Emergency Contingency Plan

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VERIZON EMERGENCY CONTINGENCY PLAN

Verizon New York Inc. respectfully submits this updated Emergency Contingency Plan (the "Plan").

I.   CROSS-REFERENCES

The following table cross-references the requirements of the Commission's rules related to emergency preparedness and emergency response by telephone corporations and cable television companies to the specific sections of this Plan in which those requirements are discussed. All references to the rules are in the form of section numbers within Title 16 of the New York Code, Rules, and Regulations.

TABLE 1

REQUIREMENT	TELEPHONE RULES	CABLE RULES	THIS PLAN
Certifications	§ 603.6(c)(2)	§ 896.8(c)(2)	Page A-1
Table of Contents	§ 603.6(d)(1)	§ 896.8(d)(1)	Table of Contents
Introduction	§ 603.6(d)(2)	§ 896.8(d)(2)	Section II
Emergency Classifications	§ 603.6(d)(3)	§ 896.8(d)(3)	Sections III(A), IV(A)
Training and Drills	§§ 603.6(b)(3), (d)(4)	§§ 896.8(d)(1), (b)(4)	Sections III(A), IV(B)
Advance Preparation and Emergency Anticipation	§§ 603.6(d)(5), (d)(6)	§§ 896.8(d)(5), (d)(6)	Sections III(A), IV(C)-(E)
Service Restoration	§ 603.6(d)(7)	§ 896.8(d)(7)	Sections III(A), V
Personnel Responsibilities	§ 603.6(d)(8)	§ 896.8(d)(8)	Sections III(B), V(C), V(F); Figure 2
Customer Contacts	§ 603.6(d)(9)	§ 896.8(d)(9)	Section V(G)
Other Communications	§ 603.6(d)(10)	§ 896.8(d)(10)	Section V(H)
Outside Aid	§ 603.6(d)(11)	§ 896.8(d)(11)	Section V(I)
Support Services	§ 603.6(d)(12)	§ 896.8(d)(12)	Section V(J)
Post-Emergency Procedures	§ 603.6(g)	§ 896.8(g)	Sections III(A)(4), VI
Public Availability of Plan	§ 603.6(c)(3)	§ 896.8(c)(3)	Section II(E)

II.   INTRODUCTION

A.   PURPOSE AND NATURE OF PLAN

This Plan sets forth the actions that Verizon and its Major Service Provider affiliates take to maintain their readiness to respond to emergency situations, and to anticipate, prepare for, and respond to such situations. It also documents steps that those companies take, after an emergency, to assess the adequacy of their response to the emergency and to adopt and implement any changes in this Plan that may be necessary or appropriate in light of such assessment. The overarching goal of the Plan is to ensure, to the extent practicable and reasonable, the continuity of service during emergencies and, where service is interrupted as a result of an emergency, to restore it as rapidly and efficiently as is reasonably possible.

Although the Plan is primarily intended to address major storms, some or all of the procedures discussed herein may apply, with appropriate modifications, to other types of significant service-affecting events. The description of actions and roles in this Plan is general, and the application of the Plan in particular situations is within the informed discretion of the managers of the company's business. Not all emergencies will necessarily require all of the steps, or activation of all of the specific roles, described herein.

Each business unit is required to comply, in every portion of its service area in New York State, with the general processes, strategies and policies set forth in this Plan, as applicable, when responding to a covered incident or event.

B.   SCOPE OF PLAN

1.   Entities Covered

This Plan primarily applies to Verizon New York Inc. It also applies to certain affiliates of Verizon to the extent that they are Major Service Providers, as the term is defined in 16 NYCRR §§ 603.6(b)(1), (b)(2), by virtue of their provision of regulated administrative services to Public Service Answering Points ("PSAPs").[1] Throughout this Plan, the covered entities are referred to collectively as "Verizon."[2]

2.   Lines of Business Covered

Verizon provides numerous services that are not subject to the Commission's jurisdiction, and this Plan is not intended to apply to such services or to the organizations or lines of business that provide them. This Plan applies to Verizon New York Inc. only to the extent that it provides, within New York, telephone services or cable television service subject to regulation by the Commission. Similarly, it applies to Major Service Provider affiliates only to the extent that they provide Commission-regulated administrative services to PSAPs.

C.   CHANGES FROM PRIOR VERSIONS OF THE PLAN

This is the second revised version of the Plan ("Version 3"), dated January 31, 2025, submitted by Verizon in accordance with Commission rules that took effect on January 19, 2023, and in accordance with the Commission's "Memorandum and Resolution Adopting Amendments to 16 NYCRR Parts 603, 890, and 896," issued on January 19, 2023 in Case 22-M-0180. Subsequent, updated versions of this Plan will be published as necessary each January 31, or on such other dates as the Commission may prescribe. (If no changes are warranted in the Plan on any such date, Verizon will file a statement to that effect.) Each subsequently published version

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[1] Explanations of the acronyms used in this Plan are provided in Appendix A (Section VII(A), below).

[2] Additionally, this Plan will serve as the Emergency Contingency Plan for affiliates of Verizon that are regulated by the Commission as telephone corporations but that are not Major Service Providers. (*See* 16 NYCRR § 603.5(b)(1).) However, the portions of this Plan that reflect obligations that are imposed only on Major Service Providers (*see id.* § 603.6) do not apply to such affiliates.

of the Plan will include, in Appendix B (Section VII(B)), a list of substantive changes made from the preceding version of the Plan.

D.   OTHER RELEVANT DOCUMENTS

Verizon maintains numerous documents setting forth methods and procedures governing the response of particular business units, persons, regions, and functions to particular types of events that may be covered by this Plan. These include Business Continuity Plans, Business Unit Continuity of Operations Plans, Crisis Management Plans, Network Disaster Recovery Plans, and Site Emergency Action Plans. Those separate plans are listed and described in Table 2, below:

TABLE 2

TYPE OF PLAN (ACRONYM)	DESCRIPTION	# OF PLANS
BUCOOP	Business Unit Continuity of Operations Plan — Ensures safe operations of the business unit, identifies critical functions and assets, and establishes leadership continuity.	1
CMP	Crisis Management Plan — Outlines procedures for organizing, staffing, activating and operating an emergency operations center.	1
BCP	Business Continuity Plan — Identifies strategies for the continuity of the critical business functions.	24
DRP	Disaster Recovery Plan — Identifies critical network elements and outlines continuity strategies to mitigate loss of service during emergency events.	10
SEAP	Site Emergency Action Plan — Cares for the safety of Verizon employees and buildings.	145

This Plan is not intended to displace, override, or incorporate such separate plans. Rather, it is intended to describe an overarching framework for emergency response consistent with each of those separate plans and with the Commission's rules.

Verizon will amend such separate plans as necessary to ensure their consistency with this Plan, as it is revised and updated from time to time.

E.   PUBLIC AVAILABILITY OF THE PLAN

A copy of this Plan will be made available on Verizon's website, at https://www.verizon.com/about/our-company/state-government-affairs.

F.   OUT-OF-SERVICE ALLOWANCES

The emergency-response rules adopted by the Commission on January 19, 2023 generally require regulated telephone service providers and cable television companies to issue credits to their customers when service outages affecting 100 or more subscribers occur due to a particular service interruption cause. Verizon has completed its implementation of these rules for

consumers and expects implementation for customers of the Verizon Business line of business to be completed shortly.

III. OVERVIEW OF THE PLAN

The following discussion describes the general emergency-readiness and emergency-response strategies on which this Plan is based. Further detail concerning the implementation of these strategies is provided in Sections IV through VI, below.

A. IN GENERAL

The processes and procedures discussed in this Plan are based on Verizon's comprehensive Business Continuity and Event Management ("BCEM") Framework, which governs the company's emergency-preparation and emergency-response efforts. The BCEM Framework provides guidance to the organizations responsible for business continuity, disaster recovery, and crisis management on how to implement and manage those functions as part of Verizon's enterprise-wide program. The Framework also provides guidance on organizational collaboration, coordination, and integration across all Verizon operations to ensure the most effective collective use of available resources in order to achieve the greatest possible speed and efficacy of emergency response and recovery.

The Verizon BCEM Framework outlines consistent processes, procedures and templates for managing emergency events, and provides a standardized event-management and incident-management approach to facilitate timely and effective response activities.

The BCEM Framework recognizes four overlapping phases or components of emergency management: mitigation, preparedness, response, and recovery. These components are discussed in greater detail below and in Sections IV through VI of this Plan.

1. Mitigation

Mitigation is the process of increasing resilience by identifying risks and vulnerabilities and taking action in advance to avoid, mitigate, or eliminate the potential damage they can cause. Mitigation activities are identified and carried out by Verizon's Global Event Management Center ("GEMC"). The GEMC team monitors and assesses any threatened or actual events that might impact Verizon operations (including both natural and man-made events), gathers event-related information, engages subject matter experts, and disseminates information, assessments, and recommendations to key response groups within Verizon.

2. Preparedness

Preparedness activities are those that address what issues mitigation activities have not or cannot prevent and that increase Verizon's ability to respond effectively to an emergency when it occurs, and include planning, training, conducting drills, and maintaining an inventory of emergency-response assets.

a) Planning

All Verizon business units are responsible for developing, maintaining and implementing plans specific to their units that are consistent with the BCEM Framework. Those plans include strategies, actions, and procedures required to repair critical infrastructure and systems, and to resume business operations following damage caused by an emergency. Among the matters addressed by the plans are identifying the steps necessary to safeguard human life and protect Verizon assets, establishing and organizing a command post for recovery operations, and mobilizing and activating human and material resources necessary to facilitate and support the recovery process.

The plans are based on a Business Impact and Critical Functions Analysis that assesses the operational impacts predicted to result from a major disruption of services; identifies critical and time-sensitive business operations and services; identifies the equipment, supplies, tools, and other resources essential to service restoration; and sets time frames within which critical operations, processes and functions must resume.

Business-unit plans, and the analyses on which they are based, are reviewed and updated, both as part of an annual planning cycle, or as otherwise required (based, for example, on personnel changes within a business unit or the results of exercises, drills, testing, or actual emergencies).

The plans and analyses are thoroughly documented, and each is subject to certification and attestation by the executive of the business unit that "owns" the plan.

Verizon seeks to establish and maintain strategic relationships with public and private sector partners both in emergency and non-emergency operations. Each Verizon CMP is therefore required to capture those engagement processes and points of contact for the geography covered by the plan.

Verizon actively participates in numerous industry working groups and regularly works with government bodies at the local, regional, and national level. Some of these relationships include the U.S. Department of Homeland Security, the National Cybersecurity and Communications Integration Center, and the National Coordinating Center ("NCC") for Telecommunications. These interactions inform Verizon's analysis and planning process.

b) Training

Verizon personnel involved in planning and response efforts are required to undertake training that is specific to the function/role they support.

c) Exercises

Exercises for all Verizon BCPs, DRPs and CMPs are conducted on an annual basis. Exercises can be coordinated at the local, regional or global level. Different scenarios are developed each year, and can cover both man-made and natural incident types.

d) Resources

Verizon maintains an inventory of emergency-response assets for immediate deployment to any area in which a predicted or imminent event may impact the Verizon network. Those resources — along with additional assets provided by vendors — include equipment, temporary shelters, generators, critical communication tools, and supplies necessary for the restoration and recovery of network components, transmission systems, and customer premise equipment. In a disaster, these resources are deployed as needed in support of local recovery requirements.

All of these resources are maintained by Verizon at a level of readiness that enables the company to deploy them quickly and efficiently in the event of a disaster. Verizon regularly conducts training, holds disaster exercises, maintains disaster recovery documentation, and performs preventative maintenance on all recovery assets and support tools in order to ensure a high level of readiness.

3. Response

Response activities are those conducted immediately prior to, during, and immediately following an emergency. These measures seek to minimize service interruptions and to restore service as rapidly as possible to normal levels. The response phase includes the activation of Verizon Emergency Operation Centers ("EOCs") and Crisis Management Teams ("CMTs"). The purpose of an EOC is to develop and maintain awareness of the incident situation for decision makers, and to coordinate support for responding organizations. CMTs are composed of a cross-functional team of personnel who are responsible for coordinating the response to an incident under the management of the GEMC.

Verizon utilizes the National Incident Management System ("NIMS") methodology in operating its EOCs. NIMS is the incident management methodology used across the United States to coordinate emergency preparedness, incident management, and incident response by the public sector and also by many private sector entities. NIMS includes:

- a standardized approach to incident management that is scalable and flexible;

- enhanced cooperation and interoperability among responding organizations;

- comprehensive all-hazards preparedness;

- efficient resource coordination among organizations; and

- integration of best practices and lessons learned for continuous improvement.

4. Recovery

Recovery activities are those that bring Verizon operations and infrastructure back to business-as-usual operations following an emergency incident. The activities can be both short-term (returning to minimal operations) and long-term (returning to normal or improved operations). Recovery activities, functions or programs that are included within the Verizon BCEM Framework include:

- deactivation of EOCs;

- deactivation of CMTs;

- deactivation of DRPs, BCPs, and CMPs; and

- demobilization of deployed BCEM emergency resources (personnel, teams and assets).

Verizon CMPs are required to include processes for the deactivation of EOCs, as well as the demobilization of emergency resources.

B.   MANAGEMENT/ORGANIZATIONAL STRUCTURE

Verizon's emergency-management process includes an organizational structure that ensures that clear and consistent direction will be provided when an event occurs, and that the multiple components of the company's response to the event will be properly coordinated. The organizational structure is summarized in Figure 1 below, and the specific roles played by each part of the structure are described in the discussion that follows.

The structure described in this section is a general one, and each individual role is not necessarily assigned for every emergency. In all cases, staffing is dictated by the needs of the situation, based on informed business judgment.
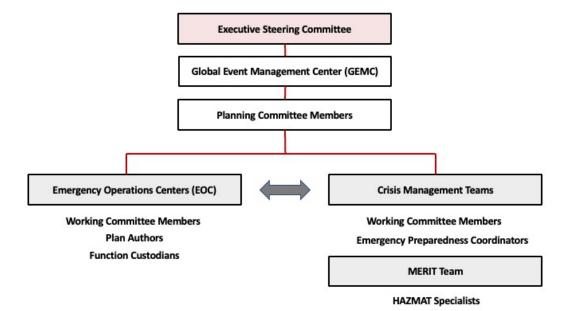
FIGURE 1

1. **Executive Steering Committee**

The BCEM organization within Verizon manages the company's overall framework for developing, maintaining, and implementing the specific plans that are listed in Table 2 and is governed by an Executive Steering Committee ("ESC"). The ESC is a team of designated senior executives representing numerous organizations within Verizon that are involved in emergency response. ESC members are responsible for supporting corporate business continuity strategies, policies, priorities and guidelines; providing decision-making oversight; and resolving corporate issues during Verizon's preparation for, or response to, a declared emergency event.

2. **Global Event Management Center**

The GEMC performs an information sharing and analysis center ("ISAC") function as part of its day-to-day operations. This function includes monitoring, information gathering, and notification for Verizon operations.

3. **Planning Committee Members**

Planning Committee Members ("PCMs") are director-level employees assigned to ensure that their business units are in full compliance with BCEM program requirements and to address any other requests for information or action. The PCMs oversee their assigned Working Committee Members (see section below) and ensure all Verizon emergency management planning initiatives are implemented.

4. **Emergency Operations Centers**

A business unit's EOC coordinates an operational and technical inter-business-unit response to an incident within a specified area. The EOC is the operational single point of contact between business unit operations and the GEMC. Subject matter experts from the business units staff the EOCs, either on a physical or virtual basis, as determined by the EOC leader.

5. **Crisis Management Teams**

CMTs coordinate preparation, mitigation, recovery and restoration efforts. The CMT process follows a modified Incident Command System ("ICS") structure in which management of the event typically begins closest to the disaster and, depending on its size and scope, escalates to the Global Crisis Management Team ("GCMT") for overall command and cross-functional support. CMTs are staffed by subject-matter experts from the business units.

6. **Major Emergency Response Incident Team (MERIT^{SM})**

MERIT^{SM} is a team of employees of Verizon and its affiliates with varying technical telecommunications backgrounds, who have been trained in emergency-response management to perform repair functions while providing subject-matter expertise in emergency management during times of natural disaster or hazardous-material incidents. This team of specialists is trained under OSHA and National Fire Protection Association guidelines to protect Verizon personnel and assets during times of natural disaster or hazardous-materials incidents.

7.   Working Committee Members

Working Committee Members ("WCMs") are manager-level employees assigned to lead their business unit's emergency management planning initiatives by working with the designated BCEM manager. WCMs are responsible for production of all required plans, documents, and reports. WCMs report to the business unit PCM.

8.   Emergency Preparedness Coordinator

The Emergency Preparedness Coordinator ("EPC") is a manager-level employee whose primary focus is emergency response and incident management for a particular work location. The EPC is not, however, intended to have absolute responsibility for responding to and recovering from all emergencies and disasters. Rather, the EPC is expected to call on inside and outside resources, first responders, WCMs, PCMs, and the GEMC to assist in providing decision support and emergency resources. An EPC is also expected to have a back-up and, in some cases, to work with an entire team, depending on the number of employees in the facility.

9.   Plan Authors

BCP and DRP Plan Authors are responsible for developing, updating, and conducting exercises for their assigned business unit's plans. Plan updates and exercises must be managed in accordance with the requirements of the BCEM Framework.

10.   Function Custodians

Function Custodians are responsible for conducting a Business Impact Analysis ("BIA") of a business unit's critical business functions at the commencement of its annual BCEM Planning Program, prior to plan development, and annually on an ongoing basis. This analysis determines and prioritizes the operational impacts resulting from a major disruption of services.

IV.   MAINTENANCE OF READINESS FOR EMERGENCIES AND PREPARATION FOR IMPENDING EMERGENCIES

A.   EMERGENCY CLASSIFICATIONS

Consistent with NIMS, Verizon's CMTs use a scalable threat level and response approach. Figure 2, below, shows how the threat levels range from minor to strategic, with a corresponding scaling of CMTs to provide robust response and recovery operations regardless of the size and/or duration of an incident's impact.[3]

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[3] In Attachment 1 to its May 12, 2023 guidance for the preparation of ECPs, Staff reproduced an "Example Emergency Classification" taken from a plan filed by Central Hudson in 2021 in Case 20-E-0618. Verizon does not believe that the type of classification set forth in Attachment 1 would be meaningful for the types of emergencies Verizon might confront. Experience has demonstrated, for example, that a particular number of customers impacted (row 1 of the Central Hudson table) cannot necessarily be correlated with the expected time to 90% restoration or to the type of damage expected. A specific number of customers impacted in a small, densely populated area (such as Manhattan following Superstorm Sandy in 2013) would have a very different damage

FIGURE 2

Threat Level	Examples	BCEM Role Involvement	BCEM Plan Activation
Strategic	- Mass Supply Chain Disruption - Pandemic - Enterprise Cyber Event	- Global Event Management Center - Executive Steering Committee - Emergency Operations Centers	- Business Unit Continuity of Operations Plans - Business Continuity Plans - Crisis Management Plans
Critical	- 9/11 - Category 3-5 Hurricane - Data Breach (Yahoo Data Exposure)	- Global Event Management Center - Executive Steering Committee - Emergency Operations Centers - Working Committee Members	- Business Unit Continuity of Operations Plans - Business Continuity Plans - Crisis Management Plans - Disaster Recovery Plans
Major	- Category 1-2 Hurricane - Major Winter Storms - Critical Vulnerability (SolarWinds 0-Day)	- Crisis Management Teams - MERIT Team - Emergency Operations Centers - Planning Committee Members - Working Committee Members	- Business Continuity Plans - Crisis Management Plans - Disaster Recovery Plans
Moderate	- Wildfires - Regional Floods - Tornados - Unauthorized Access (Social Engineering)	- Crisis Management Teams - Emergency Operations Centers - Working Committee Members	- Site Emergency Action Plans - Business Continuity Plans
Minor	- Water Pipe Break - Loss of HVAC - Email Phishing Campaign	- Working Committee Members - Emergency Preparedness Coordinators	- Site Emergency Action Plans

B.   EMERGENCY-RESPONSE TRAINING AND EXERCISES

1.   Training

Verizon personnel involved in emergency planning and response efforts must undertake training specific to the function or role they support, as shown in Table 3, below. The table is not an exhaustive list, and does not include mandatory training requirements for issues such as ethics, personnel management, etc. that may be generally relevant, but not specifically applicable, to business continuity or event and crisis management functions.

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profile and expected response time from a situation in which similar number of customers was affected over a relatively large area. Other variables such as electric-company response time frames would also affect the specifics of Verizon's response. The above comments also apply to the emergency classification tables included in Staff's August 2024 guidance.

TABLE 3: REQUIRED, RECOMMENDED, AND OTHER AVAILABLE TRAINING

A. REQUIRED COURSES

TYPE	COURSE	DURATION	FUNCTION/ROLE
Virtual	BCEM Program Fundamentals (VZ130945)	20 Mins.	All
External	Certified Business Continuity Professional (CBCP) and/or Member Business Continuity Institute (MBCI)	N/A	BCEM Select Staff

B. RECOMMENDED COURSES

TYPE	COURSE	DURATION	FUNCTION/ROLE
Virtual	Emergency Preparedness Attestation (VZ133198)	5 Mins.	All Work Site Based/Hybrid Employees
Virtual	Emergency Preparedness (VZ131126)	30 Mins.	All
Virtual	Site Emergency Action Plan (SEAP) Training (VZ68150)	15 Mins.	EPC/WCM
Virtual	Not Just Another Day: Responding to an Active Threat Situation (VZ132337)	15 Mins.	All
In Person	BC Plan Training/Awareness Sessions	1 Hr.+	Planners/WCM
Virtual	Telecommunications Service Priority (VZ73095)	30 Mins.	BCEM, ACC
In Person	Self-Paced Fusion Training (provided in system by roles)	1 Hr.	Planners/Function Custodians
Virtual	BC Plan Training Sessions (specific training by plan type)	1 Hr.	Planners/WCM
External	IS-100.c Introduction to Incident Command System	3 Hrs.	CMT
External	IS-200.c – Basic Incident Command System for Initial Response	3 Hrs.	CMT
External	IS-700.b An Introduction National Incident Management System (NIMS)	3 Hrs.	CMT

ADDITIONAL AVAILABLE TRAINING RESOURCES

DRI International: https://drii.org
Business Continuity Institute: http://www.thebci.org/
FEMA Emergency Management Institute: http://training.fema.gov/IS/

Internal training programs are developed and updated by the GEMC and implemented and tracked by the WCM for each business unit.

2. Exercises

All Verizon emergency response plans, including BCPs, DRPs, SEAPs, and CMPs, are required to be the subject of at least one annual exercise. Exercises increase response-team capabilities, and give plan owners and management confidence that the response, recovery, and restoration strategies will minimize any impact on the business or its customers.

Exercises can be conducted for any functions, applications, plans, or business units, or for the enterprise as a whole; and can cover any geography (local, regional, area or global). Annual enterprise testing includes severe weather preparedness.

Verizon will, when required, develop, conduct and/or facilitate exercises, following standard exercise guidelines. Data from the Verizon planning system, environmental scans, and other risk assessment sources support development of appropriate test/exercise scenarios and requirements. Where possible, Verizon will also identify additional opportunities to conduct more complex exercises following major incidents or multiple plan activations.

In addition to these internal exercises, Verizon will participate in exercises with partner electric utilities and with local officials. Verizon will give representatives of the State's Department of Public Service at least two weeks' notice prior to major drills organized by the company.

Exercise types include:

- **Orientation:** A seminar and/or briefing activity used to familiarize participants with specific business continuity and crisis management responsibilities.

- **Test or Functional Drill:** Coordinated activity normally used to test, develop, or maintain skills in a single operation or function in a single organization or facility.

- **Tabletop Exercise:** Simulates emergency situation in an informal environment; designed to elicit constructive scenario-based discussions for an examination of an existing BCP, DRP, or CMP, or to review the state of training and preparedness.

- **Functional Exercise:** Used to validate the capability of an organization to respond to a simulated emergency, in order to test one or more functions of an existing BCP, DRP, or CMP.

- **Cross-Functional Exercise:** Used to validate the capability of multiple organizations to respond to a simulated emergency, in order to test emergency response teams from multiple BCPs, DRPs, or CMPs.

- **Full Scale Exercise:** Simulates an actual emergency; intended to evaluate operational Business Continuity, Disaster Recovery, or Crisis Management procedures and capabilities under simulated stressful conditions.

All Verizon BCPs, DRPs, and CMPs must include an exercise report that contains the following components, among others:

- **Exercise Type:** Plan Owners[4] will determine which type of annual exercise to conduct from the choices outlined above.

- **Exercise Scenario:** The Plan Owner must decide on the appropriate backstory for the exercise, making sure that it includes a transition from a "blue sky" (business-as-usual) to a "black sky" (plan activation) condition. The Plan owner must also ensure that the scenario challenges the continuity/recovery strategies developed for a common set of scenarios and strengthens the "muscle memory" and skills of those supporting the plan.

- **Exercise Objectives:** Participants must be provided with a method for measuring the outcome of an exercise. This may include validating specific plan components such as recovery-time objectives (where applicable), incident management processes, continuity and communication strategies, emergency notification systems, asset deployment, etc.

- **Exercise Review:** An Exercise Review captures action items identified during the course of the exercise.

- **Plan Updates:** All exercises will include a walk-through of the plan to document updates and to identify lessons learned during the exercise, prior to plan approval.

The GEMC is accountable to track the overall exercise program and report results to the ESC.

C.   ONGOING ADVANCE PREPARATION FOR EMERGENCIES

1.   **Stockpiling of Tools and Supplies**

Verizon's Supply Chain organization provides long-range forecasts, including damage assessment and recovery needs, to critical suppliers in order to improve supply continuity. The organization uses multiple suppliers for key inventory. In response to recent supply-chain disruptions, Verizon has also identified product substitutes to mitigate supply constraints or shortages for critical supplies. The company continues to identify additional sources of supply for purposes of redundancy. Verizon maintains 30-plus days of inventory in distribution centers (warehouses) and in the field. It also has a regular cadence of communication with key suppliers to ensure a steady supply of inventory across the supply chain (distribution center, garage work

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[4] "Plan Owners" are responsible for developing, maintaining, and conducting exercises and certifying specific plan(s).

centers, central offices). Any item in stock at these facilities — including both tools and supplies — can be ordered and shipped for overnight or same day delivery if needed.

When Verizon knows that a certain area will be impacted by an emergency, the Supply Chain organization will pre-position inventory to the potentially impacted location. Supply Chain also works directly with Verizon partners to ensure an adequate supply to any impacted areas. In the event of a large-scale event, bulk locations are created that can be utilized to allocate inventory to specific areas. Such hubs serve as a designated resource for both tools and supplies. There can be multiple hubs depending on the severity of the incident and the size of the impacted area.

Machine learning and data analytics are leveraged to optimize inventory levels in response to changing demand. The Supply Chain organization partners with key suppliers to stock and maintain vendor-managed inventory within the garage work centers. This allows for automated replenishment and near real-time identification of inventory usage.

Additionally, Verizon keeps key critical spares in the field, as well as in forward stocking locations.

2. Preparation and Distribution of Customer Communications

In certain situations, including severe weather events, Verizon provides emergency advice to customers calling into the company's customer-assistance line (1-800-VERIZON). For example, such a message might state:

> There's a major storm predicted in the next 24 hours which could cause outages. To be prepared we recommend charging all of your devices and have extra batteries on hand. You can use the My Verizon app to report any problems.

Where a service interruption is known to Verizon, the message might state:

> We are aware of a service interruption in your area. We are already working to resolve the issue. For other inquiries, please remain on the line. In addition, customers can access Verizon's web page, which includes Emergency Preparation Tips and Tools— https://www.verizon.com/about/news/emergency-resource- center/emergency-preparation-safety-tips.

In the case of a major storm, Verizon will post online, and will send out, an announcement before the storm hits, stating that the company is preparing its network to meet

the emergency, and providing preparedness and safety tips for customers. The company also provides this information to local media outlets in the affected area.[5]

3. Maintenance of Up-To-Date Contact Lists

Verizon maintains and updates the following lists relevant to emergency response, as described below.

a) Personnel with Operational Responsibilities Related to Emergency Response

All Verizon employees are listed and maintained within the company's Human Resource database. Managers with emergency-management responsibilities have 24/7 access to that database, and can use it to obtain up-to-date contact information for members of their teams. Verizon's operational load-management systems track technicians who are on-call in particular areas at any given time, and assign work as necessary based on load and available personnel. All of these functions are carried out by automated systems, and there is thus no need for managers to maintain or update their own separate lists of emergency-response personnel.

b) Vendors and Contractors Involved with Emergency Response

As discussed in Section IV(I), below, Verizon generally does not call on contractors to perform installation, maintenance, and repair functions during emergency events. Rather, the company's practice has been to obtain additional personnel, where needed, from its landline operating affiliates in other states. These partnerships are identified in Verizon's BCPs.

To the extent that an emergency requires supplementation of available call center resources, Verizon's systems automatically route overflow calls to call centers in other states.

The only exception to this general policy is that on occasion Verizon uses the Red Cross to assist employees who may be impacted by the event and require support for human services, housing, etc. Contact information for Red Cross is maintained on its website and publicly available at https://www.redcross.org/contact-us.html.

Managers responsible for critical centers and network facilities are required to maintain detailed lists of suppliers and vendors which are updated semi-annually at a minimum. These lists identify the name of the supplier or vendor and the materials or services that it provides, and include necessary contact information such as telephone numbers, email addresses, and websites.

c) Identification of Special Needs Customers

Verizon's residential basic local exchange ("POTS") service customers with special needs are entitled to certain protections related to suspension or termination of service as

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[5] Verizon's website is regularly tested by accessibility testing teams to ensure that it meets Web Content Accessibility Guidelines ("WCAG") 2.1, Level AA standards. On Verizon's accessibility policies, *see generally* https://www.verizon.com/accessibility.

specified in 16 NYCRR § 609.5.[6] Such customers are also entitled to prioritized service restoration under the Service Quality Improvement Plan for Verizon (the "SQIP") that was adopted by the Commission in 2010. In order to identify customers eligible for such special protections, Verizon annually sends out a bill insert that invites eligible customers to self-identify their eligibility for such protections. Verizon maintains a database of customers who have self-identified. Self-identification is required only once; once the application is processed, the customer will be permanently identified on Verizon's customer service records as special-needs.

The class of customers entitled to special protections under the SQIP is somewhat broader than the class covered by § 609.5, and includes Lifeline customers and those living in areas where there is no available landline competitive alternative to Verizon service. Such customers are automatically designated as special-needs in Verizon's system.

Additionally, if customers reporting a trouble with their phone line indicate they may have a medical condition, the call center representative will mark the trouble reports as special needs, and the repair will be prioritized accordingly.

Every customer — whether of POTS or of Fios services — can self-identify as disabled and have a disability flag placed on their account. Calls from flagged numbers are routed to the Verizon Center for Customers with Disabilities ("VCCD") call center during normal business hours. Additionally, the presence of the disability flag on the account results in prioritization of service restoration.

d)   Medical Facilities and Other Human Service Agencies

All local and area managers are aware of the critical customers within their assigned orbit. These customers include medical/emergency facilities as well as special government agencies and human services organizations. Such customers are also listed in Verizon Business Continuity and Disaster Recovery Plans. Critical customer remote-terminal usage is also stored in an internal database. During outages, response teams can view this data and see which, if any, critical customers are served by the terminal being viewed.

Such facilities are also identified in Verizon's systems as Telecommunications Service Priority ("TSP") customers pursuant to federal law and Verizon's tariffs and Product Guides.[7]

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[6] Customers covered by the special protections of § 609.5 include those who are "blind, disabled, or 62 years of age or older, and all the remaining residents of the household are 62 years of age or older, 18 years of age or under, blind or disabled …." 16 NYCRR § 609.5(b)(1).

[7] Telecommunications Service Priority ("TSP") is a program that authorizes national security and emergency preparedness ("NS/EP") organizations to receive priority treatment for vital voice and data circuits or other telecommunications services. The TSP program provides service vendors a Federal Communications Commission ("FCC") mandate to prioritize requests by identifying those services critical to NS/EP. A TSP assignment ensures that it will receive priority attention by the service vendor before any non-TSP service. The TSP program may be used for provisioning or restoration of those telecommunication services that support any of the following NS/EP missions: (a) National Security Leadership; (b) National Security Posture and U.S. Population Attack Warning; (c) Public Health, Safety and Maintenance of Law and Order; and (d) Public Welfare and Maintenance of the National Economic Posture.

TSP information is updated through a process administered by the United States Cybersecurity and Infrastructure Security Agency.[8]

e) Local Media Outlets

Verizon regularly and actively communicates with media outlets across New York State. As a result, Verizon maintains current lists of media contacts at all of the major outlets that provide information to New Yorkers. Verizon's Public Policy and Media Relations teams for New York State will maintain a list of contacts of all major print, broadcast, and Internet media sources that would provide information to the public in the event of an emergency. The list will include not just specific individual contacts but generic news-gathering contact information (*e.g.*, the City Desk phone number at a newspaper or a generic, monitored email address, such as editor@newspublication.com) to ensure delivery and receipt. Verizon will review, refresh, and update the list at least semi-annually.

f) Public Officials

Verizon's Public Policy team maintains a detailed list of officials at government agencies, including those responsible for emergency management. This list will be updated at least semi-annually.[9]

D. THREAT MONITORING AND ASSESSMENT

As described previously, the GEMC team performs an information sharing and analysis center ("ISAC") function as part of its day-to-day operations, monitoring and assessing any threatened or actual events that could impact Verizon operations, and disseminating information, assessments, and recommendations to key response groups within Verizon. Among the activities the GEMC carries out in this area are:

- actively monitoring, analyzing and disseminating situational information and intelligence regarding potential threats or actual impacts to Verizon;

- conducting and coordinating risk assessments on upcoming events (elections, high-profile sports events, etc.);

- monitoring national media (traditional/mainstream and social media platforms);

- monitoring National Weather Service ("NWS") information as well as subscribing to all available NWS emergency weather alerts;

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[8] *See* Verizon Tariff PSC No. 15, § 1(N) and https://www.cisa.gov/topics/emergency-communications/priority-services.

[9] Because of the large number of county and local officials across the State and the difficulty of obtaining direct contact information for many of them, Verizon anticipates that it will be necessary to rely on the state's emergency apparatus to cascade emergency-response information as necessary to county and local officials.

- subscribing to state and local SMS emergency alert services; and

- distributing daily ISAC briefings identifying current potential threats to the network.

E.   NOTIFICATION OF AN IMMINENT THREAT

Table 4, below, identifies the preparatory measures Verizon would implement in anticipation of a potential imminent severe storm or network emergency.

TABLE 4

A. Pre-Incident Preparatory Activities

	TASK
1	Monitor National Oceanic and Atmospheric Administration ("NOAA") website (http://www.nhc.noaa.gov/).
2	Monitor major news media including Interactive NWS ("iNWS") alerts.
3	Create named event in Event Tracking Dashboard site.
4	Update the emergency organization/function charts and contact lists.
5	Ensure proper fuel status for all required vehicles and equipment. All fueled equipment and extra storage should be topped off.
6	Update the list and location of deployable equipment and verify status/operability. - Portable Generators - Conversion Cords - Fuel Storage - Chainsaws
7	Test stationary power generation plants under load to ensure proper operation and correct any discrepancies.
8	Inventory and verify secondary communication: - Satellite Phones - Mobile Phones - High Frequency, Hand and 2-Way Radios - Spare Batteries/Chargers
9	Send out reminders to test/acquire Government Emergency Telecommunications Service ("GETS")/Wireless Priority Service ("WPS") services.
10	Review building access plans for all employees, including those loaned-in.
11	Ensure the following preparedness plans are current:
12	Site Emergency Action Plans ("SEAP")
13	Business Continuity Plan ("BCP")

14	Business Unit Continuity of Operations Plan ("BUCOOP")
15	Crisis Management Plan ("CMP")
16	Respond to all required special government agency activities/requests.
17	Ensure all wireline operations site metrics are functional and updated.
18	Verify site-specific items such as tarps, pumps, water and batteries are in place and secure.
19	Inspect and secure all facilities, to include roof-mounted equipment and outer entry points for loose or missing hardware.
20	Inspect and secure garage work center lots to ensure items such as tie downs, chalk items, and trash do not pose any hazards.
21	Inspect Cable Vaults and test sump pumps.
22	Identify potential flood locations that may require sandbagging. Verify local Verizon Real Estate contacts.
23	Close any open plant and secure handhole lids.
24	Review Remote Terminal priority levels are correct based on current customers served ensuring those serving public safety (emergency services/hospitals) are given priority.
25	Notify locators to mark with flags in addition to paint.
26	Update contact lists, open lines of communication and place Area Control Center ("ACC") Team on alert as needed.
27	Contact Local, State, and Federal Emergency Management Agencies (EMA/OEM) as needed.
28	Contact external suppliers/vendors as needed: - Electricians - Generator/Electrical Switch Gear - Batteries - Transportation - HVAC
29	Contact impacted Area Operations and Center Managers (or established ACC Team representatives).
30	Obtain and review Department of Transportation ("DOT") rules and waivers, and a copy of the state declaration.
31	Establish, post and update all conference bridge numbers used for storm activity.
32	Assign representatives from all disciplines to monitor and support the various conference bridges as/if needed.
33	Review all the state traffic, road closure and evacuation details.
34	Review abnormal event procedures with management.

35	Identify list of Business Continuity Plans in the potential storm path and have centers review plans for possible updates.
36	Appropriately escalate outstanding repairs that increase potential business interruption, e.g., network, equipment, vehicles, facilities, environmental, outside plant.
37	Verify all power connections and equipment are out of basements and low-lying first floor areas subject to potential flooding.
38	Review staffing plans to ensure appropriate staffing levels – shifts covered, alternate reporting locations, etc. Review the following needs: - Do Maintenance Administrators need to be pre-positioned in centers? - Do Central Office Technicians need to be placed in vulnerable Central Offices? - Does lodging need to be obtained for any employees?
39	Review communications process and advise employees of operations status and how to obtain ongoing instructions.
40	Ensure generator load has been transferred within the past 30 days. Perform site load transfer within the next 24 hours (if not conducted in previous 30 days).
41	Continue to review and refine potential locations that may require sandbagging (based on projected storm trajectory).
42	Appropriately escalate outstanding repairs that increase potential business interruption, e.g., network, simplex conditions, environmental.
43	Escalate any inbound deliveries of needed equipment or materials. Items of focus include (but are not limited to): - Extra Poles - BBUs/ONTs - Strand and Aerial Hardware - Drop Wire
44	Verify request has been made for accounting codes from Risk Management or GEMC.
45	Ensure Fios Optical Network Terminal ("ONT") outage data is reset.
46	Distribute Inclement Weather Policy Document and inform leadership of need for possible decision on shutting down operations across the footprint.
47	Communicate status call timelines and participants to field managers and reinforce standard agenda.
48	Review back-up plans for loss of key facilities (network re-routes, etc.).
49	Verify Real Estate has staged response equipment (sandbags, salt, plows, etc.) within affected area.
50	Avoid dispatches/call-outs during hazardous storm conditions.
51	Identify critical sites that may require generator support (non-Central Office).
52	Consider alternative locations or work-from-home strategies.
53	Provide whereabouts of field operations personnel to dispatch centers.

54	Obtain DOT and access waivers from GEMC and Area Crisis Management Team ("ACMT") if needed.
55	Coordinate the relocation of mobile restoration equipment and Verizon Telecom vehicles out of the target area (as needed).
56	Coordinate and complete the deployment of Essential Team Members to assigned locations. Include Pre-position Power and Facility Engineering/Construction to storm areas.
57	Coordinate with all network operations centers to respond to network alarms monitored remotely to provide local knowledge and dispatches as necessary.
58	Conduct conference calls with local/key management to discuss threats to specific sites as/if needed.
59	Establish priority activities for the event.
60	All employees should ensure personal emergency contact information is up to date using Employee Self Service.
61	Ensure all Technical Support Team pre-incident checklists are completed.
62	Provide EOC representation on GEMC/ACMT conference calls.
63	Coordinate with Local Emergency Coordinating Center ("LECC") to determine LECC deployment strategy.
64	Distribute ACC status report to participants and GEMC/ACMT as needed.
65	Verify Area Operations Teams completion of any local/specialized checklists.
66	Report any plan activations and status to the GEMC/ACMT.
67	Email/Update All-Hazards Checklist completion for the GEMC/ACMT.

B. Incident Level Preparatory Activities

	Task
1	Distribute latest storm information as updated/needed.
2	Evaluate the need to initiate local government single point of contact ("SPOC") support process.
3	Evaluate the need to initiate the online storm damage database and activate the storm damage hotline.
4	Evaluate the need to initiate the Event Project Manager process.
5	Establish damage survey teams as needed and assign to impacted areas as appropriate.
6	Monitor the health of the network.

7	Continuously assess resource deployment and needs based on recovery requirements.
8	Provide regional impact reports to EOC.
9	Ensure all Technical Support Team Incident checklists are completed.
10	Provide EOC representation on GEMC/ACMT conference calls.
11	Distribute EOC status report to participants and GCMT/ACMT.
12	Report any plan activations and status to the GCMT/ACMT.
13	Email/Update Checklist completion for the GCMT/ACMT.

V. SERVICE RESTORATION DURING AND IMMEDIATELY FOLLOWING EMERGENCIES

A. SERVICE RESTORATION PRIORITIES

For large-scale emergencies, it is not always possible to immediately take steps to restore service to "priority" customers, since their service may depend — along with the service of thousands or tens of thousands of other customers — on the repair of "upstream" network facilities, such as the serving central office, major feeder cables, and remote terminals. Moreover, even when upstream facilities are fully functional, Verizon technicians may not be able even to enter a neighborhood until electric utility workers fix downed power lines and ensure a safe working environment, and they may not be able to isolate troubles affecting a particular customer until commercial power is restored. Service restoration may also require repair or replacement of downed poles, and the transfer of facilities attached to those poles.[10] It is only when those preliminary tasks are completed that prioritization of specific customers within a neighborhood can begin. Indeed, repair of upstream facilities and of downed poles may, by itself, restore power to all or most affected customers, thus rendering the prioritization issue moot.

Subject to that important caveat, Verizon employs a rational prioritization scheme to ensure that essential services are restored as rapidly as possible. This scheme is applied automatically by Verizon's load-management and dispatch systems. The following priority categories are applied, in the order given:

1. Verizon communications services necessary to manage emergency event recovery

2. TSP customers

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[10] Verizon can and does prioritize restoration of poles and attached facilities in areas that are of critical importance because they serve facilities such as hospitals, government offices, etc.

3.   Essential government services

4.   Public safety services

5.   Network infrastructure

6.   Priorities of Federal, State and Local Governments

7.   Other Services (including special needs customers if not already cared for among the above priorities)[11]

Sample Priority Matrix

Restoration Priority	Priority
Main Utility & Communications Facilities	1
Telecommunications Service Priority (TSP) Customers	2
Fire, Police, Paramedic & Rescue Facilities	3
Emergency Management Centers/Offices	3
Main Flood Control Structures	3
Hospital or Emergency Medical Facilities	4
Water & Waste Water	4
Emergency Shelters	4
Life Support & Other Special Needs Customers	4
Customers Providing Key Products & Services	5
Other Critical Government Function Support	6
Nursing Homes & Dialysis Centers	7
Prisons & Correctional Facilities	7
Public Communications (Radio, TV, etc.)	7
Large Employers & Key Customers	7

B.   DAMAGE ASSESSMENT

In order to respond effectively to an emergency event, it is important that a comprehensive estimate of the overall impact of the event be provided at the earliest possible time to the local management team accountable for the area. This will allow for decisions to be

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[11] Special needs customers are identified and prioritized through mechanisms discussed in Section IV(C)(3)(c), above.

made relative to assigning sufficient resources to respond to the troubles, seeking additional resources to assist in the effort, and identifying and obtaining necessary supplies and materials to respond to the event.

Damage assessment information is shared with the EOC, when one is activated. The EOC then facilitates obtaining additional resources and supplies for area work forces, and coordination of efforts to respond to the emergency.

Depending on the type of emergency event, special requirements such as security arrangements, electric hazard mitigation and other safety requirements, and special transportation needs may need to be considered before allowing a damage assessment team or any employees to access the disaster area.

1. Building Assessment

Verizon's Global Real Estate organization works with other organizations to conduct damage assessments of all Verizon Telecom buildings. An important element of damage assessment reports is the time frame in which business units can reoccupy their workspace. Depending on the time frame, some business units may need to activate their BCPs.

2. Plant Assessment

At the regional level, damage assessment activities are managed at the executive and EOC level with information provided from the sources and activities listed below.

- Field technicians, other utilities (through the Verizon Power Management Center), and emergency response agencies (police/fire) report facility damage/impact to the various network control centers.

- Network control centers monitor network traffic to detect areas that may be impacted by weather or other damage.

- Abnormal network conditions are identified and escalated to field teams for resolution.

- Dispatch centers monitor group tickets to detect if larger network facilities may be down. (For example, twelve similar tickets reported against the same cable may indicate a cable trouble.)

- Network control centers monitor high water/flood/cable vault alarms for damage/water intrusion.

- Field teams monitor the efficacy of flood mitigation efforts (where relevant).

- Network control centers monitor the U.S. Power Outage site and coordinate with electric utilities to identify damage to poles and lines.

- Executive leadership monitors Event Dashboard and Tracking, StormTracker, and network traffic sites to determine areas of impact.

- Verizon's Safety, Health and Environment organizations may engage building engineers to determine whether or not a heavily damaged building is safe for occupancy.

- Critical centers follow damage assessment procedures as outlined in their BCPs.

C.   DEPLOYMENT OF PERSONNEL

Field technicians will be deployed by dispatch centers (largely through the use of automated dispatch systems) based on Verizon's load management strategy and restoration priorities. The dispatch centers will continually evaluate the need for additional response personnel based on damage assessments and current maintenance load.

Crews and their workloads will be monitored and managed by local and area managers. These managers will provide workload assessments to leadership as needed. Crews will be reassigned as needed based on event impact, force availability, and maintenance load severity. Once the area has returned to business as usual, loaned technicians will return to their home business units.

D.   COMMUNICATIONS WITH DAMAGE-ASSESSMENT AND SERVICE-RESTORATION PERSONNEL

The following company-provided communications methods are used by field personnel performing emergency response tasks:

- Mobile phones (voice, text)

- Tablets (used to manage dispatches)

- Company email

- Command Center Communications (conference bridge)

E.   COORDINATION WITH OTHER UTILITIES AND WITH PUBLIC AGENCIES

Verizon field managers and supervisors work directly with their electric utility counterparts to mount an effective response to emergency events. Since Verizon can begin restoration work only when the site is made safe/operational by the electric utility, this coordination is critical to Verizon's response efforts. In addition to participating in electric utility command centers during emergency events, regular contact is maintained between field teams during an event. Information concerning where and when electric utility work will be completed that is collected through these contacts allows Verizon to respond to outages by dispatching its own technicians as quickly as possible. Verizon also partners with local officials and emergency centers to gain similar information. During large-scale events where mutual aid is in place, local/state emergency centers will assist in maintaining information on when and

where utility work is being performed. In such cases Verizon will also appoint employees to serve as single points of contact for local officials. Should those officials require any information or support, this point of contact will be the only person the local official needs to work with to resolve an issue or obtain information.

F. PERSONNEL RESPONSIBILITIES

See the discussion of this issue in Section III(B) and V(C), and Figure 2, above.

G. CUSTOMER COMMUNICATIONS

1. Handling Incoming Calls

Verizon's systems for handling incoming customer calls are robustly designed to handle the peak loads of incoming calls that can be expected during an emergency event. Incoming trunks are sized to achieve low blocking levels based on standard engineering criteria and projections of emergency peak loading. Additionally, to the extent that emergency events result in call volumes exceeding a call center's response capacity, calls are automatically routed, without need for human intervention, to alternative call centers — generally ones outside of the immediate area of the emergency. The company monitors service levels to ensure there is no significant level of call blockage. Call center representatives will provide the latest estimate for service restoral, which is updated regularly as the workload and workforce balance is constantly evaluated. In the event of an emergency, staffing levels will be increased to accommodate the projected call load and, as mentioned earlier, calls can be routed to other centers for handling.

Verizon does not utilize third-party service providers to handle customer calls during emergency events.

In the event of a commercial electric outage, Verizon facilities have back-up generators and remote terminals have back-up batteries to provide electric power. These generators are tested regularly and, in advance of any projected emergency, fuel tanks are topped off to ensure continuous operation during power failures. Coordination between Verizon and local electric companies are managed by local field manager.

Special needs customers have an identifier on their Verizon account records that indicates to the call center representative that priority treatment is required regardless of whether there is an emergency condition or not. Verizon does not send messages proactively to priority special needs customers.

During an emergency event, Verizon's call center hours are not extended as they already are operational every day (Mon – Sat 8:00AM – 7:00PM, Sun 8:00AM – 5:00PM). Customers that dial Verizon call centers during a particularly heavy load will be given the option of leaving their callback number and will then be placed on a prioritized callback list. Call center circuits are engineered to achieve an answer time of 30 seconds for 80% of calls, regardless of weather conditions. Call center management monitors the call volumes into their centers every day, every hour, and adjusts call handling to maximize responsiveness, as a routine function of the

center. The call center representatives receive real-time updates of Verizon repair response times as a routine function of the center.

2. Outgoing Communications with Customers Concerning Restoration of Service and Other Matters

Communication is cared for in various ways depending on the situation, as listed below.

- **1-800-Verizon portal.** See discussion in Section IV(C)(2), above.

- **Verizon.com.** Customers can access Verizon's webpage, which includes Emergency Preparation Tips and Tools. *See* https://www.verizon.com/about/news/emergency-resource-center/emergency-preparation-safety-tips.

- **Media.** Verizon's Media Relations and Public Policy teams partner to disseminate information, as necessary and appropriate, before, during, and after an emergency to a list of contacts including all major print, broadcast, and Internet media sources that provide information to the public in the impacted area. Where the severity of the event and the level of media interest warrant, Verizon will conduct briefings for the media during the emergency and its aftermath. Verizon anticipates that briefings conducted during emergencies will be virtual but can provide alternative arrangements at facilities throughout New York State should circumstance warrant. Frequency of media briefings will be situation-specific and depend upon the nature of the emergency and the availability of new information.

- **Contact Engine.** This tool ensures customers are kept up to date concerning scheduled service restoration time frames for their own service, and allows customers to reschedule repair appointments if needed.

- **Arrival Confirmation.** The field team will call ahead to individual customers prior to arriving at their location. This is done to ensure that the customer is home and the technician will have access to the premises to complete repairs.

H. COMMUNICATIONS WITH OTHER STAKEHOLDERS

Verizon recognizes that it is critical to establish and maintain procedures for communications with customers, government representatives, and the media before, during, and after an event. Verizon's Public Policy and Media Relations teams will gather and release information about the incident to government officials, news media, and other appropriate agencies and organizations.

This team anticipates communicating with public officials in three ways. First, Verizon will rely on its existing list of core government contacts to notify appropriate representatives as circumstances warrant during an incident. This list will include key state officials, and the expectation would be that information would flow to county and local resources through those

state officials. The contacts will include key officials at the State's Department of Public Service and the Division of Homeland Security and Emergency Services. When circumstances warrant, the identified contacts will receive written briefing materials and will be able to speak with Verizon representatives as needed.

Second, where and when appropriate based on the severity of the incident and the level of interest, Verizon will hold virtual briefings with appropriate government officials as needed.

Third and finally, Verizon representatives already work closely with government officials during incidents in many jurisdictions, including New York City, and those established and successful procedures are expected to continue as well. Verizon's contact for emergency monitoring with government officials is Michele Cinquegrano, Senior Director, State & Local Government Affairs.

Verizon will appoint a lead from its Public Policy team to be the central liaison and point of contact for key New York State agency officials in the case of an emergency, specifically the State's Department of Public Service and the Division of Homeland Security and Emergency Services. Verizon's Public Policy contact for this emergency monitoring is Mayra Cevallos, Senior Manager, State & Local Government Affairs.

Where necessary and appropriate, Verizon will set up a toll-free number to facilitate communications between government officials and Verizon.

I.   OBTAINING OUTSIDE AID

As previously discussed, Verizon does not generally seek aid from outside companies to supplement its technician force in order to handle installation, maintenance, and repair functions during an emergency. Rather, the company draws on resources made available by its operating affiliates located outside of the affected service area.

J.   SUPPORT FOR SERVICE RESTORATION CREWS

In order to support ongoing restoration efforts during an emergency event, the Verizon Response Team is required to maintain a multitude of emergency support assets. Emergency support assets are staged throughout Verizon territory when severe weather is forecast or a National Special Security Event ("NSSE") is scheduled.[12] Deployment of all emergency support assets is managed through the Verizon Response Team and Satellite Solutions Group. Depending on the scope and scale of the emergency, these assets may include, but are not necessarily limited to, those listed below.

- Mobile Incident Command Posts (for Verizon and government/emergency services support)

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[12] An NSSE event is an event of national or international significance deemed by the Department of Homeland Security to be a potential target for terrorism or other criminal activity. Examples of such events are presidential inaugurations, state of the union addresses and international summits.

- o   Allows leadership to work at incident site

- o   Conference space

- o   Workstations for center use

- o   Satellite communications

- o   Wi-Fi access

- o   Battery packs/bricks

- o   Fleet management (focusing fleet deployment to impacted areas and sharing of vehicles by multiple technicians where possible)

- Human Needs Trailers (for Verizon and community support)

  - o   Safety/protective equipment

  - o   Accommodations

  - o   Comfort facilities (restrooms, bathing)

  - o   Food/water supply and distribution

  - o   Heating/cooling tents

- Mobile supply trucks/vans – Allows local deployment of restoration assets such as tools, cable/wire, network equipment, etc.

- Special access vehicles

  - o   Boats (small for personnel and large for equipment)

  - o   Snowmobiles/Sno-Cats

  - o   All-terrain vehicles (side-by-sides, multi-wheeled and tracked)

- Generators on a Trailer or "GOATs" (for Verizon and community support)

- Mobile Communication Assets (for Verizon and community support)

  - o   Satellite Pico-cell on a Trailer ("SPOT")

  - o   Cell on Wheels ("COW")

  - o   Cell on Light Truck ("COLT")

  - o   Drones (Flying cell sites, damage assessment)

Verizon CMTs and ACCs partner with the Red Cross and local hotels as needed to ensure safe lodging for employees while performing restoration work. Open/available fueling station lists are maintained by the GEMC and distributed daily, or as updated by the ACC, to field teams. Corporate credit card limits are also increased by Verizon Finance to allow for responders to purchase items (transport, food, lodging, fuel, tools) needed for emergency response. Local/area managers handle purchasing for employees who do not have access to a corporate credit card.

VI. POST-EMERGENCY ACTIVITIES

A. POST-INCIDENT ACTIVITIES

Post-incident activities include those listed in Table 5, below.

TABLE 5

	Task
1	Publish and maintain a master list of temporary office telephone numbers for displaced workers immediately after the storm.
2	Initiate local OEM SPOC process if required.
3	Initiate the online storm damage database and establish owner(s) if required.
4	Initiate the Event Project Manager process if required.
5	Remind employees to use correct special accounting codes.
6	Get daily info on incoming/pending load (troubles and service orders) so that decisions can be made on force redeployment.
7	Conduct personnel check.
8	Assess damage and disruption to network and facilities.
9	Identify any abnormal network conditions and develop restoration strategy to mitigate.
10	Coordinate the deployment of emergency restoration contractors to assist with restoration activities.
11	Coordinate the deployment of portable generators to all sites operating on battery backup.
12	Coordinate the inspections of sites operating on standby power generators.
13	Coordinate with Network Operation Centers to resolve critical customer circuit services.
14	Note and escalate any requests for additional resources.

15	Learn if personnel and/or the emergency response team ("ERT") will go to the impacted area and create a travel list.
16	Ensure emergency contact information has been obtained for any borrowed employees.
17	For unsafe or heavily damaged locations verify with GEMC prior to anyone entering.
18	Put safety teams in place as soon as possible to assist with the many issues related to the storm.
19	Ensure pertinent safety messages are being distributed by Safety.
20	Ensure food, water, and ice is available as needed.
21	Monitor and report as needed information from the StormTracker website.
22	If needed continue to verify need and track loaned-in resources.
23	Complete/verify elimination of sandbagging after environment is deemed stable.
24	Utilize automation (Interactive Voice Response, etc.) for ticket closeouts.
25	Provide EOC representation on GEMC/ACMT conference calls.
26	Distribute EOC status report to participants and GEMC/ACMT.
27	Ensure all Technical Support Team Post-Incident checklists are completed.
28	Assess need to release borrowed workers/resources.
29	Assess need to keep EOC activated.
30	Track plan deactivations and report status to GCMT/ACMT.
31	Update Checklist completion for the GCMT/ACMT.
32	Email return to BAU status to GCMT/ACMT once reached.

B.   POST-EMERGENCY ASSESSMENT

Verizon performs a business unit-led after-action review with GEMC support for any incident that requires the activation of one or more of its BCEM plans. All business units participating in the event response are required to submit responses. Participating business units are asked to:

- Provide observations from event response and submit responses using the following framework:

- o   Categorize the observation (process, staffing, communications, reporting, training, checklists, systems or tools)

- o   What worked well?

- o   What did not work well?

- o   Where is the opportunity for improvement?

- o   Identify the steps recommended

Once all replies have been submitted, the GEMC compiles all responses and forwards them to the appropriate business unit for action/implementation.

Once there is confirmation of return to business as usual, business units/plan owners perform reviews of their plans to determine whether or not updates are needed for any plan that was activated. These updates may come from the after-action report or from internal reviews of the plan performance during the event. Plan evaluations vary slightly based on the type of plan being reviewed. Below is an example of the types of reviews that may be performed post-event.

> **Considering the results of the after-action report, please complete a walkthrough of your plan, noting any changes that need to be made to address any gaps and findings from the event. Be sure to validate all items.**

Section: **Introduction:**

Plan Section	Information to Validate	Yes / No	What plan updates are required?
Plan Description	Does Plan Description provide an appropriate overview and purpose of the plan and the team(s) responsible for carrying out activities covered in the plan?		
Operating Footprint	Are the global regions, countries, areas, markets and states/territories that are covered by the plan listed in this section?		
Key Plan Personnel	Are the correct Key Plan Personnel listed?		
EOC/CMT Operating Model	Is the appropriate Operating Model noted?		
Operating Locations	Are the appropriate Operating Locations listed?		

Section: **Plan Activation**

Plan Section	Information to Validate	Yes / No	What plan updates are required?
Other Criteria (optional)	Does any information in the Other Criteria section need to be completed or updated?		

Section: Notification Lists

Plan Section	Information to Validate	Yes / No	What plan updates are required?
Notification Lists	Is there at least one Notification List included in the plan with a description included?		
	Are all individuals included in the notification lists active?		

Section: Response Teams

Plan Section	Information to Validate	Yes / No	What plan updates are required?
Response Teams	Is there at least one response team included in the plan with a description included?		
	Are all members active and do they have designated roles?		

Section: Checklists

Plan Section	Information to Validate	Yes / No	What plan updates are required?
Plan Checklists	Has at least one Checklist been included related to plan activation?		
	Has a Checklist been provided for each Response Team included in the plan?		
	Do all Plan Checklists have tasks included?		
	Do any of the task names or descriptions need clarification?		

Section: Vendors

Plan Section	Information to Validate	Yes / No / NA	What plan updates are required?
Vendors	Are any Vendors required for restoration and/or listed in any other section of the plan included in this section?		
	Are the Role / Description / Representative information valid for any vendors?		

Plan Section	Information to Validate	Yes / No	What plan updates are required?
Plan Appendices	Have you attached all appropriate plan appendices to the plan?		
	Are all appendices up to date?		

In addition to the activities described above, Verizon will, for all future events covered by this Plan, prepare "30-day" and "60-day" reports to the extent required by 16 NYCRR §§ 603.6(g)(2)-(4) and 896.8(g)(2)-(4).

VII. APPENDICES TO THE PLAN

A. GLOSSARY OF ACRONYMS USED IN THIS PLAN

Abbreviation	Definition
ACC	Area Control Center
ACMT	Area Crisis Management Team
BC	Business Continuity
BCEM	Business Continuity & Event Management
BCP	Business Continuity Plan
BIA	Business Impact Analysis
BUCOOP	Business Unit Continuity of Operations Plan
CBCP	Certified Business Continuity Professional
CMP	Crisis Management Plan
CMT	Crisis Management Team
COLT	Cell on Light Truck
COW	Cell on Wheels
DHS	Department of Homeland Security
DOT	Department of Transportation
EMA	Emergency Management Agency
EOC	Emergency Operation Center
EPC	Emergency Preparedness Coordinator
ERT	Emergency Response Team
ESC	Executive Steering Committee
FCC	Federal Communications Commission
GCMT	Global Crisis Management Team
GEMC	Global Event Management Center

GETS	Government Emergency Telecommunications Service
GOAT	Generator on a Trailer
HAZMAT	Hazardous Materials
HVAC	Heating Ventilation Air Conditioning
ICS	Incident Command System
iNWS	Interactive National Weather Service
ISAC	Information Sharing & Analysis Center
LECC	Local Emergency Coordinating Center
MBCI	Member Business Continuity Institute
MERIT	Major Emergency Response Incident Team
NCC	National Coordinating Center
NIMS	National Incident Management System
NOAA	National Oceanic and Atmospheric Administration
NS/EP	National Security and Emergency Preparedness
NSSE	National Special Security Event
NWS	National Weather Service
OSHA	Occupational Safety and Health Administration
OEM	Office of Emergency Management
ONT	Optical Network Terminal
PCM	Planning Committee Member
POTS	Plain Old Telephone Service, i.e., residential basic local exchange service
PSAP	Public Service Answering Points
SEAP	Site Emergency Action Plan
SMS	Short Message Service
SPOC	Single Point of Contact
SPOT	Satellite Pico-cell on a Trailer
SQIP	Service Quality Improvement Plan
TSP	Telecommunications Service Priority
VCCD	Verizon Center for Customers with Disabilities
WCAG	Web Content Accessibility Guidelines
WCM	Working Committee Member
WPS	Wireless Priority Service

B.   CHANGES FROM PREVIOUS VERSIONS OF THE PLAN

Aside from minor wording, numbering, and format changes, substantive changes were made to the following sections of the Plan:

- Section I: The insertion of a table cross referencing the Commission's rules to specific sections of the Plan.

- Section II(F): An update concerning Verizon's implementation of the rules related to out-of-service allowances.

- Section V(A): The insertion of a sample priority matrix.

- Sections V(G) and (H): Updates to discussion of communications with customers and other stakeholders.

C.   BACK-UP POWER FOR SWITCHING OFFICES AND VIDEO HUB OFFICES

All Verizon central offices and video hub offices use stationary, industrial diesel generators for backup power. Generators are connected via automatic transfer switches. These transfer switches constantly monitor available power and automatically engage the diesel generator when commercial power is lost. Power transfer occurs seamlessly to the customer. To ensure proper function, Verizon performs monthly tests of all diesel back-up power plants. The tests from January 2024 through December 2024 were all successful and required no corrective action to be taken.