

EMERGENCY PLAN

OF

Enqwest, LLC

April 8, 2015

TABLE OF CONTENTS

PAGE

I	INTRODUCTION.....	1
II.	DEFINITIONS.....	1
	A. Major Service Interruption.....	1
III.	RESPONSIBILITIES.....	1
	A. Sr. Vice President of Technical Network Development.....	1
	B. Director of Operations, Technical Network Development Group	2
	C. Director of Regulatory Affairs	2
	D. The Company.....	2
IV.	NOTIFICATION PLAN FOR MAJOR SERVICE INTERRUPTIONS.....	3
	A. Initial Notification.....	3
	B. Subsequent Notification.....	4
V.	NOTIFICATION PLAN FOR IMMINENT DANGERS.....	6
VI.	REPORTING REQUIREMENTS.....	6
	A. Initial Reports.....	6
	B. Status Reports.....	7
	C. Closing Reports.....	7
VII.	TRAINING.....	7
VIII.	DISCLAIMER.....	7

ATTACHMENT A

**EMERGENCY PLAN
OF
Enqwest, LLC**

I. INTRODUCTION

This Emergency Plan sets forth Enqwest, LLC's operational plan in the event of a Major Service Interruption. It generally describes what the Company's staff should do in responding to, in 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

A. Director of Operations, Technical Network Development Group

Gabriel Delgado, Director of Operations is responsible for the overall operation of the plan and manages the day-to-day operation of the plan. This responsibility includes ensuring that essential management and staff as designated by the Company are adequately trained and prepared to execute the plan, notifying essential management and staff of emergencies, monitoring restoral efforts, evaluating the company's response, maintaining a file of Major Service Interruptions. His phone number is 201-625-1133, Ext 105, and E-mail address is Gabriel@enqwest.com. He also maintains a list of the Company's employees and their telephone numbers.

B. Regulatory Affairs

Gabriel Delgado, Director of Operations, will file the Company's Emergency Plan with the State of New York Department of Public Service Office of Telecommunications and ensuring that the Emergency Plan is current along with reporting Major Service Interruptions, providing ongoing status reports and a closing report as required by the Office of Telecommunications and as set forth in Section VI of this plan. His phone number is 201-625-1133, Ext 105, and E-mail address is Gabriel@enqwest.com. He also maintains a list of the Company's employees and their telephone numbers.

C. The Company

The Company 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

A. Initial Notification

1. Normal business hours:
Major Service Interruptions that occur during normal business hours should be reported promptly by telephone to Mr. Brian Derkin, SVP Technical Operations. His phone number is

201.625.1133 x116, and E-mail address is brian@enqwest.com

2. Outside normal business hours:
Major Service Interruptions that occur outside normal business hours should be reported promptly by telephone to Network Manager on Duty (24hrs.). His/her phone number is _____, fax number is _____.
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. Name: Gabriel Delgado
Title: Director Operations and Regulatory
Bus.Tel.: 201.25.1133 x105
Cell Tel.: _____
E-Mail: Gabriel@enqwest.com
 - b. Name: Mike Koch
Title: General Manager
Bus.Tel.: 201.25.1133 x108
Cell Tel.: _____
E-Mail: Mike@enqwest.com

B. Subsequent Notification

1. Depending upon the type and location of the Major Service Interruption, the individual initially notified above should contact the appropriate Company personnel in critical positions and external entities and should coordinate with these people the necessary steps that should be taken to minimize the service interruption and help speed the restoration of service.

- a. Appropriate Company personnel in the following critical positions may include:

Name: Brian Derkin
Title: Sr. Vice President
Bus.Tel.: 201.25.1133 x116
Cell Tel.: _____
E-Mail: Brian@enqwest.com

Name: Gabriel Delgado
Title: Director Operations and Regulatory
Bus.Tel.: 201.25.1133 x105
Cell Tel.: _____
E-Mail: Gabriel@enqwest.com

Name: Mike Koch
Title: General Manager
Bus.Tel.: 201.25.1133 x108
Cell Tel.: _____
E-Mail: Mike@enqwest.com

b. External entities notified may include:

(1) Underlying ILEC

Contact: _____

Phone: _____ (trouble reporting number) _____

(2) Underlying IXC

Contact: _____

Phone: _____

(3) Account Manager

Phone: _____

Pager: _____

E-mail: _____

(4) Other Resources (Contractors, Critical Systems)

Contact: _____

Address: _____

Phone: _____

Fax: _____

E-Mail: _____

(5) Police

Contact: _____

Address: _____

Phone: _____

Fax: _____

E-Mail: _____

(6) Fire Department

Contact: _____

Address: _____

Phone: _____

Fax: _____

E-Mail: _____

(7) Medical Facilities

Contact: _____

Address: _____

Phone: _____

Fax: _____

E-Mail: _____

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. Normal business hours:

Major telecommunications service outages and incidents that occur during normal business hours should be reported promptly by telephone as follows:

Within Normal Business Hours (8AM-4PM):

Primary contact at 201-625-1133

Secondary contact at

Tertiary contact at

2. Outside normal business hours -

Major telecommunications service outages and incidents that occur outside normal business hours should be reported promptly by telephone as follows:

Outside Normal Business Hours (4PM-8AM):

Primary Contact at

Secondary Contact at

3. Content

Initial reports will be reported, ideally no later than one hour after the outage is first recognized, to a designated Department staff member via a "live" telephone conversation at the numbers listed. Voice Mail or E-Mail should not be used. Staff may make informal arrangements for electronic transmittal reports. However, even in these instances personal contact with Department staff is necessary for initial reporting of a major service outage.

Initial reports to the Department of Public Service shall include the following critical information:

- the type of outage
- outage location
- estimated number of affected customers
- the time the outage occurred
- the estimated time of restoral
- a contact name and phone number associated with the current event
- any other known critical information available

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, using Attachment A as a guide for forwarding additional information. **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 person(s) 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 Company should notify all Company personnel on whom they should call when a service interruption occurs.

The Business Unit Coordinators will train internal staff. Training for new hires will be part of the orientation process in the appropriate business units.

VIII. DISCLAIMER

THE COMPANY IS PROVIDING THIS EMERGENCY PLAN TO THE STATE OF NEW YORK, DEPARTMENT OF PUBLIC SERVICE, OFFICE OF TELECOMMUNICATIONS TO PROVIDE A GENERAL OVERVIEW OF THE COMPANY'S MAJOR SERVICE INTERRUPTION PROCEDURES. THE EMERGENCY PLAN IS NOT INTENDED TO CREATE A DUTY WITH RESPECT TO ANY OF ITS CUSTOMERS OR ANY OTHER PERSON OR ENTITY, AND IS NOT INTENDED TO GIVE RISE TO ANY PARTICULAR STANDARDS OF CARE. THE COMPANY FURTHER DISCLAIMS, WITHOUT LIMITATION, ANY WARRANTY OR GUARANTEE OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE ARISING FROM COURSE OF PERFORMANCE, COURSE OF DEALING, OR FROM USAGES OF TRADE AS A RESULT OF THIS EMERGENCY PLAN.

ATTACHMENT A
STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE
TELEPHONE SERVICE INTERRUPTION and CYBER INCIDENT REPORT FORM

Instructions: Part A, Lines 1- 12 must always be completed. Part B, Lines 13-22 must be completed for TELEPHONE SERVICE Interruptions affecting consumers or other carriers. Part C, Lines 23-30 must be completed for CYBER Incidents regardless of impact on consumers or other carriers. Submit this form for each Telephone service Interruption and/or Cyber Incident E-mail completed report to: outages@dps.ny.gov		
A.	General Information	
1.	Type of Event – check all that apply	☐ Telephone Interruption ☐ Cyber Incident
2.	Reporting Company	
3.	Name, title, telephone number and e-mail of person making this report	
4.	Date, time and person first contacted at Department of Public Service	
5.	Date and Time of Report	
6.	Start Date and Time of the Event	
7.	Detection Date and Time (if different than line 5)	
8.	Estimated Date/Time of Restoral (if known)	
9.	Actual Date Time of Restoral (if known)	
10.	Location of Event or Interruption(street address, building, room, city, and counties affected)	
11.	Identify applicable Network Reliability and Interoperability Council (NRIC) Best Practice(s) that may have avoided this outage. For a current list of these Best Practices, see https://www.fcc.gov/nors/outage/bestpractice/BestPractice.cfm	
12.	What implementation plans, if any, does the company have related to the NRIC Best Practice(s) noted in 11 above, and the dates by which this might be expected.	

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE
SERVICE INTERRUPTION REPORT
(CONTINUED)

B.	Telephone Service Interruption	
13.	Company trouble ticket number or tracking number (if available)	
14.	Affected Wire Centers (name and CLLI Code)	
15.	Affected NPA-NXX Codes	
16.	Number of TSP Circuits Affected	
17.	Number of Access Lines Affected by wire center	
18.	Number of Special Service Circuits Affected by wire center	
19.	Nature and Cause of the Interruption	
20.	Steps Taken or Underway to Notify the Public	
21.	Steps Taken or Underway to Mitigate the Impacts (e.g., making public/cell telephone available?) Pending Full Restoral	
22.	Steps Taken to Restore Service	
23.	Additional Information	

STATE OF NEW YORK

DEPARTMENT OF PUBLIC SERVICE
SERVICE INTERRUPTION REPORT
(CONTINUED)

C.	Cyber Incident	
23.	Nature of the incident • Denial of service • Malicious Code • Reconnaissance Scans and Probes • Unauthorized Access • Other (describe)	
24.	Details (virus name, events, etc.)	
25.	How was the incident detected?	
26.	Describe overall business impact of the incident	
27.	Compromised System Details • System(s) Affected • Hardware involved (e.g. manufacturer/model) • Operating System • Compromised Software • Source of attack	
28.	Describe What Actions have been taken so far • Was the system removed from the network? • Describe initial containment measures (firewall, ACI, etc.) • Who was notified(e.g. ISAC, law enforcement) • When were they notified (Date and Time)	
29.	Technical Contact (System/network administrators)	
30.	Additional Information	