



**NATIONAL SECURITY EMERGENCY PREPAREDNESS (NSEP)
EMERGENCY PREPAREDNESS PLAN**
(Non-Proprietary Document)
Revised March 2006

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1. INTRODUCTION AND OVERVIEW

- 1.1 This document provides an overview of AT&T's NSEP disaster prevention, response and recovery program. It outlines strategies and procedures that insure the company's ability to plan for, respond to and recover from emergencies or disasters. It is a condensed and non-proprietary version of the following combined AT&T documents:

- Emergency Preparedness Plan
- National Security and Federal Compliance Plan
- Fire Protection/HDPR Program

- 1.2 The primary objectives of this document are to provide the government and other major customers with AT&T's plans and programs which provide:

- Service continuity
- Protection of the life, safety and health of employees
- Protection of company property and assets
- Provision for restoration and resumption of normal business operations
- Compliance with government mandates, laws, and standards

2. EMERGENCY MANAGEMENT ORGANIZATION / RESPONSE TEAMS

- 2.1 The Emergency Management Organization
The primary role of the EMO is to provide policy direction, coordination, and overall management of emergency operations. The organization is comprised of groups of managers from key levels of

the Company, acts in a consolidated and coordinated manner to prepare for, respond to, and recover from a disaster.

2.2 Corporate Emergency Policy Committee

A committee comprised of Corporate Officers responsible for the formation of corporate business continuity planning, emergency response and disaster recovery responsibilities.

2.3 RESPONSE TEAMS

2.3.1 Emergency Operations Center (EOC) Team

A team comprised of subject matter experts (SMEs) representing 20+ key corporate organizations that in the event of a widespread and/or multi-state disaster would convene in their respective EOC to formulate restoration and provisioning decisions.

2.3.2 Local Response Team (LRT)

A team comprised primarily of local Network Services SMEs who would convene in the Local Response Center (LRC) to coordinate response and recovery efforts at the local level.

3. EMERGENCY CENTERS

3.1 Definition & Purpose

AT&T Emergency Centers are designated either as an Emergency Operations Center (EOC) or Local Response Center (LRC). EOCs, as part of AT&T's agreement with the Federal Government are mandated centers under the control of the AT&T NSEP organization whereas LRCs are the responsibility of the local Area, Region or State Network Services organization. These centers serve as emergency command and control locations developed for the purpose of having a designated site, which in the event of an emergency or disaster are equipped to house a team trained in emergency response and recovery techniques. EOCs and LRCs are typically equipped with multiple desks or work stations, tables, file cabinets, PCs, phones, copy and FAX machines, etc. that provide a response team the tools to facilitate service restoration.

3.2 Functions

The EOCs are the primary operations interface for the AT&T – NSEP organization during a disaster or emergency situation. LRCs serve as the primary interface for local, region or state restoration coordination and interface with AT&T's – NSEP organization during emergency situations. The EOC and LRC personnel have similar designated duties that include, but are not limited to:

- a. Assess and compile damage information
- b. Prioritize and re-prioritize restoration efforts
- c. Arrange for additional staff to facilitate service restoration
- d. Provide guidance and coordination of service restoration activities
- e. Reconstitute the network
- f. Disseminate damage reports and alerts
- g. Communicate internally and externally status of event, efforts underway and expected time frame(s) to complete service restoration
- h. Document service restoration efforts
- i. Debrief after each emergency, review actions taken and make recommendations for improvement
- j. Maintain up to date contact lists, pre-plan and response checklists

3.3 Activation and Notification

Activation of an EOC is made at the discretion of the AT&T NSEP Director or designee.

Activation of a LRC is made at the discretion of the local Network Services Director or designee.

Typically, a LRC is activated in response to a disaster or emergency event that cannot be readily resolved under normal circumstances within a 48 – 72 hour period. An EOC is generally activated for events or disasters that are multi - departmental in nature or are expected to last six or more days in duration.

Upon activation, the EOC is under direction of the Chairperson and the AT&T NSEP Director in concert with the EOC Chairperson and Emergency Management Organization. LRC response teams are under the direction of the local area, region or state Network Services Director Chairperson and the Emergency Management Committee. The response team is empowered to develop strategies and make decisions for the organization(s) they represent. Based upon the severity of the event or potential impact on the network, an EOC or LRC may be required to be operational 24 hours per day for the duration of the event.

The designated NSEP manager will perform notification of activation for the EOC. The local area, region or state Network Services Director for the LRC will initiate notification of activation for the LRC.

3.4 Emergency Operations Centers (EOC's)

The four EOC's and one Executive Communications Center (ECC) are strategically placed throughout the 13 state wireline territory as represented below:

<u>Location</u>	<u>Region Served</u>
Illinois EOC	AT&T Midwest
Northern California EOC	AT&T West
Southern California EOC	AT&T West
Texas EOC	AT&T Southwest
Texas ECC	AT&T 13 States wireline (All Regions)

3.5 Alternate EOC and LRC Succession Planning

Each LRC will designate an alternate center. The purpose of this alternate center is to ensure response/recovery procedures are carried forward if the primary emergency center cannot be activated. The alternate center may be another fully functional LRC within the same region or a designated EOC location within the region equipped to handle the minimal requirements for the LRC response team.

Each EOC will designate an alternate center. The EOC succession plan may be instituted at the discretion of the AT&T NSEP Director. The EOC succession plan provides for the activation of an EOC in another region when it is either impractical or impossible to adequately activate the primary EOC. Determination of which EOC is to be activated will be based on several factors.

3.6 EOC Communications

Each EOC is equipped with alternate communications to ensure back-ups are in place to guarantee continuity of communications to and from the EOC. These communications tools include:

- land based lines from alternate central offices
- cellular communications
- satellite communications
- HF radio/Ham radio
- access to the AT&T Intranet
- access to the Public Internet
- cable/satellite access to local and national news services
- corporate private line network access
- corporate private video network

- 3.7 EOC Emergency Power
The EOC is required to have back up emergency power that will automatically carry the load in the event of a commercial power outage to ensure continuity of operations throughout the emergency event and to maintain EOC integrity.
- 3.8 EOC Security
Entrance to the EOC is allowed only to EOC Team members and other NSEP authorized personnel. EOC identification badges will be issued upon entrance, worn by all personnel while in the EOC and surrendered to NSEP personnel prior to leaving the EOC.
4. EXERCISES
- 4.1 Exercise Purpose
Exercises are designed to provide an opportunity to validate various aspects of the Company's disaster preparedness and response capability and to identify any planning elements or procedures that may require further development or training. The NSEP staff together with their respective EOC Teams develops disaster scenarios and conduct exercises for the specified function, organization, or region. Critiques are conducted immediately following each exercise. Findings and recommendations from these critiques are shared with the appropriate management so that suggested upgrades may be integrated into the plans.
- 4.2 Types of Exercises
- 4.2.1 Table Top Exercise - usually the smallest in scope and the easiest to stage. They are conducted in the EOC. Participants are presented with a scenario and specific simulated emergency situations without time constraints. The exercise is designed to elicit constructive discussion among participants as they attempt to examine and resolve problems based on existing disaster plans. Virtually no external communications are required, as the exercise is primarily restricted to the EOC environment. This type of event is conducted annually in each EOC.
- 4.2.2 Functional Exercise – involves simulators who are located in a separate location from the EOC. The simulators transmit messages concerning simulated emergency events to the participants by phone or in writing. Participants determine what action should be taken and convey decisions and directions back to the simulators. No actual response actions are implemented outside of the EOC and simulator room. Exercise observers may be assigned to evaluate the effectiveness of specific exercise elements or procedures. This type of exercise is conducted annually in the EOC.
- 4.2.3 Mini Exercises – are tests that can be internal or external to the corporation. The purpose of these exercises are to develop or test procedures associated with a specific process or work group. The exercise will include representatives from the target entity and usually do not include the EOC team or EOC assets. These exercises can be conducted several times annually on an as needed basis.
- 4.2.4 Call Out Exercises – test the response teams ability to respond to an EOC activation or disaster event. This test is performed twice annually. The exercise will test the NSEP call out list and notification system.
- 4.2.5 Other exercises are primarily communication exercises which test NSEP communication tools. These include:
- HF Radio/SHARES Exercise
 - Alerting Exercise
 - Emergency Communication Exercise

5. RESTORATION PRIORITIES

5.1 General

The clearing of trouble and service impairments caused by normal wear, accident, fire, storm, etc. is a common occurrence in telephone company operations. When the severity or impact of events develops into a major emergency the contention for resources and the ability to facilitate timely restoration may require the prioritization of service restoration and the emergency provisioning of service to support restoration efforts or in response to emergency needs.

This section describes special procedures to be followed for restoring service in the event of widespread damage, an emergency condition or disaster event.

All levels of management on a coordinated basis will start restoration prioritization immediately as soon as safety and working conditions permit.

The period required for restoring service throughout the area, region or State will vary widely due to differences in the complexity of outside plant, central office equipment and the type of services. In general, in the absence of any priority service requirements, service restoration will be met in the following sequence:

1. Communications from a stricken community to the outside world.
2. Communications to all essential community agencies, e.g., E-911, fire, police, hospitals, etc.
3. Restoration of full community and outside service either by means of permanent or temporary facilities as determined to be the most expedient and practicable.

5.2 Priority Restoration

It is of primary importance that FCC mandated Telecommunications Service Priority (TSP) system procedures, which were developed to ensure priority treatment for our most important telecommunication services, be followed for both the restoration and provisioning of critical Federal, State and Local services.

When a locality or State has an order declaring it a major disaster, extraordinary situation or other emergency, the restoration and provisioning of telecommunication services will be in accordance with the Federal Response Plan and TSP procedures.

In addition to TSP subscribers, many activities to restore critical services will occur simultaneously and may be influenced by the direction of specific Government Agencies.

6. DISASTER PREVENTION

6.1 Overview

AT&T utilizes a myriad of tools and techniques to prevent disastrous events from having a major adverse impact on customer service. Many of these techniques are AT&T Company proprietary and cannot be detailed in this document. However, some portions of our disaster prevention program are either required by certain State/local codes or are Federal mandates. These include:

- Fire Prevention Program/Code Compliance
- Hardware Disaster Prevention and Recovery (HDPR)
- Federal Interface Requirement

6.2 Fire Prevention Program/Code Compliance

The purpose of the AT&T Fire Protection Program is to provide for the safeguarding of AT&T employees from exposure to fire and of AT&T central office facilities from major interruptions in service due to fire. Also, in the event that preventative measures fail, proper emergency response and recovery mechanisms are available.

6.2.1 It is the policy of the AT&T Office of Fire Protection that each AT&T Network Unit will abide by the rules, standards, codes of the National Electric Safety Code (NESC), National Fire Protection Association (NFPA), American National Safety Institute (ANSI), American Society for Testing and Materials (ASTM) and government safety laws, codes and mandates as they relate to fire protection and life safety.

6.2.2 The AT&T Fire Protection Program requires that the following initiatives be adopted and maintained in all Network Service central offices or as otherwise stipulated. Each initiative has a brief overview.

- A. Interchange data
- B. Safety Program
- C. Physical Security & Emergency Access
- D. Disaster & Recovery Procedures
- E. Remote Alarm Monitoring
- F. Smoke Control Ventilation & Fireman Access
- G. Detection Systems
- H. Pre-emergency Planning
- I. Power and Communications Systems
- J. Suppression
- K. Inspections
- L. Training
- M. Compartmentalization
- N. Fire Incident Investigations

6.3 Hardware Disaster Prevention & Recovery (HDPR)

The AT&T HDPR Program is designed to improve network reliability, enhance customer service and prevent/reduce switch downtime. This is performed through a series of proactive preventative and reactive recovery measures primarily related to switch/transport equipment contamination due to dust, dirt, water, battery acid, fire, smoke, non-thermal, etc.

The AT&T HDPR Program is managed and administered by the National Security Emergency Preparedness (NSEP) Organization. The AT&T HDPR Team is comprised of subject matter experts from NSEP, Network Services, Real Estate, Engineering, Environmental and Health & Safety. The collective interdepartmental representatives work jointly to identify and resolve switch/transport contamination hazards that may result in adverse service conditions.

6.4 Government Interface and Partnership

At a singular level, AT&T Network Services National Security Emergency Preparedness (NSEP) organization serves as the primary interface point for Network Services enterprise wide involving matters associated with national security and emergency preparedness response. As a result, AT&T NSEP interfaces on a regular basis with:

- National Communications System (NCS)
- Defense Information Systems Agency (DISA)
- Federal Emergency Management (FEMA)
- Federal Department of Homeland Security (DHS)

The AT&T NSEP organization maintains a partnership with the above federal agencies as well as with local, county and state government, which serves to reinforce and strengthen AT&T's Emergency Preparedness Program. This teaming strategy with respect to disaster prevention and response comes in the form of joint MOUs (Methods of Understanding), DRPs (Disaster Recovery Plans), and exercises, which are reviewed, updated and executed on a periodic basis.