Hancock Telephone Company and affilliates

Hancel Inc

Hancock Long Distance

Enhanced Emergency Response Plan

Compliance Statement

The Hancock Telephone Company's (HTC) Enhanced Emergency Response Plan constitutes the policies, procedures and guidelines that will be followed by HTC and its affiliates in response to a severe weather or other emergency event that results in, or is expected to result in, loss of Telecommunication Services to a substantial number of customers in our service territory. In addition to the policies, procedures and guidelines that make up the Plan, the following principles of compliance, consistent with the New York Public Service Law and the New York State Public Service Commission's ("NYS PSC" or the Commission) Orders will apply to this Plan:

1. The procedures, policies and guidelines herein will be followed by all personnel engaged in the emergency response, to the extent possible given the unique circumstances of the event.
2. The Plan will be saved electronically in a location accessible by all Company employees.
3. The Plan will be filed with the Director of the Office of Communications and the Secretary of the NYS PSC annually before December 31st, or, if no changes are made from the prior year's plan, a statement to that effect will be filed with the Director of the Office of Communications and the Secretary of the NYS PSC.
4. Any additional plan requirements ordered by the PSC will be incorporated into the Plan as directed.
5. Copies of the Plan, and all related documents, will be provided to the New York State Department of Public Service ("NYS DPS"), Director of the Office of Communications.
6. A printed copy of the current Plan (phone numbers redacted) will be available at the Company's main office at 34 Read Street, Hancock, NY for viewing by the public upon request.
7. Material changes to the Plan will be filed with the PSC Secretary within 60 days following the modification.
8. If, under emergency conditions, or other circumstances related to a national pandemic, the Company modifies our response from that in the Plan to the extent required to restore service in a safe and

efficient manner, the modifications and the circumstances that caused the modification will be reported in writing to the PSC Secretary within 60 days from restoration of full service. Minor changes need not be reported but should be made to the Plan as soon as practical.

Table of Contents

1. Overview 6
1.1 Introduction 6
1.2 Safety 8
1.3 Annual Emergency Exercise 8
1.4 Training 8
1.5 Contact Lists 8
1.6 Critical Facilities 8
1.7 Contact with Local Municipal Officials 9
1.8 Customer Storm Preparedness Information 9
1.9 Mutual Assistance Group Membership 9
1.10 Storm Staffing 10
2. Incident Command System 10
2.1 Pre-Event Planning 10
2.2 Pre-Event Staff Communication 10
2.3 Organization Charts 11
2.4 Position Descriptions 11
2.5 Command and Manager Staff Responsibilities 12
3. During Event 14
3.1 Assessment 14
3.2 Restoration 14
3.2.1 Restoration Priorities 15
3.2.2 Road Clearing Coordination 15
3.2.3 Mutual Assistance 15
3.3 Emergency Materials 16
3.4 Estimated Time of Restoration (ETR) 16
3.5 Coordination with Bordering Utilities 16
3.6 Storm Credit and Protection 16
4. Post Event 16
4.1 Revisions to Enhanced Electric Emergency Plan 17
5. Communication 17
5.1 Estimated Time of Restoration 17
5.2 IVR Upfront Messages 17
5.3 DPS and State OEM Communication 17

5.4 Electric Communication 18
5.5 County EOC and Municipal Official Support 18
5.6 Critical Facilities and Managed Customers 19
5.7 News Releases and Media Information 19
6. Procedures 19
6.1 Estimated Time of Restoration Protocols 19
6.1.1 Event Expected To Last 48 Hours Or Less 21
6.1.2 Event Expected To Last Greater Than 48 Hours 22
6.2 ETR Procedure 23
6.2.1 Outage Class 1 Storm 23
6.2.2 Class 2 Storm 24
6.2.3 Class 3 Storm or Disaster Event 24
6.3 Damage Assessment Process 25
6.4 Mutual Assistance Procedures 26

1. Overview

1.1 Introduction

The Enhanced Emergency Response Plan (EERP) is the guide for responding to emergencies which affect telecommunications service to HTC customers. Throughout the year, HTC performs many activities to increase readiness and reduce the number of customers impacted from service outages. Our goal in emergency response is to protect the public and our employees, to restore services interrupted by the event as quickly as possible and to communicate our restoration progress to our customers, regulators, and municipal officials.

This Plan serves as the guidelines that HTC and our employees will operate under. In addition, this Enhanced Emergency Response Plan will be used as the basis for our annual emergency exercises and employee Emergency Response training.

New York State defines three classifications of emergencies: Class 1, 2, and 3. We have changed the customer predictions to meet our current customer numbers.

The following criteria are used to define Storm Classification at HTC:

Storm Classification Guidelines			
Description	**Class 1**	**Class 2**	**Class 3**
Number of Customers Affected	>50	51-250	<250
Expected Time to 90% Restoration	< 24 hours (Less than 1 day)	25 - 72 hours (1-3 days)	73 - 96 hours (3-4 days or greater)
Mutual Aid Crews	No	Optional	Yes
Type of Damage	Tree/limb contacts; few sections of wire down; 1-2 broken poles; limited power outages.	More significant tree damage; numerous wire sections down; 3-10 broken poles; local power outages.	States of emergency Declared, Heavy tree damage; remote offices down; significant wires down; many broken poles; damaged equipment; regional power outages.

If an event can be If an be classified in multiple classes in the table above, the classification in line with the "Expected Time to 90% Restoration" will prevail.

1.2 Safety

During emergencies, the safety of the public and of our employees is our highest concern. By normal practice, our daily scheduling and work planning meetings cover safety issues and reminders. During an emergency or event, all incident planning and debrief meetings will include discussion on safe practices during outages and severe weather events. Field conditions that pose a danger to our employees, whether it's due to power issues or unsafe road conditions, are identified and discussed. This includes any and all mutual assistance crews.

1.3 Annual Emergency Exercise

HTC will perform an annual Emergency Response Exercise. prior to December 31st of each year. The management team will plan and execute the exercise and ensure that the objectives and procedures are in place with the entire emergency staff. In addition, this team will develop any amendments and updates needed to improve the logistics of the Plan. The training exercise will work through a communications scenario, exercise logistics, and observe the actions and response of each Manager.

To satisfy the emergency exercise requirement, the exercise will include a simulated mobilization of utility personnel with mock internal communication for readiness, and a "test" scenario to at least one Outreach company.

Two to three weeks prior to the Emergency Exercise, the Emergency and/or Co-Emergency Commander will notify exercise participants of the date, time, and location of the exercise. Additionally, he/she will notify NYS PSC Staff of the exercise plans at least two weeks prior to the exercise and will invite local municipal and neighboring telecom company representatives to participate in the exercise. The exercise scenario will simulate the main aspects of responding to a Class 2 or 3 event which includes the following actions:

1. Emergency Commander is designated.
2. Emergency Commander informs Manager Staff of impending event.
3. Initial notification is prepared.
4. NYS / County or Local OEM is contacted.
5. Emergency organization is developed, and positions are assigned.
6. Simulated damage assessment information is reviewed and restoration plans are developed.
7. Outreach Support is simulated.
8. A simulated status conference call or meeting is held.
9. NYS PSC report is completed.
10. Mock Municipal and Electric communications (calls and emails) are conducted or simulated in accordance with the Municipal and Telecom conference call agendas.
11. News and Social Media releases are prepared.

Following the exercise, a de-brief is conducted to gather immediate feedback from the emergency exercise participants. Within 60 days following the conclusion of the exercise, the Emergency Commander and Co-Emergency Commander Emergency will prepare and modify the EERP based on the feedback and certify the potentially updated EERP with the NYS PSC

Secretary and the Director of the Office of Communications by December 31st. HTC will also perform/verify the following as a part of the Annual Emergency Exercise:

(a) Confirm telephone and e-mail contacts and update lists of names of internal and external contact persons identified as Outreach support companies.
(b) That HTC conducted at least one emergency exercise involving the appropriate Company personnel assigned emergency response responsibilities.

Alternatively, and in the unlikely situation, the Emergency Commander may waive this drill requirement if previous incidents during the calendar year provided sufficient experience only if approved in writing by the NYS PSC.

1.4 Training

Emergency Response Training is performed annually for all employees of the Company, or newly assigned to Emergency Command Staff, Manager Staff and Support Staff; training is also performed as needed (for example, if an employee is assigned multiple duties or changes duties). Training outlines and/or on-the-job training are prepared by experienced Operations personnel and are used consistently for in-person training.

The training includes a review of the current Enhanced Emergency Response Plan, and the location of where the EERP can be accessed is provided to all attendees. The current Enhanced Emergency Response Plan is available to all employees on HTC's internal network.

1.5 Contact Lists

Contact lists for key positions to the emergency response effort are maintained as needed (when changes are known), or at least updated annually as shown below.

- Mutual aid companies and contractors
- Human services agencies
- Print and broadcast media: Annually
- State, county and local elected officials
- Law enforcement officials, emergency management and response personnel
- Vendors

Contact lists can be found in the appendices of this plan.

1.6 Critical Facilities

Due to the size of HTC's operating territory, we have only the following Critical Facilities, typically those customers that provide essential services or functions for survival, continuation of public safety, and disaster recovery. All other customers fall under the normal customer service restoral criteria.

Critical Facility Level 1 facilities are critical to public health and safety. These include:

DEFINITION	LEVEL
Hospital/Emergency Medical Facilities	1
Main Utility and Communications Facilities	1
Water and Wastewater	1
Emergency Shelters	1
Fire, Police, Paramedics and Rescue Facilities	1
Emergency Management Offices	1
Main Flood Control Structures	1

1.7 Contact with Local Municipal Officials

During storm events, the Emergency Commander will serve as the main point of contact for municipalities to communicate emergency needs and priority repairs with HTC. The Emergency Commander and the Outreach/Communications Manager maintains two-way communications with local municipal officials to coordinate repairs and provide status updates when available.

Throughout the course of normal business activities, HTC routinely interacts with municipal officials such as highway superintendents, building inspectors, and government leaders (mayors, supervisors). Storm/emergency readiness and any changes to critical facilities or infrastructure is commonly discussed if necessary. Many of HTC's employees are members of the local fire department, so everyone is in constant communication with the emergency services coordinators.

1.8 Customer Storm Preparedness Information

At least once per year, the Outreach/Communications Manager, ensures that storm preparedness information is distributed to customers by means of bill inserts, website updates and/or social media site updates. This information includes the following preparedness and safety tips:

- Pay attention to weather advisories and storm warnings.
- Reminder that cordless phones require power.
- To keep flashlights and other essential battery powered devices in good condition.
- Charge wireless phones or use a portable charger to maintain a means of communication.
- Stay clear of downed or low-hanging wires.

1.9 Mutual Assistance

HTC is a member of the New York State Telecommunications Association (NYSTA) and is closely aligned with other NYSTA members and nearby RLEC's for mutual aid if required. It is common practice within the industry to provide mutual aid to fellow NYSTA member RLEC's and has always been provided on a case-by-case basis when needed. The procedures for Mutual Assistance during restoration efforts can be found in Section 3.2.3, and general procedures for

Mutual Assistance can be found in Section 6.6 of this Plan.

1.10 Storm Staffing

As a small telecommunications company, emergency event staffing is based on an "as-needed" basis and due to the varying needs of any storm or event. Any employee may be asked to perform any storm restoration function for which he/she has been properly trained and equipped.

2. Emergency Command System

HTC's storm command structure primarily follows a condensed FEMA Incident Command System (ICS). This structure allows storm responsibilities to be easily understood, eliminates confusion regarding chain of command, and improves communication during storm events. There are slight differences between the HTC incident command structure and ICS which are a result of the unique nature of telecommunications emergency response.

2.1 Pre-Event Planning

For those events where advance warning is received, e.g. severe weather events, HTC will undertake appropriate steps to prepare for such events, such as positioning generators, crews etc.

2.2 Pre-Event Staff Communication

As part of Pre-Event planning, Emergency Commander(s) notify the Manager Staff of the potential need to mobilize and will schedule additional staffing based on the expected timing and severity of the event. This is done using traditional means of communication such as email, texts, and phone calls. Depending on the expected impact and available notice, an email to all employees providing awareness of the potential need to participate in their assigned storm duties may also be sent out by the Emergency and/or Co-Emergency Commander. As a small company, duties are shared amongst the principals of the company and operational tasks by the commanders are shared as well.

When additional resources need to be mobilized, in addition to these pre-event plans and outside of normal business hours, employees working Outreach or System Operations will initiate individual callouts as needed, to respond to specific emergencies. Additionally, managerial staff may initiate callouts for their respective group of personnel. Large scale callouts which cross multiple groups of employees may be initiated by the Emergency Commander, or the Outreach/Communications Manager.

Should any unit require additional field or non-field staffing beyond what is already mobilized, the Manager Staff may utilize the Support staff to assist in outreach and coordination.

2.3 Organization

Once an emergency has been declared, the Emergency Command structure will be put in place. Emergency Command may be transferred upwards through the chain as the original responders begin to narrow their responsibilities. When command is handed off, it will be clearly communicated by the person relinquishing command and the person accepting it.

As emergency staff positions are filled throughout the organization, it is the responsibility of the person directly above each individual to clearly communicate what his/her position is and ensure that each person is familiar with the designated responsibilities.

2.4 Position Descriptions

The roles and responsibilities of each member of the Command Staff, Manager Staff and Support Staff are found below. Note that HTC is a small company with the same person(s) doing many roles. The same person may have multiple roles in the event of an emergency.

2.5 Command and Manager Staff Responsibilities

The Emergency Commander, Manager Staff, and Support Staff each have unique and distinct areas of responsibility during a storm event, but as noted above the same person may have multiple roles.

Emergency Commander: The Emergency Commander is the leader for the event, and as such provides the overall leadership for incident response. He/she assesses the severity of the event, determines the need for staff and appoints individuals to fill high-level storm positions. The Emergency Commander determines the incident objectives and works with staff to develop the Action Plan. The Emergency Commander provides oversight of the storm response effort, ensuring that all actions are in accordance with the Action Plan, regulatory requirements, and Company practices.

OSP/Technician Manager: The OSP/Technician Manager is responsible for the Technical and Outside Plant staff, including their duties related to the Action Plan and restoration of customer services. The OSP/Technician Manager works directly with the Emergency Commander and/or Co-Emergency Commander, and assists in the;

- Coordinate Pole Line, Fiber/Copper Facility, and Drop Restoration staff and outside crews if required.
- Coordinate and Perform OSP network assessment for repair and restoration.
- Assist in notifying critical facilities and municipal officials of impending events.
- Develop staffing plan for Outreach to additional crews.
- Perform safety inspections of field work sites.
- Instruct OSP Support Staff Director to:
    - Check fuel availability.
    - Power Systems and Back-up Power health.
    - Review emergency stock levels

Financial Manager: The Financial Manager is responsible for;

- Track and maintain financial and spending records of restoration services.
- Obtain current list of all Company employees to be used for storm staffing.
- Assign/assist employees to fill the Time, Contracts, Cost, and Claims reports.
- Supervise time, contracts, cost, and claims activities.
- Resolve problems as necessary and provide backup coverage for all functions when needed.
- Communicate with Emergency and Co-Emergency Commander to fulfill daily finance-related needs.
- Evaluate the needs for Purchasing Card limits and materials for key storm personnel.

IT/Systems Manager: The IT/Systems Manager is responsible for;

- Coordinate restoration and repair to network and core electronics.
- Assist OSP/Technician Manager with customer system restoration and configuration.
- Provide storm restoration status of systems and electronic information to the Emergency and/or Co-Emergency Commander when requested.
- Direct the IT staff and Network Admins to run system maintenance and provide notification of network status and overall customer connection health.

- Assist in the collection of damage assessment information.

Outreach/Communications Manager: The Outreach/Communications Manager is responsible for;

- Prepare news releases, public service announcements and employee information updates.
- Respond to media inquiries.
- Coordinate and review outbound storm related messaging as needed for consistency. This includes messaging on the company website and social media sites.
- Interface with the Emergency Commander(s) to provide adequate information on restoration progress.
- Initiate and moderate Municipal Conference Calls.
- Initiate Mutual Aid crew requests when instructed by the Emergency Commander or OSP/Technician Manager.

3. During Event

When an emergency or natural disaster causes telecommunications outages in our service territory, an Emergency Commander will be designated if one is not already in place.

The Emergency Commander will initiate response by developing an Action Plan (AP) based on the current emergency or disaster scenario.

Once the Action Plan is developed, the Emergency Commander will communicate the plan to the HTC Manager Staff and Support Staff Teams and will provide updates as needed throughout the event. Manager Staff will coordinate the remaining storm positions, ensuring that all positions are filled (some individuals may be assigned to more than one position). The subsequent response of each Manager and Support Staff will be expected to follow the Action Plan, and to adhere to all Company work practices, safety policies, and construction standards.

3.1 Assessment

Assessment of the nature and extent of damage to the outside plant facilities and telecommunications network is an essential step toward effective response. Information about damaged locations and facilities affected is obtained from several sources:

1. System Alarms: Alarms will be monitored and evaluated to establish the extent the communications network has been damaged..
2. Trouble Call Comments - Customer trouble calls are usually helpful in pinpointing damage locations. CSRs are trained to enter any information provided by customers about possible outage causes and also relay this information to management/emergency coordinators.
3. Police/Fire/911 Calls – Emergency responders in our service territory have a priority line to our Central Office/Company Managers.
4. Field Representatives – Company employees who are already working on restoration or those observing damage locations on their way in to work report their findings.

Damage Assessment is a critical part of the restoration operation as it provides the information needed to determine what level of resources are needed to restore service to customers in a timely fashion.

Damage Assessment Patrollers will be assigned to perform either case-specific outages or full impact area patrols and will log the conditions via Trouble Tickets within our current ticketing system. If the patrollers are mutual aid workers or contract employees, they will be assigned to report directly to the OSP/Technician Manager or Emergency Commander.

.

3.2 Restoration

Restoration of the telecommunications system following severe weather or other damaging event will require the coordinated effort of the entire company.

3.2.1 Restoration Priorities

Restoration and repair of service following a storm event will generally proceed according to the following priority:

a. Ensure employee and public safety by working with emergency response personnel to respond to hazardous conditions, including road closures blocking the ingress and egress to a neighborhood or community.
b. Waiting for damage repair completion of Electric transmission lines, if compromised, and substations that are resulting in customer power outages and lack of access to our facilities.
c. Service Restoration Priorities
    i. Local Telephone
    ii. Special Circuits
    iii. Internet/Broadband
    iv. Cable Television
d. Facility/Customer Restoration Priority
    i. Critical Facility Level 1 Customers.
e. All remaining customers whose service has not yet been restored. Consideration will be given to factors such as; outage size, extent of damage, distance from available crews, etc.
f. Permanent repairs to temporary conditions for telecommunications restoration.
g. Tree conditions not causing service interruptions.

While the priorities above represent a hierarchy and guide, which is considered when establishing Restoral Action Plans and assigning outage locations to crews, these priorities have to be balanced with the criticality of having large numbers of customers without service.

For PSC reporting purposes, critical facilities will be listed as Level 1, When directed by Staff, the Company will compile a listing of critical facilities that are believed to be without service and submit it as part of the update.

3.2.2 Road Clearing Coordination

As stated in Section 1.7, the Outreach/Communications Manager serves as the main point of contact for municipalities to communicate emergency needs and priority repairs with HTC. This includes reports of road closures, downed lines, 911 call routing issues, and critical facility damage that relate to the clearing of roadways. Priority of critical roads as communicated by the county or municipality is used to prioritize response of our restoration crews. As the Telecom provider we must wait for the Power Company to clear the road and complete their restoration work. Understanding the priority and the timing of their work completion is critical to our ability to restore our customers in a timely fashion.

3.2.3 Mutual Assistance

When the Emergency Commander makes the determination that the suspected or actual damage sustained by HTC's facilities cannot be repaired within a reasonable amount of time using our company personnel, then additional outside resources will be sought. The Emergency Commander(s) along with OSP/Technician Manager will determine the number of additional

crews needed, and the call for Mutual Aid will go out to the RLEC's nearby or to the greater NYSTA RLEC membership.

3.3 Emergency Materials

HTC, being a small company only has supplies on hand for normal emergencies, eg, we do not keep miles of fiber in stock. If such an emergency arises, we will reach out to neighboring companies and our normal vendor supply chain for emergency deliveries once the initial damage assessment has been made.

3.4 Estimated Time of Restoration (ETR)

Customers have indicated that communication of storm status and estimated restoration times is as important to them as having their service restored. Due to HTC's commitment to Customer Satisfaction, a high level of attention needs to and will be given to the development and communication of ETRs.

3.5 Coordination with Bordering Utilities

HTC maintains close communication with our neighboring telecom/RLEC companies. This enhances our ability to communicate with each other during major storms, to ensure that all 'borderline' customers are being addressed. Field verification can be performed by either company and then communicated between the companies to plan repair of the service.

3.6 Storm Credit and Protection

HTC will follow the requirements in CASE 22-M-0180 for credit during and/or after a disaster/storm. Details of the requirement are below.

4. Post Event

Following restoration of an event with a duration greater than 72 hours, HTC will conduct a post-storm assessment. This assessment will evaluate the effectiveness of our storm response, with the intention of identifying areas that worked well and those that could have been improved.

The post-storm assessment will also evaluate the accuracy of ETRs provided. If ETRs are found to be inaccurate, then corrective measures shall be investigated as a result of the review. An evaluation of joint work and mutual aid coordination shall also take place during the post-storm assessment.

4.1 Revisions to Enhanced Emergency Restoration Plan

Should any post-event recommendations result in a modification to this Plan, these will be done in a timely manner and an updated version filed with the PSC Secretary. It is our intention that this Plan is to be flexible and able to be modified as planning, restoration, and communication practices change. Please refer to the "Statement of Compliance" section for details regarding filing of updates to Enhanced Emergency Restoration Plan.

5. Communication

Effective communication during a storm event is crucial to the success of the restoration effort. Our customers have indicated that their satisfaction with HTC during outages is highly dependent on the accuracy and availability of information about their restoration status.

This section includes guidelines for outbound customer messages, municipal and OEM conference calls, PSC reporting instructions, and offsite Contact Center staffing.

5.1 Estimated Time of Restoration

HTC will comply with the requirements contained within Section 6.1 – Estimated Time of Restoration Protocols and the steps to achieve the targets set within.

5.2 IVR Upfront Messages

HTC's main and support telephone numbers are answered by a live person, 24 hours per day and we expect that to continue during an emergency or event. Should we need to change that or the volume of calls exceeds our capacity an IVR will be used. All IVR's will be updated to reflect any changes in the situation or ETR's This message will contain a date and time of the message/update, high level event status, any pertinent outage information, and reference to the Company's website (www.hancock.net)

5.3 DPS and State OEM Communication

During storm events, the Emergency Commander(s) and/or the Outreach/Communications Manager will be responsible for responding to all inquiries from the State Office of Emergency Management (OEM). The Emergency Commander(s) and Outreach/Communications Manager will ensure that any answers provided to the State OEM are consistent with all other customer and public communications.

The Emergency Commander(s) and/or the Outreach/Communications Manager is also responsible for interacting with the county 911 centers and for keeping these 911 employees informed of damage and restoration status.

5.4 Electric Communication

When an event is expected and time allows, direct communication with the Electric Utility Companies in our territory, **NYSEG,** will be the responsibility of the Outreach/Communications Manager.

If the Electric Utilities have scheduled both Municipal Calls and Telecom Company calls, HTC will participate in these calls and use this platform to update all parties involved. The Emergency, Outreach/Communications Manager will continue to address individual concerns from Municipal Officials and/or Electric Utilities, and proactively communicate, when necessary, where restoration is ongoing after Municipal and Telecom Company Conference Calls have ended.

5.5 County EOC and Official Support

County EOC

County Emergency Managers can request a representative from HTC to be in direct communication with their command center, or 911 Dispatch offices.

EOC staff will also assist the state, county, and municipal highway crews in communicating to HTC where downed wires need to be cleared or attention is needed. If any individual location to be cleared is a high priority, the EOC Representative will coordinate with HTC operations personnel to notify the 911 center when lines and services are secured and restored.

If, during a particular event, HTC needs to obtain resources from the county or state, these requests would be coordinated through our EOC staff or the Emergency/Co-Emergency Commander.

Officials

Municipal Officials such as municipal highway superintendents, building inspectors, and government leaders (mayors, supervisors) will be provided with the most up-to-date information possible during storm/disaster events so that they can better serve their communities. It is the responsibility of the Emergency Commander or Outreach/Communications Manager who are the primary contact for Municipalities to respond as quickly as possible to municipal official calls, and to provide timely information or assistance when requested. When needed, additional Company personnel should be assigned to assist this effort so that timely response to municipal official communication is maintained.

5.6 Critical Facilities and Managed Customers

Critical facilities, and commercial customers have contact throughout the year with various operational and technical staff at HTC. During storms and other emergencies, these customers would continue to use these contacts for assistance with estimated restoration times, escalation ofemergency needs, or any other storm-related issues. If those contacts are unreachable, then the customers will be routed to HTC's 24 x 7 Emergency Support Desk.

5.7 Emergency Support Desk Staffing, Call Routing and Customer Contacts

The beginning of a major storm event drives volume of all HTC's contact channels from customers reporting their outages by phone, or e-mail, Customers are able to report their outages through our main office phone numbers, directly to our 24 x 7 Emergency Support Desk, or via our support email address that are listed on HTC's main website. In all of these contacts, an outage can be reported, and a subsequent trouble ticket is entered into our trouble ticket system

6.1 Estimated Time of Restoration Protocols

The following ETR Protocols are activated when more than 100 customers are out of service in a area or more than 1,000 customers are out of service companywide for more than 8-hours.

The ETR Protocols include minimum requirements for when, and at what level of detail an ETR will be communicated to the Department of Public Service (Department or DPS Staff). The tables below clarify the necessary actions to be taken by the involved utilities before and during the outage period for the specific outage event.[1]

The protocols are considered minimum requirements necessary to ensure the public and the Department are adequately informed. **During restoration, utilities are to continuously refine ETRs and update DPS Staff and the public, customer representatives, IVR systems, and websites.** The utilities will also provide restoration information such as ETRs to social media, web outlets, and public officials in the affected areas. ETRs will be used and applicable to at least 95% of the affected customers in the reported level.

When adverse weather conditions exist, the start of the restoration period is the point in time when:

- Field personnel can be dispatched without unacceptable safety risks from continued severe weather conditions and;
- When the potential additional damage to the telecommunications system from the storm is low in proportion to the expected level of damage already sustained.

Initial notification to the Department will follow the notification requirements issued in Case 04-M-0159 on December 15, 2008. Any additional information that is available will be included in the

initial notification even if the notification is required prior to the start of restoration. For widespread outage events, company-wide outage estimates will also be provided as part of the initial notification.

Reporting is targeted at 8:00am, 1:00pm and 6:00pm unless otherwise specified. The reports will include, at a minimum:

- Utility information.
- Summary of the outage event, for major storms summarize current weather forecast.
- Summary of outages and number of impacted customers.
- Discussion of major damage and work plans for restoring customers.
- ETRs
- Resource summary, including on-site personnel and mutual assistance activity.
- Summary of the impacts to EOC's, Emergency Services, and critical facility customers.

[1] An outage event is either a major storm, as defined in 16 NYCRR §97.1(c), or another Telecommunications disaster.

For major storm events, ETRs are reviewed and agreed upon by the Emergency Commander, OSP/Technician Manager and IT/Systems Manager. The Outreach/Communications Manager is responsible for verifying ETRs published internally are current and match those developed by the various operating staff. This effort involves verifying ETRs several times a day during major storms.

6.1.1 Outage Event Expected To Last 48 Hours Or Less

Within the first 8 hours of the restoration period
▪ Notify DPS Staff that the outage event will last less than 48 hours. The notification to DPS Staff will state what the Company has defined as the start of the restoration period. For outage events expected to last less than 24 hours, notification may be via the Department's information reporting system. ▪ Provide available information to the public. Update customer representative, IVR systems, social media, and websites. ▪ In certain situations, such as a nighttime outage event, only limited information may be available within the initial eight-hour window. In these situations, the expectation is that the companies will inform DPS Staff of the delay in determining the initial outage duration within eight hours and the notification will occur in an expedited manner as information becomes known. Following a nighttime outage event, the determination of whether the restoration period will be less than 48 hours will be communicated to DPS Staff as soon as possible, but no later than noon the following day. Any delay in establishing the initial expectations will not affect the time requirements below.
Within the first 16 hours of the restoration period
▪ Provide DPS Staff and the public with any available ETRs and any available local/town, EOC's, emergency services, or municipal ETRs. Update customer representatives, IVR systems, social media, and websites. ▪ Communicate with affected EOC's, municipal, and elected officials if necessary.
Within the first 24 hours of the restoration period
▪ Consider issuing a press release for the next upcoming news cycle based on conditions.
Reporting guidelines during the event
▪ Provide restoration information updates three times daily to DPS Staff (8:00am, 1:00pm and 6:00pm) if requested by DPS Staff. Updates will continue until otherwise directed by DPS Staff. ▪ Notify DPS Staff when all outage event related interruptions have been restored.

6.1.2 Event Expected To Last Greater Than 48 Hours

Pre-event whenever sufficient notice of an impending weather event is available

- Make pre-event outbound calls and emails to EOC's, critical facilities customers, emergency services, and any special needs customers.
- Complete pre-storm communications with outreach to employees, news media, social media, website updates, and advisories to municipal and elected officials.
- If necessary, consider having pre-event EOC and municipal conference calls based on the severity of the event.

Within the first 8 hours of the restoration period

- Notify DPS Staff that the outage event will last more than 48 hours. The notification to DPS Staff will state what the Company has defined as the start of the restoration period.
- Provide available information to the public. Update customer representative, IVR systems, social media, and websites.
- In certain situations, such as a nighttime outage event, only limited information may be available within the initial eight-hour window. In these situations, the expectation is that the companies will inform DPS Staff of the delay in determining the initial outage duration within eight hours and the notification will occur in an expedited manner as information becomes known. Following a nighttime outage event, the determination of whether the restoration period will be more than 48 hours will be communicated to DPS Staff as soon as possible, but no later than noon the following day. Any delay in establishing the initial expectations will not affect the time requirements below.

Within the first 16 hours of the restoration period

- Provide DPS Staff and the public with any available ETRs and any available local/town, EOC's, emergency services, or municipal ETRs. Update customer representatives, IVR systems, social media, and websites.
- Communicate with affected EOC's, municipal, and elected officials if necessary. This communication may or may not be by way of a municipal conference/MS Teams call.
- Communicate information such as system damage, outages, restoration status etc. with affected EOC, emergency services, municipal. and elected officials as appropriate.
- Communicate status, and request an updated status, of all Electrical Utilities that HTC has joint pole ownership and pole rentals with. Coordinate joint work with Electrical Utilities.
- Notify DPS Staff and the public of what areas sustained the most damage, if any, to the telecommunications system and ETRs where known.

Within the first 24 hours of the restoration period

- Participate in any scheduled municipal or electrical utility conference calls.
- Provide DPS Staff and the public with any available ETRs and any available local/town, EOC's, emergency services, or municipal ETRs. Update customer representatives, IVR systems, social media, and websites.
- Identify for DPS Staff and the public any heavily damaged areas where large numbers of customers may remain without service for an extended period of time. If necessary, note that the situation is still developing, and more details will be provided as soon as they become available.

Within the first 48 hours of the restoration period
▪ Participate in any scheduled municipal or electrical utility conference calls. ▪ Provide DPS Staff and the public with any available ETRs and any available local/town, EOC's, emergency services, or municipal ETRs. Update customer representatives, IVR systems, social media, and websites. ▪ Identify for DPS Staff and the public any heavily damaged areas where customers still remain without service, and the current restoration efforts and ETR.
Within the first 60 hours of the restoration period
▪ Provide DPS Staff and the public with any available ETRs and any available local/town, EOC's, emergency services, or municipal ETRs. Update customer representatives, IVR systems, social media, and websites.
Reporting guidelines during the outage event
▪ Provide restoration information updates three times daily to DPS Staff (8:00am, 1:00pm and 6:00pm) if requested by DPS Staff. Updates will continue until otherwise directed by DPS Staff. ▪ Notify DPS Staff when all outage event related interruptions have been restored.

6.2 ETR Procedure

6.2.1 Outage and Class 1 Storms

Procedure:

Outages are reported in HTC's trouble ticket system via direct contact through Customer Service Representatives or Support Helpdesk.

Dispatchers who are comprised of HTC staff that would fill the OSP/Technician Manager position, outage information, and determine the best available technician/crew.

Dispatcher contacts the technician/crew to be assigned to the case by cell phone or text message and relays the case information, e.g. trouble ticket number, location of trouble, and any pertinent information.

The technician/crew can use their cell phone or mobile tablet to update, close out, and add information to the trouble ticket. If the technician/crew verbally reports their ETR and/or trouble ticket closure or information, the dispatcher or any customer service representative can update the trouble ticket.

If at any time, other troubles or outages are received that are expected to be worked by a technician/crew that are already assigned and working on another ticket, the Dispatcher will estimate the ETR and timing for the next trouble/outage to be assigned. The ETR for the next trouble/outage will be based on the ETR for the first one the technician/crew is on, plus projected time to restore the next case.

Escalation Process – This process will remain in place until there is sufficient trouble/outage activity that justifies additional assistance. At such time the Dispatcher or OSP/Technician Manager will work with the Emergency Commander or the Vice President of Plant to coordinate additional help from neighboring companies or contractors.

6.2.2 Class 2 Storm

Procedure:
For a large area outage and/or 51 - 250 customers are out of service, Dispatch operations will coordinate with the Emergency Commander and OSP/Technician Manager to set up triage for incoming communication of troubles/outages. Together, the Dispatcher and OSP/Technician Manager will determine the restoration start time and begin assessment of ETR's based on the current weather situation and damage assessment.

The procedures will follow the same protocol for Outage and Class 1 Storms, however additional staff will be mobilized and enacted to work on restoration. The Dispatcher and OSP/Technician Manager will assume responsibility for assigning and communicating ETRs.

6.2.3 Class 3 Storm or Disaster Event

For Class 3 or Disaster Event storms, the following assumptions are made:

- Emergency operations are established and are being run by the Emergency
- All employees are on duty and "all hands are on deck" has been instituted. All disaster/storm positions are filled, and support staff is ready to be mobilized.
- Cellular Service may be limited and-or compromised due to the storm or disaster. Internal network communication via Wi-Fi and messaging will be used in this situation.
- Emergency Operations is staffed at 34 Read Street, Hancock NY
- Damage assessment has been activated.

Procedure:

Develop the action and restoration plan by the end of the first full day following the storm. Contact with Electric Utilities is a necessity to confirm that the action and restoration plan can be enacted.

Preliminary ETR for each area is assessed and prioritized if decided by the Emergency Commander.

Troubles/Outages will be reported in HTC's trouble ticket system via direct contact through Customer Service Representatives or Support Helpdesk.

Dispatcher(s) who are comprised of HTC personnel including the staff that would fill the OSP/Technician Manager position, assess outage information, and determine the best available technician/crew.

Once 100% of all trouble/outages have been cleared, a de-brief and full review of all incoming tickets will be performed by the Dispatcher, Emergency Commander, and/or the OSP/Technician Manager to confirm that no service outage was missed, and to assess the needs of permanent repairs

6.3 Damage Assessment Process

During Class 1 /2/3 storms, damage assessment is usually performed by Technicians or Line Crew personnel. Any information about outside plant conditions, customer downed lines, or by other knowledgeable sources such as electrical utilities, police/fire responders or company employees, will be entered into our trouble ticket system by the Dispatcher, Customer Service Representatives, or the OSP/Technician Manager.

Damage Assessment can be a two-stage process. It begins with Preliminary Assessment and moves into Detailed Assessment. The timing of these assessment stages is described in Sections 3.1.1 and 3.1.2. The goal of Preliminary Assessment is to quickly get employees into the field in areas where damage is suspected or reported by customers, emergency service staff, and incoming trouble calls. The information gathered during the Preliminary Assessment is made available to the Dispatcher and OSP/Technician Manager so they can begin to deploy crews and include it in the action plan. Preliminary Assessment information is also used by the Emergency/Co-Emergency Commander and Outreach/Communications Manager to formulate the need for additional/mutual aid resources.

The Preliminary Assessment process is as follows:

- OSP/Technician Manager and Dispatcher(s) determine what areas need attention first by analysis of reports and system reporting. These are usually the areas where there are a high number of customer outages and are normally tied directly to electric grid damage/outages.
- The Dispatcher contacts the Line Crew or Technicians to proceed to those areas to obtain high-level assessment of the damage and repair the service if they safely have access. The Trouble Ticket number is communicated to the Crew/Technician and assigned to the appropriate person.
- The Line Crew/Technicians call the Dispatcher to report the findings and/or repair.
- Any detailed information such as broken pole locations that we need to work with the electrical utility that is obtained through the preliminary assessment is noted in the Trouble Ticket and suspended until the telecommunications repair work can be accomplished.
- Employees performing Preliminary Assessment may need to flag, mark, and call in any electrical wires that are down or damaged. The employees are trained not to engage any electrical lines.

Detailed Assessment can be performed simultaneously with Preliminary Assessment, depending on the situation. There may be multiple levels of damage that cause a two-phase approach (i.e. Broken Pole that has Fiber Optic Cables damage) that require two separate crews to analyze the extent of the restoration efforts. Detailed Assessment follows the same procedure as the Preliminary Assessment but yields far greater information entry into the Trouble Ticket and

information regarding follow-up restoration work.

It is the responsibility of the OSP/Technician Manager and/or Dispatcher to determine whether the number of staff to utilize during the Damage Assessment efforts. Being a small company, the same staff that assess the damage are responsible for the repair. This makes for an efficient process, however, it can in certain circumstances slow the progress of restoration down.

If the damage is too great for in-house staff to analyze, HTC will utilize outside contractors.

6.4 Mutual Assistance Procedures

Restoring service after a major storm is a complex task that must be completed as quickly as possible. A speedy restoration requires significant logistical expertise, along with skilled workers and specialized equipment. Telecommunication companies affected by significant outages frequently call on other companies for assistance to help speed restoration. This practice is known as mutual assistance.

Mutual assistance is an essential part of the telecommunications and utility business continuity planning: The affected company can increase the size of its workforce by "borrowing" workers and materials from other companies, but only has to pay for those extra crews during times of need.

The need for mutual assistance is determined by the level of event impacting the company as described in the following table:

Level	Description
1	Local Area - Resources come from within a single company including sister companies.
2	Local Region – Resources come from one regional NYSTA RLEC and potentially neighboring RLEC companies.
3	Regional – Resources come from more than one member NYSTA RLEC.

Request for mutual assistance will be coordinated by the Emergency Commander, with input and discussion with the OSP/Technician Manager, who are in direct communication with the staff responsible for restoring customer telecommunications services.

Once it is determined that external resources are required, the mutual assistance process will be implemented as follows:

- HTC shall initiate a Mutual Aid request.
- The current known incident overview shall be presented to understand the emergency.
- An estimate of actual or predicted impact / damage and when these are expected to occur shall be presented.
- An estimate of resources needed shall be presented.

If the resource needs cannot be met from within the NYSTA RLEC members, the mutual assistance request may be expanded to encompass neighboring RLEC's. If the request for resources cannot be fulfilled by the neighboring RLEC's, HTC will utilize contractors.