

EMERGENCY PLAN

OF

Telengy, LLC

January 30, 2024

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ATTACHMENT A

**EMERGENCY PLAN
OF
Telengy, LLC**

I. INTRODUCTION

This Emergency Plan sets forth Telengy, LLC's ("Telengy" or "Company") operational plan in the event of a Major Service Interruption. It generally describes what the Company's staff should do in responding to, preparing for, and reporting a Major Service Interruption.

II. DEFINITION OF MAJOR SERVICE INTERRUPTION

A. 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 networks, 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.

III. RESPONSIBILITIES & LEADERSHIP CONTACT INFORMATION

A. Chief Technology Officer

Gregory Borodiansky serves as the Chief Technology Officer of Telengy, LLC and is responsible for managing Telengy’s technical operations, as well as the implementation and oversight of this Emergency Plan. His phone number is [REDACTED], and his email address is [REDACTED]

B. VP of Operations

Stephen Irwin serves as the VP of Operations of Telengy, LLC and is responsible for submitting the Company’s Emergency Plan with the New York Department of Public Service; as well as overseeing the day-to-day operation of this plan. This responsibility includes notifying essential management and staff of emergencies, monitoring restoral efforts, evaluating the company’s response, maintaining a file of Major Service Interruptions, and providing ongoing status reports as well as a closing report as required by the Office of Telecommunications and as set forth in Section VI of this plan. His phone number is [REDACTED], and his email address is [REDACTED]

C. Director of Customer Support

Venkata Suggula serves as the Director of Customer Support of Telengy, LLC and is responsible for the training of support staff, overseeing customer interactions, and publishing customer notifications. His phone number is [REDACTED], and his email address is [REDACTED]

D. The Company

Telengy, LLC is a Competitive Local Exchange Carrier (“CLEC”) that utilizes many of the facilities of the Incumbent Local Exchange Carrier (“ILEC”), pursuant to Section 251 of the Telecommunications Act of 1996, in each of the areas it operates and, therefore, relies on the integrity of the ILEC’s network and the ILEC’s emergency plan for all related equipment and facilities that are owned, operated and maintained, etc. by the ILEC and utilized by the Company. For equipment and facilities that are constructed and maintained by the Company alone, the Company constructs and maintains such equipment and facilities in a manner that ensures that such equipment and facilities are minimally susceptible to Major Service Interruptions.

IV. NOTIFICATION PLAN FOR MAJOR SERVICE INTERRUPTIONS & RELEVANT CONTACT INFORMATION

A. Initial Notification

1. Normal business hours: 9AM-5PM EST
Major Service Interruptions that occur during normal business hours should be reported promptly to the Network Operations Center, by email (noc@telengy.net) or telephone ((833) 835-3649).
2. Outside normal business hours:
Major Service Interruptions that occur outside of normal business hours should be promptly reported to the NOC, which is available 24/7/365, by email (noc@telengy.net) or telephone ((833) 835-3649).
3. If the assigned person cannot be reached, attempts should be made to reach one of the following people in the order shown below.
 - a. Stephen Irwin, VP of Operations
Telengy, LLC
11 Broadway – Suite 1015
New York, NY – 10004
Telephone: [REDACTED]
Fascimile: [REDACTED]
Toll-Free: [REDACTED]
Email: [REDACTED]
 - b. Venkata Suggula, Director of Customer Support
Telengy, LLC
11 Broadway – Suite 1015
New York, NY – 10004
Telephone: [REDACTED]
Fascimile: [REDACTED]
Toll-Free: [REDACTED]
Email: [REDACTED]
 - c. Gregory Borodiansky, Chief Technology Officer
Telengy, LLC
11 Broadway – Suite 1015
New York, NY – 10004
Telephone: [REDACTED]
Fascimile: [REDACTED]
Toll-Free: [REDACTED]
Email: [REDACTED]

B. Subsequent Notification

Depending upon the type and location of the Major Service Interruption, the individual initially notified above will contact the appropriate Company Personnel in critical positions listed above, and/or external entities to direct the necessary steps that should be taken to minimize the service interruption and expedite service restoral.

V. NOTIFICATION PLAN FOR IMMINENT DANGERS

The same individuals notified in Section IV should be notified to address imminent dangers such as approaching storms, flooding, etc. that have the potential to cause a Major Service Interruption.

VI. REPORTING REQUIREMENTS TO THE NEW YORK DEPARTMENT OF PUBLIC SERVICE

A. Initial Reports

1. Major telecommunications service outages and incidents that occur should be reported promptly to the Office of Telecommunications by telephone (24/7) **and** subsequent email as follows:

- Outage Phone Number: (518) 391-3935
- Outage Email Address: telecom.outages@dps.ny.gov

2. Content

The Company's Initial reports should be made, **ideally no later than one hour after the outage is first recognized by the provider**, to a designated Department staff member via a "live" telephone conversation at the number listed above. Voice Mail or E-Mail should not be used for initial outage reports. Thereafter, Staff may make informal arrangements with certain service providers for subsequent electronic transmittal reports. However, even in these instances personal contact with Department staff is necessary for the initial reporting of a major service outage.

Initial reports to the Department of Public Service shall include the information listed on Attachment A of this Emergency Response Plan.

If some critical information is not known at the time of the initial report, service providers should supply their best estimates.

B. Status Reports

Telecommunications service providers should provide regular status reports of any ongoing major service outage. **The first status report should be provided within three hours of the initial report;** subsequent status reports should be provided twice a day until the situation has been stabilized, and immediately upon restoration of service to normal condition. All reports should be transmitted by telephone to the contacts indicated above, unless otherwise requested.

C. Closing Reports

Depending on the severity of the outage and the services involved, telecommunications service providers may be requested to provide more detailed information about the outage, the steps taken to restore service, and what steps can be taken to prevent future outages.

VII. TRAINING

The Management Team will train internal staff on what to do in the event of a major service outage. Training for new hires will be part of the orientation process in the appropriate business units. A copy of this plan will be stored at each network operations center, central office, and on the Company's internal network.

ATTACHMENT A

New York State Department of Public Service, Office of
Telecommunication: Outage Report

The following entries below must be filled in when sending the outage email. The initial outage report must have entries 1 through 8c filled. The final outage report must include entries 1 through 11. An outage will not be considered reported unless all entries are filled.
Additional Information at - <https://dps.ny.gov/telecommunications-outage-reporting>

1) Reporting Entity / Company: _____

1a) Primary Contact: Company's Regulatory Compliance Officer's Name: _____

1b) Phone Number: Company's Regulatory Compliance Officer's Phone Number: _____

1c) Email Address: Company's Regulatory Compliance Officer's Email Address: _____

2) Affected Central Office / Headend Location: City, Town, State: _____

3) Outage Start Date and Time: _____

4) Estimated Time of Restoration (if known): _____

5) Reason Reported: _____

6) Is 911 affected?: _____

7) Affected Network / Subnetwork: _____

8) Impact of Outage (What is not working?): _____

8a) Number of Customers Impacted: _____

8b) Number of Blocked Calls: _____

8c) Type of Circuit or Hardware: _____

9) Outage Cause: _____

10) Corrective Action Taken (This is how the outage was resolved and by whom): _____

10a) Outage End Date and Time: _____

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10b) Outage Duration: _____

11) Event Timeline (This is all of the trouble ticket entries associated with the outage): _____
