

Enhanced Emergency Response Plan



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Table of Contents

SECTION 1: INTRODUCTION.....	4
1.1 Statement of Purpose, policies, and Objectives.....	4
SECTION 2: EMERGENCY CLASSIFICATIONS.....	4
2.2 Classification of Storm Emergency by Severity and Criteria Used for Determining Each Classification and Expected Time to Restoration.....	4
SECTION 3: EMERGENCY RESPONSE TRAINING PROGRAM.....	5
3.1 Emergency Response Training	5
3.2 Persons Responsible for Managing and Evaluating Training Program.....	5
3.3 Procedures for Annual Storm Drill Simulation Training	5
SECTION 4: ADVANCE PLANNING AND PREPARATION	6
4.1 On-going Annual Actions to Plan and Prepare for an Emergency.....	6
4.2 Company’s Plans to Inventory Emergency Restoration Tools and Supplies	6
4.3 Provisions for Preparation and Communication on Customer Storm Preparations	6
SECTION 5: EMERGENCY ANTICIPATION	7
5.1 Preparatory Measures Which Management to Implement in Anticipation of Potential Storm	7
5.2 Criteria for Notification and Deployment of Key Restoration Personnel in an Impending Emergency	8
SECTION 6: SERVICE RESTORATION PROCEDURES INCLUDING FIELD DAMAGE ASSESSMENT	8
6.1 Procedures for Mobilizing Personnel, Materials and Equipment in Order to Survey System Damage and Implement Measures to Ensure Timely Restoration to Service	8
6.2 Description of How Field Reports of System Damage are Integrated with Damage Reports for Accurate Assessment of System Damage.....	9
6.3 Procedures for Deploying Company and Contractor Crews to Work Assignments	9
6.4 Procedures for Coordinating Company Restoration Procedures with the Restoration Efforts of Electric Utilities and Other Service Providers.....	9
SECTION 7: PERSONNEL RESPONSIBILITES	9

7.1 Chart of Organization and Operational Assignments of Personnel	9
7.2 Procedures for Contacting and Managing All Personnel with Assigned Emergency Restoration Responsibilities	11
SECTION 8: CUSTOMER CONTACTS.....	11
8.1 Procedure for Handling Volume of Calls During Emergency Events Including Messaging to Customers for Projection of Service Restoration	11
8.2 Overall Company Goals for Answering Customer Calls During Emergencies.....	12
8.3 Procedures to Restore Telecommunication Service to Special Needs Customers.....	12
SECTION 9: COMMUNICATIONS	12
9.1 Procedures for Establishing and Maintaining Both Pre and Post External Communications Exchanges Regarding Damage and Restoration Progress.....	12
9.2 Designation of Company Representative for Liaison with Government Entities.....	12
9.3 Company’s Planned Frequency of Communication Updates to the Media	13
SECTION 10: OUTSIDE AID	13
10.1 Company Criteria for Which Requests for Service Restoration Aid from Other Service Providers.....	13
SECTION 11: SUPPORT SERVICES	13
11.1 Actions to be Taken to Sustain and Support Restoration Crew Activities.....	13
ATTACHMENT A: DEFINITION OF MAJOR SERVICE INTERRUPTION	14
ATTACHMENT B: CONTACT LISTS.....	15
ATTACHMENT C: PERSONNEL CONTACT LIST FOR EMERGENCIES	18

SECTION 1: INTRODUCTION

1.1 Statement of Purpose, policies, and Objectives

The Enhanced Emergency Response Plan (EERP) is a guide for responding to emergencies which affect telephone, broadband, and cable services to Nicholville Telco LLC d/b/a Nicholville Telephone Company (NTC) customers in the event of a major service interruption. This guide describes what the Company’s staff should do in responding to, preparing for, and reporting major service interruptions.

The Company’s objective in emergency responses is to protect the public, to restore telephone, broadband, and cable service interrupted by an event as quickly as possible and to communicate the Company’s restoration progress to its customers, regulators, and municipal officials.

NTC utilizes fully managed services from SLIC Network Solutions, Inc. (SLIC), a sister CLEC company, provides for all emergency responses reflected in the sections of this EERP.

SECTION 2: EMERGENCY CLASSIFICATIONS

2.2 Classification of Storm Emergency by Severity and Criteria Used for Determining Each Classification and Expected Time to Restoration

All emergency facilities affected by disaster are considered a priority to restore services. SLIC has trained plant personnel, GIS engineers, Central Office technicians, data network specialists, and other staff available on standby along with generators ready to deploy in addition to SLIC’s own construction crews on standby to restore services within business-as-usual levels to any affected areas. SLIC utilizes additional outside construction crews as necessary depending on the level of outside plant damage.

Description	Class 1	Class 2	Class 3	Disaster Event
Number of Customer Predicted	15 – 50	51– 999	1000 – 5000	>5000
Number of Predicted or Actual Cases of Trouble	<50	51 – 250	251 - 1000	>1000
Expected Time to 90% Restoration	24 – 48 Hours	49 – 72 Hours	73 – 96 Hours	>96 Hours
Mutual Aid Contractor/Crews	No	Optional	Yes	Yes
Anticipated Damage	Drops down, isolated fiber breaks, no major	Drops down, multiple fiber breaks, power loss,	Drops down, multiple fiber breaks, pole	Drops down, multiple fiber breaks with

	power outages	infrastructure damage, network isolation	damage, power loss, infrastructure damage, network isolation or loss	large number of cables and poles down, company-wide power loss, significant infrastructure damage, complete network isolation or loss
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SECTION 3: EMERGENCY RESPONSE TRAINING PROGRAM

3.1 Emergency Response Training

Annual storm drills will be conducted as part of SLIC’s ongoing effort to provide safe, efficient, and effective emergency responses to disasters and other major service interruptions.

3.2 Persons Responsible for Managing and Evaluating Training Program

- Brad Pattelli, President & CEO
- Kevin Lynch, Chief Operating Officer
- Paul Barton, Chief Relationship Officer
- Chris Converse, I&R Supervisor
- Darlene Cole, Director of Operations and Customer Service Manager

3.3 Procedures for Annual Storm Drill Simulation Training

Annually, the annual storm drill simulation training will involve one or more of the following outage scenarios:

- Significant Outside Plant Disaster/Storm Event
- Loss of Major Wire Center
- Loss of Commercial Power

3.3.1 Outside Company Personal Resources Required for Simulation

If necessary, outside agencies may be included in the outage scenarios, including but not limited to:

- Local Emergency Services
- County, State or Federal Emergency Services
- Power utility providers
- Media or related entities

3.3.2 Review of Simulation

- All storm drill simulations will be scheduled with at least two weeks advance notice to SLIC employees including any other required entity.
- If necessary, simulation activities will be announced to customers using standard outreach methods.
- Following all storm drill simulations, a debriefing session will be held to review efficiencies and recommendations for improvements.

SECTION 4: ADVANCE PLANNING and PREPARATION

4.1 On-going Annual Actions to Plan and Prepare for an Emergency

In addition to an annual review of the Enhanced Emergency Response Plan as defined in Section 3, SLIC will perform a review of inventory of emergency restoration tools, review customer notification of emergency preparations, and update necessary outage contact lists.

4.2 Company's Plans to Inventory Emergency Restoration Tools and Supplies

SLIC has an emergency inventory set up in 5 Locations within its service territories including backbone, splicing and CPE equipment that is replaced automatically through our Inventory system.

4.3 Provisions for Preparation and Communication on Customer Storm Preparations

SLIC regularly reviews weather conditions and incoming storms that can potentially disrupt services and plans and notifies all staff of any upcoming potential service interruptions. In addition, the VP of Regulatory Affairs, or designee, will ensure that storm preparedness information is distributed to customers by means of bill inserts, news releases, website updates and social media site updates. This information includes the phone number to contact to report loss of telephone, broadband, or cable TV service as well as the following preparedness and safety tips:

- Pay attention to weather advisories and storm warnings.
- Keep a flashlight and fresh batteries handy.
- Have a battery-powered radio to keep informed of restoration efforts.
- Charge wireless phones or use a portable charger to maintain a means of communication.
- Double-check your supply of food, and stock your pantry with packaged or canned foods that require no refrigeration or cooking. Avoid opening your refrigerator unnecessarily during outages, so food lasts longer.
- Be sure you have a non-electric can opener. If you have an electric water pump, always keep an emergency supply of bottled water on hand for drinking and washing. If a major storm is forecast, fill your tub with water as an added reserve.
- Remember, never use outdoor gas or charcoal grills indoors. They pose a fire hazard, and over time can give off deadly carbon monoxide gas. Use these appliances only outdoors with proper ventilation.
- Be sure you know how to open your garage door manually, if you usually rely on an electrically- operated, automatic, remote control door opener. Use home generators safely and in accordance with manufacturer's instructions.
- Stay clear of downed or low-hanging wires.

4.3.1 Outage Contact Persons

4.3.1.1 Company Personnel Assigned Service Restoration Responsibilities

See Attachment B

4.3.1.2 External Storm Restoration Vendors and Contractors

See Attachment B

4.3.1.3 Medical Facilities and Other Human Service Agencies

See Attachment B

4.3.1.4 Print and Broadcast Media

See Attachment B

4.3.1.5 State, County, and Local Elected Officials, Law Enforcement, 9-1-1 Dispatching Centers, and Emergency Management Offices

See Attachment B

4.3.1.6 Critical Equipment and Supply Vendors

See Attachment B

4.3.2 Procedures to Update Semiannual Lists of Contact Persons

VP of Regulatory Affairs will review and update all lists of contact persons by the first of January and July every year and provide all updates to its employees that have plan implementation responsibilities.

SECTION 5: EMERGENCY ANTICIPATION

5.1 Preparatory Measures Which Management to Implement in Anticipation of Potential Storm

In anticipation of a potential storm or Network Emergency SLIC's Head of OSP and Chief Operating Officer will contact the appropriate Vendors and or Contractors to get lined up for the potential outages. Personnel will be put on standby and CO and Engineering staff will monitor systems for outages or potential issues.

The Head of OSP will verify all generators are fueled and contracts for propane are current.

5.2 Criteria for Notification and Deployment of Key Restoration Personnel in an Impending Emergency

Key restoration personnel will be contacted by the Head of OSP and supervisory personnel to begin staging resources throughout the areas to be affected. When weather indications move from a watch to a warning or similar civilian disaster, crews will be notified that response may be imminent.

SECTION 6: SERVICE RESTORATION PROCEDURES INCLUDING FIELD DAMAGE ASSESSMENT

6.1 Procedures for Mobilizing Personnel, Materials and Equipment in Order to Survey System Damage and Implement Measures to Ensure Timely Restoration to Service

The Head of OSP will contact the OSP managers to survey system damage and put our storm response into action along with the help of SLIC's Engineering team.

6.1.1 Procedures to Identify Restoration Priorities to Ensure Restoration Time is Minimized

OSP managers along with the Network Operations Center, the Customer Care Center and the Engineering team will identify critical customers and infrastructure. Response will be prioritized as backbone first, then distribution, then the last mile. OSP will coordinate closely with power companies to clear access to downed or damaged lines. Customers with services that support life-safety or critical infrastructure will be prioritized.

6.1.2 List of Priorities for Service Restoration Among Service Groups Including Telecommunications Service Priority Customers

Service Group Priorities

- 1) Medical facilities
- 2) Medical life-line customers
- 3) Law enforcement agencies
- 4) Fire departments
- 5) Cell towers
- 6) backhaul for other telecommunications providers

6.1.3 Procedures for Making within 24 Hours Broadscale Preliminary Assessments of the Extent of System Damage Based on Rapid Field Damage Assessment in Severe Emergencies

Assessment of the extent of damaged facilities will occur with outages posted to SLIC's GIS outage map. SLIC will send OSP Managers out into the field for field verification and report back to the Chief Operating Officer, the Head of OSP and the Engineering Team.

6.1.4 Procedures for Making within 48 Hours More Detailed Assessments of System Damage Based in Severe Emergencies

SLIC's Engineering team will work closely with OSP staff to update the master outage map, which can be shared with key constituents. Data will be compiled, and customer impact will be evaluated from the data collected.

6.2 Description of How Field Reports of System Damage are Integrated with Damage Reports for Accurate Assessment of System Damage

Field reports are validated by SLIC's Plant Managers in the field. Field reports are entered into ArcGIS field maps, which are then displayed and aggregated on a master map for the OSP, Engineering and CO staff analysis. Using the query capabilities of GIS, reports can be generated and disseminated as needed.

6.3 Procedures for Deploying Company and Contractor Crews to Work Assignments

The Head of OSP utilizes existing procedures for dispatching contract crews and company crews as an integrated unit. All field crews use ARCGIS field maps and ZenDesk for assigning and coordinating work across the disaster area.

6.4 Procedures for Coordinating Company Restoration Procedures with the Restoration Efforts of Electric Utilities and Other Service Providers

The Head of OSP and Engineering staff have contacts with each of the power utilities with which Nicholville works. During the emergency as well as during the broader emergency response update meetings, SLIC personnel communicate directly with power utility personnel.

6.4.1 Procedures to Coordinate Efforts with Electric Utility for Restoring Service to Priority Telecommunications Facilities

Critical backbone information has been shared ahead of time with power owners to ensure appropriate emphasis is placed on restoring access to poles to repair any damage.

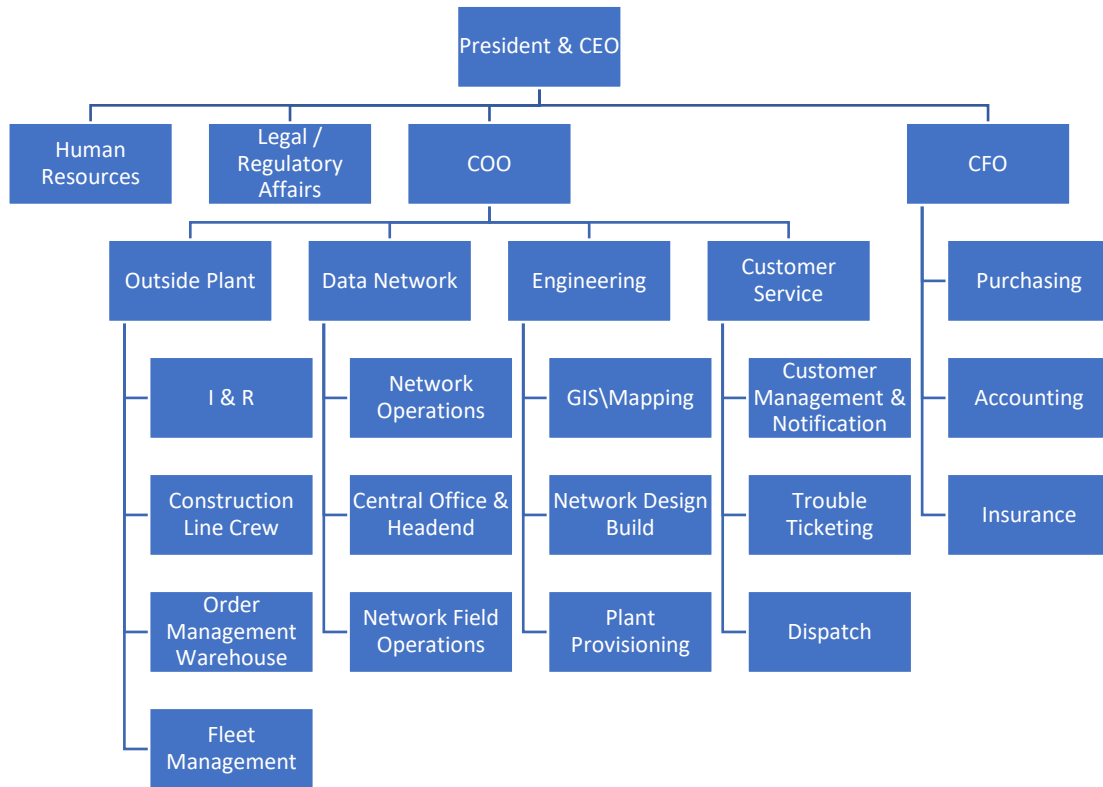
SECTION 7: PERSONNEL RESPONSIBILITIES

7.1 Chart of Organization and Operational Assignments of Personnel

Below are the organizational and operational assignments of personnel to be mobilized as necessary dependent upon the severity of storm damage within each CLASS 1, CLASS 2, CLASS 3, and Disaster Event emergency as identified in section 2.2.

7.1.1 Organizational and Operational Assignment of Personnel for Emergencies

- President & CEO – Brad Pattelli: responsible for the overall operation of the plan. See Attachment C for contact information.
- COO – Kevin Lynch: responsible for the integrity of SLIC’s core fiber network and for maintaining a high level of reliability to our customers. Manages a team of [35] professionals, including GIS engineers and Data Network Specialists who offer extensive knowledge and support in maintaining SLIC’s network systems. Responsibilities include deploying technical staff for all levels of technical network outages and what is needed to restore operations. Will contact any external network vendors if required for any redundancy requirement as needed. Responsible for contacting all state, county and local elected officials, law enforcement, 9-1-1 dispatching centers, and emergency management office facilities of status of repair and restoration. See Attachment C for contact information.
- Outside Plant – acting Head of OSP: responsible for assessing all damage to plant facilities, including fiber breaks, pole damage, drop damage, as well as assessing power loss and generator distribution requirements. Will facilitate and provide coordination of all outside plant staff and construction crews to safely and quickly restore the fiber network and customer services in addition to providing coordination with power utility companies in the event of downed power facilities and cable burns. See Attachment C for contact information.
- Engineering – Dakota Casserly. Responsible for mapping of the outside plant, incorporating field reports into master outage map, coordinating response, supporting field personnel and CO. See Attachment C for contact information.
- Data Network – Eric Kreckel. Responsible for supporting the logical infrastructure of the network and coordinating emergency connections and dynamic rerouting. See Attachment C for contact information.
- Director of Operations/Customer Service Manager – Darlene Cole: responsible for CSRs to help field customer trouble calls and create trouble tickets and to dispatch I & R field personnel as needed. Provides key communications between outside plant personnel and Customer Service Department. Also works with I & R and network field personnel in testing and confirming services. Provides service status updates to NTC’s customers via social media and company website and is the company representative to act as liaison with key customers with service problem affecting a hospital, police, fire, governmental entities, large residential and commercial building or complex, or other major customer such as a school See Attachment C for contact information.
- Legal/Regulatory – Sean O’Connell: Responsible for filing the Emergency Plan with the Secretary of the State of New York’s Department of Public Service and to ensure that the Emergency Plan is current. Also responsible for reporting all Major Service Interruptions as defined by the PSC (see Attachment A), provide ongoing status reports, and file a closing report as required by the Office of Telecommunications. See Attachment C for contact information.
- CFO – Peter Draveck: Responsible for maintaining vendor contracts to be executed as needed to respond to major events. Ensures adequate financial resources and reciprocal relationships to utilize mutual aid to respond to major events. Ensure appropriate financial vehicles to enable hotel, rental car, and other emergency services to be employed when needed. See Attachment C for contact information.
- Human Resources – Kate Blevins: Ensures proper procedures to maintain a safe and healthy working environment for internal and external resources and appropriate compensation as required. See Attachment C for contact information.



7.2 Procedures for Contacting and Managing All Personnel with Assigned Emergency Restoration Responsibilities

All personnel with assigned emergency restoration responsibilities will have access to at least two forms of communication. The first line of communication will be through the Microsoft Teams platform utilizing a defined emergency channel. Should certain personnel be unreachable through the Teams platform, standard SMS messaging will be utilized. The next line of communication will be telephonic, should Teams and SMS prove ineffective. In this situation, communications will follow the reporting structure in place at the time, with all supervisors and managers within the emergency response team being responsible for communicating with each of their direct reports on the emergency response team.

SECTION 8: CUSTOMER CONTACTS

8.1 Procedure for Handling Volume of Calls During Emergency Events Including Messaging to Customers for Projection of Service Restoration

SLIC has procedures in place for handling the extraordinary volume of customer calls that are normally placed during emergency events such as remote staff with IP-based company phones and PCs/laptops to handle all call

inflows including a front-end message on the Interactive Voice Response (IVR) alerting customers of outages and status updates. In addition, customers unable to reach a customer service representative (CSR) during normal business hours have the option of leaving a voice mail or waiting on hold for the next available CSR. All voice messages are regularly monitored and followed up on with customers by the CSR team. In addition, all calls received after business hours are handled by SLIC's live after-hour 24-hour support service with subsequent follow-up with SLIC's on-call contact escalation. Also, social media and the company website are used to provide restoration status updates to customers to help mitigate the volume of calls into the Company.

8.2 Overall Company Goals for Answering Customer Calls During Emergencies

Our goal is to reduce the number of calls by providing information via text, social media, and recorded messages. With these mitigation factors in place, our goal is to answer every call within 10 minutes.

8.3 Procedures to Restore Telecommunication Service to Special Needs Customers

SLIC maintains within its Customer Relationship Management (CRM) system special field indicators which automatically flag accounts of special needs customers such as the elderly, the vision impaired, the hearing and speech-impaired, and the mobility-impaired whenever they call into the business office. Special needs customers are given higher priority during all emergency restoration of service outages as monitored by the CSRs and trouble ticket system with follow-up calls to special needs customer to confirm restoration of service.

SECTION 9: COMMUNICATIONS

9.1 Procedures for Establishing and Maintaining Both Pre and Post External Communications Exchanges Regarding Damage and Restoration Progress

Under the direction of the Chief Operating Officer, the company's website and Facebook page will be updated providing information on the status of the network, customers affected, and estimated restoral time. Included in the communications will be instructions on how to report outages and/or degraded services with web links, phone numbers, and other instructions as appropriate. Key personnel will have at least two forms of Internet access to be able to maintain communications via these platforms, as well as access to an out-of-theatre resource who can update pages and Facebook via phone directed communications (in the event of no local or in-theatre Internet access).

The company will utilize its GIS mapping capabilities to give community-based updates on damage and restoration process.

9.2 Designation of Company Representative for Liaison with Government Entities

The Chief Operating Officer and the Customer Service Manager will be the Company representative to act as liaison with governmental entities. Specifically, a service problem affecting a hospital, police, fire, governmental entities, large residential and commercial building or complex, or other major customer, such as a school. All *emergency facilities* affected by disaster are given the highest priority to restore services. SLIC has technical,

data network, and other staff available on standby as well as their own construction crew on standby to restore services within business-as-usual levels to any affected emergency facility.

9.3 Company's Planned Frequency of Communication Updates to the Media

The company will endeavor to update social media every 2 hours.

SECTION 10: OUTSIDE AID

10.1 Company Criteria for Which Requests for Service Restoration Aid from Other Service Providers

When, in the judgment of senior management, in consultation with field personnel and the leadership team, services cannot be restored with internal personnel in a reasonable time.

SECTION 11: SUPPORT SERVICES

11.1 Actions to be Taken to Sustain and Support Restoration Crew Activities

The Head of the Outside Plant and the Chief Operating Officer will be responsible for any actions which need to be taken to sustain and support restoration crews. In general, materials needed for the restoration are expected to be on hand in advance of the required relief efforts. If materials are not available, the Head of the Outside Plant will coordinate with third-party contractors for the provisioning of any materials which are required. Contractors will utilize their own equipment and the company personnel will likewise utilize the company's equipment. Contractors' rates will consider any lodging and meals included in services provided and contractors will be paid at agreed upon rates. Internal personnel will be paid for their time, including overtime, and will be reimbursed for meals, fuel, and lodging pursuant to company policy.

ATTACHMENT A: Definition of Major Service Interruption

New York State Department of Public Service Definition of Major Service Interruption

A major service outage is defined as any of the following conditions associated with wired and wireless, Internet Protocol-enabled (IP-enabled) or traditional circuit-switched, voice, data, broadband, or cable services provided by telecommunications service providers. It also includes both physical and cyber incidents that affect the provider's network, facilities, services, or operations:

- 1.) 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;
- 2.) A service problem affecting public access to 911, operator services, Telephone Relay Service, police, fire departments, or emergency medical services;
- 3.) A service problem that disrupts the delivery of Emergency Alert System (EAS) provided emergency information to the public;
- 4.) 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 five minutes;
- 5.) Extensive network congestion or call blockage;
- 6.) Any failure (e.g., outside plant cable damage) affecting 1,000 or more subscribers;
- 7.) A service problem affecting a public transportation terminal, hospital, national defense installation, large residential and commercial building or complex, or other major customer, such as a utility or other Telecom service provider.

All emergency facilities affected by disaster are considered a priority to restore services. SLIC has trained plant personnel, GIS engineers, Central Office technicians, data network specialists, and other staff available on standby along with generators ready to deploy in addition to SLIC's own construction crew on standby to restore services within business-as-usual levels to any affected areas. SLIC utilizes additional outside construction crews as necessary depending on the level of outside plant damage.

ATTACHMENT B: Contact Lists

Company Personnel Assigned Service Restoration Responsibilities

Business Name	Contact Name	Contact Title	Contact Phone Number	Contact Email Address

External Storm Restoration Vendors and Contractors

Business Name	Contact Name	Contact Title	Contact Phone Number	Contact Email Address

Medical Facilities and Other Human Service Agencies

Business Name	Contact Name	Contact Title	Contact Phone Number	Contact Email Address

Print and Broadcast Media

Business Name	Contact Name	Contact Title	Contact Phone Number	Contact Email Address
North Country Now	Main Office		315-265-1000	News@NorthCountryNow.com
WWNY	Main Office		315-788-3800	newsroom@wwnytv.net
WPTZ	Main Office		518-561-5555	newstips@mynbc5.com
WTEN	Main Office		518-436-4822	news@news10.com
Watertown Times	Main Office		315-782-1012 (main) / 315-661-2523 (fax news line)	
Malone Telegram	Main Office		518-483-4700	news@mtelegram.com
Massena Courier Observer	Main Office		315-769-2451 (main) / / 315-661-2523 (fax news line)	

State, County, and Local Elected Officials, Law Enforcement, 9-1-1 Dispatching Centers, and Emergency Management Offices

Business Name	Contact Name	Contact Title	Contact Phone Number	Contact Email Address
New York State Senate	Mark Walczyk	New York Senator	518-455-3438	walczyk@nysenate.gov
New York State Senate	Daniel Stec	New York Senator	518-743-0968	stec@nysenate.gov
New York State Senate	Jacob Ashby	New York Senator	518-455-2381	ashby@nysenate.gov
New York State Senate	James Tedisco	New York Senator	518-455-2181	tedisco@nysenate.gov
New York State Assembly	Billy Jones	New York State Assemblyman	518-455-5943	jonesb@nyassembly.gov
New York State Assembly	Matthew Simpson	New York State Assemblyman	518-455-5565	SimpsonM@nyassembly.gov
New York State Assembly	Carrie Woerner	New York State Assemblywoman	518-455-5404	
New York State Assembly	Robert Smullen	New York State Assemblyman	518-455-5393	
New York State Assembly	Ken Blankenbush	New York State Assemblyman	518-455-5797	
County Sheriff – St Lawrence County	Brooks Bigwarfe	County Sheriff	315-379-2222	
County Sheriff – Franklin County	Jay Cook	County Sheriff	518-483-3304	Jay.Cook@franklincountyny.gov
County Sheriff – Clinton County	David Favro	County Sheriff	518-565-4300	

ATTACHMENT C: Personnel Contact List for Emergencies

Business Name	Contact Name	Contact Title	Contact Phone Number	Contact Email Address
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