵⁵ See 47 CFR § 4.9(c).

⁵⁶ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6320, para. 13.

⁵⁷ ACA Connects Comments at 5 n.8.

⁵⁸ See ATIS Comments at 1-2; CTIA Comments at 5-6; NTCA Comments at 4; and Verizon Comments at 2.

⁵⁹ NTCA Comments at 4.

⁶⁰ See CTIA Comments at 5-6. The regulatory flexibility that we offer in this regard is consistent with our conclusion below that a coverage area map, rather than the locations of individual equipment or facilities, is the best way for providers to convey geographic information about outage impacts during disasters to the Commission and emergency managers for the purpose of offering insight into the availability of Wireless Emergency Alerts and 911 service.

⁶¹ See ATIS Comments at 4.

filing system and template used for the submission of such communications disruption reports.”⁶² While no commenter challenges this delegation,⁶³ some commenters seek to require the Bureau to exercise its delegated authority “subject to consultation with wireless service providers”⁶⁴ or limited to “what is expressly authorized in the final rules.”⁶⁵ We find it unnecessary to revise the authority delegated to the Bureau in this manner. The revision to section 4.18(a) that we adopt today will contain more specificity for PSHSB to implement as it revises the DIRS filing system and templates. We further find that it is necessary for the Bureau’s authority to be sufficiently broad to ensure that the Bureau has the flexibility to timely implement lawful changes to DIRS and otherwise maintain the system as necessary to ensure that it remains effective without unnecessary bureaucratic obstacles.

25. We direct the Bureau to afford providers an opportunity to test the above improvements to DIRS before they are officially released, as recommended by Verizon.⁶⁶ This process will also allow filers to provide additional feedback on the new DIRS interface to ensure usability. We decline, however, to require the Bureau to engage in a second round of notice and comment on the look and feel of the new DIRS system, as suggested by USTelecom, ATIS, AT&T, CTIA, and WISPA.⁶⁷ While formal notice and comment was appropriate to address the information that providers are required to file in DIRS because those changes affect their legal obligations, no such formality is needed to enable the Bureau to consider feedback from industry on its implementation of the changes contemplated herein.

D. Eliminating the DIRS Final Report

26. As proposed in the *FNPRM*, we eliminate the requirement for providers to file a final report in DIRS within 24 hours of DIRS’ deactivation.⁶⁸ Many commenters argue that DIRS final reports are not useful to emergency managers.⁶⁹ ATIS, WISPA, and WTA submit that the primary reason DIRS final reports have not been as useful in practice as the Commission intended is the “uncertainty and unknowns that will still exist right after the end of the DIRS reporting period,” which prevent providers from offering reliable, actionable service restoration estimates.⁷⁰ We agree. In our experience, DIRS final reports have not provided emergency managers with reliable service restoration estimates, which must be made when DIRS is deactivated. Moreover, we understand from experience that the timeline for

⁶² See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6321-22, para. 17 (citing 47 CFR § 0.392(i)).

⁶³ See, e.g., CTIA Comments at 6.

⁶⁴ CTIA Comments at 6; see also Verizon Comments at 2 (advocating delegated authority be exercised in “conjunction with industry feedback and testing”).

⁶⁵ USTelecom Comments at 8-9.

⁶⁶ See Verizon Comments at 2 (“Once the format is finalized, an implementation period for testing and voluntary participation would be appropriate, and only after the reliability of the updated system is confirmed should any new format be mandated.”).

⁶⁷ See USTelecom Comments at 9 (requesting “that the Commission require the Bureau to release any revised DIRS forms for public notice and comment prior to adoption, and coordinate with industry on the format to ensure compatibility with providers’ systems”); ATIS Comments at 3-4 (recommending “that the Commission make available, perhaps on the DIRS test server, a mockup of the form, and allow DIRS filers to review, similar to the way the Commission provided examples of its proposed templates for multilingual WEA so the public can provide informed input”); AT&T Reply at 2; CTIA Reply at 4.

⁶⁸ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6322, paras. 18-19.

⁶⁹ See, e.g., ACA Connects Comments at 6; NTCA Comments at 3-4; and WISPA Comments at 4.

⁷⁰ See ATIS Comments at 2, 5 (DIRS final report “asks for information when conditions may not have stabilized enough to safely assess damage or service availability, making timely and complete reporting impractical.”); WISPA Comments at 4 (“during the 24-hour period between DIRS deactivation and the final report deadline service restoration may still be ongoing and restoration timelines may be uncertain.”); ACA Connects Comments at 6; WTA Comments at 2; CTIA Comments at 3-4; NRECA Comments at 4; NCTA Comments at 2; NTCA Comments at 3-4; USTelecom Comments at 3-4; Verizon Comments at 2.

service restoration can depend on factors outside of the service provider's control, such as the accessibility of the damaged area to service technicians or the availability of replacement parts, so it is not sensible to refer to estimates provided in the midst of an emergency as "final." As such, we disagree with the Foundation for Defense of Democracies that the DIRS final report "ensur[es] accountability and provid[es] a definitive record for planning repairs and analyzing outages."⁷¹ As we reasoned in the *FNPRM*, service restoration estimates that routinely prove incorrect cause more harm than good because reliance on those estimates leads to the misallocation of finite disaster response resources.⁷² Taking more time to consider the potential utility of these requirements, as Public Knowledge suggests we should,⁷³ cannot change the fundamental difficulty of presenting DIRS information to emergency managers as "final" as if service providers can predict the future. Further, we are not persuaded to retain the DIRS final report requirement by Public Knowledge's vague assertion that, even if this information is not valuable for immediate situational awareness, it has value as "historic information for analysis and planning."⁷⁴ We also do not believe it would be beneficial to retain a streamlined version of the DIRS final report requirement that providers could satisfy with "one-click."⁷⁵ If the Bureau believes that an additional day of DIRS reporting on infrastructure status was warranted before DIRS's deactivation, it can obtain that information simply by keeping DIRS active for an additional day.

E. Exempting Non-Facilities-Based Providers From DIRS Reporting

27. To eliminate duplicative and potentially speculative DIRS reporting about infrastructure neither owned nor operated by the reporting entity, we revise our mandatory DIRS rules to apply only to facilities-based providers, exempting providers that do not own or operate their own facilities or infrastructure in the DIRS activation area. We agree with CTIA that providers that do not own or operate their own facilities or infrastructure should not report in DIRS because "their service offerings rely on the facilities of underlying service providers that already report the status of those facilities" in DIRS.⁷⁶ In our experience, information that non-facilities-based providers submit in DIRS about the status of facilities or infrastructure that they do not own or operate tends to be either speculative, as ACA Connects and NCTA observe,⁷⁷ or derivative of information that the non-facilities-based provider has imposed upon the facilities-based provider to obtain, as WISPA observes.⁷⁸ We agree with CTIA and T-Mobile that receiving information about the status of the same communications equipment from both the facilities-based provider that owns and operates that equipment and from non-facilities-based providers that rely upon that equipment to offer service introduces a risk of double counting that threatens the quality of DIRS data.⁷⁹ It will promote our ability to quickly and reliably produce aggregated information about the status of communications equipment during disasters to receive one authoritative report about each relevant communications facility in a DIRS activation area, and we agree with ACA Connects that the report we receive should come from the party "with direct visibility into the outage and system restoration."⁸⁰ That provider will be in the best position to answer DIRS' prompts about the status of the

⁷¹ See Foundation for Defense of Democracies Comments at 3.

⁷² See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6322, para. 18.

⁷³ See Public Knowledge Comments at 2.

⁷⁴ See *id.*

⁷⁵ See Foundation for Defense of Democracies Comments at 5.

⁷⁶ CTIA Comments at 4.

⁷⁷ See ACA Connects Comments at 9; NCTA Comments at 2.

⁷⁸ See WISPA Comments at 5.

⁷⁹ See CTIA Comments at 4 (explaining how the underlying service providers already reports the status of their facilities to the Commission); T-Mobile Comments at 5 (indicating that the facilities-based carriers the MVNOs utilize must submit infrastructure status information in DIRS).

⁸⁰ ACA Connects Comments at 3.

facilities or infrastructure. Eliminating reporting requirements for other providers will result in more accurate data and remove unnecessary burdens from industry.

28. NCTA recommends that we extend the exemption for non-facilities-based providers to NORS for the same reasons as we offer it in the context of DIRS.⁸¹ We reject this recommendation and continue to require mobile virtual network operators and wireless, wireline, and interconnected VoIP resellers to report outages in NORS.⁸² As the Commission has previously found, these providers are “uniquely positioned to provide information on outages affecting their customers.”⁸³ Unlike DIRS reporting’s focus on “infrastructure status” during and after disasters,⁸⁴ non-facilities-based providers are in the best position to report in NORS about the effects of outages on their subscribers because they have visibility into the status of their own subscribers, while the underlying facilities-based providers on which they rely often do not. The Commission also relies on NORS reporting as a source of information about the root causes of all kinds of network outages and the impacts of those outages on end users, which leads “to the development of best practices and has fostered a ‘data-driven, self-improvement model.’”⁸⁵ By maintaining the requirement that non-facilities-based providers report in NORS, the Commission preserves its insight into the impact of outages on the millions of non-facilities-based provider subscribers nationwide.

29. We do not adopt the *FNPRM*’s proposal to require facilities-based wireless providers to report in DIRS which mobile virtual network operators utilize their respective networks within the DIRS activation area, nor do we adopt the alternative that mobile virtual network operators identify their underlying network providers as part of a limited DIRS filing.⁸⁶ Public Knowledge observes that there is not necessarily a simple, direct relationship between the operational status of a facilities-based provider and a non-facilities-based provider that relies upon it.⁸⁷ As CTIA also recognizes, non-facilities-based providers often utilize the networks of multiple facilities-based providers in delivering their service.⁸⁸ As a result, we are concerned that a list of business relationships alone would be insufficient to enable emergency managers to derive actionable insights about a disaster’s impacts on their community, irrespective of whether a facilities-based or non-facilities-based provider submits it. While there are undoubtedly examples of non-facilities-based providers that rely exclusively on a single facilities-based provider to offer service, significant risk would stem from inducing emergency managers to believe that

⁸¹ See NCTA Comments at 3.

⁸² See 47 CFR §§ 4.3(f) (defining wireless communications providers to include “affiliated and non-affiliated entities that maintain or provide communications networks or services used by the provider in offering such communications”); 4.3(g) (defining wireline communications providers to include affiliated and non-affiliated entities that maintain or provide communications services used by the provider in offering such communications); 4.3(h) (defining interconnected VoIP providers to include facilities-based or non-facilities-based providers and “affiliated and non-affiliated entities that maintain or provide communications networks or services used by the provider in offering such communications”); 4.9(e)(1); 4.9(f)(1); 4.9(g)(1) (requiring wireless, wireline, and interconnected VoIP providers, respectively, to notify the Commission via NORS of outages on any facilities they “own, operate, lease, or otherwise utilize . . .”).

⁸³ See *Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket No. 15-80 and ET Docket No. 04-35, Report and Order, 30 FCC Rcd 3206, 3227, para. 63 (2015); cf. *FCC Enforcement Advisory - Mobile Virtual Network Operators (MVNOs) must file in the Robocall Mitigation Database (RMD) and respond to traceback requests*, Public Notice, DA 26-174 at 2 (EB Feb. 20, 2026).

⁸⁴ 47 CFR § 4.18(a).

⁸⁵ *New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 16830, 16846-47, para. 28 (2004); see also 47 CFR § 4.9.

⁸⁶ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6323, para. 21.

⁸⁷ See Public Knowledge Comments at 4.

⁸⁸ CTIA Comments at 4-5; Public Knowledge Comments at 4.

this is always the case by requiring the disclosure of business relationships as a proxy for the availability of service to communities. While Public Knowledge argues that this complexity is grounds for the Commission to continue require non-facilities-based providers to report in DIRS, we conclude that the burdens of filing this information outweigh its public safety value.

F. Voluntarily Collecting More Information on Where Facilities Are Out of Service

30. We direct the Bureau to upgrade DIRS to improve the ability of filers to voluntarily submit geographic information about service areas and the locations of facilities that are out of service. As Public Knowledge puts simply, collecting more granular information for stakeholders “can improve their disaster response.”⁸⁹ In the *FNPRM*, we specifically sought comment on whether to collect more granular information from wireless providers about the location of cell sites that are out of service.⁹⁰ Whereas DIRS requires providers to specify the location of major equipment other than wireless cell sites,⁹¹ DIRS currently only requires wireless providers to complete a worksheet to specify the number of cell sites out by county.⁹² Wireless providers, however, have voluntarily submitted more granular information than DIRS requires about the location of their wireless cell sites. T-Mobile voluntarily provides cell site location data in Keyhole Markup Language.⁹³ As ATIS observes, one major wireless provider has voluntarily submitted shape files in response to DIRS activation since 2017,⁹⁴ which provide “information about cell site impacts on a very conservative measure of -98db.”⁹⁵ Accordingly, we agree with CTIA that collecting mapping data from service providers during DIRS activation on a voluntary basis is an approach that is working well,⁹⁶ and we therefore do not require providers to submit any additional mapping data at this time.⁹⁷

31. However, we recognize that DIRS does not offer an easy way for providers to voluntarily submit geographic information about service coverage and infrastructure location and believe that expanding that capability may induce more providers to submit that information and make DIRS easier to use for providers that do submit that information.⁹⁸ We do not limit the submission of geographic information solely to cell site locations, but allow it for any kind of geographic information that filers believe would be useful to provide to emergency managers. We believe this flexibility was warranted in light of Verizon, CCA, and other commenters arguments that “[c]overage, not site location, is most

⁸⁹ Public Knowledge Comments at 1.

⁹⁰ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6320, para. 15.

⁹¹ See DIRS User Guide at 33, 35, 38 (requiring the Common Language Location Identifier for major equipment, remote aggregation devices and switches, wireless mobile switching centers); see also iconectiv, *TruOps Common Language location information services CLLI* at 1, <https://iconectiv.com/sites/default/files/2021-01/iconectivtruopscommonlanguageclli.pdf>; FCC, *Disaster Information Reporting System (DIRS) User Guide*, at 33, 35, 38 (Dec. 2023), <https://www.fcc.gov/sites/default/files/DIRS-UserGuide-122023.docx> (eliciting the CLLI as a required field for major equipment, remote aggregation devices, and wireless MSC STP voice, but not wireless cell sites).

⁹² See DIRS User Guide at 38-39.

⁹³ See T-Mobile Comments at 6.

⁹⁴ ATIS Comments at 5 (stating that DIRS filers have been providing more accurate location information in for cell sites in DIRS since 2017).

⁹⁵ ATIS Comments at 5 (attributing this practice to “DIRS filers” but, in the Bureau’s experience, only one major provider takes this approach).

⁹⁶ See CTIA Reply at 6-7.

⁹⁷ While providing this information in DIRS is voluntary, the Bureau may still exercise its delegated authority to require providers to provide this information in appropriate circumstances. See, e.g., 47 CFR § 0.392(h).

⁹⁸ The wireless provider that submits shape files in DIRS, for example, needs to compress their shape file into a .zip file before submitting it using DIRS and the Commission needs to unzip that file before it can access the shape file.

relevant to where Wireless Emergency Alerts, 911 calls and public safety-related communications are affected during disaster events.”⁹⁹ Upgrading DIRS to offer providers a clear way to submit a wider array of geographic information in additional formats may also reduce burdens on providers and other stakeholders.

G. Requiring DIRS Reporting for Public Safety Voice and Broadband Network Operators

32. To ensure that emergency managers and first responders have the information they need to stay connected during disasters, we require public safety voice and broadband network operators to submit DIRS daily reports about their infrastructure status when the Commission activates DIRS in geographic areas where they provide service.¹⁰⁰ Public safety voice and broadband networks now play a vital role in keeping first responders connected during emergency response. FirstNet manages and operates a nationwide public safety voice and broadband network that plays a key role in enabling first responders using FirstNet’s network to communicate with one another and with PSAPs during emergencies.¹⁰¹ As the National Regional Planning Council states, public safety officials increasingly use FirstNet’s network to replace older Land Mobile Radio systems for communication among first responders during emergencies.¹⁰² First responders use FirstNet for voice-over LTE, rich communication services and IP-based messaging to communicate with one another from a variety of operational locations, including outdoors, inside buildings, through drones and satellites, from airborne vehicles like helicopters, and from onboard maritime vessels.¹⁰³ First responders also rely on FirstNet’s network to access key technologies that affect situational awareness, such as cameras that convey real-time or historical data; Internet-connected devices and sensors that monitor weather, traffic, environmental issues, or access to secured locations; and maps and Geographic Information Systems that may provide the location of responders or assets, potential hazards, or relational information between personnel and assets.¹⁰⁴ According to Verizon, its Frontline service prioritizes first responder communications on Verizon’s 5G network and provides high speed, low latency, large capacity connectivity to over 45,000 agencies.¹⁰⁵ T-Mobile USA, Inc.’s (T-Mobile) T-Priority service prioritizes data-intensive communications for public safety agencies by using 5G network slicing to enable law enforcement, fire protection, emergency medical services, and other first responders to respond to emergencies.¹⁰⁶ Disruptions to services like FirstNet, Verizon Frontline, or T-Priority could be a matter of life and death for first responders or members of the public who rely on police, fire, and emergency medical services that subscribe to these services.

33. The *FNPRM* sought comment on whether the Commission should revamp DIRS to

⁹⁹ Verizon Comments at 3; CCA Reply at 4; ATIS Comments at 2, 5; T-Mobile Comments at 3); *see also FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6321, para. 16.

¹⁰⁰ *See FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6320, para. 15.

¹⁰¹ *See First Responder Network Authority License Renewal Order*, Order, 38 FCC Rcd 4989, 5000, para. 30 (PSHSB 2004) (noting FirstNet’s structure to allow PSAPs and Public Safety Enterprise Networks to integrate with the FirstNet core network).

¹⁰² *See* Comments of the National Regional Planning Council, PS Docket No. 21-346, at 2 (May 10, 2024).

¹⁰³ *See* FirstNet Authority, *First Responder Network Authority Roadmap* at 9-11 (2020), https://firstnet.gov/sites/default/files/Roadmap_2020_nocompress.pdf (*FirstNet Roadmap*).

¹⁰⁴ *See id.* at 13.

¹⁰⁵ *See* Verizon, *The advanced network and technology for first responders*, <https://www.verizon.com/business/resources/factsheets/verizon-frontline-public-safety-platform.pdf> (last visited Mar. 18, 2026).

¹⁰⁶ *See* T-Priority, *FAQ – The facts about T-Priority*, https://www.t-mobile.com/t-priority/why-choose-t-priority?icid=TFB_TMO_P_24TFBFRSTR_EACBC7D5BB79CA7644179 (last visited Mar. 18, 2026).

enable voluntary or mandatory reporting on the status of public safety voice and broadband networks.¹⁰⁷ The Commission also proposed to require FirstNet to report in DIRS in 2024,¹⁰⁸ and received significant support.¹⁰⁹ As Public Knowledge, Communications Workers of America, and New America’s Open Technology Institute observed, effective crisis response “can only happen if those responding to the crisis—and managing the response—have clear knowledge of the communications environment in as close to real time as possible.”¹¹⁰ NASUCA and TURN recognized that FirstNet’s “unique purpose [is] to provide robust public safety communications and, by extension, carry some of the most life-saving information across public safety stakeholders when disasters strike.”¹¹¹ And Next Century Cities observed that, “without mandatory DIRS or NORS reporting the Commission and state and local officials are left without critical information about how the nation[’]s emergency services are connected.”¹¹² We agree with these views and find that DIRS reports are inadequate for providing actionable infrastructure status information if they do not specifically identify impacts to public safety voice and broadband network customers and efforts to restore service for public safety customers.¹¹³ Moreover, government stakeholders commonly request that the FCC share DIRS reports about FirstNet, but no public safety voice and broadband network operator has voluntarily provided information specific to the status of those network functions in their DIRS reports to date. Mandatory DIRS reporting will close this gap and provide critical visibility and situational awareness into these vital public-safety networks during disasters, consistent with the Commission’s reasoning for previously requiring other types of providers to file in DIRS.¹¹⁴

34. AT&T and Verizon oppose making public safety voice and broadband network reporting mandatory, asserting such additional reporting is unnecessary, duplicative, and may be misleading.¹¹⁵ With respect to FirstNet, AT&T’s states that information about FirstNet’s network status, infrastructure, and assets is already included as part of AT&T’s DIRS reporting and is provided directly to FirstNet’s public safety customers via the FirstNet Central platform.¹¹⁶ Verizon acknowledges the Commission’s

¹⁰⁷ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6320, para. 15 (“We also seek comment on the burdens that collecting and reporting this information in DIRS would pose to the providers of these public safety networks, and whether these providers should report this information on a mandatory or voluntary basis.”).

¹⁰⁸ See *Second Report and Order & FNPRM*, 39 FCC Rcd at 651-653, paras. 60-63.

¹⁰⁹ See Comments of New York State Public Service Commission, PS Docket No. 21-346, at 3 (Apr. 29, 2024) (supporting NORS and DIRS outage reporting for FirstNet considering the implications to public safety that an outage could present); Comments of Maryland Department of Information Technology, PS Docket No. 21-346, at 1-2 (Apr. 3, 2024) (supporting a real-time data reporting requirement in NORS and DIRS); Comments of Next Century Cities, PS Docket No. 21-246, at 9 (May 13, 2024); Comments of T-Mobile USA, PS Docket No. 21-346 at 4-5 (May 13, 2024); Comments of Verizon, PS Docket No. 21-246, at 8-9 (May 13, 2024); Reply of the Competitive Carriers Association, PS Docket No. 21-34, at 2 (June 12, 2024). Notwithstanding, no public safety commenters responded to the Commission’s *FNPRM*, including on this issue.

¹¹⁰ Comments of Public Knowledge, Communications Workers of America, New America’s Open Technology Institute, PS Docket No 21-346, at 2 (May 13, 2024).

¹¹¹ Comments of the National Association of State Utility Consumer Advocates (NASUCA) and the Utility Report Network (TURN), PS Docket No. 21-346, at 6 (May 13, 2025).

¹¹² Comments of Next Century Cities, PS Docket No. 21-246, at 9 (May 13, 2024).

¹¹³ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6320-21, para. 15 (describing how failing to identify impacts to public safety voice and broadband network customers “prevents the Commission from disseminating information to emergency management agencies about outages that may affect first responders’ ability to communicate with one another and with PSAPs in disaster-affected areas”).

¹¹⁴ See, e.g., *Second Report and Order & FNPRM*, 39 FCC Rcd at 631-32, para. 15 (2024).

¹¹⁵ See AT&T Reply at 5; Verizon Comments at 4-5.

¹¹⁶ See AT&T Reply at 6.

“legitimate situational awareness interest in a wireless outage’s impact on public safety users[.]”¹¹⁷ but is concerned such reporting may double-count infrastructure impacts since the same networks are used for commercial and public safety purposes, be inaccurate as providers may have different designations for what constitutes a public safety customer, and, as AT&T notes, likely duplicates information being provided directly to customers.¹¹⁸ We find that mandatory reporting for public safety voice and broadband networks in DIRS is both necessary to ensure public safety officials can respond during disasters, and, as Verizon observes, will provide important situational awareness that does not exist today regarding the status of all of these critical networks.

35. We find that direct reporting to enterprise customers via interfaces such as FirstNet Central is an inadequate substitute for the visibility that DIRS reporting will yield.¹¹⁹ AT&T asserts that FirstNet Central provides its users with “near real-time network status[.]” enabling FirstNet users access to more information [than DIRS], even during emergency events that do not rise to the level of a DIRS activation.¹²⁰ We are unpersuaded by the argument that outage information public safety voice and broadband network operators share with public-safety subscribers obviates DIRS reporting.¹²¹ While a public safety voice and broadband network operator may share information about its network status relevant to its own customers, not all public safety customers subscribe to the same public safety voice and broadband network. During a disaster, those customers may need to communicate with public safety entities that are customers of a different public safety voice and broadband network. Thus, broader visibility to the public safety voice and broadband network ecosystem is essential to identify outages that may impede seamless communications among customers of all public safety voice and broadband networks. Through mandatory DIRS reporting, the Commission can aggregate public safety voice and broadband network status information for all such networks and provide more comprehensive visibility than any single, network-specific outage reporting platform like FirstNet Central can provide.¹²²

36. Other aspects of the outage notifications provided by public safety voice and broadband network operators to their customers today further demonstrate how those notifications fail to sufficiently accomplish our goals. Information that public safety voice and broadband network operators report directly to enterprise customers is not available to state, Tribal, territorial, or Federal agencies that are not themselves FirstNet users. Additionally, while FirstNet Central may provide some outage-specific information, T-Mobile observes that FirstNet does not provide information within any specific timeframe

¹¹⁷ Verizon Comments at 4.

¹¹⁸ *See id.* at 4-5.

¹¹⁹ According to FirstNet, FirstNet Central is a “secure online portal that, among other things, provides public safety agencies with visibility into the FirstNet network operational status and site conditions (e.g., areas that may be experiencing outages; the cause, if known, of the outage; [and] estimated restoration time).” *See* Comments of the First Responder Network Authority, PS Docket No 21-346, at 3 (May 10, 2024) (filed by the National Telecommunications and Information Administration) (“FirstNet 2024 Comments”).

¹²⁰ *See* AT&T Reply at 6; *see also* FirstNet 2024 Comments at 3 (stating that FirstNet Central “includes maps of local coverage and site conditions, overlaid with external data such as weather and traffic conditions, flooding, wind, drought, active fire incidents, and critical assets (e.g., hospital trauma centers)”).

¹²¹ Verizon Comments, PS Docket Nos. 21-346 and 15-80, ET Docket No. 04-35 at 5 (rec. May 13, 2024) (Verizon 2024 Outage Reporting Comments); AT&T Reply, PS Docket Nos. 21-346 and 15-80, ET Docket No. 04-35 (rec. June 12, 2024) at 6 (AT&T 2024 Outage Reporting Reply) (stating the same with respect to FirstNet Central); *see also* T-Mobile USA, Inc. Comments, PS Docket Nos. 21-346 and 15-80, ET Docket No. 04-35 at 7 (rec. May 13, 2024) (observing that “agencies participating in the outage reporting information sharing regime will know the status of T-Priority without the need for T-Mobile to file additional reports.”) (T-Mobile 2024 Outage Reporting Comments).

¹²² While AT&T describes how it and “the FirstNet Authority actively engage in state emergency operations centers during a disaster,” AT&T Reply at 7, state emergency operations centers lack access to the aggregated network status available as a result of the DIRS reporting requirements we adopt today.

after an outage begins, or update information at any specific interval thereafter.¹²³ It is also unclear whether FirstNet Central provides its customers with outage information on a customer-specific basis, or on a larger scale such as a region, state, or for its network as a whole. Moreover, it is uncertain the extent to which FirstNet Central provides infrastructure status in addition to the information it provides on “operational status[.]”¹²⁴ DIRS’ inclusion of infrastructure status makes it more robust and useful, providing visibility to the damaged equipment that would need to be restored to reestablish critical connectivity.¹²⁵ Aside from FirstNet, the record is silent on whether or how Verizon and T-Mobile notify Frontline and T-Priority users, respectively, of outages on their public safety voice and broadband networks,¹²⁶ but no information about the operational status of these networks has been reported directly to the Commission, nor are we aware of state, Tribal, territorial, or Federal agencies that are not themselves Frontline or T-Priority users receiving access to this information. Accordingly, we find that customer-specific outage communications are inadequate substitutes for the visibility and situational awareness DIRS reporting will yield for emergency management agencies and the Commission.

37. We require public safety voice and broadband network operators to file in DIRS irrespective of whether their service is integrated into their network or standalone. T-Mobile asserts that only FirstNet and other providers of standalone public safety networks should be required to report in DIRS,¹²⁷ and that T-Mobile, which offers its T-Priority service through a dedicated 5G network slice,¹²⁸ should be exempt. In our view, this distinction is immaterial. Operators of public safety voice and broadband networks can prioritize service restoration to those networks irrespective of whether they are physically or logically diverse.¹²⁹ Network slicing allows network administrators to dynamically prioritize access (and, potentially, post-outage service restoration) to transport, backhaul, and core network functions for public safety customers during emergency response and disaster recovery efforts when network congestion is more likely to occur.¹³⁰ Excluding such offerings from the requirement we adopt today would limit our and public safety agencies’ visibility into the status of these important services based on a network architecture distinction that is irrelevant to their importance during disasters and emergencies.

38. To eliminate the potential for both duplicative reporting burdens and “overstating the physical and user impact of an outage,”¹³¹ we will allow operators of public safety voice and broadband

¹²³ See T-Mobile Comments at 8 (stating “[a]lthough FirstNet Central is an available tool that may provide outage information regarding FirstNet, the Commission correctly notes that this tool does not report outages within any specific required timeframe and is not accessible to non-FirstNet users. Therefore, a gap exists in situational awareness of FirstNet’s operational status.”).

¹²⁴ See AT&T Reply at 6 (describing how FirstNet Central provides “public safety customers with visibility into the FirstNet network operational status and specific site conditions through a secure online portal”).

¹²⁵ See AT&T Reply at 6 & n.29 (noting that “FirstNet Central includes maps of local coverage and site conditions, overlaid with external data”). It is unclear whether this information also includes the status of specific infrastructure.

¹²⁶ Verizon states that detailed service availability and restoration information is *likely* already being provided in accordance with contractual terms and conditions as part of the provider-enterprise customer relationship, but neither definitively states that such communications are, in fact, occurring, nor provides any specifics about those communications. See Verizon Comments at 5.

¹²⁷ See T-Mobile Comments at 7 (emphasis added).

¹²⁸ See *id.*

¹²⁹ See *id.*

¹³⁰ Donny Jackson, *T-Mobile formally launches T-Priority for first responders, powered by 5G network-slicing technology* (Feb. 25, 2025), <https://urgentcomm.com/public-safety/t-mobile-formally-launches-t-priority-for-first-responders-powered-by-5g-network-slicing-technology>.

¹³¹ Verizon Comments at 4-5.

networks to satisfy their DIRS reporting obligation by indicating whether the status of their public safety voice and broadband network is the same as the status of their other network infrastructure. In the event that the status is not the same, then we require the fields in DIRS that are applicable to that network to be completed to identify specific impacts. This approach is consistent with Verizon’s proposal for “a simple voluntary Yes/No checkbox field . . . that answers the question ‘Public Safety Voice and Broadband Network Customers Affected?’”¹³² At the same time, we find it critical to require these providers to submit additional information to help the Commission identify public safety communications-specific impacts and restoration information, so we require them to submit the information that is appropriate for their type of network (e.g., the provider of a wireless public safety voice and broadband network shall complete the wireless service provider fields in DIRS). This approach strikes a balance that will ensure we collect important information about public safety impacts that will provide the Commission and our federal, state, Tribal, and territorial partners with visibility into the operational status of these networks while minimizing new burdens on providers.¹³³ To further minimize reporting burdens, we allow FirstNet to either file in DIRS itself or designate AT&T to do so on its behalf, so long as the report includes the required information about FirstNet subscribers and impacts. While Verizon expresses concern about the potential for “apples-to-oranges comparisons between providers that have different designations for what constitutes a ‘public safety’ entity,”¹³⁴ this does not deter us from our conclusion. We think it reasonable that each public safety voice and broadband network operator will have eligibility criteria that requires customers on their respective networks to have a legitimate public safety purpose in order to subscribe. We acknowledge this criteria may not be identical across all public safety voice and broadband networks, but find this potential variance will not adversely affect our goal of capturing impacts to public safety customers. As with the other changes we implement today, we delegate authority to the Bureau to integrate public safety voice and broadband networks’ infrastructure status into DIRS reporting.

H. Retaining NORS Reporting Requirements for DIRS-Lite Activations

39. At this time, we decline to extend the suspension of NORS reporting requirements during DIRS activations to DIRS-Lite activations, which we believe is necessary to preserve our visibility into outages that result from disasters for which we activate DIRS-Lite. By contrast to DIRS activations, the Commission activates DIRS-Lite for disasters that are less severe than those warranting a full DIRS activation.¹³⁵ In anticipation of disaster impacts on communications services that are less severe, but that are nonetheless important for local emergency managers to understand on a day-to-day basis, the Commission can choose to collect infrastructure status information from providers by activating DIRS-Lite.¹³⁶ When the Commission activates DIRS-Lite, it collects infrastructure status information informally, by e-mail or phone, rather than via DIRS’s online interface. All information that providers offer to the Commission during a DIRS-Lite activation is submitted voluntarily; providers are not required to submit the detailed infrastructure status information that DIRS elicits.¹³⁷ The daily cadence of infrastructure status information during DIRS-Lite activations supplements more fulsome information that providers are required to report in NORS for outages that meet the Commission’s reporting thresholds. The Commission has never waived NORS reporting requirements during an activation of DIRS-Lite. Accordingly, we disagree with ATIS, CTIA, USTelecom, and Verizon that we should waive

¹³² See Comments of Verizon, PS Docket No. 21-346, at 4 (May 13, 2024).

¹³³ See *id.* at 4-5.

¹³⁴ Verizon Comments at 5.

¹³⁵ See FCC, Standard Operating Procedures, DIRS-Lite at 1, https://transition.fcc.gov/pshs/docs/Standard_Operating%20Procedures_DIRS-Lite.pdf.

¹³⁶ See FCC, Standard Operating Procedures, DIRS-Lite at 1, https://transition.fcc.gov/pshs/docs/Standard_Operating%20Procedures_DIRS-Lite.pdf.

¹³⁷ See FCC, Standard Operating Procedures, DIRS-Lite at 1, https://transition.fcc.gov/pshs/docs/Standard_Operating%20Procedures_DIRS-Lite.pdf.

NORS requirements during DIRS-Lite activations.¹³⁸

40. We agree with Public Knowledge that suspending NORS filing obligations during DIRS-Lite activations could create a gap in the Commission's information about network reliability by shifting the type of information that the Commission collects from information about outage root causes and subscriber impacts to information about infrastructure status at the time that network outages are most likely to occur.¹³⁹ We also agree with Public Knowledge that extending the NORS waiver to DIRS-Lite activations may make it necessary for the Bureau to annually reconcile NORS filings, DIRS filings, and DIRS-Lite in order to maintain a complete picture of network resilience.¹⁴⁰ We believe that this would pose significant administrative burdens for the Commission that outweigh the benefits of waiving NORS filings. Second, we are not persuaded that DIRS-Lite activations present burdens to providers that would meaningfully detract from their service restoration efforts. For these reasons, we decline to extend the suspension of NORS reporting requirements to DIRS-Lite activations.

I. Compliance Timeframe

41. With respect to eliminating the DIRS final report and providing a filing exemption for providers that do not own or operate their own facilities, neither of these changes will necessitate technical changes to DIRS before becoming effective as the providers to which these changes apply can simply decline to file the reports in question. Accordingly, both changes to our rules shall be effective immediately upon publication of this *Third Report and Order* in the Federal Register.¹⁴¹ However, we expect that many of the steps that we take today to streamline DIRS, including the creation of a dynamic form, the elimination of unnecessary fields, and the creation of a field to collect more granular location information, will require additional time to modify DIRS. We direct the Bureau to implement the necessary technical modifications to DIRS to effectuate the improvements described in this *Report and Order*, work with stakeholders to share information about and test the improvements to help facilitate any modifications to their reporting practices, and release a Public Notice to notify stakeholders when those improvements have been implemented.

42. We require public safety voice and broadband network operators to begin reporting in DIRS on the later of (i) 30 days after the Bureau announces that the Office of Management and Budget has completed its review of this requirement pursuant to the Paperwork Reduction Act and that DIRS is ready to receive public safety voice and broadband network operators' filings; or (ii) November 30, 2026. We believe that this approach will provide sufficient time for public safety voice and broadband network operators to make any necessary adjustments to their existing reporting processes to comply with the new requirement and to adjust to DIRS modifications.

J. Assessing the Benefits and Costs

43. We conclude that the rules we adopt today to reduce the burdens of DIRS reporting on service providers, along with new mandatory DIRS reporting requirements for public safety voice and broadband network operators, will result in annual cost savings of approximately \$4 million, which outweighs the approximately \$176,000 one-time cost and the \$72,000 annual recurring cost to implement

¹³⁸ See ATIS Comments at 7, CTIA Comments at 3-4, USTelecom Comments at 4-5; Verizon Comments at 2.

¹³⁹ See Public Knowledge Comments at 6.

¹⁴⁰ Public Knowledge Comments at 2, 6.

¹⁴¹ In addition to these amendments, the *FNPRM* proposed amendments to section 4.18(a) that specified the types of information that providers are required to report in DIRS. See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6337. Because these amendments reflect information that is currently required to be reported in DIRS and do not impose any new obligations on providers, we also make those amendments effective immediately upon publication of this *Third Report and Order* in the Federal Register.

these changes.¹⁴² We find that these net cost savings, along with the public safety benefits that will flow from our actions will outweigh any new costs and any potential effects on public safety from the Commission no longer receiving and sharing certain types of infrastructure status information.

44. By removing the need for providers to select from the current array of ten separate forms concerning different types of service and infrastructure, we find that manual filers should be able to complete their filings more quickly. In addition, we find that eliminating unnecessary and duplicative fields will allow DIRS filings to be submitted more quickly. To quantify these cost savings, we use the methodology that we proposed in the *FNPRM*.¹⁴³ Consistent with the *FNPRM*, we estimate the overall recurring cost savings to providers arising from modifying DIRS to simplify filing to be approximately \$143,000 annually. We arrive at this figure by reducing by 20%, on average, the time we estimate providers will spend filing DIRS reports and by eliminating the cost burden associated with the requirement to provide a DIRS final report.¹⁴⁴ We acknowledge that a batch filer in DIRS may incur one-time costs “to reconfigure its systems to reorganize how it exports data, and to ensure that the data is

¹⁴² The approximate \$4 million benefit estimate includes cost savings of \$143,000 for streamlining the filing process and eliminating the final report requirement for facilities-based voice providers and \$3.9 million from eliminating DIRS reporting obligations for mobile virtual network operators and VoIP resellers. See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6325, para. 26, n.51. The cost estimates include a \$176,000 one-time cost for DIRS batch filing reconfiguration, and an annual cost of \$72,000 for public safety voice and broadband networks to report outages when DIRS is activated.

¹⁴³ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6325, paras. 27-28 & n.55. Consistent with the *FNPRM*, based staff estimation using the most recent available data, at the county-level, there are on average 53 fixed voice providers, including cable communications, wireline, and VoIP providers per county. Among these, an average of 12 fixed voice providers are facilities-based, and 41 are non-facilities based resellers. Staff calculation, FCC, Form 477 non-public data (June 2024). We further estimate that there are an average of six facilities-based mobile wireless voice providers and 82 mobile virtual network operators per county. Staff calculation based on FCC Form 477 non-public data (June 2024) and Form 499 non-public data (Aug. 2024) (where providers with revenue reported at any time during the calendar year 2023 filed a Form 499).

¹⁴⁴ We estimate the cost saving from streamlining DIRS reporting with a $(20\% \text{ cost reduction}) \times 1 \text{ office and administrative support worker} \times (\$35.22 \text{ hourly compensation}) \times [(10/60) \text{ hours for the initial entry} + (10/60) \text{ hours for daily updates} \times 14 \text{ days}] \times 339 \text{ counties} \times 18 \text{ facilities-based service providers} = \$107,456$. DIRS filers will realize these cost savings on an annually recurring basis; therefore, these savings will exceed the one-time implementation costs associated with these changes. We further estimate a \$35,819 cost saving from eliminating the final reporting requirement as $1 \text{ office and administrative support worker} \times (\$35.22 \text{ hourly compensation}) \times (10/60) \text{ hours for the final report entry} \times 339 \text{ counties} \times 18 \text{ facilities-based service providers} = \$35,819$. The aggregate cost saving is \$143,275 ($= \$107,456 + \$35,819$), which we round to \$143,000. See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6325, paras. 27-28 & n.55 (estimating a total of 18 facilities-based voice providers, including 12 fixed voice providers and six wireless voice providers, per county).

For labor costs, the *FNPRM* used an hourly compensation figure of \$35.22, which remains consistent with the most recent available wage data. See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6326, para. 28 & n.56. The most recent available data suggests a base hourly wage for an office and administrative support worker of \$24.12/hour. See Bureau of Labor Statistics (BLS), *Occupational Employment and Wage Statistics, Occupational Employment and Wages* (May 2024), <https://www.bls.gov/oes/tables.htm> (navigate to “May 2024,” “National,” then “Office and Administrative Support Occupations (43-0000),” stating that the mean hourly wage for an office and administrative support occupation worker is \$24.12/hour in May 2024, which is the most recent data available). Consistent with the *FNPRM*, we calculate the applicable benefits markup by using Bureau of Labor Statistics data, as of December 2025, where civilian wages and salaries averaged \$33.45/hour and benefits averaged \$15.33/hour. Using these figures, we calculate that benefits constituted a markup of $\$15.33/\$33.45 \sim 46\%$. Taking 46% for cost of benefits (\$11.10/hour), we determine an hourly compensation of \$35.22/hour ($\$24.12/\text{hour} + \$11.10/\text{hour}$). See Press Release, Bureau of Labor Statistics, *Employer Costs for Employee Compensation—December 2025* (Mar. 20, 2026), <https://www.bls.gov/news.release/pdf/ecec.pdf> (*Benefit Markup*).

formatted in a manner accepted by DIRS” and find those costs to be approximately \$176,000.¹⁴⁵

45. Our action today to exclude non-facilities-based providers from mandatory DIRS reporting will result in considerable savings for these providers. We find there will be an estimated \$3.9 million annual cost savings for these categories of providers, as explained in the *FNPRM*.¹⁴⁶ We estimate the cost saving as follows: 1 office and administrative support worker working at a wage rate of \$35.22 per hour working for ten minutes on the initial entry and ten minutes for each daily update multiplied by the 14-day average period of a DIRS activation plus the ten minutes saved as a result of no longer having to submit a final report multiplied by 339 counties in which DIRS is activated, on average, each year, multiplied by the sum of the nation’s estimated 82 mobile virtual network operators and 41 resellers. The result of this calculation is \$3,916,182, which we round to \$3.9 million. No commenters opposed our estimated cost savings or methodology.

46. Expanded reporting for public safety voice and broadband network operators will bring new visibility to the status of these critical networks and the essential first responders and emergency management customers who rely on those networks to perform life-saving recovery work. We estimate that the cost of public safety voice and broadband network operators reporting infrastructure status information in DIRS will not exceed approximately \$72,000 annually.¹⁴⁷ As proposed, we calculate the annual costs for public safety voice and broadband network operators filing in DIRS by applying the hourly wage of an office and administrative support worker (\$35.22) multiplied by the amount of time we estimate for these providers to enter initial contact information and file one daily status update in DIRS for each day of the 14-day average duration of a DIRS activation. We note that this figure is likely conservatively high because of our actions to eliminate duplicative reporting burdens, including allowing operators of public safety voice and broadband networks to satisfy their DIRS reporting obligation by indicating whether the status of their public safety voice and broadband network is the same as the status of their other network infrastructure.

¹⁴⁵ The most recent available data suggests a base hourly wage for a database administrator of \$51.65/hour. See BLS, *Occupational Employment and Wage Statistics, Occupational Employment and Wages* (May 2024), <https://www.bls.gov/oes/tables.htm> (navigate to “May 2024”, “National”, then “Database Administrators (15-1242)”, stating that the mean hourly wage for a Database Administrator is \$51.65/hour in May 2024). Taking 46% for cost of benefits (\$23.76/hour), we arrive at an hourly compensation of \$75.41/hour (which equals \$51.65/hour plus \$23.76/hour using our methodology for benefits markup). We revise our facilities-based estimate in the *FNPRM*, to estimate a total cost of \$175,479 = 1 database administrator × \$75.41/hour × 1 hour × 2,327 facilities-based cable, wireline, wireless, and interconnected VoIP providers, which we round to \$176,000. See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6326, para. 29. Note that in the *FNPRM*, we used the county average estimate for facilities-based providers in counties where DIRS is activated, whereas the one-time cost here applies to all providers that have set up their systems for batch-filing. On our own initiative, we update the one-time cost calculation to reflect this. Because we do not have data on the total number of batch-filing, we conservatively use the sum of all facilities-based cable, wireline, wireless, and interconnected VoIP as a cost ceiling (i.e., the maximum possible number of batch filers). This consists of 53 wireless facilities based providers and 2,274 wireline end-user switched access and interconnected VoIP providers based on the most recent Voice Telephone Services Report. Industry Analysis Division, Office of Economics and Analytics Voice Telephone Services: Status as of December 31, 2024 (Feb. 2026), <https://docs.fcc.gov/public/attachments/DOC-418460A1.pdf> (Table 2, Rows 1 and 4).

¹⁴⁶ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6327, para. 30 & n.65 (1 office and administrative support worker × (\$35.22 hourly compensation) × [(10/60) hours for the initial entry + (10/60) hours for daily updates × 14 days + (10/60) hours for the final report entry] × 339 counties × (82 MVNOs + 41 resellers) = \$3,916,182, which we round to \$3.9 million).

¹⁴⁷ See *FNPRM and Order on Reconsideration*, 40 FCC Rcd at 6327, para. 30 & n. 67 (estimating the cost for public safety voice and broadband network operators to file in DIRS). We update that calculation as follows: (1 – 20% cost saving) × {1 office and administrative support worker × (\$35.22/hour) × [(10/60) hours for the initial entry + (10/60) hours for daily updates × 14 days] × 339 counties × 3 public safety voice and broadband network operators} = \$71,637, which we round to \$72,000.

IV. PROCEDURAL MATTERS

47. *Regulatory Flexibility Act.* The Regulatory Flexibility Act of 1980, as amended (RFA),¹⁴⁸ requires that an agency prepare a regulatory flexibility analysis for notice and comment rulemakings, unless the agency certifies that “the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities.”¹⁴⁹ Accordingly, the Commission has prepared a Final Regulatory Flexibility Analysis (FRFA) concerning the possible impact of the rule and policy changes contained in this *Third Report and Order* on small entities. The FRFA is set forth in Appendix B.

48. *Paperwork Reduction Analysis.* This *Report and Order* may contain new or substantively modified information collection requirements subject to the Paperwork Reduction Act of 1995 (PRA), Public Law 104-13. All such requirements will be submitted to the Office of Management and Budget (OMB) for review under Section 3507(d) of the PRA. OMB, the general public, and other federal agencies will be invited to comment on any new or modified information collection requirements contained in this proceeding. In addition, we note that, pursuant to the Small Business Paperwork Relief Act of 2002, Public Law 107-198, see 44 U.S.C. § 3506(c)(4), we previously sought specific comment on how the Commission might “further reduce the information collection burden for small business concerns with fewer than 25 employees.” In Appendix B, we have assessed the effects of the required collection of information on these small entities.

49. *Congressional Review Act.* The Commission has determined, and the Administrator of the Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), concurs, that this rule is “non-major” under the Congressional Review Act, 5 U.S.C. § 804(2). The Commission will send a copy of this *Third Report and Order* to Congress and the Government Accountability Office pursuant to 5 U.S.C. § 801(a)(1)(A).

50. *Additional Information.* For further information regarding the *Third Report and Order*, contact Jeanne Stockman, Attorney Advisor, Public Safety and Homeland Security Bureau at (202) 418-7830 or Jeanne.Stockman@fcc.gov or James Zigouris, Attorney Advisor, Public Safety and Homeland Security Bureau at (202) 418-0697 or James.Zigouris@fcc.gov.

V. ORDERING CLAUSES

51. Accordingly, IT IS ORDERED that, pursuant to the authority contained in Sections 1, 4, 201, 214, 218, 251, 301, 303(b), 303(g), 303(j), 303(r), 307, 309, 316, 332, and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154, 201, 214, 218, 251, 301, 303(b), 303(g), 303(j), 303(r), 307, 309, 316, 332, 403; sections 2, 3(b), and 6-7 of the Wireless Communications and Public Safety Act of 1999, 47 U.S.C. §§ 615 note, 615, 615a-1, 615b, as well as Title VI, sections 6201, 6206, and 6213, of the Middle Class Tax Relief and Job Creation Act of 2012, 47 U.S.C. §§ 1421, 1426, 1433, this *Third Report and Order* in PS Docket Nos. 21-346 and 15-80 and ET Docket No. 04-35 IS ADOPTED and part 4 of the Commission’s rules, 47 CFR part 4, IS AMENDED as set forth in Appendix A.¹⁵⁰

52. IT IS FURTHER ORDERED that, pursuant to 5 U.S.C. § 553(d)(1), this *Third Report and Order* SHALL BE EFFECIVE upon publication in the Federal Register. Revisions to 47 CFR § 4.18(a) and (c) described in amendatory instruction 3 of Appendix A hereto will not become effective until the Public Safety and Homeland Security Bureau obtains any Paperwork Reduction Act review that it determines is required and provides an effective date by subsequent Public Notice, which shall not be earlier than (i) 30 days after the Bureau announces that the Office of Management and Budget has

¹⁴⁸ 5 U.S.C. §§ 601 *et seq.*, as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

¹⁴⁹ *Id.* § 605(b).

¹⁵⁰ Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 24, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 51735 (Oct. 4, 1993).

completed its review of this requirement pursuant to the Paperwork Reduction Act and that DIRS is ready to receive public safety voice and broadband network operators' filings; or (ii) November 30, 2026.

53. IT IS FURTHER ORDERED that the Commission's Office of the Secretary SHALL SEND a copy of this *Third Report and Order*, including the Final Regulatory Flexibility Analysis, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.

54. IT IS FURTHER ORDERED that the Office of Managing Director, Performance Program Management, SHALL SEND a copy of this *Third Report and Order* in a report to be sent to Congress and the Government Accountability Office pursuant to the Congressional Review Act, 5 U.S.C. § 801(a)(1)(A).

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

APPENDIX A**Final Rules**

For the reasons discussed in the document above, the Federal Communications Commission amends 47 CFR part 4 as follows:

PART 4 – DISRUPTIONS TO COMMUNICATIONS

1. Revise the authority citation for part 4 to read as follows:

Authority: 47 U.S.C. 34-39, 151, 154, 155, 157, 201, 214, 218, 251, 301, 303, 307, 309, 316, 332, 403, 615, 615a-1, 615b, 1302(a), 1302(b), 1421, 1426, and 1433; 5 U.S.C. 301, and Executive Order no. 10530.

2. In § 4.18, revise the section heading and paragraph (a) introductory text, and remove and reserve paragraph (a)(2). The revisions read as follows:

§ 4.18 Mandatory Disaster Information Reporting System (DIRS) reporting.

(a) Cable Communications, Wireline, Wireless, and Interconnected VoIP providers that own or operate their own facilities shall be required to report their infrastructure status information each day in the Disaster Information Reporting System (DIRS) when the Commission activates DIRS in geographic areas in which they provide service, even when their reportable infrastructure has not changed compared to the prior day. These providers are subject to mandated reporting in DIRS and shall:

* * * * *

3. Delayed indefinitely, in § 4.18, revise paragraph (a) and add paragraph (c) to read as follows:

§ 4.18 Mandatory Disaster Information Reporting System (DIRS) reporting.

(a) Cable communications, wireline communications, wireless service, and interconnected VoIP providers that own or operate their own facilities shall submit daily reports on their infrastructure status in the Disaster Information Reporting System (DIRS) when the Commission activates DIRS in geographic areas in which they provide service, even when their reportable infrastructure has not changed compared to the prior day. These providers shall include in their reports the following information about areas in which the Commission has activated DIRS:

- (1) Cable communications providers shall submit information concerning the type, power status, location, and identifying information of any major equipment that is down.
- (2) Wireline communications providers shall submit information concerning the type, power status, location, and identifying information of any major equipment that is down; the quantity of working telephone numbers for which the provider provides service, and the quantity of such numbers that are without service; the name, service area, and number of customers served by any Public Safety Answering Point (PSAPs) for which the provider provides service; the number of Optical Carrier 3 (OC3) circuits or their equivalents that are down; and the location, identifying information, and quantity of working numbers served by any remote aggregation device, and the quantity of such numbers that are without service.
- (3) Wireless service providers shall submit information concerning the type, power status, location, and identifying information of any major equipment that is down; the number and location of cell sites that are down or on backup power; and the cause of any cell site outages.
- (4) Interconnected VoIP providers shall submit information concerning the type, power

status, location, and identifying information of any major equipment that is down; the number of interconnected VoIP service subscribers without service; and the number of OC3 circuits or their equivalents that are down.

(5) Cable communications, wireline communications, and interconnected VoIP providers that are stage 2 recipients of the Uniendo a Puerto Rico Fund and Connect USVI Fund shall also submit information concerning the quantity of broadband Internet access service subscribers for whom the provider provides service, and the quantity of such subscribers who are without service.

* * * * *

(c) Public safety voice and broadband network operators shall submit information in DIRS concerning the status of infrastructure used by that network. They shall submit information that is applicable to the characteristics of the network (e.g., the provider of a wireless public safety voice and broadband network shall complete the wireless service provider fields in DIRS). Facilities-based cable communications, wireline communications, wireless service, and interconnected VoIP providers that operate public safety voice and broadband networks shall identify the status of the infrastructure relied upon by the public safety voice and broadband network in addition to identifying the status of their infrastructure overall.

APPENDIX B

Final Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),¹ the Federal Communications Commission (Commission) incorporated an Initial Regulatory Flexibility Analysis (IRFA) in the *Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications Third Further Notice of Proposed Rulemaking (Third Further Notice)* released in August 2025.² The Commission sought written public comment on the proposals in the *Third Further Notice*, including comment on the IRFA. No comments were filed addressing the IRFA. This Final Regulatory Flexibility Analysis (FRFA) conforms to the RFA and it (or summaries thereof) will be published in the Federal Register.³

A. Need for, and Objectives of, the Final Rules

2. The Commission's rules require cable communications, wireless, wireline and interconnected VoIP providers to report network outages in the Commission's Disaster Information Reporting System (DIRS) when it is activated. The *Third Report and Order* reduces DIRS-related burdens faced by small and other service providers and government agencies so that they can dedicate more resources to restoring and maintaining communications services during a disaster. The *Third Report and Order* makes the following changes to DIRS:

- Redesigning the DIRS user interface to streamline reporting for service providers who enter information in DIRS manually so these filers can submit information more efficiently;
- Eliminating fields and reports that are not core to public safety disaster response and recovery needs to reduce the information collection burden for manual and batch DIRS filers;
- Eliminating DIRS final reports for mandated DIRS filers; and
- Exempting non-facilities-based providers from requirements to report in DIRS.

3. The *Third Report and Order* also supports the collection of new information that would offer significant public safety value during disasters, namely requiring reporting on infrastructure status by public safety voice and broadband network operators, and allowing all DIRS filers to voluntarily submit granular location maps, such as maps of downed cell sites. The Commission believes that the improvements to DIRS in the *Third Report and Order* strike the appropriate balance of reducing regulatory burdens for providers while ensuring collection of necessary and relevant information when disasters occur.

B. Summary of Significant Issues Raised by Public Comments in Response to the IRFA

4. Comments were filed by the Competitive Carriers Association (CCA), the National Association of Broadcasters (NAB), and WTA - Advocates for Rural Broadband (WTA) addressing the impact of the proposed rules on small entities. The Competitive Carriers Association (CCA) observes that redesigning the DIRS interface to replace the ten separate DIRS worksheets with a single, dynamic form addresses a concern that is "particularly acute for small and rural carriers. Such providers often operate with limited engineering and operations teams, many of whom are simultaneously engaged in

¹ 5 U.S.C. §§ 601 *et seq.*, as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

² See *Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*; PS Docket Nos. 21-346, 15-80, 04-35, Third Further Notice of Proposed Rulemaking and Order on Reconsideration, 40 FCC Rcd 6313 (2025) (*Third Further Notice*).

³ 5 U.S.C. § 604.

damage assessment, power restoration, and physical repairs.”⁴ WTA, whose members are small, rural local telecommunications carriers, also explain that “[s]treamlining 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.”⁵ NAB discussed its support for a “one-click” option in DIRS that would allow providers to indicate there is no change in infrastructure status from the previous day’s report. NAB notes that in addition to saving time and streamlining DIRS report preparation, this change “would facilitate broadcasters’ voluntary participation in DIRS, especially smaller stations.”⁶ The Commission agrees with these views and adopts both of these changes to DIRS.

C. Response to Comments by the Chief Counsel for the Small Business Administration Office of Advocacy

5. Pursuant to the Small Business Jobs Act of 2010, which amended the RFA, the Commission is required to respond to any comments filed by the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy, and to also provide a detailed statement of any change made to the proposed rules as a result of those comments.⁷ The Chief Counsel did not file any comments in response to the proposed rules in this proceeding.

D. Description and Estimate of the Number of Small Entities to Which the Rules Will Apply

6. The RFA directs agencies to provide a description of and, where feasible, an estimate of the number of small entities that may be affected by the adopted rules.⁸ The RFA generally defines the term “small entity” as having the same meaning as the terms “small business,” “small organization,” and “small governmental jurisdiction.”⁹ In addition, the term “small business” has the same meaning as the term “small business concern” under the Small Business Act (SBA).¹⁰ A “small business concern” is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the SBA.¹¹ The SBA establishes small business size standards that agencies are required to use when promulgating regulations relating to small businesses; agencies may establish alternative size standards for use in such programs, but must consult and obtain approval from SBA before doing so.¹²

7. Our actions, over time, may affect small entities that are not easily categorized at present. We therefore describe three broad groups of small entities that could be directly affected by our actions.¹³

⁴ CCA Reply at 3.

⁵ WTA Comments at 2.

⁶ See NAB Comments at 2.

⁷ 5 U.S.C. § 604(a)(3).

⁸ 5 U.S.C. § 604(a)(4).

⁹ 5 U.S.C. § 601(6).

¹⁰ 5 U.S.C. § 601(3) (incorporating by reference the definition of “small-business concern” in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies “unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register.”

¹¹ 15 U.S.C. § 632.

¹² 13 CFR § 121.903.

¹³ 5 U.S.C. § 601(3)-(6).

In general, a small business is an independent business having fewer than 500 employees.¹⁴ These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.¹⁵ Next, “small organizations” are not-for-profit enterprises that are independently owned and operated and not dominant their field.¹⁶ While we do not have data regarding the number of non-profits that meet that criteria, over 99 percent of nonprofits have fewer than 500 employees.¹⁷ Finally, “small governmental jurisdictions” are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.¹⁸ Based on the 2022 U.S. Census of Governments data, we estimate that at least 48,724 out of 90,835 local government jurisdictions have a population of less than 50,000.¹⁹

8. The rules adopted in the *Third Report and Order* will apply to small entities in the industries identified in the chart below by their six-digit North American Industry Classification System (NAICS)²⁰ codes and corresponding SBA size standard.²¹ Where available, we also provide additional information regarding the number of potentially affected entities in the identified industries below.

Table 1. 2022 U.S. Census Bureau Data by NAICS Code

Regulated Industry (Footnotes specify potentially affected entities within a regulated industry where applicable)	NAICS Code	SBA Size Standard	Total Firms ²²	Total Small Firms ²³	% Small Firms
Radio Broadcasting Stations ²⁴	516110	\$47 million	2,616	2,136	81.65%
Television Broadcasting Stations ²⁵	516120	\$47 million	413	316	76.51%
Media Streaming Distribution	516210	\$47 million	5,217	3,673	70.40%

¹⁴ See SBA, Office of Advocacy, *Frequently Asked Questions About Small Business* (July 23, 2024), https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf.

¹⁵ *Id.*

¹⁶ 5 U.S.C. § 601(4).

¹⁷ See SBA, Office of Advocacy, *Small Business Facts, Spotlight on Nonprofits* (July 2019), <https://advocacy.sba.gov/2019/07/25/small-business-facts-spotlight-on-nonprofits/>.

¹⁸ 5 U.S.C. § 601(5).

¹⁹ See U.S. Census Bureau, 2022 Census of Governments –Organization, <https://www.census.gov/data/tables/2022/econ/gus/2022-governments.html>, tables 1-11.

²⁰ The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. See www.census.gov/NAICS for further details regarding the NAICS codes identified in this chart.

²¹ The size standards in this chart are set forth in 13 CFR § 121.201 by six digit NAICS code.

²² U.S. Census Bureau, "Selected Sectors: Employment Size of Firms for the U.S.: 2022." Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEEMPfirm, 2025, and "Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2022." Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEREVfirm, 2025.

²³ *Id.*

²⁴ Affected Entities in this industry include Broadcast Auxiliary Services (BAS) Remote Pickup (RPU) Licensees (Radio).

²⁵ Affected Entities in this industry include Broadcast Auxiliary Services (BAS) Remote Pickup (RPU) Licensees (TV).

Services, Social Networks, and Other Media Networks and Content Providers ²⁶					
Wired Telecommunications Carriers ²⁷	517111	1,500 employees	3,403	3,027	88.95%
Wireless Telecommunications Carriers (except Satellite) ²⁸	517112	1,500 employees	1,184	1,081	91.30%
Telecommunications Resellers ²⁹	517121	1,500 employees	955	847	88.69%
Satellite Telecommunications	517410	\$44 million	332	195	58.73%
All Other Telecommunications ³⁰	517810	\$40 million	1,673	1,007	60.19%

Table 2. Telecommunications Service Provider Data

2024 Universal Service Monitoring Report Telecommunications Service Provider Data ³¹ (Data as of December 2023)	SBA Size Standard (1500 Employees)		
	Affected Entity	Total # FCC Form 499A Filers	Small Firms
Competitive Local Exchange Carriers (CLECs) ³²	3,729	3,576	95.90
Incumbent Local Exchange Carriers (Incumbent LECs)	1,175	917	78.04
Interexchange Carriers (IXCs)	113	95	84.07
Local Exchange Carriers (LECs) ³³	4,904	4,493	91.62
Local Resellers	222	217	97.75

²⁶ Affected Entities in this industry include Cable Broadcasting Networks, Cable Television Networks, Satellite Television Networks, and Subscription Television Networks.

²⁷ Affected entities in this industry include Cable Companies and Systems (Rate Regulation), Cable System Operators (Telecom Act Standard), Competitive Local Exchange Carriers (CLECs), Direct Broadcast Satellite (DBS), Incumbent Local Exchange Carriers (Incumbent LECs), Interexchange Carriers (IXCs), Local Exchange Carriers (LECs), Operator Service Providers (OSPs), and Wired Broadband Internet Access Service Providers.

²⁸ Affected entities in this industry include 1670–1675 MHz Services, 3650-3700 MHz Band, 700 MHz Guard Band Licensees, Advanced Wireless Services - AWS Services, Air-Ground Radiotelephone Services, Broadband Personal Communications Service, Broadband Radio Service and Educational Broadband Service, Fixed Microwave Services, Local Multipoint Distribution Service (LMDS), Lower 700 MHz Band Licenses, Specialized Mobile Radio Licenses, Upper 700 MHz Band Licenses, Wireless Broadband Internet Access Service Providers, Wireless Carriers and Service Providers, Wireless Communications Services, and Wireless Telephony.

²⁹ Affected entity in this industry includes Local Resellers, Toll Resellers, and Wireless Resellers.

³⁰ Affected Entities in this industry include Internet Service Providers (Non-Broadband).

³¹ Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), <https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf>.

³² Affected Entities in this industry include all reporting local competitive service providers.

³³ Affected Entities in this industry include all reporting fixed local service providers (CLECs & ILECs).

2024 Universal Service Monitoring Report Telecommunications Service Provider Data ³¹ (Data as of December 2023)	SBA Size Standard (1500 Employees)		
	Affected Entity	Total # FCC Form 499A Filers	Small Firms
Telecommunications Resellers	633	615	97.16
Toll Resellers	411	398	96.84
Wired Telecommunications Carriers ³⁴	4,682	4,276	91.33
Wireless Telecommunications Carriers (except Satellite) ³⁵	585	498	85.13
Wireless Telephony ³⁶	326	247	75.77

Table 3. Broadcast Entity Data

Broadcast Station Owners (as of August 8, 2025) ³⁷	SBA Size Standard (\$47 Million)		
	Affected Entity	# Commercial Licensed ^{38 39}	Small Firms
Radio Stations (AM & FM) Groups	2,881	2,863	99.38
Television Stations	171	142	83.04

³⁴ Local Resellers fall into another U.S. Census Bureau industry (Telecommunications Resellers) and therefore data for these providers is not included in this industry.

³⁵ Affected Entities in this industry include all reporting wireless carriers and service providers.

³⁶ Affected Entities in this industry include Cellular/PCS/SMR - Specialized Mobile Radio Licensees and SMR (Dispatch).

³⁷ Data as of 2024, according to Commission staff review of the BIA Kelsey Inc. Media Access Pro Television Database (BIA) on Aug. 8, 2025.

³⁸ *Id.*

³⁹ As of December 31, 2025, there were 4,342 licensed commercial AM radio stations and 6,589 licensed commercial FM radio stations, for a combined total of 10,931 commercial radio stations. There were 4,755 licensed noncommercial (NCE) FM radio stations, 1,994 low power FM (LPFM) stations, and 8,867 FM translators and boosters. Additionally, there were 1,389 licensed commercial television stations, 388 licensed noncommercial educational (NCE) television stations, 397 Class A TV stations, 1,760 LPTV stations and 3,092 TV translator stations. *Broadcast Station Totals as of December 31, 2025*, Public Notice, DA 26-49 (rel. Jan. 13, 2026) (*January 2026 Broadcast Station Totals PN*), <https://docs.fcc.gov/public/attachments/DA-26-49A1.pdf>.

Table 4. Cable Entities Data

Cable Entities	Size Standard	Total Firms	Small Firms	% Small Firms in Industry
Cable System Operators (Telecom Act Standard) Small Cable Operator	Serves fewer than 498,000 subscribers, either directly or through affiliates ^{40 41}	530 ⁴²	524 ⁴³	98.87%
Cable Companies and Systems (Rate Regulation) Small Cable Company	Serves 400,000 or fewer subscribers nationwide ^{44 45}	530 ⁴⁶	523 ⁴⁷	98.51%
Cable Companies and Systems (Rate Regulation) Small Cable System (headends)	Serves 15,000 or fewer subscribers ⁴⁸	4,545 ⁴⁹	3,965 ⁵⁰	87.24%

E. Description of Economic Impact and Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

9. The RFA directs agencies to describe the economic impact of adopted rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an estimate of the classes of small entities which will be subject to the requirement and the type of professional skills necessary for preparation of the report or record.⁵¹

10. The Commission estimates that the reduction the burdens of DIRS reporting on small and other communications service providers, will result in annual recurring cost savings for small entities. By

⁴⁰ Pursuant to 47 U.S.C. § 543(m)(2) of the Communications Act of 1934, as amended, the size standard for a “small cable operator,” is a cable operator that, directly or through an affiliate, serves in the aggregate fewer than 1% of all U.S. subscribers and has no affiliation with entities with gross annual aggregate revenues exceed \$250,000,000.

⁴¹ *FCC Announces Updated Subscriber Threshold for the Definition of Small Cable Operator*, Public Notice, DA 23-906 (MB 2023) (2023 Subscriber Threshold PN). In the Public Notice, the Commission determined that there were approximately 49.8 million cable subscribers in the United States at that time using the most reliable source publicly available. This threshold will remain in effect until the Commission issues a superseding Public Notice. See 47 CFR § 76.901(e)(1).

⁴² Based on Commission staff review of S&P Global Market Intelligence, S&P Capital IQ Pro, U.S., *Broadband & Video Subscribers by Geography Q3-2025(June 2025)* data. (last visited Sept. 15, 2025).

⁴³ *Id.*

⁴⁴ 47 CFR § 76.901(d).

⁴⁵ *Id.*

⁴⁶ Based on Commission staff review of S&P Global Market Intelligence, S&P Capital IQ Pro, U.S., *Broadband & Video Subscribers by Geography Q3-2025(June 2025)* data. (last visited Sept. 15, 2025).

⁴⁷ *Id.*

⁴⁸ 47 CFR § 76.901(c).

⁴⁹ Based on Commission staff review of S&P Global Market Intelligence, S&P Capital IQ Pro, U.S. *MediaCensusDW, Operator Subscribers by Geography Q3-2025(June 2025)* data. (last visited Sept. 15, 2025).

⁵⁰ *Id.*

⁵¹ 5 U.S.C. § 604(a)(5).

removing the need for providers to select from the current array of ten separate forms concerning different types of service and infrastructure, the Commission expects that manual filers should be able to complete their filings more quickly. In addition, the Commission expects that eliminating unnecessary and duplicative fields will also allow DIRS filings to be submitted more quickly. The Commission estimates the overall recurring cost savings to small providers arising from modifying DIRS to simplify the filing process to annually be approximately \$23.48 for each county in which a small provider operates. The Commission arrives at this figure by reducing by 20%, on average, the time we estimate that small and other providers will spend filing DIRS reports and by eliminating the cost burden associated with the requirement to provide a DIRS final report.⁵² The Commission acknowledges that a batch filer in DIRS may incur one-time costs “to reconfigure its systems to reorganize how it exports data, and to ensure that the data is formatted in a manner accepted by DIRS” and find those costs to be \$75.41 per small entity.⁵³

11. In addition, the exclusion of small and other non-facilities-based providers from mandatory DIRS reporting will result in an estimated \$3.9 million annual cost savings.⁵⁴ The Commission estimates the cost saving as follows: one office and administrative support worker working at a wage rate of \$35.22 per hour, working for ten minutes on the initial entry and ten minutes for each daily update, multiplied by the 14-day average period of a DIRS activation. Added to this is the ten minutes saved due to no longer having to submit a final report. This total is then multiplied by the 339 counties in which DIRS is activated, on average, each year, and further multiplied by the sum of the

⁵² The Commission estimates cost savings from streamlining DIRS reporting with a (20% cost reduction) × 1 office and administrative support worker × (\$35.22 hourly compensation) × [(10/60) hours for the initial entry + (10/60) hours for daily updates × 14 days] × 339 counties × 18 facilities-based service providers = \$107,456. Further, $(\$107,456 / (339 \times 18)) = \17.61 per provider per county per year. The Commission estimates a \$35,819 cost saving from eliminating the final reporting requirement as 1 office and administrative support worker × (\$35.22 hourly compensation) × (10/60) hours for the final report entry × 339 counties × 18 facilities-based service providers = \$35,819. Further, $(\$35,819 / (339 \times 18)) = \5.87 per provider per county per year. The aggregate cost saving is $(\$17.61 + \$5.87) = \$23.48$ per provider per county per year. Small and other filers in DIRS will realize these cost savings on an annually recurring basis; therefore, these savings will exceed the one-time implementation costs associated with these changes.

The most recent available data suggests a base hourly wage for an office and administrative support worker of \$24.12/hour. See Bureau of Labor Statistics (BLS), *Occupational Employment and Wage Statistics, Occupational Employment and Wages* (May 2024), <https://www.bls.gov/oes/tables.htm> (navigate to “May 2024,” “National,” then “Office and Administrative Support Occupations (43-0000),” stating that the mean hourly wage for an office and administrative support occupation worker is \$24.12/hour in May 2024, which is the most recent data available). The Commission calculates the applicable benefits markup by using Bureau of Labor Statistics data, as of December 2025, where civilian wages and salaries averaged \$33.45/hour and benefits averaged \$15.33/hour. Using these figures, the Commission calculates that benefits constituted a markup of $\$15.33 / \$33.45 \sim 46\%$. Taking 46% for cost of benefits (\$11.10/hour) results in an hourly compensation of \$35.22/hour ($\$24.12/\text{hour} + \$11.10/\text{hour}$). See Press Release, Bureau of Labor Statistics, Employer Costs for Employee Compensation—December 2025 (Mar. 20, 2026), <https://www.bls.gov/news.release/pdf/ecec.pdf> (*Benefit Markup*).

⁵³ The most recent available data suggests a base hourly wage for a database administrator of \$51.65/hour. See BLS, *Occupational Employment and Wage Statistics, Occupational Employment and Wages* (May 2024), <https://www.bls.gov/oes/tables.htm> (navigate to “May 2024,” “National,” then “Database Administrators (15-1242),” stating that the mean hourly wage for a Database Administrator is \$51.65/hour in May 2024). Taking 46% for cost of benefits (\$23.76/hour) results in an hourly compensation of \$75.41/hour (which equals \$51.65/hour plus \$23.76/hour using our methodology for benefits markup). The Commission estimates that reconfiguring these systems will require one hour per provider. To the extent some small entities may find it more cost-effective to file manually rather than to update their batch filing capabilities, then these providers would not incur these one-time implementation costs.

⁵⁴ 1 office and administrative support worker × (\$35.22 hourly compensation) × [(10/60) hours for the initial entry + (10/60) hours for daily updates × 14 days + (10/60) hours for the final report entry] × 339 counties × (82 MVNOs + 41 resellers) = \$3,916,182, which rounds to \$3.9 million. Further, $\$3,916,182 / (339 \text{ counties} \times (82 \text{ MVNOs} + 41 \text{ resellers})) = \93.92 per MVNO/reseller per county per year.

nation's estimated 82 mobile virtual network operators and 41 resellers. The result of this calculation is an annual cost savings of \$93.92 for each county in which a small MVNO or small reseller operates.

12. Expanded reporting for public safety voice and broadband network operators will bring new visibility to the status of these critical networks and the essential first responders and emergency management customers who rely on those networks to perform life-saving recovery work. The Commission estimates that small entities will not be impacted by the public safety voice and broadband network operators reporting infrastructure status information in DIRS requirement since the providers it would likely apply to are not considered small entities.

F. Discussion of Steps Taken to Minimize the Significant Economic Impact on Small Entities, and Significant Alternatives Considered

13. The RFA requires an agency to provide “a description of the steps the agency has taken to minimize the significant economic impact on small entities...including a statement of the factual, policy, and legal reasons for selecting the alternative adopted in the final rule and why each one of the other significant alternatives to the rule considered by the agency which affect the impact on small entities was rejected.”⁵⁵

14. In the *Third Report and Order*, the Commission takes several steps that could reduce the economic impact for small entities. As noted above, our actions reduce DIRS-related burdens faced by small and other service providers and government agencies so that they can dedicate more resources to restoring and maintaining communications services during a disaster. These burden-reducing actions include streamlining the DIRS user interface eliminating unnecessary fields; eliminating DIRS final reports for mandated DIRS filers; and exempting non-facilities-based providers from requirements to report in DIRS. The Commission also considered additional ways to reduce burdens on DIRS filers that were proposed by commenters and adopted some of those proposals. In some instances, the Commission declines to make changes to DIRS on which it sought comment that had the potential to further reduce burdens, such as eliminating the voluntarily DIRS satellite form, because the potential public safety value of collecting the information outweighed the potential reduction in costs.

15. The Commission declines to adopt its proposal to require facilities-based wireless providers to identify which non-facilities-based providers utilize their networks within the DIRS activation area, nor does the Commission adopt the alternative that mobile virtual network operators identify their underlying network providers. The Commission is persuaded by the record that a list of business relationships alone would be insufficient to enable emergency managers to derive actionable insights about a disaster's impacts on their community, and therefore requiring the reporting of this information would be unnecessarily burdensome on small and other providers.

16. The Commission adopts new requirements for public safety voice and broadband network operators to report in DIRS in light of the vital role these services play in keeping first responders connected during emergency response and the need to provide visibility and situational awareness into these vital public-safety networks during disasters while only imposing costs on a small number of operators. The Commission considers whether direct reporting to enterprise customers via interfaces such as FirstNet Central would be an adequate substitute for DIRS reporting, but finds that that approach would not yield information that was comprehensive to accomplish these public safety goals.

17. The Commission also declines to extend the suspension of NORS reporting requirements during DIRS activations to DIRS-Lite activations to preserve visibility into outages during those activations. While this suspension would reduce filing burdens on small and other providers, the Commission finds that this would receive far less specific information that it currently receives about outages for a much smaller number of providers, which would create a gap in its situational awareness about network reliability and result in an incomplete picture of the weak points in critical communications infrastructure. The Commission also finds that this would pose significant administrative burdens that

⁵⁵ 5 U.S.C. § 604(a)(6).

outweigh the benefits of suspending the requirement. The Commission is also not persuaded that DIRS-Lite activations present burdens to providers that would meaningfully detract from their service restoration efforts.

G. Report to Congress

18. The Commission will send a copy of the *Third Report and Order*, including this FRFA, in a report to Congress pursuant to the Congressional Review Act.⁵⁶ In addition, the Commission will send a copy of the *Third Report and Order*, including this FRFA, to the Chief Counsel for the SBA Office of Advocacy and will publish a copy of the *Third Report and Order* and this FRFA (or summaries thereof) in the *Federal Register*.⁵⁷

⁵⁶ 5 U.S.C. § 801(a)(1)(A).

⁵⁷ *Id.* § 604(b).

APPENDIX C**List of DIRS Fields by Provider**Broadcast Providers:

- Voluntary Information:
 - Call Sign
 - FAC ID
 - Broadcast Status
 - Power Status
 - Impacted Equipment Location Information (Latitude/Longitude or Street Address/City/State/Zip)
 - Generator Availability
 - Fuel Status (Volume Capacity and Hours)

Cable Communications Providers:

- Required Information:
 - Physical System Identifier (PSID)
 - Type of Major Equipment Down
 - Power Status
 - Common Language Location Identifier (CLLI) Code for the Equipment
 - Impacted Equipment Location Information (Latitude/Longitude or Street Address/City/State/Zip)
 - Number of Cable Communications/Interconnected VoIP Subscribers Served
 - Estimated Number of Cable Communications/Interconnected VoIP Subscribers Down by County or Municipality
 - Number of OC3s or Functional Equivalents Down
 - For Filers Required to Report Broadband Status:
 - Number of Broadband Access Subscribers Served
 - Estimated Number of Broadband Access Subscribers Down
- Voluntary Information:
 - Generator Availability
 - For Filers Not Required to Report Broadband Status:
 - Number of Broadband Access Subscribers Served
 - Estimated Number of Broadband Access Subscribers Down

Interconnected VoIP Providers:

- Required Information:
 - Type of Major Equipment Down
 - Power Status
 - Common Language Location Identifier (CLLI) Code for the Equipment
 - Impacted Equipment Location Information (Latitude/Longitude or Street Address/City/State/Zip)
 - Number of Interconnected VoIP Subscribers Served
 - Estimated Number of Interconnected VoIP/Cable Communications Subscribers Down by County or Municipality

- Number of OC3s or Functional Equivalents Down
- For Filers Required to Report Broadband Status:
 - Number of Broadband Access Subscribers Estimated Number of Broadband Access Subscribers Down
- Voluntary Information:
 - Generator Availability
 - For Filers Not Required to Report Broadband Status:
 - Number of Broadband Access Subscribers Served
 - Estimated Number of Broadband Access Subscribers Down

Public Safety Voice and Broadband Network Operators:

- Required and voluntary information will align with the underlying technology used by the individual public safety voice and broadband network operator (e.g., a public safety voice and broadband network that relies on wireless technology will report the same information as a wireless provider).

Wireless Providers:

- Required Information for Wireless Providers and Public Safety Voice and Broadband Network Operators, if Applicable:
 - Type of Major Equipment Down
 - Power Status
 - Common Language Location Identifier (CLLI) Code for the Equipment
 - Cell Sites Down by County
 - Cell Sites Out Due to Cell Site Damage by County
 - Cell Sites Out Due to Transport by County
 - Cell Sites Out Due to No Power at Cell Site by County
 - Cell Sites on Backup Power by County
 - Equipment Address Information (Latitude/Longitude or Street Address/City/State/Zip)
 - Public Safety Voice and Broadband Network Operators
 - Status of Major Equipment and Cell Sites the Same as for the Commercial Network
 - Number of Public Safety Customers Served in DIRS Activation Area
 - Estimated Number of Public Safety Customers Down
 - Regionally Appropriate Public Safety Voice and Broadband Network Contact Name, Telephone, and Email Information
- Voluntary Information for Wireless Providers and Public Safety Voice and Broadband Network Operators:
 - Generator Availability
 - Location and Coverage of Down Cell Sites (shapefile/CLLI codes)

Wireline Providers:

- Required Information:
 - Type of Major Equipment Down
 - Power Status
 - Common Language Location Identifier (CLLI) Code for the Equipment
 - Number of Working Numbers Served

- Number of Working Numbers Down
- Impacted Equipment Location Information (Latitude/Longitude or Street Address/City/State/Zip)
- Number of OC3s or Functional Equivalents Down
- For Filers Required to Report Broadband Status:
 - Number of Broadband Access Subscribers Served
 - Estimated Number of Broadband Access Subscribers Down
- For Public Safety Answering Point (PSAPs) Served
 - PSAP Name
 - Area Served by PSAP (e.g., County)
 - Number of Customers Served by PSAP
- Zip Code
- For Remote Aggregation Devices Down
 - CLLI of Switch/Geographic Area
 - Number of Working Numbers Served
 - Number of Working Numbers Down
- Voluntary Information:
 - Generator Availability
 - For PSAPs Served
 - PSAP Status
 - Reason PSAP Is Out or Rerouted
 - Restoral Time (Projected or Actual)
 - Location Information (Address/City)
 - Number of Remote Aggregation Devices Down by CLLI or State
 - Number of Telecommunications Service Priority (TSP) Circuits Down by State
 - For Filers Not Required to Report Broadband Status:
 - Number of Broadband Access Subscribers Served
 - Estimated Number of Broadband Access Subscribers Down