New York Emergency Management Plan

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REDACTED VERSION

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1. Introduction

This document provides Frontier's organizational business units with planning and program guidance for implementing the Business Continuity and Crisis Management Program (Program). The Program aims to enable Frontier Communications to improve their capabilities in handling all types of emergencies (for example: crisis, disruptions, and disasters).

The multiple functions of incident response are shared between organizations and agencies, with the private sector and the government having different levels of responsibility. Thus, there is a need to guide all involved parties on how to prepare and implement effective incident response.

When multiple organizations, or different parts of one organization, are involved in the incident response:

- consensus should be sought on overall mission objectives among all involved organizations,
- structures and processes should permit operational decisions to be taken at the lowest possible level, and coordination and support offered from the highest necessary level, and
- authority and resources shall be appropriate to the mission.

2. Scope

This Plan provides a framework for effective incident response and provides the basics for command and control, operational information, coordination and cooperation within the organization. Preparation for, response to, and recovery from an event impacting the administrative or business functions of Frontier requires the cooperative efforts of multiple organizations in partnership with the functional areas supporting the "business" of Frontier.

Frontier requires the commitment of each employee, department, and vendor in support of the objectives required to protect Frontier assets and ensure the Company's ability to serve its customers. This Plan highlights the functions, operations, and resources necessary to ensure the continuation of Frontier's critical business processes in the event of an emergency. This Plan applies to all Frontier operations and personnel who must be familiar with response and recovery operations and processes within their respective roles and responsibilities.

3. Assumptions

This Plan is predicated on the validity of the following assumptions:

- During normal operations, routine or minor emergencies are within the response capabilities of each business unit organization, with minimal need for support or assistance from the Emergency Response Center (ERC).

- The emergency may occur with little or no warning and may escalate more rapidly than response organizations can manage. Resources to activate and operate the ERC will be made available by the business unit organizations supporting the ERC function.

- The situation that causes the event is larger than the region or state can control or perform restoration within their internal contingency plans. It should be noted, however, that the Plan can be functional and effective even in a localized emergency event or disaster. The priorities for restoration of essential communication services to the community will normally take precedence over the recovery of an individual organization.

- The Plan is based on the availability of personnel and support services. The accessibility of these, or equivalent support resources, is a critical requirement to the success of the restoration. The Plan is a document that reflects the changing environment and requirements of Frontier. Therefore, the Plan requires the continued allocation of resources to maintain it and keep it in a constant state of readiness.

4. Terms and Definitions

Business Continuity Operations Team (BCT) - Members of the business units who have overall responsibility to manage all continuity related planning and recovery efforts. These members will participate in ERC activations.

Continuity and Crisis Management Team (CCM) - Within the organization, the team that manages the overall strategic and operational functions of business continuity and crisis management events, procedures, and plans. This team helps manage all ERC activations.

Emergency Response Center (ERC) - The incident command system that supports effective emergency management of all available assets in a preparation, incident response, continuity and/or recovery process. This system follows guidelines set forth by the Federal Emergency Management Agency (FEMA and National Incident Management System (NIMS).

EventCon Checklist - The organizational business unit's checklist of responsibilities as it relates to emergency or continuity events.

Federal Communications Commission (FCC) - An independent agency of the U.S. federal government that regulates communications by radio, television, wire, satellite, and cable across the United States. The FCC maintains jurisdiction over the areas of broadband access, fair competition, radio frequency use, media responsibility, public safety, and homeland security.

Local Exchange Carrier (LEC) - The telephone company which operates within a local area and provides telecommunication services within that area.

Telecommunications Service Priority Program (TSP) - A program that authorizes national security and emergency preparedness (NS/EP) organizations to receive priority restoration and installation of vital voice and data circuits or other telecommunications services that may be damaged as a result of a natural or man-made disaster. TSP enables telecommunications carriers to prioritize the restoration, recovery and installation of critical circuits and voice capabilities in the event of a disaster or threat to the security of the United States. It is also the only authorized mechanism for receiving priority provisioning and restoration of NS/EP telecommunications circuits.

5. Emergency Response Center

5.1. General

The objective of the Emergency Response Center (ERC) is to enable business units to carry out efficient incident response, independently as well as jointly, with all other involved parties, to support all measures to restore critical services. The ERC follows the guidelines set forth by the Federal Emergency Management Agency (FEMA) and National Incident Management System (NIMS).

The ERC shall be:

- Scalable for different incident types and involved organizations
- Adaptable to any type of incident
- Able to integrate different incident response organizations and involved parties
- Flexible to the evolution of the incident and outcome of incident responses

To fulfil these tasks, an ERC shall include:

- A command and control structure
- A command and control process
- The resources necessary to implement the command structure and process

5.2. Communication Processes

Frontier will coordinate appropriate communication depending on the incident/event. During emergencies, communication is managed by Frontier's Crisis Response Team, in coordination with Corporate Communications and the Joint Communications Team. These teams ensure all initial and on-going communication is shared with the public, its customers, its employees, and the media. A continuous schedule of communication will depend on the extent of the incident/event, and will be shared with the public and the media, as appropriate.

Federal, State and Local Communication

When an outage occurs, Frontier has designated representatives responsible for communicating with Federal, State and Local partners. The Continuity and Crisis Management Team activate the Emergency Response Center and coordinate with state and local emergency management officials. Frontier has the capability to send local representatives to public utility or county emergency management offices for enhanced situational awareness and collaboration. Frontier's Regulatory Team is responsible for communication to the state commissions.

Customer Communication

When an outage is detected, Frontier sends SMS communication to impacted customers covering the lifecycle of the outage event. If there is not a mobile telephone number on file, an auto-dialer call is made using the customers BTN on file.

First point of contact is a proactive outage notification that is sent at the time the outage is identified.

> Frontier: *"We're working to resolve an outage affecting service in your area. No need to contact us; we'll keep you updated as we work to resolve the issue and will let you know when your service is restored. You can also check the status of your services on Frontier.com/outage."*

Subsequently, the customer is updated via SMS/auto-dialer with outage updates. First update is sent 2 hours after the initial notification; then every 6 hours until the outage is resolved. Once resolved, the customer will receive a notification that the outage has been resolves and services should be back up.

> Frontier: *"Great news, we've resolved the outage and your service is up and running. You may need to restart your router/modem by pressing the power button or unplugging it from the wall. Please allow up to 5 minutes for the devise to restart. AUTOMATIC MESSAGE - DO NOT REPLY."*

5.3. Activation Triggers

Activation triggers or thresholds are mandatory activation of the ERC. These triggers will be agreed upon by the Incident Commander, in coordination with the ERC Region Lead. The activation phase begins with select trigger points that signify different levels of trouble volume, or when significant damage to a facility has occurred. During this phase, EventCon checklists will be utilized to direct efforts to protect life, property, and operational stability. Security over the area is established as local support services, such as Police and Fire Departments, are enlisted through existing regional and state mechanisms.

Frontier has identified the following triggers which would indicate an activation:

1. Natural Disaster
2. Damage to Premise
3. Loss of Utility Supply
4. Cyber Attack/Loss of IT Records
5. Disclosure of Sensitive Information
6. Labor Strike
7. Act of War/Terrorism/Sabotage
8. Pandemic
9. Global Supply Chain Interruption

5.4. Roles and Responsibilities

Roles and Responsibilities of business unit organization during an incident are as follows:

Command Staff

Incident Commander (SVP of Business Function) - The Incident Commander position will be led by the appropriate organizational SVP depending on the incident. The IC has overall responsibility of the incident and is the lead point of contact for team members during an emergency business situation.

ERC Region Lead (Continuity & Crisis Management) - The ERC Region Lead coordinates activation and planning of incident management activates, supporting the Incident Commander. The ERC Region Lead is responsible for establishing command schedules, conducting ERC meetings, collecting and disseminating information during the incident, assisting in coordination of resource requests, and cooperating with external agencies and municipalities.

Information Officer (Corporate Communications) - The Information Officer serves as the conduit for information to and from internal and external stakeholders, including the media or other organizations seeking information directly related to the incident or event. The Information Officer is the lead for the Joint Communications Team, coordinating a consistent message both internally and externally.

Liaison Officer (Regulatory, Legal, Labor) - The Liaison Officer may vary depending on the incident or event and is the individual responsible for communication with other agencies or organizations.

Safety Officer (Environmental, Health & Safety) - The Safety Officer monitors safety conditions and develops measures for assuring the safety of all assigned persons during an incident or event.

General Staff

Administration and Finance - This section is responsible for managing financial, administrative and cost analysis aspects of an incident or event. This section manages contracts and vendors, completes insurance requirements, manages the status of Frontier buildings, and provides logistical support for the incident or event. Administration and Finance is broken down into 5 branches to include: Risk Management, Human Resources, Finance, Procurement, and Facilities.

Business - This section supports the Consumer and Commercial needs of the business during an incident or event. Teams create and distribute relevant information to both customers and wholesale carrier partners. This section may also support emergency sales orders during an incident.

Customer Operations - This section is responsible for communication to all Frontier customers during an incident or event and consists of national and overseas based call

center operations. Through a web-based platform, state-mandated rights of customers affected during an incident or event is communicated.

Network Operations - This section coordinates response and recovery efforts during an incident, reports on customer and 911 outages, conducts damage assessments, and coordinates with local police and fire departments, public utilities and emergency management agencies for restoration priorities. Network is broken into 5 branches to include Operations (Field and Central Offices), Construction/Engineering, National Services Group (Fleet/Dispatch), Network Operations Center and 911 Support, and Corporate Security.

Technology - This section is responsible for monitoring all cyber, software/hardware, and connected systems within the company. This section supports internal staff access needs during labor events and interruptions through the management of the Disaster Recovery Plan.

Joint Communications Team - This team is comprised of those business units who manage communication to Frontier's customers, employees, the public and the media. The Joint Communications Team is led by Corporate Communications.

5.5. Command and Control Structure

The Command and Control Structure shall be organized in such a way that the Incident Commander can delegate authority.
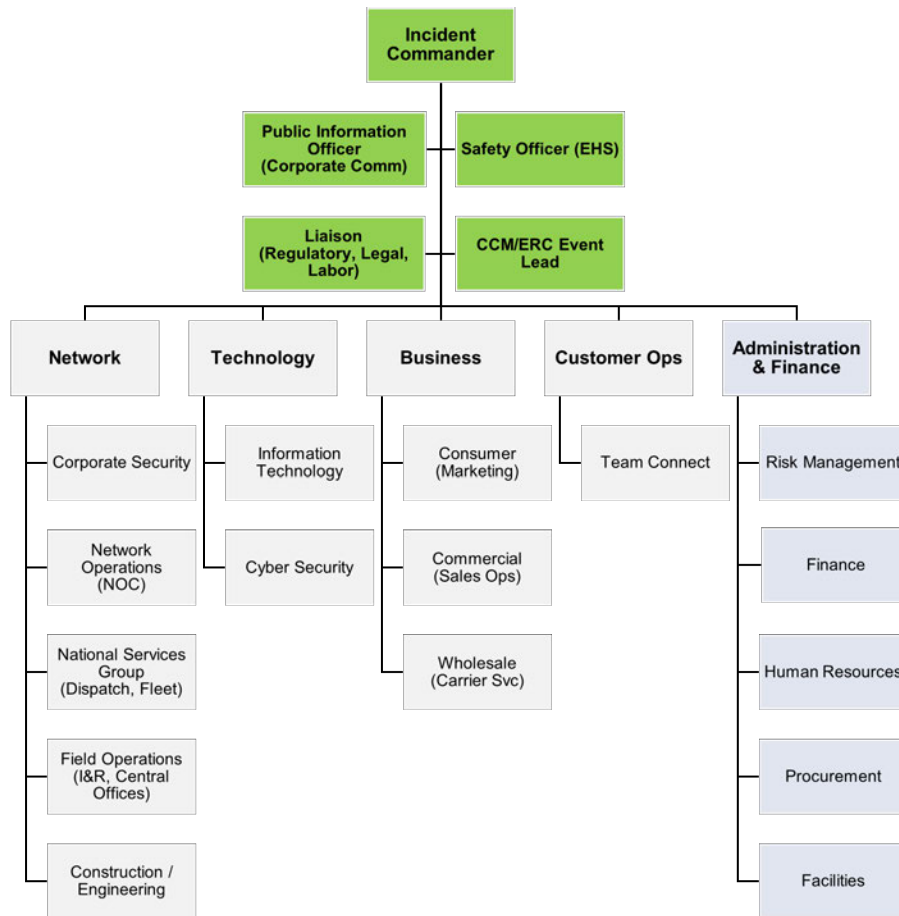
5.6. Levels of Incident Response

Corresponding to the predefined strategic and tactical command structure, Frontier has categorized a scale of incident severity levels. This is in order to implement, as soon as reasonably practicable, the appropriate level of command and control. The Emergency Response Center (ERC) will classify a disaster based on geographical scope and anticipated impacts.

Frontier deploys 4 levels of incident response:

Monitoring - This phase is implemented when a potential impact is expected to disrupt business operations. Monitoring is completed by the ERC Region Lead. This phase may also include early communication with specified teams in order to control crisis communications or begin the preparedness stages of operations. There may be times where the impact is unplanned and immediate, and the level of response results in an activation.

Activated - This phase establishes incident objectives and resolving unmet needs of business units in the response phase of an emergency. During this phase, regular meetings are held with business unit leaders to share information and other situational awareness regarding the status of the emergency and determine any additional resources that are required to successfully respond to the emergency. Contingency operations are implemented, contracted services are coordinated, and recovery plans have been activated. Crisis communications is in full force during this phase.

Recovery - This phase tracks all business unit activity to report restoration timelines to commissions or municipalities. Recovery may take weeks to complete, depending on the outcome of damage assessments and the need to restore certain equipment. Crisis communications may continue during this phase for any outstanding areas of impact.

De-Activated - This phase has de-activated the ERC however, recovery actions may still be taking place during this time. The need for coordinated resources and crisis communications has subsided.

EventCon Checklists

EventCon checklists are incident/event management checklists established within each business unit for actions that take place at certain levels of response within an incident.

EventCon 0 - Business As Usual
EventCon 1 - Preparedness
EventCon 2 - Readiness
EventCon 3 - Advanced Readiness
EventCon 4 - Activation
EventCon 5 - Recovery

5.7. Command and Control Process

Frontier has a command and control process which is ongoing and includes the following activities:

- Observation;
- Information gathering, processing and sharing;
- Assessment of the situation, including forecast;
- Planning;
- Decision-making and the communication of decisions taken;
- Implementation of decisions;
- Feedback gathering and control measures.

The command and control process is not limited to the actions of the incident commander but also applicable to all persons involved in the incident command team, at all levels of responsibility.
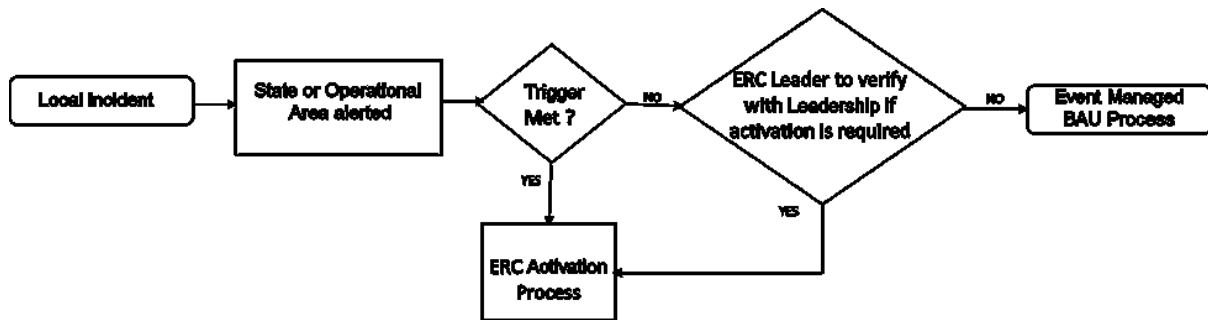
5.8. ERC Activation Log

No events have occurred in the state of NY that have required an activaiton.

6. Emergency Restoration Priorities

Telecommunications Service Priority (TSP) Program

The Federal Communications Commission (FCC) established the TSP Program to provide priority treatment of national security and emergency preparedness telecommunications services. Frontier is required to provision and restore services with TSP assignments before non-TSP services. TSP provides for priority treatment for provisioning and restoring voice and data telecommunications service that:

- Serve our national security leadership;
- Support the national security posture and U.S. population warning systems;
- Support public health, safety, and maintenance of law-and-order activities.

Frontier's Emergency Response Center (ERC) focuses efforts on high-priority restoration and repair first, such as Public Service Answering Points, E911 Service, TSP circuits and services, hospitals, government facilities, and similar locations. Many activities to restore critical services can and will occur simultaneously. Should there be a competition for recovery resources, the following order of restoration guidelines will be followed:

1. Communications necessary to manage the event recovery
2. TSP Services
3. Essential Government Services
4. Public Safety Services
5. Network Infrastructure
6. Priorities of Federal, State, and Local governments
7. Other Services

6.1. Restoration Priority

Frontier will dispatch personnel outside normal business hours if necessary to restore TSP services assigned a restoration priority of 1, 2, or 3. Frontier is required to dispatch personnel outside normal business hours to restore TSP services assigned 4 or 5 only when the next business day is more than 24 hours away. Frontier is required to convey the TSP assignment to subcontractors and interconnecting carriers. Frontier is responsible for verifying the restoration priority assigned, ensuring the information is correctly recorded on the service record.

6.2. Provisioning Priority

If Frontier receives more than one Emergency TSP service request from customers, Frontier will provision them in order of receipt. The customer is immediately liable to pay the prime service vendor any authorized costs associated with provisioning the service within a shorter than standard interval.

6.3. Disaster Recovery Priority

When resolving conflicts, the restoration or provisioning of TSP services follows the below sequence:

1. Restore TSP services assigned restoration priority 1.
2. Provision Emergency TSP services assigned provisioning priority E.
3. Restore TSP services assigned restoration priority 2, 2, 4, or 5.
4. Provision TSP services assigned provisioning priority 1, 2, 3, 4, or 5.

Frontier Response / Outside Aid

Frontier deploys all personnel to recovery efforts following a disaster/storm. If the scope of work exceeds the levels for local personnel, Frontier has procedures to handle priority incidents with relief workers and has the capability to activate mutual aid contracts with vendors to bring in additional staffing to address the disaster.

Support Services

Frontier will manage any outside aid response in accordance with the policies and procedures outlined in its Relief Worker process. Accommodations and access to equipment and supplies will be handled at the local level by the appropriate Operations Director or Local Manager.

6.4. Federal TSP Annual Service Reconciliation

TSP Reconciliation is upon request by the Department of Homeland Security. This process requires a verification of records that involves comparing Frontier Communication's TSP service information with the TSP Program Office's TSP database and resolving any discrepancies.

6.5. E911 Restoration Priority Procedures

Frontier Communications provides a dedicated 911 Customer Care Center (CCC). All critical Frontier 911 customers have a dedicated 911 Service Manager for the area in which the customer is located and is available 24 hours per day to assist in any service matter. As a matter of Frontier's Standard Operating Procedure, all major 911 service issues are automatically escalated to your designated 911 Service Manager.

Frontier has also adopted the **911 Compliance Manual**, which contains 911 operating procedures that must be followed to ensure compliance with the FCC 911 regulations and requirements.

6.6. Documented Medical or Life-Threatening Condition, Disability, or Elderly Customers

If a customer is documented as a medical/life-threatening condition customer, Frontier will flag them manually and will prioritize these customers in the dispatch process.

Medical emergencies are allowed in all properties based on local business practice, and in some states, it is tariffed. Customer must provide letter on Doctor's Office letterhead or State Board of Health with the following information:

- State registration number or licensed physician;
- Name and address of seriously ill person;
- Any services beyond local exchange service that may be necessary to reach customer's doctor and, that absences of such services would be a serious risk of inaccessibility of emergency medical assistance; and
- Signature of licensed physician or public health official certifying illness or medical emergency.

6.6.1. Medical Emergency Accounts - Overview and Processing

The purpose of a medical emergency account notation is to signal Plant Service Center of service repairs and outages associated with residential customers that have health conditions requiring minimal interruptions of access to Frontier's services.

IMPORTANT NOTE: Medical emergencies are applied to the customer's account for one year from the receipt date of the medical provider's certification.

New York Certification: Frontier runs a semi-annual bill message in June and December informing customers how to seek priority medical emergency status.

Important information about priority medical status
Customers with a physician-verified health condition, such as a heart condition or asthma, may sign up for Frontier's priority medical emergency status. Customers who submit a completed medical certification will receive priority handling with respect to service installation and repair. Frontier will restore service of customers with priority medical emergency status at all hours, consistent with the medical needs of the customer and personal safety of utility personnel. For further information or to enroll, customers can go to [Medical Emergency Priority Status Overview | Frontier](#) or contact customer service at 1-800-921-8101.

Annual Certification
A letter/document must be received from the customer's medical provider **annually**, certifying that the medical emergency exists, and that Frontier service is essential to the customer. If the customer would like a copy emailed or mailed to their billing address, the Frontier version of the form can be requested. Staff would visit [The Hub Task - Inquire - Low Income Programs/Offline Mailing (ftr.com)](#) for this option. The letter or document must contain the following information:

- Medical provider's state registration or license number (not required in MN) (An authorized user with Power of Attorney is permitted to assist or submit a medical certification by a medical provider).
- Name and address of Frontier customer.

- Name, signature of licensed physician or public health official (nurse or physician's assistant) certifying customer illness or medical emergency and date.
- Optional: Any services beyond local exchange service that may be necessary, and that absence of such services would be a serious risk of inaccessibility of emergency medical assistance.
- Customer should be instructed to mail the letter/document to the Frontier correspondence address.

IMPORTANT NOTE: If the customer is requesting assistance with a past due account due to a medical condition, the customer must speak with a Collections Agent. Staff are directed to follow the Collections Medical exemption process Collections - Medical Override (MED) Treatment Type (ftr.com).

6.6.2. Services for Customers with Disabilities

Call Procedure:

- Hearing or speech impaired customers, using either a Telecommunications Device for the Deaf (TDD) or a computer keyboard can call the Frontier Customer Center Disabilities (FCCD) number 1-877-462-6606.
- Customers can also dial 711 to be connected with a Telecommunications Relay Services Communication Assistant. Hearing person will give communication assistant calling number, called number and type of call. Communication Assistant will complete the call and will act as a translator from TDD to voice and voice to TDD for the duration of the call.

Access Availability:

- Dual Party Relay Service (DPRS) will give the hearing and/or speech impaired telephone user communication comparable to that of the hearing/voice telephone user. Service is available 24 hours a day / 7 days a week.
- Types of calls provided: DPRS shall only complete intrastate calls. Calls may be placed person-to-person and station-to-station.
- Types of calls handled by DPRS include:
  - Non-coin sent paid
  - Third Party
  - AT&T Card or other telephone credit card
  - Collect
  - Call Limitations
- Types of calls not handled by DPRS include:
  - 976 calls
  - DIAL-IT 900 service
  - Weather and other recorded announcements
- DPRS will make every effort to handle calls to 911 and other emergency calls. This service is offered to our customers at no extra cost. Calls will be billed according to the rate period in existence at the time the call is placed.

Certification:

- Customer must be certified in writing as hearing or speech impaired by licensed physician, otolaryngologist, speech-language pathologist, audiologist, or authorized representative of official **'State'** agency as having hearing or speech disability. Pre-existing conditions establishing the impairment of hearing or speech, such as those which qualify a person with a disability for Social Security benefits on the basis of total hearing

impairment, or for use of facilities of an agency for persons with hearing or speech impairment can also be used.

6.6.3. Medical Expedites - Elderly Attribute

Frontier identifies and applies medical expedites to customer accounts that are 75 years and older.

6.7. VIP (Emergency) Organizations Hazardous Conditions Repair Process

Public Safety, Law Enforcement, and other emergency organizations require a quick, efficient avenue to report trouble to Frontier Communications. VIP organizations are defined as emergency and safety agencies which may report trouble requiring immediate resolution, such as a pole or cable down in the road. Emergency organizations have been advised to call the established numbers for hazardous conditions repair. Examples of these organizations include:

- Police Departments and other law enforcement agencies
- Fire Departments
- Public Utilities
- Local Managers

VIP / MT Repair Toll Free Numbers

- All States including an option for CA & MN **877-486-5667**
- California **877-677-0730 (special CA line for specific municipalities)**
- Connecticut **844-834-4361**
- Minnesota **888-671-6122** (special MN line for customers to call)

6.8. Public Reporting of Hazardous Conditions

The public can make a report to Frontier at any time during a disaster if damage is identified. To report damages to poles, downed wires/cable, or other hazardous conditions, the public can dial 1-877-486-5667. For other customer service reported outages, the public can dial 1-855-981-4544.

To report 911 service issues, the public can dial 1-877-245-3511.

7. State Requirements

Frontier establishes and implements procedures regarding the construction, operation, and maintenance of its network, which are intended to minimize service failures, including but not limited to cable cuts, sudden increases in traffic, employee absences, fires, severe storms, and floods and which are intended to maintain, to the extent practical and reasonable, continuous operation of its service in the event of commercial power loss (except where such power is provided by the consumer).

7.1. Commission Contacts

Cassandra Knight

████████ ████

AZ, CT, GA, NC, NY, PA, SC

Jenny Smith

████████

CA, NV

Judy Geise

██████

AL, FL, IA, IL, IN, MI, MN, MS, NE, NM, OH, TN, TX, UT, WI, WV

7.2. Specific State Requirements

This section breaks down those states in which regulatory requirements are documented and compliance is required. Plans will be distributed to each state on an annual basis, or as required by regulatory.

7.2.1. New York

State Statutes & Rules - Case 22-M-0180, 16 NYCRR 603.05(a) and 16 NYCRR 603.6

603.5 Service Interruptions
(a) Each service provider shall establish and implement procedures regarding the construction, operation, and maintenance of its network, which are intended to minimize service failures, including but not limited to cable cuts, sudden increases in traffic, employee absences, fires, severe storms, and floods and which are intended to maintain, to the extent practical and reasonable, continuous operation of its service in the event of commercial power loss [except where such power is provided by the consumer].

603.06 Major Service Provider Emergency Contingency Plans
(a) This section applies only to Major Service Providers as defined in this section. Major Service Providers are required to incorporate the requirements of this section into the emergency contingency plans pursuant to section 603.5(b)(1). These requirements are primarily intended to ensure adequate response for storm and storm-like emergencies; however, some aspects of these additional requirements will have application to virtually all events noted in section 603.5(a) and should be used accordingly.

(b) Definitions:
(1) Major Service Provider. A Major Service Provider is defined as (i) any service provider that is an incumbent local exchange provider, or (ii) any facilities-based service provider with over 500,000 access lines, or (iii) a certificated 911 service provider as defined in section (b)(2).

(2) 911 Service Provider. A 911 service provider is any entity that is certified under the Public Service Law that provides 911, E911, or NG911 capabilities such as 911 call or information transport, selective routing, ALI, ANI, or the functional equivalent of any of those capabilities. , NG911 core services, directly or indirectly intended for or to a Public Safety Answering Point (PSAP), statewide default answering point, or appropriate state, regional or local 911 authority, or that operates facilities that directly serve a PSAP or state, regional or local 911 authority. For the purpose of these rules, a provider "directly serves a PSAP" if it: hosts a selective router or ALI/ANI database; provides functionality equivalent to NG911 capabilities and core services; or is the last service provider facility through which a 911 trunk, SIP connection, or administrative line passes before connecting to a PSAP.

(e) Sensitive and confidential information. Any Major Service Provider may request that the commission designate as confidential any information required to be submitted in emergency contingency plans. Confidential information may include, for example, names and telephone numbers of its employees and outside contact persons, any information which, in the opinion of the service provider, could compromise its ability to protect the network against vandalism, terrorist acts, or other potential threats to the network. Such requests shall be filed in accordance with section 6-1.3 if the Commission's regulations.

(f) Commission review and approval. Upon receipt and review of emergency contingency plans or amendments files pursuant to this Part, the commission may require any such Major Service Provider to modify such plans or amendments or otherwise prescribe conditions for compliance with the requirements of this Part.

7.2.1.1. Plan Content Requirements

Each Major Service Provider's emergency contingency plan shall provide a current, detailed description of its service restoration plan and shall include the following information:

1. Table of Contents

2. Introduction. A statement of the purpose, policies and objectives of the plan.

3. Emergency classifications. *Refer to Section 5.3 - Activation Triggers, Section 5.6 - Levels of Incident Response, and Section 6.3 - Disaster Recovery Priority*

- Specify classifications of a storm emergency or other emergency by severity and the criteria or guidelines used for determining each classification.The guidelines should include, but need not be limited to,
    - o the geographical scope of the emergency,
    - o the estimated time required to restore service to business-as-usual levels,
    - o the type of expected damage to the provider's network, i.e., from a storm or other storm-like emergency, and
    - o an indication of whether company personnel alone or company and supplementary, non-company personnel will be needed to repair network damage.

4. Emergency response training program. *Refer to Section 8 - Training & Exercises*

- State the Major Service Provider's program to provide emergency response training for those personnel assigned service restoration responsibilities that are different from their normal duties.
    - o Identify person(s) responsible for managing and evaluating the effectiveness of the program.
    - o Include procedures for conducting a minimum of one (1) annual storm drill simulating a response to either a storm, or storm-like emergency that would be classified at the highest or next highest level of severity.
    - o State the extent to which any personnel outside the company may be involved in a storm drill.
    - o Include as well, provisions for critiquing the drill procedures and for giving staff a minimum of 2 weeks' advance notice of a scheduled drill.

5. Advance planning and preparation. *Refer to Third Parties Appendix*

- Specify the on-going actions that the Major Service Provider expects to take throughout each year to plan and prepare for an emergency. The procedures should include the corporation's plans to stockpile emergency restoration tools and supplies.
    - o State also, provisions for the preparation and distribution of literature or other forms of communication with information on customer storm preparations. Such information should address storm survival without electric power, and/or telecommunications service, and safety precautions regarding electrical hazards such as downed wires and the use of portable generators.
    - o State procedures to update at least semiannually, its list of contact persons, with titles, addresses, phone numbers and other pertinent data for the following:
        - All provider personnel assigned service restoration reesponsibiltiies;
        - External storm restoration vendors and contractors, additional (non-NY) internal staffing;

- All life support and other special needs customers;
- Medical faciltiies and other human services agencies;
- Print and broadcast media;
- State, county and local elected officials, law enforcement, 911 dispatching centers, and emergency management offices; and
- Critical equipment and supply vendors.

o At least annually, in accordance with the requirements of section 603.6(c)(2), the corporation shall verify that the preceding data is current. At least semiannually, the corporation shall issue updated lists of known changes to its employees that have plan implementation responsibilities,

6. Emergency anticipation. *Refer to Section 5.3 - Activation Triggers*

- Identify the preparatory measures corporate management would implement in anticipation of a potential storm or network emergency expected to affect the service territory within hours or days.
- Identify the criteria under which key personnel with service restoration responsibilities would either be notified of an impending emergency or deployed to assigned areas, and any special precautions that would be taken.

7. Service restoration procedures. *Refer to Section 6 - Emergency Restoration Priorities*

- Provide the corporation's procedures for mobilizing its personnel, materials, and equipment in order to survey system damage and implement measures to ensure timely, efficient and safe restoration of service to customers in areas damaged by a storm or other storm-like emergency or loss of commercial power or telecommunications service.
- Procedures need to identify restoration priorities to ensure that restoration time is minimized, while ensuring critical customers' needs are met.
- Include a listing of the priorities for service restoration among customer groups in these procedures, including TSP customers.
- For those severe emergencies when field damage assessments are needed, describe the methods for making, within 24 hours, broadscale preliminary assessments of the nature and extend of system damage based on rapid surveys of damaged areas and other data sources, and for making, within 48 hours, more detailed estimates of system damage based on systematic field surveys.
- Describe how field reports of system damage will be integrated with damage reports or indicators from other sources, such as customer call-ins, to make a responsibly accurate assessment of system damage and reliable projections of the personnel, equipment, materials and time that will be needed to rapidly and safety achieve service restoration goals in all damaged areas.
- Provide procedures for deploying company and contractor crews to work assignment areas, monitoring crew activity, reassigning crews as necessary, and releasing crews, both under centralized and decentralized command modes.
- Describe the methods and means that will be used to communicate with damage survey crews and service restoration crews.
- Identify procedures for coordinating company restoration procedures with the restoration efforts of electric utilities, other telecommunications and cable television service providers, and with state and local emergency management and public works agency efforts.
- State the procedures to coordinate efforts with the service territory's electric utility provider for restoring electric service to priority telecommunications facilities.

8. Personnel responsibilities. ***Refer to Section 5.4 - Roles & Responsibilities, Section 5.5 - Command & Control Structure***

- Provide a narrative and chart of the organization and operational assignments of personnel to be mobilized for each emergency classification identified.
- State areas of management and supervisory responsibility and functions to be performed at each emergency classification level.
- Include procedures for contacting and managing all personnel assigned duties under the emergency restoration plan at both the corporate and operating division level.

9. Customer contacts. ***Refer to Section 5.2 - Communication Process, Section 6 - Emergency Restoration Priorities***

- Provide the Major Service Provider's procedures and facilities for handling the extraordinary volume of customer calls that are normally placed during emergency events.
  - o Include a description of the type of messages that may be given to all-in customers regarding projections for service restoration or other pertinent information.
- State the overall corporate goals for answering customer calls during emergencies including, but not limited to
  - o Plans for staffing levels
  - o Number of positions activated
  - o Use of pre-recorded messages
  - o Means of providing updated information to customer service representatives, and
  - o Means of monitoring calls received and answered at the Major Service Provider's customer service centers.
- State procedures to coordinate efforts with the service territory's electric utility provider for restoring electric service to priority faciltiies.
- State procedures to contact and restore telecommunications service to special needs customers such as the elderly, vision-impaired, hearing and speech-impaired, mobility-impaired and human service agencies representing these customers, along with policies for handling inquiries and request for assistance from them.

10. Communications. ***Refer to Section 5.2 - Communications Process***

- Provide the Major Service Provider's procedures and facilities for establishing and maintaining both pre and post storm external communications exchanges regarding damage and restoration progress with customers in general, human service agencies, the media, the Department of Public Service, the Division of Homeland Security and Emergency Services and other state agencies, county and local governments, emergency response services, and law enforcement agencies, etc.
- Include identification of any dedicated phone lines, the designation of any special company representative to act as liaison with government entities, and any special provisions that may be required for dealing with critical facilities.
- State the Major Service Provider's planned frequency of communication updates to the media.

11. Outside Aid. ***Refer to Section 6.3 Disaster Recovery Priority***

- State the corporate policy and criteria governing conditions under which requests for service restoration aid from other service providers, contractors, government agencies or others would be made and the procedures to be followed in obtaining outside aid.

12. Support services. *Refer to Section 6.3 Disaster Recovery Priority*

- Describe the actions that will be taken, the department and personnel responsible for implementing them, to sustain and support restoration crew activities. These shall include:
    o   vehicle management
    o   crew and vendor accommodations (e.g. housing, food, transportation)
    o   distribution of warehouse supplies (e.g. materials, tools, equipment needed in the restoration process)

7.2.1.2. Commission Filing Requirements

Plans shall be filed annually by **January 31.**

(g) Compliance with emergency contingency plans.

(1) Each Major Service Provider shall comply with the guidelines and practices set forth in its effective emergency contingency plans. Each Major Service Provider shall comply with any additional emergency contingency plan requirements that may be imposed by the commission.

(2) Within 30 days following completion of service restoration in an emergency where the restoration period exceeds 3 days, and if requested by the Director of the Office of Telecommunications or the Director of the Office of Resilience and Emergency Preparedness, a Major Service Provider shall file with the commission as assessment by requirement of each required Major Service Provider emergency contingency plan action against its actual preparation and system restoration performance.

(3) Within 60 days following completion of service restoration in an emergency where the restoration period exceeds 3 days, as requested by the Director of the Office of Telecommunications or the Director of the Office of Resilience and Emergency Preparedness, a Major Service Provider shall file with the commission a full review and assessment of all aspects of its preparation and system restoration performance, including compliance with required Major Service Providers emergency contingency plan actions.

(4) Within 60 days following completion of service restoration in an emergency where restoration exceeds 3 days, a Major Service Provider shall identify instances where, under emergency conditions, it modified its storm response from that in the filed emergency contingency plan to the extend required to restore service in a safe and efficient manner and the circumstances that caused such modification.

7.2.1.3. Commission Notification Rules

Title 16 NYCRR Part 603, Subsection 603.4(a)

Initial reports should be made within 1 hour after the outage is first recognized by the provider, reports should be to a designated Department staff member via a "live" telephone conversation. Status reports should be provided on any ongoing major outage. The first status report should be provided within 3 hours of the initial report.

7.2.1.4. Commission Specified Outage Level Response, Recovery or Restoration Strategies

- A service problem or newsworthy event caused by, for example, a major storm, flood, fire, job action, sabotage, civil unrest, death, a cyber or physical security breach at a service provider's building(s), or other event;
- A service problem affecting public access to 911, operator services, Telephone Relay Service, police, fire departments, or emergency medical services;
- A service problem that disrupts the delivery of Emergency Alert System (EAS) provided emergency information to the public. Excluded from this are temporary EAS equipment outages as permitted under the rules of the Federal Communications Commission;
- A major network node and/or telecommunications traffic concentration point (e.g. head-end, central office, toll office, packet switch, router) failure lasting more than 5 minutes;
- Extensive network congestion;
- Any failure (e.g. outside plant cable damage) affecting 1,000 or more subscribers;
- A service problem affecting a public transportation terminal, hospital, national defense installation, or large residential and commercial building or complex, or other major customer.

7.2.1.5. Emergency Drill Requirements

This plan must be tested at least once a year through ERC activations, ERC monitoring events and/or exercises internally and externally with public utility companies and local governments who would normally be included in service restoration responses.

*Refer to **Section 5.8 ERC Activation Log** for plan activation activity.*

8. Training and Exercises

The Emergency Management Plan, in conjunction with the Business Continuity Plan, will be tested annually. Enhancing capacity for emergency response must occur in all areas of the business. Training and exercises should include a variety of practical activities and include different business units. Effective exercises test capabilities of personnel and equipment. Exercises test the weaknesses in procedures and equipment, but at the same time should be basic enough to allow inexperienced staff to learn the emergency response functions.

A comprehensive training and exercise program will allow the organization to:

- Identify gaps in processes and procedures
- Identify opportunities to integrate public and private stakeholders
- Identify areas of cross-training
- Training or technology advancement opportunities

A minimum of one (1) training exercise will be held annually, simulating a storm or other activation trigger incident. Staff involved in the training will receive notification in advance of the exercise date. Frontier will make every attempt to include external partners in the exercise.

Following an exercise, after action reviews will be completed to capture any gaps in the process and allow for development plans to be put in place. Effectiveness of the program will be led by the Continuity and Crisis Management Team.

9. Review and Revision Process

This Plan will be reviewed on an as needed basis, but not less than annually. Each activation should trigger a Plan review with after action improvement items being added to processes included in the Plan. Plan reviews will be conducted by the Continuity and Crisis Management Team, in coordination with the Business Continuity Operations Team.

A. Appendix Associated Relationships

New York Emergency Management Plan

New York State Public Service Commission	Type: Government/Municipality Agency
Description:	
Street Address: Three Empire State Plaza	Main Number: +1 518-474-7080
	General Email:
City: Albany	Main Fax: +1 518-473-2838
State/Province: NY	Main Contact:
Country: Unknown country	Web Address: http://www.dps.ny.gov
Region:	

NY - Jefferson County Fire & Emergency Management	Type: Emergency Management Agency
Description:	
Street Address: 753 Waterman Dr	Main Number: +1 3157862654
	General Email:
City: Watertown	Main Fax:
State/Province: NY	Main Contact:
Country: United States	Web Address:
Region:	

(NY - Jefferson County Fire & Emergency Management) Plummer, Joseph
Business Information
Business Email: josephp@co.jefferson.ny.us
Business Phone: +1 (315) 786-2654
Personal Information
This record has no Personal Information

NY - Madison County Office of Emergency Management	Type: Emergency Management Agency
Description:	
Street Address: 138 N Court Street	Main Number: +1 3153662789
	General Email:
City: Wampsville	Main Fax:
State/Province: NY	Main Contact:
Country: United States	Web Address:
Region:	

(NY - Madison County Office of Emergency Management) Degear, Dan
Business Information
Business Email: dan.degear@madisoncounty.ny.gov
Business Phone: +1 (315) 366-2789
Personal Information
This record has no Personal Information

NY - National Grid	Type: Public Utility Partner Agency
Description:	
Street Address: 144 Kensington Ave.	Main Number:
	General Email:

City: Buffalo
State/Province: NY
Country: United States
Region:

Main Fax:
Main Contact:
Web Address:

(NY - National Grid) Aichinger, Glen	**(NY - National Grid) Eddy, Gregory**
Business Information Business Email: glen.aichinger@ nationalgrid.com Business Phone: +1 (716) 868-6420 **Personal Information** This record has no Personal Information	**Business Information** Business Email: gregory.eddy@ nationalgrid.com Business Phone: +1 (518) 338-9057 **Personal Information** This record has no Personal Information
(NY - National Grid) Johnston, Cassandra	**(NY - National Grid) Pease, Jonathan**
Business Information Business Email: cassandra.johnston@ nationalgrid.com Business Phone: +1 (518) 524-7507 **Personal Information** This record has no Personal Information	**Business Information** Business Email: jonathan.pease@ nationalgrid.com Business Phone: +1 (518) 932-5514 **Personal Information** This record has no Personal Information

NY - NYS Electric & Gas/Rochester
Electric & Gas
Description:
Street Address: 35 Milan Road

Type: Public Utility Partner Agency

Main Number:
General Email:

City: Brewster
State/Province: NY
Country: United States
Region:

Main Fax:
Main Contact:
Web Address:

(NY - NYS Electric & Gas/Rochester Electric & Gas) Dasher, Veronica	**(NY - NYS Electric & Gas/Rochester Electric & Gas) Garrity, Tom**
Business Information Business Email: veronica_dasher@rge.com Business Phone: +1 (585) 815-3863 **Personal Information** This record has no Personal Information	**Business Information** Business Email: tgarrity@nyseg.com Business Phone: +1 (585) 484-2213 **Personal Information** This record has no Personal Information
(NY - NYS Electric & Gas/Rochester Electric & Gas) Rankin, Stephanie	
Business Information Business Email: stephanie_rankin@rge. com Business Phone: +1 (607) 644-2218 **Personal Information** This record has no Personal Information	

NY Office of Communications
Description:
Street Address:

Type: Government/Municipality Agency

Main Number: +1 518-391-3935
General Email:

City:
State/Province:
Country: Unknown country
Region:

Main Fax:
Main Contact:
Web Address:

NY State Office of Emergency Management
Description:
Street Address: 1220 Washington Ave

City: Albany
State/Province: NY
Country: United States
Region: Region 5 (Finger Lakes)

Type: Emergency Management Agency

Main Number: +1 5853719013
General Email: OEMRegion5dl@dhses.ny.gov
Main Fax:
Main Contact: Lisa Burkovich
Web Address:

(NY State Office of Emergency Management)
Burkovich, Lisa
    Business Information
    Business Email: lisa.burkovich@dhses.ny.gov
    Business Phone: +1 (585) 797-4068
    Personal Information
    This record has no Personal Information