

ATTACHMENT B

San Juan County Outage Communications Plan of CenturyLink

INTRODUCTION

This document serves as CenturyLink’s communications plan for use by CenturyLink personnel during certain outages in San Juan County (“San Juan County Outage Communications Plan” or “SJCOCP”). The SJCOCP also provides the Commission, San Juan County emergency management officials and the public an understanding of the communications to expect from CenturyLink in the event of a covered outage of telephone service in San Juan County. The procedures set forth in the SJCOCP are intended to explain CenturyLink’s communications procedures but are not intended to limit CenturyLink’s ability or prerogative to communicate with the Commission, emergency management officials and/or the public in other ways and at other times not specified in the SJCOCP.

GOAL/OBJECTIVE

The goal of the SJCOCP is for CenturyLink to make information about a major outage of telephone service in San Juan County available to the people who need to know that is as timely and accurate as reasonably possible so that they can plan for and adapt to the effects of the outage.

INCORPORATION BY REFERENCE

The parties involved in helping CenturyLink develop the SJCOCP concluded that any procedures established in a statewide outage communications plan should also apply to San Juan County and that, therefore, the outage communications plan for San Juan County should consist of the statewide outage communications plan with procedures for disseminating information that are unique to San Juan County appended to it. Accordingly, this SJCOCP incorporates by reference CenturyLink’s statewide outage communications plan that is Attachment A to this compliance filing.

SAN JUAN COUNTY

San Juan County's nearly 16,000 residents (as of 2015) live on a collection of 32 inhabited islands, with no road connections to the mainland or between islands. The Washington State Ferries operated by the Washington State Department of Transportation (WSF) transport passengers and vehicles to and among the four most populous islands: San Juan, Orcas, Lopez

and Shaw. Large equipment or goods that are forbidden on WSF are moved by one of three barges serving the entire county.

CenturyTel of Inter Island d/b/a CenturyLink (Inter Island) provides wireline voice service in San Juan County. In 2013, the failure of a submarine cable providing Inter Island's only connection to the mainland resulted in an outage that left Inter Island's subscribers unable to connect to the mainland by wireline phone for ten days. Since that outage, Inter Island has repaired the submarine cable and has installed a microwave radio that provides a redundant connection to the mainland and that greatly reduces the chances Inter Island voice customers will be isolated from the mainland.

Almost everywhere in Washington where CenturyLink is the Incumbent Local Exchange Carrier (ILEC), CenturyLink serves less than 25% of the homes and businesses it passes. San Juan County is an exception. Inter Island is the only ILEC in San Juan County and, as of the end of 2013, it served more than 12,000 access lines in San Juan County, which constitutes a service penetration rate much higher than 25%. In the five years since 2009, ILEC access line counts statewide declined 34%; in San Juan County, they declined only 8%. This data suggests San Juan County depends far more on Inter Island's ILEC voice service than Washingtonians as a whole depend on ILEC service.

COMMUNICATIONS PROCEDURES UNIQUE TO SAN JUAN COUNTY

Because of the unique nature of San Juan County and its high dependence on Inter Island, CenturyLink's communications procedures include the following in addition to the procedures set forth in CenturyLink's Statewide Outage Communications Plan.

1. CenturyLink will make a reasonable effort to personally notify the E911 Dispatcher on duty at the San Juan County Sheriff's Office of any major outage and any other single outage affecting more than 250 voice grade equivalents (VGE). The employee will provide the E911 Dispatcher a copy of an Outage Status that appears as Appendix A to this SJCOCP.¹
2. If the duration of a major outage exceeds 4 hours or the duration of a single outage of more than 250 VGE exceeds 12 hours, CenturyLink will use the "outage@sanjuandem.net" email address to notify key local personnel and decision

¹ CenturyLink will endeavor to provide prompt and accurate notice. In some circumstances—the middle of the night for example—notice may be by telephone. In instances of multiple outages—caused by, for instance, strong winds, heavy rain, or earthquake—CenturyLink will provide a single notice that it is experiencing multiple outages. The data shown in Appendix A will be delivered as soon as reasonably possible within 24 hours.

makers by email and include in the email a copy of an Outage Status that appears as Appendix A to this SJCOCP. If CenturyLink determines that email communication with the San Juan County Emergency Management Director (SJCEMD) was unsuccessful (such as notification of e-mail delivery failure), the employee will attempt to contact the SJCEMD by telephone. If telephone communication with the SJCEMD is unsuccessful, the employee will make a reasonable attempt, under the circumstances, to contact the SJCEMD in person.

3. A CenturyLink employee will make a reasonable attempt to provide the E911 Dispatcher and SJCEMD updates concerning the outage twice daily at the beginning and ending of each day until service is restored and notice when service is restored.
4. In the case of a single outage affecting more than 500 VGE with a duration exceeding 48 hours, CenturyLink will make a reasonable attempt to cause to be posted a written notice about the outage at a conspicuous location on all of the four WSF-served islands affected by the outage. The notice will include pertinent information such as that found on the outage notice and status appearing in Appendix A of this SJCOCP. The location for posting the notice on each island is set forth in Appendix B of this SJCOCP. The CenturyLink network operations supervisor for San Juan County will consult annually in December with the SJCEMD about the need to change the posting location of the notices and will update Appendix B to this SJCOCP before February 1 of each year.
5. For major outages lasting (or expected to last) more than 48 hours and for smaller outages as recommended by the SCJEMD:
 - a. CenturyLink will make a reasonable attempt to cause to be posted a written notice about the outage at a conspicuous location on all of the four WSF-served islands affected by the outage. The notice will include pertinent information such as that found on the outage notice and status appearing in Appendix A of this SJCOCP. The location for posting the notice on each island is set forth in Appendix B of this SJCOCP. The CenturyLink network operations supervisor for San Juan County will consult annually in December with the SJCEMD about the need to change the posting location of the notices and will update Appendix B to this SJCOCP before February 1 of each year.
 - b. CenturyLink will host daily conference calls. The invitation list for these calls is set forth in Appendix C to this SJCOCP. The CenturyLink network operations supervisor for San Juan County will consult annually in December with the SJCEMD about who should be added to and removed from the invitation list and will update Appendix C to this SJCOCP before February 1 of each year.

- c. CenturyLink will update local media directly of outage using the CenturyLink Corporate Communication maintained distribution list, and provide updates at a minimum of every 12 hours.
- 6.** For major outages lasting (or expected to last) more than 72 hours:
- a. CenturyLink will establish a website providing available information about the outage that that CenturyLink reasonably believes to be accurate. Information on the website will be updated at least every 12 hours. CenturyLink will notify local media of the website.
 - b. CenturyLink will establish a local telephone number with recorded information about the outage. Information on the recording will be updated a least every 12 hours. CenturyLink will notify local media of the recording.
 - c. CenturyLink will hold community meetings on all of the four major island(s) experiencing the outage. The SJCEMD may recommend emergency services organizations that could host such community meetings and effective means of notifying the public of the meetings.

Appendix A

CENTURYLINK			
OUTAGE NOTIFICATION AND STATUS			
<input type="checkbox"/>	1ST Notification	Date:	Time:
<input type="checkbox"/>	Update	Date:	Time:
1.	Type of Service Impacted	<input type="checkbox"/> E911 <input type="checkbox"/> Voice Toll <input type="checkbox"/> Voice Long Distance <input type="checkbox"/> Voice Local <input type="checkbox"/> Internet	
2.	Island Impacted	<input type="checkbox"/> San Juan <input type="checkbox"/> Orcas <input type="checkbox"/> Lopez <input type="checkbox"/> Other	
3.	Number of Customers Affected		
4.	Location of Outage		
5.	Cause of Outage		
6.	Estimated Time to Repair		
7.	Additional Information		

Appendix B

Locations for posting notices of telephone service outages in San Juan County

Outage on	Posting Location
San Juan Island	King's Market , 160 Spring St. W, Friday Harbor
Orcas Island	Island Market , 469 Market St., Eastsound
Lopez Island	Lopez Village Market , 162 Weeks Road in Lopez Village
Shaw Island	Shaw Island Community Center

Appendix C

Invitees to daily conference calls regarding telephone service outages in San Juan County

Outage Occurring On	Conference Call Invitees
Any island	<ul style="list-style-type: none">• San Juan County E911 Dispatcher• San Juan County Sheriff's office• Director of San Juan County/Town of Friday Harbor Department of Emergency Management
San Juan Island	
Orcas Island	
Lopez Island	
Shaw Island	
Decatur Island	
Blakely Island	