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Adam Teitzman, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20220000-OT ATTN: Division of Engineering

Dear Mr. Teitzman:

Attached for filing, please find the AT&T Network Emergency Response and Storm Restoration Procedures and Protocols for AT&T Florida, pursuant to Section 5 of Rule 25-18.020, Florida Administrative Code.

Acknowledgement, date of receipt and authority number of this filing are requested. Your consideration and approval will be appreciated.

If you have additional questions, please contact me at (850) 228-0231.

Sincerely,

A handwritten signature in blue ink that reads "Madeline Warrington".

Manager – External Affairs
Attachment



AT&T Florida Network Emergency Response and Storm Restoration

Procedures and Protocols



AT&T Florida Network Emergency Response and Storm Restoration

Introduction and Overview

This document outlines the strategies and procedures AT&T uses to plan, respond, and recover from events that may have potential impact to the AT&T Network. It provides an overview of:

- Corporate Event Management
- Network Emergency Management Center
- Network Disaster Recovery
- Restoration
- Public Reporting Procedures



Corporate Event Management

AT&T's Corporate Event Management Framework (EMF) provides an incident command structure that may be activated to manage anticipated or unanticipated events that have potential impact AT&T business processes, assets, or people. The EMF defines AT&T's Emergency Management Operations (EMO) for an event that delineates response among the entities and the roles and responsibilities of those entities. The EMF and the EMO are integral parts of our event response program.

EMO Response Teams

The EMO structure establishes multiple response teams which are focused on the restoral of key business processes. These processes cover technology operations and infrastructure, customer sales and service, network provisioning, restoration and maintenance, among other key areas.

The AT&T Global Emergency Management Center (Global EMC) performs corporate activities during a significant event, including:

- Senior Management quick engagement for Corporate strategic business decisions.
- Crisis communications and message management.
- Accounting for employees within the event impact scope.
- Consolidated event status reports.
- Corporate resources and emergency supply requirements.
- Business unit emergency management activities, including:
 - Business resumption plan activation/deactivation count.
 - Recovery of business processes and operations through prioritization and movement of resources
 - Interfacing with customers, government agencies, and other interested parties.
- Network emergency management activities, including:
 - Assessment of network damage
 - Prioritization of network response
 - Positioning and deployment of resources, and
 - Internal communications

Disaster Severity Levels

The disaster severity level matrix defines events by the severity of the damage to AT&T technology assets and/or personnel. The table provides examples of the magnitude of damage, as well as examples of the associated impact for each of the four event response levels. It also identifies the network organization responsible for command and control of a response.

	Level 4	Level 3	Level 2	Level 1
Description	Local service disruptions that can be restored by local teams. Teams follow normal, Business-As-Usual (BAU) procedures.	Outage exceeds the restoration capacity of local teams.	Regional incident requiring coordination of multiple disciplines/ response organizations.	Major event requiring the coordination and deployment of extensive resources.
Examples	Localized, single-element failures. Cable cuts, local system/ application impact, power failures, localized hazardous conditions.	Impacts more than one technical group or geographical area. Local civil unrest, local system/ application impact, minor or regional flooding, small tornadoes.	Multiple, large-scale incidents requiring dedicated teams for 3CP (Command, Control, and Communications). Earthquakes and widespread weather hazards (hurricanes, multiple tornadoes, major flooding). Significant civil unrest, or system/ application impact.	Ransomware attack, national security attacks, global communicable infectious disease outbreak, severe earthquakes.
Incident Command	Impacted Business Units	Event Management Technical Reliability Center, Global EMC, Global Technology Operations Center (GTOC)	Global Emergency Management Center, Emergency Operations Center (EOC), Global Technology Operations Center (GTOC)	Executive Command Council



Network Emergency Management

The AT&T Network Emergency Management Plan is activated during events when local damage assessment or network recovery exceeds BAU capabilities. This response is accomplished through the activation of the Emergency Operations Center (EOC). Depending upon the severity of the event or the potential impact on the business, the EOC may be required to operate 24-hours a day for the duration of an event.

Emergency Communications

AT&T maintains partnerships with federal agencies as well as state, county, and local governments, which serve to reinforce and strengthen AT&T's emergency preparedness programs. This includes information sharing, mutual exercises, and response plan interdependencies with government agencies and other critical infrastructure segments including:

- Department of Homeland Security (DHS)
- Federal Emergency Management Agency (FEMA)
- Joint Cyber Defense Collaborative (JCDC)
- Integrated Operations Division (IOD)
- Wireless Resiliency Cooperative Framework (CTIA)

Our partnerships with Local, State Government, and Federal Government entities is handled through our External Affairs, Public Affairs and Public Relations who are all part of each AT&T State President's Office. For the State of Florida and for each local jurisdiction, a member of AT&T Florida's External Affairs group is designated as liaison to that entity for emergency communications and coordination for the emergency response and restoration.

Emergency Operations Center

AT&T has an Emergency Operations Center that is staffed by members of key organizations who work together implementing procedures directly correlated with the established restoration priorities: The EOC is staffed by members of key organizations who work together to monitor and assess damage, prioritize restoration, and coordinate restoration.

The response team members are responsible for the development of response strategies and appointed to make decisions for the organizations they represent.

Activation

The EOC may be activated on a local, state, regional or national basis. The decision to activate the EOC is the responsibility of the appointed leadership team based on a situations potential to meet or exceed stated network impact thresholds.

EOC Communications

The EOC is equipped with redundant communications channels for the continuity of communications. These tools include wired communications from redundant central offices, wireless communications, satellite communications, and high frequency radios.

Global Technology Operations Center

The AT&T Global Technology Operations Center (GTOC) monitors and proactively manages the entirety of the AT&T Network (domestic and global) twenty-four hours a day, seven days a week. It



is the overall command and control center for the AT&T Network. Selected response teams provide status to the GTOC as part of the overall network assessment reports. Any information about the AT&T Network that is communicated, internally and externally, is validated by the GTOC acting as the single *voice* of the AT&T network.

Exercises

The EOC conducts regular training exercises, at a minimum, on an annual basis. These exercises are designed to validate various aspects of AT&T's disaster response capability and to identify any processes requiring further development or training. After action reports are conducted immediately following each exercise. Findings and recommendations are shared with the appropriate management teams and improvements are integrated into the plan. Training exercises can happen at any level within AT&T from the national level to a local level. Tabletop exercises ensure that personnel in the impacted areas are familiar with their roles as it relates to pre-storm preparation, storm impact and post storm responsibilities.

Tabletop exercises are the most common type of exercise conducted by the EOC because they are less resource-intensive but still provide a valuable assessment of the center's readiness level. Participants are presented with a scenario and specific simulated emergency situations without time constraints. The exercises are designed to elicit constructive discussion among participants as they examine and resolve problems based on existing disaster response plans.

Functional exercises involve external "simulators" who transmit messages concerning simulated emergency events to the participants. Participants determine what action should be taken and convey decisions and directions back to the simulators. Based on the stated training objectives for the center, it is possible that a functional exercise may be needed to provide an increased level training readiness not provided by a Tabletop Exercise.

Network Disaster Recovery

AT&T's Network Disaster Recovery (NDR) team provides recovery solutions and support for Network disaster responses in the U.S. and across AT&T's Most of World service areas.

NDR's inventory includes portable generators, emergency communications assets, telecommunications technology recovery trailers, hazmat response trucks, and a broad array of logistical support equipment including command centers, fuel trailers, and bunk trailers.

NDR's technology, asset management, and emergency communication teams are continually evaluating emerging technologies that will improve our readiness to respond. The NDR program partners with other AT&T Network organizations to provide proactive disaster response solutions. NDR maintains and stages assets at more than twenty warehouses and equipment yards, strategically positioned across the United States, allowing for a rapid response across AT&T's service footprint.

NDR's core team ensures the physical and technological readiness of the recovery equipment to enable asset deployment anywhere in the U.S. and worldwide—24x7x365. NDR uses a large pool of AT&T employees from across all business units that volunteer to be emergency responders during times of need. They physically deploy, turn-up, and recover the assets as needed; that capability is built and sustained using hands-on training exercises.



Restoration

AT&T follows special procedures to restore service after an event causes widespread and/or severe damage or when other emergency conditions exist.

Restoration of the impacted AT&T network is the company's primary objective. In general, during a specific event, service restoration is prioritized for critical infrastructure services as required by the FCC for TSP and communications for Public Safety (e.g., E-911, fire, police, and hospitals), in addition to any other event-specific priority service requirements.

AT&T begins coordinated restoration prioritization as soon as safety and working conditions permit. The period required for restoring service throughout an impacted area, state, or region will vary widely due to differences in the location and severity of an event, the complexity of our network infrastructure, central office equipment impacted, and the type of services provided in an area (e.g., broadband, wireless).

In a storm related event, each storm's progress is tracked to determine possible impact to AT&T and information is distributed multiple times daily to personnel in the affected area.

Personnel in the potential impacted area conduct and facilitate meetings to work through pre-storm checklists. Discussions include but are not limited to moving vehicles to higher ground, personnel safety and reporting, tie down and relocate items in construction yards, provide personnel direction for reporting after the storm and assign personnel to restoration efforts, etc. Daily briefing takes place to provide pre-storm preparation updates to AT&T Leadership. Depending on the level of a storm's impact, the following may be activated:

- The AT&T Emergency Operations Center may be activated as a single point of contact for all organizations to collaborate concerning identified restoration needs and resolution to eliminate roadblocks (Event Assessment Reports are documented and distributed to Leadership).
- All employees in the affected areas are required to positive report through AT&T reporting system to ensure their wellbeing.
- Construction, Engineering and Technicians will be deployed to impacted areas for restoration efforts.
- Local Disaster Recovery Teams will be activated, and meetings facilitated to restore service.

Post storm updates and meetings take place to provide impact and restoration status to AT&T Leadership and other stakeholders.

Process improvement opportunities identified, documented, and addressed as needed.

Telecommunications Service Priority

AT&T fully supports the FCC TSP program that authorizes National Security and Emergency Preparedness (NSEP) 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. The program is the only authorized mechanism for receiving priority provisioning and restoration of NSEP telecommunications circuits.



Restoration Procedures

As part of AT&T's National Disaster Response Team we have established survey teams that review our facilities in storm impacted areas. Based on the damage that is found we issue projects to replace our facilities and coordinate will all utilities that are impacted. Also, as part of AT&T's National Disaster Response Team we have established a Power Company Liaison to work with each power company in storm impacted areas. Below are the job functions of AT&T's Power Company Liaison:

- Operates from the Power Company Emergency Operations Center
- Determine which areas have been released by the Power Company for AT&T to begin their restoration assessments and restoration effort
- Manages request from the Power Companies for communications facilities to their assets
- Ensures that all utilities are made aware of what AT&T poles have been replaced and what utilities need to attach
- Coordinates with the power company on what power poles have been replaced due to storm restoration and therefore require AT&T to attach

The repair and replacement of damaged poles is generally communicated through the National Joint Use Notification System (NJUNS) if the utility company is an active member in NJUNS. If not a member of NJUN's, email notifications are sent to the utility companies to replace or attach to a pole that has been replaced.

AT&T currently has agreements in place with multiple suppliers to provide emergency response in the event of Natural or manmade disasters. These agreements include the ability to utilize the suppliers for the placement/replacement of utility poles, line clearing (tree trimming), and repair/replacement of aerial facilities upon the declaration of a service emergency within AT&T.

Public Reporting Procedures

To assist the communities we serve, a toll-free number has been established that will allow municipality officials, fire and police departments and power companies 24-hour availability to contact AT&T's Narrow Band work group to report broken poles and downed cables in the Central and Southeast regions. Municipal officials, fire and police departments, power companies, and first responders may report broken poles and downed cable emergencies by calling (713) 235-7900. Based on the information provided the center will route the referral to the appropriate work group to complete the repairs.

The general public may call (800) 288-2020 and select Repair to report issues such as broken poles, obstructive vegetation, and down cables. Both numbers are available 24 hours a day and 7 days a week.