Docket UT-143013

Sprint

Sprint Business Continuity Program Overview

This document represents Sprint Corporation's Business Continuity Program Overview as updated in 2013

Sprint

Purpose

The purpose of this document is to provide approved information that can be shared with interested parties in order to illustrate that Sprint is committed to an efficient and effective corporate approach with respect to Business Continuity Planning, Incident Management and Disaster Recovery. This document will explain the core components of the Sprint Business Continuity Program and the structure by which it is implemented.

Business Continuity Program Mission

Assure the continuation of Sprint's mission critical business operations and services. Minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Program Introduction

As businesses, government agencies, and individual consumers become more and more reliant on wireline and wireless communications, as well as remote access to information, the concept of Business Continuity has never been more important. Sprint takes Business Continuity to the next level by ensuring that it is part of the corporation's business philosophy. This philosophy promotes utilizing business continuity principles, guidelines, and standards by all company employees in their day to day business operations.

Sprint's Business Continuity (BC) Program is based on industry accepted principles. Sprint has adapted key principles from the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, Federal Emergency Management Agency (FEMA), Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, and several Military Specifications (Mil-Spec) standards, into 3 BC Program Elements: Program Governance, Incident Management, and Continuity Analysis & Planning, as defined below:

Program Governance

Program Governance Structure– Program structure, mandate and executive sponsorship is required to ensure a comprehensive Business Continuity Program.

Program Management & Continuous Improvement - Overall program management and continuous improvement includes all of the documentation and efforts designed to ensure a well-defined BC program that seeks to continually mature performance and processes.

Incident Management

Incident Management & Crisis Communications – Enterprise Incident Management Team (EIMT) and Incident Management Team (IMT) documentation, training, exercises and continuous improvement are required for those teams that have roles and responsibilities before, during or after an incident that significantly affects Sprint's employees, customers and/or shareholders.

Continuity Analysis & Planning

Criticality Analysis & Risk Management – Criticality Rating is necessary for prioritizing tasks and recovery. Risks that threaten the company's critical functions, vendors, sites, systems and network elements, require due diligence that result in decisions to mitigate or accept the risks.

Mitigation Strategies & Plan Development - After determining criticality and risks, the next steps include devising the appropriate mitigation strategies and recovery capabilities. BC plan development is formalized using on-line tools.

Program Governance Structure Overview

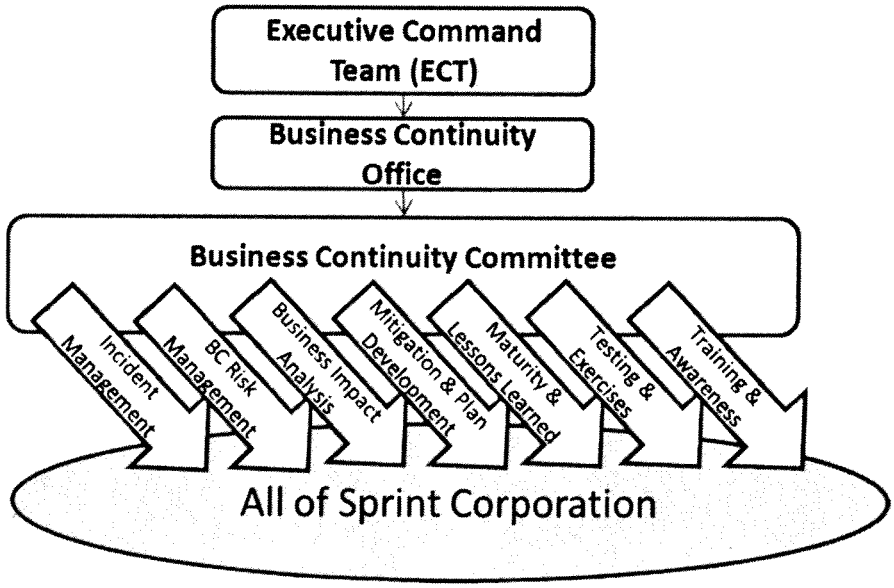
Overall BC Program governance requires executive sponsorship, a structure for decision making, and a means to direct and manage incremental changes towards goals and objectives. Sprint's program governance structure achieves each of these requirements and accomplishes them through inclusion and diversity of thought and viewpoint. The following describes the program governance structure that begins with the highest levels of the company and leverages management and expertise for optimal effectiveness.

Executive Command Team (ECT) - The ECT consists of Sprint's highest level executives, representing all critical Sprint functions. The ECT provides executive sponsorship of the overall Business Continuity Program and is briefed on issues and status of projects that require senior executive attention.

Business Continuity Office (BCO) - The BCO is the program office responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide BC and Disaster Recovery Plans. During an incident, the BCO is responsible for coordinating cross functional incident management activities of the Enterprise Incident Management Team (EIMT).

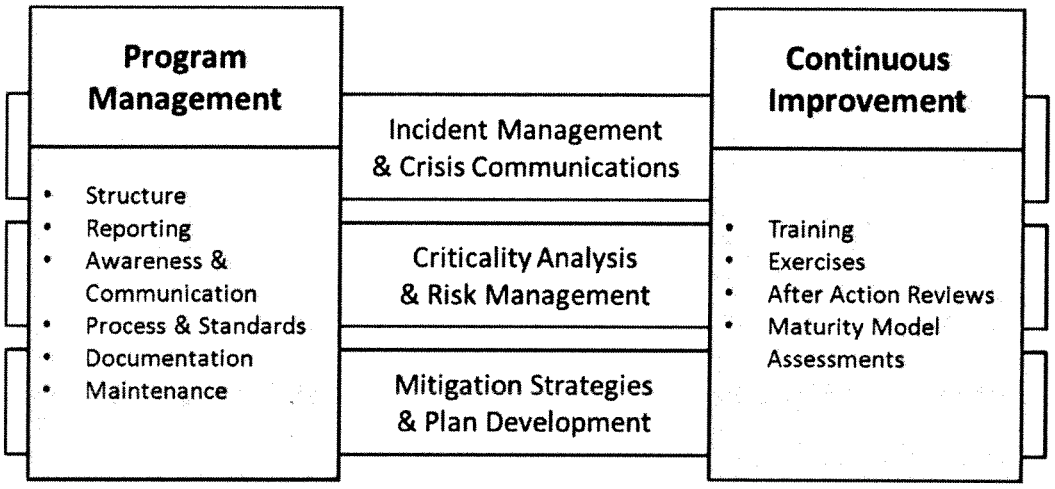
Business Continuity Committee (BCC) – The BCC is comprised of Business Continuity Teams (BCTs). The BCC is responsible for assuring business continuity policies, guidelines, standards and tools are implemented consistently across the company and acts as a forum for business continuity discussions. BCTs have overall responsibility for the implementation of business continuity initiatives within their individual business units and act as business unit Incident Management Teams (IMT) for their business units when disasters occur. The BCC has various sub-committees that focus on proactive planning, incident management, tools and training, awareness, pandemic planning and other issues that require attention.

Program Governance Structure



Program Management & Continuous Improvement

The concepts of Program Management and Continuous Improvement are the overarching control elements that bookend all other aspects of the BC Program. For each of the other Program Elements, Program Management efforts will provide definition of what the Program Element should accomplish and the methods used to achieve objectives. The Continuous Improvement efforts provide a means to keep the Program Elements evergreen, current, and striving for maturity.



Program Management:

- Awareness & Communications – Employees and management are informed of current Business Continuity efforts or awareness campaigns through internal communication methods that often target all employees in the company.
- Process, Standards & Documentation– Common terminology, methodologies and formal documentation on standards and procedures help our large company stay consistent and current. All program documents are to be reviewed annually, at a minimum, with all key stakeholders.
- Reporting – Each year, the Business Continuity Office formally reports to Sprint's Executive Management on the efforts and status of the Business Continuity Program and partners with Corporate Audit on reporting risk information to the Board of Directors.
- Maintenance – Frequent reviews of plan details and processes are updated in a timely manner, following changes to contacts, suppliers, processes, organizational structures, etc.

Continuous Improvement:

- Training – Annual training cycles are followed to ensure familiarity with systems, processes and peer organizations. Ad-hoc training is also conducted for new team members or procedure changes.
- Exercises – Exercises are used to evaluate plans, educate personnel, and test functions and operational capability of Sprint's response organizations. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with FEMA, the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster. The most common types of exercises conducted are: Tabletop, Walk-through, Functional drills, and Full-scale.

  Tabletop Exercises - In a round-table setting, members of the response team meet to discuss their responsibilities and describe how they would react as a team to an emergency scenario.

They identify areas of overlap and confusion in a cost-effective and efficient manner before conducting a more demanding exercise.

Walk-Through Drills - Both management and the response team perform their emergency functions within the emergency response location.

Functional Drills - Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. In most cases, these functions should be tested separately to help identify improvement areas and to eliminate confusion. Observers are often used to evaluate these exercises.

Full-scale Exercises - Exercises simulated to be as close as possible to a real-life disaster. They may involve a combination of response teams, management, field operations, and outside agencies. During the simulated exercise, team members are expected to actually perform their disaster responsibilities.

- After Action Reviews (AARs) – Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- Maturity – Sprint uses an internally developed Maturity Model for benchmarking Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Incident Management & Crisis Communications

Knowing that unexpected events occur, Sprint's Incident Management and Crisis Communications teams are highly trained and tested. As with the overall program governance structure, full executive support and authority is integrated into the incident management structure. Sprint's seasoned professionals, across multiple fields of expertise, have responded to all major disasters impacting the United States in the last 13 years.

Executive Command Team (ECT) – During a disaster, the ECT is kept apprised of all activities and status. If the incident requires chief executive involvement, the ECT members engage to provide guidance and approval to make necessary response and recovery decisions. The Chief Executive Officer (CEO) is the Chairperson of the ECT.

Enterprise Incident Management Team (EIMT) – The Enterprise Incident Management Team (EIMT) convenes quickly as a way of sharing impact, status and critical decision-making during an incident. This team is flexible and scalable and built on the premise of an all-hazards response approach.

Incident Management Teams (IMTs) – An IMT consists of members of a single business unit and is designed to meet the needs of the company, customers and employees at the time of an incident. Examples of IMTs include IT, Network, Human Resources, Customer Care, Corporate Security and others. In all, there are more than 20 IMTs, each of varying size and complexity, capable of responding quickly and effectively to a wide array of issues. Each IMT have a designated chairperson that represents their organization on the EIMT call when the incident requires an EIMT response posture.

Continuity Analysis & Planning

Sprint formally analyzes risks and criticality of all parts of the business that could cause impacts or disruptions, if not properly mitigated and planned. These elements of the program ensure the proper priority and attention is applied to mitigation and plan development efforts.

Criticality Analysis:

Through various forms of analysis, such as Business Impact Analysis (BIA), criticality of business processes, applications, vendors, sites, network elements and other business aspects are determined. The criticality defines the appropriate level of mitigation and planning that is necessary. Critical business processes require a comparable criticality assigned to the applications they use, the suppliers they need and other dependencies.

Risk Management:

Sprint considers resiliency and Business Continuity risks to be a matter that requires tight management and controls. Potential risks are evaluated using an internal algorithm, to determine appropriate mitigation and Business Continuity planning efforts.

Mitigation Strategies & Plan Development:

Upon identification of potentially significant risks, Sprint makes every attempt to mitigate and plan for any eventuality that could affect Sprint's customers and employees. In most cases, the risks are marginalized or eliminated due to mitigation efforts. In some cases, the risks are highly improbable, but still require alternative planning, in the event that it should occur.

The remainder of this document describes specific Business Continuity Plan details that are of interest to customers and potential customers of Sprint

Workforce Resiliency Overview

Pandemic Planning Overview

Sprint has implemented a pandemic plan that targets a safe and productive work environment for all employees and takes into consideration that absenteeism may be excessive for a period of time.

Sprint's plan allows for flexibility and scalability to adjust to changing events. The plan also incorporates a wide range of strategies that may be implemented by business units while ensuring communication and information sharing on status and success.

A separate plan document is available upon request for Sprint's Pandemic Plan.

Alternate Site and Remote Access Overview

Sprint utilizes information obtained through business impact analysis and risk reduction strategies in order to preserve business functions that are required in the face of a disaster. Depending on the size and scale of the event, Sprint has strategies in place to provide added capacity, alternative work locations and remote access if necessary to retain operations.

Business functions that require alternate sites, geographic redundancy and remote access capabilities are identified proactively and plans are periodically reviewed and revised as necessary in anticipation of any event.

Network Resiliency Overview

As a Mobile Telecommunications Leader, the resiliency of Sprint's network is of paramount interest to our customers.

Network Incident Management Team

Network Services' implementation of the Incident Command System (ICS), stays true to the core principles of ICS. This enables Sprint to leverage this best practice in wide-scale responses, using common terminology and standard organizational structures, to communicate efficiently internally and with customers such as Public Safety agencies as many of these agencies utilize ICS as well. Teams train on and deploy in standard ICS Sections, branches, units and strike teams, and emphasize span of control, comprehensive resource management, and other ICS principles.

Network teams leverage Sprint tools such as Direct Talk units, (off-network unit-to-unit communications) GPS hand held units, camera phones, laptop wireless cards, and smart phones to aid in response communication, situation assessment and resource tracking. The teams also maintain a pool of Satellite phones as a contingency plan to use in restoration. Teams continue to create innovative response tools, such as the unique Satellite backhaul SatCOLTs (Cell on Light Truck) that enable restoration of service when a traditional T1 circuit is not available.

The Network IMT receives notification of an actual or potential situation that requires activation (hurricane, earthquake, regional power outage, other event where business as usual would not resolve the situation), establishes the Emergency Operations Center (EOC), performs an initial overall assessment, establishes monitoring bridge(s), coordinates between agencies impacted by the event, assigns tasks, gathers status information, and performs executive notifications at prescribed times.

Cell Site Disaster Planning

Sprint's priority site restoration plan focuses resources and speeds recovery partly by making sure that existing infrastructure is operating properly under normal circumstances and by having a reaction plan for abnormal circumstances. To accomplish this, Sprint has implemented a detailed preventative maintenance program on site hardware to insure all systems and redundant equipment are in proper working order. Sprint sites are equipped with battery backup. Some sites have fixed generators or fuel cells for additional back-up power. . Sprint maintains a fleet of mobile generator sets, which can be deployed to Sprint service areas.

Cellular Network Disaster Planning

The Sprint wireless networks consist of multiple circuits on various combinations of copper, fiber, and microwave radio systems. Most Sprint hub locations are placed on their SONET bi-directional fiber rings. These rings significantly reduce the chance of network failure due to third party fiber damage, equipment failures, or other potential causes of service interruptions. Sprint's radio network provides significant overlapping coverage areas, which often allow cell sites to fully or partially compensate for a neighboring cell site. Also in an effort to minimize service impact when a site is down, Sprint maintains a fleet of "Cell On Wheels" (COWs), which are portable self-contained cell sites. COWs can be deployed to restore coverage from a damaged site or provide additional capacity in the immediate vicinity of an incident.

Switch Locations Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of our switch locations. These main switch locations currently have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster

recovery issues. Most switches also have tap boxes to readily connect the output of a portable generator in the event of primary generator issues.

Overall Network Performance Management Efforts

The performance of Sprint's networks is monitored 24 hours a day, 7 days per week, 365 days a year by the Network Monitoring Centers (NMCs). In addition, local switching offices staffed by trained technicians and management coordinate with these larger operations centers, to ensure that Sprint's networks are properly maintained and network performance is at expected levels.

Network Restoration Prioritization

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery response teams to establish customer prioritization once the backbone, TSP (Telecommunications Service Priority) and Critical Life Circuits are re-established. Sprint has an established service restoration priority and process.

Special Event Planning

Special events have the potential to adversely impact the customer experience due to the greatly increased traffic demand they place on communications networks. Sprint has a formal mature special events process with dedicated project management personnel and a cross-functional management tool. Teams archive records of recurring special events for future planning, and proactively search for one-time special events and leverage capacity planning teams in implementing enhancements to optimize the customer experience. Sprint has leveraged its experience in managing very large temporary users at NASCAR events in managing special events.

As a specialized type of special event, Sprint also interfaces with the NCS (National Communications System) in managing capacity needs at National Security Special Events, NSSEs.

Information Technology Resiliency Overview

Information Technology Incident Management Team

The IT Incident Management Team (IT IMT) provides timely decision making processes in the declaration of a disaster to ensure the proper decisions are made and communicated across the enterprise. The IT IMT team structure will minimize the disaster declaration time and potentially minimize the length of the event by quickly reacting to the event. The IT IMT is also responsible for maintaining and facilitating the execution of the recovery plans in conjunction with Resource & Priority Management (RPM).

Information Technology Incident Command Centers

The IT IMT Command Center serves as a centralized arena to manage disaster related operations. Recovery personnel execute defined processes and procedures, communicate and provide resources to effectively assess and manage disaster events. The Incident Command Centers are geographically redundant.

Data Center and System Resiliency Planning

The IT IMT is a proactive planning group that works in partnership with peer IMT organizations. The collective team is responsible for the accuracy and integrity of current information in their particular area of responsibility, including internal procedures, available systems, resources, call trees and points of contact. The IT IMT provides personnel with the necessary resources to assist with the restoration process. Sprint-Data Centers are held to exceptionally high and stringent industry, but more importantly, self-imposed standards of structural design, engineering, technology, redundancy, security, maintenance and 24x7 operations. Data Centers are geographically diverse and have the capability to execute an internally developed disaster recovery methodology of Internal Business Recovery (IBR) where on Data Center functions as the recovery site for another Data Center.

IT Network Restoration Prioritization

Critical Applications supporting the internal and external client community have been prioritized based on application impact analysis in order to expedite and control the recovery process. Data required for recovery of operating systems, production libraries, and application systems are backed up regularly and placed in off-site storage.

Emergency Response Team (ERT)

Who is the ERT?

Sprint's ERT is an experienced cross functional group which consists of a national team of full time, dedicated personnel as well as over a thousand of ERT Reservists across the country, that provides wireless telecommunications equipment, infrastructure and personnel operations support to federal, state and local public safety, law enforcement, military agencies and private Sector Organizations during declared emergencies, field training exercises, agency specific short term communication needs and National Special Security Events.

Support for Urgent Crisis Needs

The ERT designs and implements the internal policies and procedures necessary to enable timely and effective deployments of Sprint's products and services. The ERT fully supports high volume, short notice voice and data communication needs of emergency and disaster personnel with its SatCOLTs (Satellite Cell on Light Truck), Satellite IP Equipment, satellite earth station, and inventory of over twenty five thousand handsets and aircards which can be rapidly deployed to support short term communications.

ERT in the EOCs

During a number of recent disasters, reservists staffed State and Local Emergency Operations Centers (EOC) to relay first-hand information back to agencies that rely on critical communications. Having reservist representation at EOC's is valuable for a number of reasons: Reservists provide real time information and status updates to the EOC's on the progress of our network recovery efforts ; Allows State EOC's to provide direction on priority areas for Network restoration; Coordinate information from other critical infrastructure functions, such as Energy/Power and Transportation; and obtain location of FEMA and other emergency responder command posts using Sprint handsets to help plan for influx of capacity needs. The EOC initiative is an example of Sprint's proactive approach during an incident, through partnership, involvement and communications support. Partnering with Emergency Management agencies in cities and counties throughout the United States provides better coordination of Sprint and ERT support resources for Disaster Preparation and Response. Trained ERT Reservists are more actively involved in providing their communities with critical volunteer support. Agencies are able to have a direct channel into Sprint approved support organizations with more expedited response times and capabilities, providing critical communications support when it's needed the most.

ERT has deployed in support of over 4800 deployments supporting federal, state and local public safety, law enforcement, military and enterprise organizations; including 36 Presidential declared disasters since 2002.

Contact us

For more information on Sprint's Emergency Response Team, please visit us at www.sprint.com/ert, become a fan on Facebook at www.facebook.com/SprintEmergencyResponseTeam email us at ERTRequests@sprint.com or for emergency communications support, contact our 24x7x365 ERT Hotline at 1-888-639-0020 or for GETS users 254-295-2220.