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**Sprint Nextel Corporation**  
Tropical Storm Irene Hearing  
September 19, 2011

1. Preparation

a. What are the best practices for readiness? Response?

Sprint Nextel Corporation (Sprint Nextel) considers disaster preparedness a constant business imperative. Sprint Nextel understands that “best practices” for readiness and response involves a detailed and professional approach to practice, planning and expertise. It is by methodically and continually developing and improving its approach to disaster preparedness that Sprint Nextel implements best practices before, during and after disaster response events. Sprint Nextel defines its mission in disaster preparedness and response, also known as Sprint Nextel’s Business Continuity Program, as follows: to optimize the continuation of the company’s mission critical processes and services when faced with significant disruptions while minimizing impact and damage to Sprint Nextel’s customers, employees and the company itself. As government agencies, businesses and individual customers become increasingly reliant on wireless communications, business continuity at Sprint Nextel becomes ever more important.

Sprint Nextel regularly engages in training exercises – both internally and in collaboration with governmental agencies – to ensure its ability to maintain and restore network continuity under the most trying of circumstances. Sprint Nextel has engaged in over 250 field training exercises with federal and state agencies. In addition to such full scale exercises, Sprint Nextel engages in tabletop exercises, walk-through drills, and functional drills. Sprint Nextel has implemented a professional Disaster Recovery Exercise Program comprised of:

- Strategic goals and objectives
- Scenario/experience based education
- Dynamic and realistic simulations
- Dedicated planning resources
- Corrective actions and continuous improvement
- Increasingly complex scenarios

By practicing disaster response through its professional Disaster Recovery Exercise Program, Sprint Nextel develops and maintains a disaster response capability that is second to none.

Sprint Nextel’s planning for network continuity and recovery is a constant process. Sprint Nextel maintains internal teams of personnel dedicated to ensuring continuity of service and expeditious network recovery. These expert teams adapt their forward-looking disaster response plans from lessons learned from past responses. To date, Sprint Nextel has responded

# Sprint

to at least thirty-six (36) Presidentially declared disasters since 2002. By engaging in after-action analysis, Sprint Nextel is able to better prepare itself for each new response event.

Sprint Nextel's approach to maintaining the continuity of its operations uses practices and methodologies endorsed by the Federal Emergency Management Agency (FEMA), Business Continuity Institute, Disaster Recovery Institute International (DRII), and American National Standards Institute. Sprint Nextel is proud to employ three of only 193 people worldwide to currently hold DRII's highest certification, a Master's Certification in Business Continuity. A fourth Sprint Nextel employee is expected to complete the certification process in the next several weeks. Additionally, Sprint Nextel's practices are consistent with the Department of Homeland Security's (DHS) Public Sector Preparedness guideline, ASIS SPC.1 – 2009. Components of Sprint Nextel's programs and protocols include: Program Initiation and Governance, Risk Identification and Assessment, Risk Reduction, Plan Building, Developing and Conducting Exercises, Training and Awareness, Sustainability and Process Improvements, and Program Performance Reporting.

Practical implementation of the practices and methodologies listed above has involved continuous improvements and investments to ensure reliability and resiliency. Examples include:

- Sprint Nextel has adopted an "all hazards" incident response structure that is very closely modeled on the National Incident Management System (NIMS) and the Incident Command System (ICS). The ICS structure enables Sprint Nextel to respond quickly with a mix of both contractors and employees to restore services following a disaster. Through the use of ICS Sprint Nextel is quickly able to organize personnel and assets around a common incident response model to assess the impacts, mobilize resources and restore services.
- Implementation of a multi-million dollar Disaster Recovery Management System (DRMS). DRMS is a tool that allows multiple internal groups involved in network recovery to update and share information around outages, testing, and future plans for all cell sites in the Sprint Nextel national network.
- Invested in automation and inventory systems designed for dispatching, trouble management and fault management. These tools increase efficiency, reduce response times and allow more effective response and tactical planning for network restoration.
- Implemented a comprehensive and professional disaster recovery exercise and training program for all personnel.
- Developed an emergency response reservist program that enables fast mobilization of resources to support sustained emergency or disaster recovery operations.
- Implementation of advanced systems of control for tracking assets and their prospective site locations.

# Sprint

Sprint Nextel also has developed, implemented and maintains a robust program for protecting and ensuring the continuous operation of critical network facilities. Sprint Nextel uses a risk benchmarking algorithm modeled on industry loss prevention standards to manage risks and protect infrastructure. The program includes the strategies, tools, and methods to reduce network vulnerabilities and risks, which in turn safeguards against service interruptions. Critical network facilities are built to rigorous engineering standards and are extremely hardened and resilient to disasters, equipment failures, or power failures. Sprint Nextel's detailed preventative maintenance program on all site hardware ensures all systems and redundant equipment is in proper working order. Additionally, Sprint Nextel has a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of its switch locations.

Another essential tool in preparedness for disaster response is expertise. In this regard, Sprint Nextel is extremely proud of its teams of dedicated professionals that enable Sprint Nextel to ensure network continuity and recovery in all manner of disaster scenarios. Drawing from a wide range of backgrounds in the military, public safety and government, Sprint Nextel's disaster response personnel have the knowledge, experience and ability to manage disaster response regardless of scope.

Sprint Nextel also maintains a first in class response unit called the Emergency Response Team (ERT). Sprint Nextel's ERT has mobilized in support of over 4800 deployments supporting federal, state and local public safety, law enforcement, military, and enterprise organizations. This team of dedicated professionals specializes in providing short-term communications solutions by coordinating personnel, equipment and infrastructure for Federal and State declared disasters, field training exercises, national special security events, and planned or unplanned government events. The ERT maintains an emergency communications vehicular fleet stationed at strategic locations across the nation. This vehicular fleet includes satellite enabled mobile cell-sites on light trucks (SatCOLTs), satellite enabled communications trailers (IPoS Trailers) constituting a mobile communications facility delivering data, VoIP and streaming video at any location in the U.S., and Mobile Command Centers providing IPoS Trailer communications capability in areas inaccessible by trailers. Sprint Nextel maintains an inventory of tens of thousands of phones and equipment to enable communications in areas where communications capabilities are unavailable. Sprint's ERT team members carry certifications in Business Continuity, Homeland Security, HAZWOPER, and Project Management, and have active security clearances through the Department of Defense and the Department of Justice.

The best practices for response involve implementation of a well-prepared plan, and adaptation of that plan for unforeseen obstacles. Sprint Nextel takes a proactive approach to response by deploying its response personnel and assets outside, but in close proximity to, the projected at-risk area. By pre-deploying these assets and personnel, Sprint Nextel is able to begin response and restoration activities as soon as employee safety can be ensured. Once employee safety is ensured, Sprint Nextel approaches restoration by assessing needed restoration tasks and developing a prioritization of response. Approaching restoration in an organized,

# Sprint

prioritized manner ensures that response efforts are highly coordinated, occur in the appropriate sequence, avoid duplication of effort, and are successful on the widest possible scale.

b. How did you fare for readiness? Response?

In both readiness and response, Sprint Nextel's network continuity and recovery efforts were highly effective. Pre-staging of personnel and equipment enabled Sprint Nextel to rapidly put its network continuity and recovery plan into action. Sprint Nextel's ability to restore full wireless service to the residents of Connecticut was hindered by (1) the lack of commercial power – the U.S. Department of Energy on August 29 reported that 44% of Connecticut's customers were without power – and (2) the need for repair or replacement of the incumbent local exchange carrier (ILEC) provisioned T1 circuits that connect Sprint Nextel's cell towers to its network that were damaged or disconnected because of Irene. Sprint Nextel was able to use its own pre-staged inventory of generators to rapidly begin compensating for lack of electric power at its critical sites. At the same time Sprint Nextel worked with the ILEC to restore T1 connectivity.

Sprint Nextel did not suffer a single core-infrastructure disruption during Irene, as the redundant systems all worked as planned. Sprint Nextel's wireless network was impacted due to vulnerabilities inherent to any cellular network (power, Telco/T1, and site equipment damage). The majority of cell sites impaired or out of service were down due to power or T1 issues.

Regarding refueling, Sprint Nextel maintains relationships with three large disaster recovery refueling vendors and has arrangements with general contractors and tower crews for quick response with dedicated resources. Sprint Nextel's generator refueling operational plan was developed to incorporate a large time buffer for resupply prior to fuel exhaust, and refueling operations were successful. Sprint Nextel's readiness and response to the storm also involved deploying an ERT SatCOLT and a Cell-site On Wheels (COW) to Connecticut at the State's request. Those assets were positioned at the Connecticut Emergency Operations Center (CT-EOC) as of Saturday evening, August 27, 2011. Sprint also had personnel at the CT-EOC in advance of, during and after the storm.

c. What was the damage from Tropical Storm Irene? How many lines were affected? How many customers were affected?

Sprint Nextel is fortunate that there was no lasting damage to its network in Connecticut from Tropical Storm Irene. Sprint Nextel does not have an extensive local telephone operation in Connecticut, so it is unaware that it had any lines affected. In Section 2, below, Sprint Nextel describes the data reporting that it voluntarily provided during the storm and recovery effort.

# Sprint

- d. What was the extent of your disaster preparedness plan?
  - i. Where you prepared for a category 1 hurricane?
  - ii. What damage could have been done?
  - iii. Where/how could we have done better?

As described in the discussion of best practices above, Sprint Nextel's disaster preparedness plan constituted a comprehensive approach to ensuring network continuity and recovery. Sprint Nextel was prepared for Hurricane Irene to make landfall as a much stronger storm, and initial forecast models showed the possibility of a category 4 hurricane. Sprint Nextel is pleased that no lasting damage to its network occurred, but respectfully declines to speculate on what damage could have been done. The range of possibilities in such projections is limited only by a ceiling of total system loss and a floor of no damage whatsoever. Sprint Nextel prepares itself to address and recover from every outcome along that continuum.

Regarding the question of what the state could have done better, Sprint Nextel is not in a position to provide an answer. Sprint Nextel's practice is to review the event once recovery is complete and to evaluate how to better plan for future events. Sprint Nextel then tests its plans and protocols in various exercises to prove them out, and refines them through that process. Without knowledge of the state's specific organization plan, Sprint Nextel cannot know how that plan held up in practice. The only observation Sprint Nextel can make in response to the question is to observe that Sprint Nextel's practices and approach have proven extremely beneficial.

- e. What Lessons did you learn?

Perhaps the most unique characteristic of Hurricane Irene was its extremely large footprint. The Hurricane made landfall in North Carolina and impacted every state from there through all of New England. Even as Sprint Nextel was engaging in network continuity and recovery efforts in North Carolina, it was continuously preparing, planning and adapting its response in each state to the north. The sheer scale and volume of the storm's impact presents a tremendous opportunity for Sprint Nextel's personnel to analyze and plan for future multi-state events. Sprint Nextel's mobilization and deployment protocols will be adapted based on knowledge and experience gleaned from Hurricane Irene, as they are following all response events.

One unique characteristic of a multi-state storm is that Sprint Nextel may receive data requests from multiple governmental and public safety agencies across a number of states that can often be dissimilar in nature. Such non-conforming requests could potentially create inefficiency in Sprint Nextel's efforts to respond to states' dissimilar data requests. Sprint Nextel believes that increased awareness and utilization by states of the Federal Communications Commission's (FCC) Disaster Information Reporting System (DIRS) will facilitate expeditious information exchange and avoid placing demands on carriers' network recovery personnel to generate data responsive to requests during critical response and recovery missions. DIRS is discussed at greater length below in Section 2.

# Sprint

- f. What are your standards in regards to tree trimming? Have these standards changed over the past 10 years?

Other than instances where trees are directly impacting or threatening Sprint Nextel's equipment, Sprint Nextel does not generally engage in tree trimming. Sprint Nextel does maintain contractors for clearing roads that may be impeded by fallen trees or tree limbs.

## 2. Staffing/Labor

- a. How many line crews were deployed during peak restoration?
- b. How many line crews were brought in from other places, if any?
- c. How many line crews are employed by your company now vs. 2000?

Providing a response to this question is complicated by the fact that Sprint Nextel does not organize itself by "line crews" in disaster response or otherwise. Sprint Nextel's restoration efforts involved a complex deployment of numerous crews tasked with restoration of network operations in Connecticut. Sprint Nextel deployed sufficient personnel to promptly restore its network to full operational status. Decisions regarding deployment of personnel were informed by Sprint Nextel's past experiences and established procedures. Personnel deployment was also adapted in real time as dictated by storm restoration requirements.

Sprint Nextel voluntarily participated in reporting its restoration efforts. The FCC maintains and administers the DIRS via its Public Safety and Homeland Security Bureau. The purpose of DIRS is to provide governmental agencies an access point for retrieval of data relevant to disaster recovery and response. The FCC lists the following benefits and purposes fulfilled by DIRS:

**Designate contact:** Allows communications providers to identify the appropriate contact for his/her station during emergencies; and, in turn, eliminates lost time when trying to identify and coordinate with the federal contacts who can provide immediate assistance.

**Receive help:** Provides an avenue for communications providers to restore their operations and receive additional help during emergencies, e.g., securing generators, fuel, etc.

**Streamline requests:** Reduces the number of requests from various government agencies for status of each station. Other government agencies will rely on the FCC (DIRS) for status of each broadcast station.

**Aid your community:** Better ensures that communications providers will be able to serve their communities, providing them with critical updates and risk communications information from reliable and credible sources during emergencies.

# Sprint

The submission of information into the DIRS database is voluntary. Sprint Nextel has agreed to provide such information because it believes that the FCC and through the FCC, the DHS's FEMA and NCS (the National Communications System) should know the extent to which the communications infrastructure in an area hit by severe weather has been damaged, and the progress being made by the carriers to restore their damaged systems. Moreover, as the FCC explained, the DIRS reports help to reduce if not eliminate requests for information from other agencies including first responders and state agencies responsible for helping to mitigate the adverse effects of such emergencies. Sprint Nextel works closely with the FCC, DHS, FEMA, and NCS, and data responsive to this question is not collected by those agencies, nor is it submitted through the DIRS. Sprint Nextel voluntarily participates in the DIRS process and during Hurricane Irene, Sprint Nextel shared through DIRS all data requested by the federal government. It is Sprint Nextel's understanding that each state has the ability to obtain DIRS data by interfacing with the DHS directly.

Sprint Nextel also provided data to the State in response to requests that were received from Connecticut's Public Utility Regulatory Authority (PURA), a division of the Department of Energy and Environmental Protection. The data provided to PURA was consistent with the data submitted through DIRS. Sprint also maintained staff at the CT-EOC to ensure that Sprint's staff was available to CT-EOC personnel at all times to provide assistance to the CT-EOC and its recovery mission.

d. What are your policies/standards regarding hours of work (hours/shifts)?

Sprint Nextel maintains strict compliance with all federal, state and local requirements regarding work hours, conditions, safety, and other labor practices. Sprint Nextel places great emphasis on its workers' safety and maintains a consistent approach to worker safety during disaster response. Sprint Nextel is proud to report that despite having over 100 call centers and retail stores, as well as network restoration and ERT personnel, in the area affected by Hurricane Irene, Sprint Nextel was able to keep all of its employees safe. Sprint Nextel is also working with its employees that have been personally impacted by the storm and providing needed support. Finally, Sprint Nextel would like to recognize the fine work done by local law enforcement as not a single Sprint Nextel store was burglarized despite widespread power outages.

### 3. Communication

- a. How was the communications between your company and municipalities?
  - i. What worked? What didn't?
  - ii. How could this communication be improved?

Sprint Nextel would ordinarily expect communications from municipalities to arrive through either of two channels. For non-customer municipalities, communications would ordinarily arrive via the CT-EOC and be directed to Sprint Nextel through that channel. By maintaining personnel at the CT-EOC prior to, throughout, and after the storm, Sprint Nextel

# Sprint

was fully prepared and able to rapidly respond to priority requests from the state, municipalities, first responders, or other units of government. The second channel of communications from municipalities would involve municipalities that are Sprint Nextel customers. Sprint Nextel maintained communications with these municipalities throughout the storm and response to ensure that their communications needs were met, and any necessary escalation of response could be addressed promptly. Sprint Nextel was able to provide continuous service to its customer municipalities and was able to respond to any needs they had during the storm and response period.

- b. How was the communications between your company and your customers?
  - i. What worked? What didn't?
  - ii. How could this communication be improved?

Sprint Nextel's approach to communicating with its customers is generally two-fold. Large customer accounts (Enterprise Customers) ordinarily are managed by a dedicated employee. These account managers are able to discuss the specific needs of the Enterprise Customers on a targeted and direct basis. An account manager can work with an Enterprise Customer to make certain disaster response assets available to the customer. Sprint Nextel's ERT services, described earlier herein, are available to Enterprise Customers seeking particular levels of communications continuity in disaster response situations.

For Sprint Nextel's individual customers, Sprint Nextel directed consumers to stay informed of the latest hurricane-related updates via the homepage of Sprint.com. From there customers were directed to Sprint Nextel's Hurricane Information Web page which described Sprint Nextel's storm preparations, and provided post-storm updates regarding its network restoration/recovery efforts and retail store closures, as well posting these details on the company's various Twitter and Facebook channels. Sprint Nextel also made available a Hurricane Tips Fact Sheet to help its general and business customers understand steps they should take in advance of any hurricane.

Sprint Nextel maintains a nationally recognized, industry-best customer care organization. Sprint Nextel prides itself on excellence in customer service and its dedication to customer service has been recognized by numerous independent ratings agencies. Among the awards Sprint Nextel's family of companies has received are #1 most improved company in customer satisfaction across all industries over the last three years (American Customer Satisfaction Index, May 2011), Highest in Customer Care, Satisfaction and Purchase Experience with Non-Contract Wireless Service (J.D. Power and Associates, August 2011), #1 in Overall Satisfaction, Likelihood to Repurchase and Call Resolution (Vocal Laboratories, Inc., July 2011), tied for Highest in Satisfaction with the Purchase Experience among Full-service Wireless Providers (J.D. Power and Associates, August 2011), and customer satisfaction improvement for



# Sprint

14 consecutive quarters (Advansis, July 2011). Sprint has and continues to make its commitment to its customers its first priority.

Respectfully submitted,

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