



**Sprint Nextel**  
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**Kristin L. Jacobson**  
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STATE OF WASHINGTON  
UTILITY AND TRANSPORTATION  
COMMISSION

July 25, 2006

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, WA 98504-7250

**Re: Eligible Telecommunications Carrier Certification and  
Annual Report of Sprint Nextel Corporation ("Sprint") (UT-063052)**

Dear Ms. Washburn:

Enclosed, please find ten (10) copies each of the "Eligible Telecommunications Carrier Certification and Annual Report on Behalf of Sprint Nextel Corporation" (UT-063052), in original and redacted versions. Please note that some of the information included therein is confidential network information as provided in RCW 80.04.095, and includes confidential network outage information that is exempt from public disclosure under Exemption 4 of the Freedom of Information Act, 5 U.S.C § 552(b)(4). The aforementioned information is marked as confidential within the filing.

Feel free to contact me with any questions or concerns you may have regarding this filing.

Sincerely,

Kristin L. Jacobson

Enclosures

BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION  
OF THE STATE OF WASHINGTON

) Docket No. **UT-063052**  
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**ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION  
AND ANNUAL REPORT ON BEHALF OF  
SPRINT NEXTEL CORPORATION**

BEFORE THE PUBLIC UTILITIES AND TRANSPORTATION COMMISSION  
OF THE STATE OF WASHINGTON

) Docket No. **UT-063052**  
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**I. INTRODUCTION**

In accordance with the standards and requirements established by the Washington Public Utilities and Transportation Commission ("Commission"),<sup>1</sup> Sprint Nextel Corporation (formerly Sprint Corporation) d/b/a Sprint PCS, SprintCom, Inc., Sprint Spectrum, L.P., and WirelessCo., L.P. (collectively "Sprint Nextel") submits this Annual Report, and respectfully requests the Commission certify its eligibility for high-cost support from the federal universal service fund for calendar year 2007.

**II. BACKGROUND**

Sprint Nextel was designated as an eligible telecommunications carrier ("ETC") in certain areas served by Qwest Corporation and Verizon Northwest Inc., by the Commission in Docket No. UT-031558 on October 29, 2003 ("Non-Rural Order"). In Docket No. UT-043120, dated January 13, 2005 ("Rural Order"), the Commission also designated Sprint Nextel as an ETC for the portions of its licensed service area that coincide or overlap, in whole or in part, with the exchange areas served by the following rural telephone companies: United Telephone

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<sup>1</sup> In the Matter of Amending WAC 480-129-399, and Adopting WAC 480-123-020 through WAC 480-123-080, and WAC 480-123-999, Relating to Designation and Certification of Eligible Telecommunications Carriers, Order Amending and Adopting Rules Permanently, Docket No. UT-053021, General Order No. R-534 (June 28, 2006) ("*ETC Certification Order*").

Northwest; Asotin Telephone Company, CenturyTel of Washington, Inc., CenturyTel of Inter-Island Inc., Ellensburg Telephone Co., Hat Island Telephone Co., Hood Canal Telephone Co., Inland Telephone Co., Kalama Telephone Co., Lewis River Telephone Co., McDaniel Telephone Co., Mashell Telecom, Inc., St. John Telephone Co., Tenino Telephone Co., Toledo Telephone Co., Inc., Whidbey Telephone Co., and YCOM Networks, Inc. The areas for which Sprint Nextel is designated as an ETC in Washington are referred to as Sprint Nextel's "Designated Areas."

In August of 2005, Sprint Corporation, which provided wireless service using CDMA technology, merged with Nextel Communications, which provided wireless service using iDEN technology. As a result of this merger, Sprint Nextel now provides service in Washington over two networks, and two technology platforms. Sprint Nextel's operations as an ETC in Washington have been limited to its CDMA operations, and it receives universal service support only for customers served by the operating entities that provide service using CDMA technology. As a result, this filing relates only to Sprint Nextel's CDMA network.<sup>2</sup>

Sprint Nextel addresses each of the new annual filing requirements in order, and with appropriate references to Attachments, some of which are being filed under seal.

### **III. SPRINT-NEXTEL'S ANNUAL FILING**

Pursuant to WAC 480-123-060(2), the Commission will certify an ETC's use of federal high-cost universal service fund support, pursuant to the Federal Telecommunications Act, only if the ETC complies with the requirements in WAC 480-123-070, and the ETC demonstrates that it will use federal high-cost funds only for the provision, maintenance, and upgrading of facilities

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<sup>2</sup> If Sprint Nextel seeks to begin receiving support for customers served by operating entities that provide service using iDEN technology, it will make an appropriate filing with the Commission.

and services for which the support is intended through the requirements of WAC 480-123-080. As demonstrated and certified below, Sprint Nextel satisfies the requirements of WAC 480-123-070 and WAC 480-123-080. Sprint Nextel requests that the Commission certify to the Federal Communications Commission (“FCC”) and USAC the Company’s eligibility to receive federal universal service support in accordance with 47 C.F.R. §§ 54.313 and 54.414.

**A. 2005 Report on Use of Funds and Benefits to Customers**

WAC 480-123-070(1) requires an ETC to annually provide a report on the use of federal funds and describe the benefits that resulted to customers. The report must substantively describe the investments made and expenses paid with support from the federal high-cost fund. Furthermore, the report must substantively describe the benefits to customers that resulted from the investments and expenses. **Confidential Attachment 1** contains information for the time period January 1, 2005 through December 31, 2005, regarding the amount of high-cost federal universal service funding received, the specific location and cost of network improvements, and the population impacted by those improvements.

During 2005 Sprint Nextel added 21 cell sites to its CDMA network<sup>3</sup> in its combined rural and non-rural Designated Areas. As reflected in **Confidential Attachment 1**, high cost universal service funding contributed towards a portion of these sites as well as upgrades to sites currently “On-Air”. These additions were made to either expand the network footprint or improve coverage in its serving area. Based in part on these new sites, Sprint Nextel’s CDMA network covered **\*\*Begin Confidential** **End Confidential\*\*** pops at the end of 2005 versus **\*\*Begin Confidential** **End Confidential\*\*** pops at the end of 2004, which is a

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<sup>3</sup> Sprint Nextel’s CDMA network included some areas in which Ubiquitel Inc. operated Sprint Nextel licenses. Ubiquitel became a wholly owned subsidiary of Sprint Nextel in 2006.

1.9% increase in the total number of potential customers covered in Sprint Nextel's Designated Areas. The increase in coverage is also reflected by the fact that the percentage of the population covered in the Designated Areas increased from **\*\*Begin Confidential** **End Confidential\*\***. These investments also improved the quality of the network, as both the percentage of dropped calls and the percentage of blocked calls decreased from the end of 2004 to the end of 2005.

**B. Local Service Outages in 2005**

Pursuant to WAC 480-123-070(2), an ETC is required to make an annual filing of "local service outages" by providing a report detailing information on every local service outage 30 minutes or longer in duration experienced by the ETC. The report must include: (1) the date and time of onset and duration of the outage; (2) a brief description of the outage and its resolution; (3) the particular services affected, including whether a public safety answering point (PSAP) was affected; (4) the geographic areas affected by the outage; (5) steps taken to prevent a similar situation in the future; and (6) the estimated number of customers affected.<sup>4</sup>

This information, for the time period January 1, 2005 through December 31, 2005, is contained within **Confidential Attachment 2**.

**C. Unfulfilled Requests for Service in 2005**

WAC 480-123-070(3) requires an ETC to annually report the number of requests for service from applicants within the ETC's designated area that were unfulfilled for the reporting period. The ETC must also detail how it attempted to provide service to those applicants. Sprint Nextel has no unfulfilled requests to report for 2005.

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<sup>4</sup> The Company cannot know for certain how many of its subscribers are affected (or potentially affected) by an outage, and so has estimated this by multiplying the number of sites that were out of service by the number of total subscribers served by high-use sites in the service area.

**D. Complaints Per 1000 Handsets or Lines in 2005**

Pursuant to WAC 480-123-070(4), an ETC is required to provide separate totals for the number of complaints, per 1000 handsets or lines, made to the Federal Communications Commission ("FCC"), or the Consumer Protection Division of the Office of the Attorney General of the State of Washington during the past calendar year. The report must also describe the nature of the complaints and the outcome of the ETC's efforts to resolve the complaints. This information, for the time period January 1, 2005 through December 31, 2005, is contained within **Confidential Attachment 3**.

**E. Certification Regarding Applicable Service Quality Standards and Consumer Protection Rules**

WAC 480-123-070(5) requires an ETC to certify that it met substantially the applicable service quality standard found in WAC 480-123-030(1)(h). For a wireless ETC, a commitment to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code, as it existed on September 9, 2003, meets this requirement. Sprint Nextel certifies that it met substantially the CTIA Consumer Code, as it existed on September 9, 2003, and commits to continued compliance with those standards. As a signatory to the Consumer Code, Sprint Nextel demonstrates to CTIA its compliance with the Consumer Code on an annual basis in order to be authorized to display the CTIA Seal of Wireless Quality/Consumer Information. A copy of CTIA's most recent certification issued to Sprint Nextel is **Attachment 4**.

**F. Certification Regarding Ability to Function in Emergency Situations**

WAC 480-123-070(6) requires an ETC to annually certify that it has the ability to function in emergency situations based on continued adherence to WAC 480-123-030(1)(g). For a wireless carrier, WAC 480-123-030(1)(g) requires information that demonstrates a wireless carriers ability to remain functional in emergency situations including information that

demonstrates it has at least four hours of back up battery power at each cell site, back up generators at each microwave hub,<sup>5</sup> and at least five hours back up battery power and back up generators at each switch.

Except as set forth in the paragraph below, Sprint Nextel certifies that it currently meets the standards set forth in WAC 480-123-030(1)(g). In addition, **Attachment 5** is a copy of the Sprint Business Continuity Program Overview. The Business Continuity Program is the framework in which Sprint Nextel sets policies for network resiliency, the development and conduct of emergency preparedness exercises and the formation of the Emergency Response Team.

Sprint Nextel has one microwave hub in Washington that does not have an on-site generator. This hub is located in North Bend, and is a hub for four microwave satellite sites. Sprint Nextel is researching whether there is space for a generator at this location, or whether the Company could obtain approval under its lease or zoning laws to place a generator. This microwave hub does maintain 4 hours of backup battery power, and Sprint Nextel will increase that to 12 hours by November 1, 2006. In addition, the Company will explore whether it is feasible to place a generator at that location based on the limitations that exist. In the meantime, Sprint Nextel seeks a waiver of the strict requirement contained in WAC 480-123-030(1)(g) as applied to this microwave hub. Sprint Nextel will report to the Commission in its July 31, 2007, annual report regarding this issue, and will seek any necessary further waivers at that time.

Based on the above, and subject to the limited waiver it has requested, Sprint Nextel certifies that it has the ability to function in emergency situations based upon these standards.

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<sup>5</sup> WAC 480-123-070(6) does not define the term "microwave hub." Sprint Nextel defines a microwave hub as a location responsible for back-haul associated with four or more microwave satellite sites.



**G. Certification Regarding Advertising of Telephone Assistance Programs, Including Advertisement on Indian Reservations**

WAC 480-123-070(7) requires an ETC to annually certify that it has publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. The publicity should include advertisements likely to reach those who are not current customers of the ETC within its designated service areas.

Sprint Nextel advertises its Lifeline and Link Up programs program quarterly in newspapers within its Designated Areas. Sample advertisements are within **Attachment 6**. In the third quarter of 2006 Sprint will make available to state agencies flyers to be distributed to their offices to try to reach additional potential Lifeline and Link Up customers.

Based upon the above, Sprint Nextel certifies that it has publicized the availability of its telephone assistance programs in accordance with WAC 480-123-070(7).

**H. Annual Plan for USF Expenditures**

WAC 480-123-080 requires an ETC to annually report on the planned use of federal support that will be received during the period of October 1 of the current year through the following September; or the planned investment and expenses which the ETC expects to use as the basis to request federal support from any category in the high cost fund. The report must include a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers. This information, for the time period October 1, 2006 through September 30, 2007, is contained within **Confidential Attachment 7**.

Based on the Company's most recent line counts and the per-line support projections of the Universal Service Administrative Company ("USAC"), Sprint Nextel currently estimates that it will receive approximately \$3,100,000 in federal high-cost universal service support during the period covered by this annual plan. The actual amount of high-cost universal service support received by the Company may vary from this estimate as universal service funding levels and subscribership change over time. In addition, if these anticipated amounts are not received, Sprint Nextel reserves the right to modify its annual plan accordingly.

Sprint Nextel's anticipated investments in the Designated Areas will allow it to add new cell sites which will expand the footprint of its network and maintain the same high level of service by filling in gaps, improving in-building coverage, and increasing capacity. **Confidential Attachment 7** provides detail of the population affected by the improvements, and whether each improvement will increase capacity, coverage and/or signal strength in an area. Sprint Nextel will use federal high-cost universal service support to assist it in completing these improvements between October 1, 2006 and September 2007. The map within **Confidential Attachment 7** shows the new cell sites included within the Company's Annual Plan.

The selection of these projects is based on the Sprint Nextel's evaluation of many factors, including current consumer demand, competitive forces, available capital, and others. As these factors change, the Company's annual plan may be modified. In addition, forces beyond the Company's control (for example, zoning issues related to cell site placement) may result in modifications to planned projects or timelines. As a result, the content and timing of the projects in **Confidential Attachment 7** is subject to change.

**IV. CONCLUSION**

Based on the foregoing information, Sprint Nextel, respectfully requests the Commission to certify to the FCC and USAC its eligibility to receive federal universal service support in accordance with 47 C.F.R. §§ 54.313 and 54.414.

Dated: July 26, 2006.



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Kristin L. Jacobson  
Counsel, Sprint Nextel  
Regulatory Affairs West Region  
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San Francisco, CA 94105-1855  
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Fax: (415) 278-5303

BEFORE THE PUBLIC UTILITIES AND TRANSPORTATION COMMISSION  
OF THE STATE OF WASHINGTON

) Docket No. **UT-063052**  
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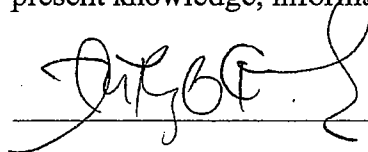
**CERTIFICATION**

The undersigned, Anthony G. Krueck, does hereby certify as follows:

I serve as Vice President Product Development and Management for Sprint Nextel Corporation.


This certification is submitted in support of the Company's Annual Filing as Required by General Order No. R-534 in Docket No. UT-053021 ("Annual Filing").

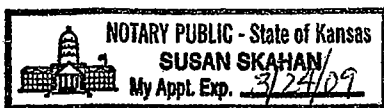
I have reviewed the Annual Filing and the facts stated therein, of which I have personal knowledge, are true and correct to the best of my present knowledge, information and belief.

  
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Subscribed and sworn to before me  
this 26<sup>th</sup> day of July, 2006.

(NOTARY SEAL)

  
\_\_\_\_\_  
Notary Public





**CONFIDENTIAL ATTACHMENT 1**

**2005 Report on Use of Funds**

**Entire Attachment Redacted**

**THE INFORMATION CONTAINED IN CONFIDENTIAL ATTACHMENT 1  
CONTAINS CONFIDENTIAL COST, FINANCIAL, AND NETWORK INFORMATION  
THAT IS VALUABLE COMMERCIAL INFORMATION AS PROVIDED IN RCW  
80.04.095.**



**CONFIDENTIAL ATTACHMENT 2**

**Local Service Outages in 2005**

**Entire Attachment Redacted**

**THE INFORMATION CONTAINED IN CONFIDENTIAL ATTACHMENT 2 CONTAINS CONFIDENTIAL NETWORK INFORMATION THAT IS VALUABLE COMMERCIAL INFORMATION AS PROVIDED IN RCW 80.04.095. IN ADDITION, NETWORK OUTAGE INFORMATION FILED WITH THE FEDERAL COMMUNICATIONS COMMISSION IS CONFIDENTIAL AND EXEMPT FROM PUBLIC DISCLOSURE UNDER EXEMPTION 4 OF THE FREEDOM OF INFORMATION ACT, 5 U.S.C. § 552(b)(4). SEE NEW PART 4 OF THE COMMISSIONS RULES CONCERNING DISRUPTIONS TO COMMUNICATIONS, 19 FCC RCD 16830, 16853-55 ¶¶ 41-44 (2004) (“The record in this proceeding, including the comments of the Department of Homeland Security, demonstrate that the national defense and public safety goals that we seek to achieve by requiring these outage reports would be seriously undermined if we were to permit these reports to fall into the hands of terrorists who seek to cripple the nation’s communications infrastructure.”) SEE ALSO 47 C.F.R. § 4.2.**





**CONFIDENTIAL ATTACHMENT 3**

**Complaints Per 1000 Handsets or Lines in 2005**

**Entire Attachment Redacted**

**THE INFORMATION CONTAINED IN CONFIDENTIAL ATTACHMENT 3  
CONTAINS VALUABLE COMMERCIAL INFORMATION AS PROVIDED IN RCW  
80.04.095.**



**ATTACHMENT 4**

**CTIA Certification Letter**





Expanding the Wireless Frontier

Steve Largent  
President

March 29, 2006

Ms. Luisa L. Lancelli  
Vice President  
Government Affairs – Wireless Regulatory  
Sprint Nextel  
401 Ninth Street, Suite 400  
Washington, DC 20004

Dear Luisa:

Congratulations! This letter is to notify you that Sprint Nextel has completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period September 9, 2005 – September 9, 2006, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint Nextel is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of Sprint Nextel review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Attached are two specimens (color and black/white) of the Seal for Sprint Nextel's use on its website or collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Andrea Williams, CTIA's Assistant General Counsel, at (202) 736-3215 or [awilliams@ctia.org](mailto:awilliams@ctia.org).

CTIA commends Sprint Nextel for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with Sprint Nextel on this important industry initiative.

Sincerely,

Steve Largent

Attachments (2)



1100 15th Street, NW Suite 500 Washington, DC 20004 Direct 202.739.3204 Fax 202.739.3232 [www.ctia.org](http://www.ctia.org)



Expanding the Wireless Frontier

## SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

### LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the CTIA Consumer Code for Wireless Service and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the CTIA Consumer Code for Wireless Service Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the CTIA Consumer Code for Wireless Service.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the CTIA Consumer Code for Wireless Service.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.



1400 16th Street, NW Suite 800 Washington, DC 20036 Main 202.785.2587 Fax 202.785.0791 [www.ctia.org](http://www.ctia.org)

**ATTACHMENT 5**

**Sprint Business Continuity Program Overview.**







# Sprint Business Continuity Program Overview

This document may not be duplicated, modified, used by or disclosed to a third party without the prior express written consent of Sprint Nextel Corporation.



## Disclaimer

This document may not be duplicated, modified, used by or disclosed to a third party without the prior express written consent of Sprint Nextel Corporation.

### 1. 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 and Disaster Response. This document will explain the core components of the Sprint Business Continuity Program and the structure by which it is implemented.

### 2. Communication Tiers

In order to share pertinent Business Continuity and Disaster recovery information to a variety of external parties, Sprint has created three layers of BCP/DR external communications. This Tier approach will allow Sprint to be effective in communicating the right level of detail yet protect the company from sharing proprietary information. This document is considered Tier 1.

### 3. Business Continuity Program Mission

To optimize the continuation of the company's mission critical processes and services when faced with significant business disruptions while minimizing financial impact and damage to Sprint's brand, its employees, and customers.

### 4. 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. This program includes a collection of business resumption and disaster response plans that are designed to ensure the company has implemented cost effective risk reduction strategies for crucial assets such as employees, network components, processes, and facilities.

### 5. Program Structure Overview

The corporation has established a structure that is designed not only for the purposes of impact assessments and decision making during an event, but also includes teams and committees dedicated to analyzing and assessing business risks as well as establishing the strategic direction for mitigating these risks.

**Executive Command Team (ECT)** - The ECT consists of executives representing all critical Sprint functions. The ECT is the executive sponsor of the overall business continuity program. The ECT approves all policies, guidelines, strategies, and initiatives both proactively and also during a disaster.

**Officer Business Continuity Committee (OBCC)** - The OBCC consists of Vice President level individuals who oversee the implementation of the business continuity program across the company to assure overall compliance with program objectives, review collaborative and cost effective risk reduction recommendations, align key stakeholders around approved implementation strategies and priorities, and provide guidance to the BCO and the Business Continuity Committee.

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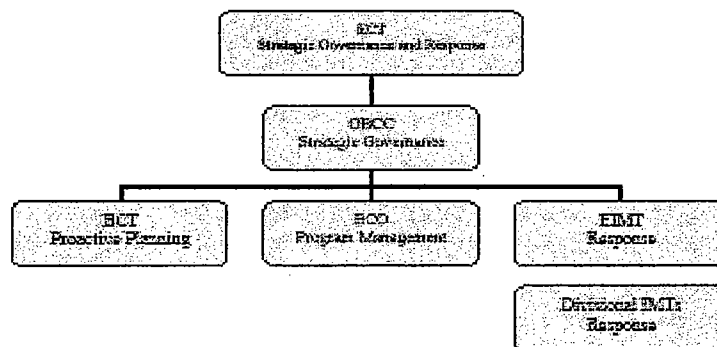
**Business Continuity Office (BCO)** - The BCO is the program office responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide Continuity and Disaster Response Plans. During an incident, the BCO is responsible for coordinating cross functional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

**Business Continuity Teams (BCTs)** - BCTs develop business continuity plans and execute these plans and crisis procedures in the event of a business disruption. The BCTs are organized to represent all business areas at Sprint: Network Services, IT Services, Business Solutions, Consumer Solutions, and Corporate Function teams (Human Resources, Facilities, Security, Corporate Communications, Legal, Supply Chain Management and Finance). Sprint's Emergency Response Team (ERT) is a customer facing team that provides support services to communities and government agencies in need of temporary communications, providing priority access and handsets during widespread events.

**Enterprise Incident Management Team-** The Enterprise Incident management Team (EIMT) convenes quickly to provide the logistical support required to respond to and recover from an incident in an expeditious manner. Once an event has been declared a disaster, the EIMT transitions to an Incident Command System (ICS) structure. Sprint utilizes ICS as the recognized response system for providing restoration of the network and critical business process recovery. The EIMT has the most current status regarding internal response and recovery efforts. This team is intended to be an implementation support organization for all divisions within the company, to provide the necessary resources to assist with the restoration efforts.

**Incident Management Team-** Sprint has incident management teams in all major divisions. The divisional IMTs are responsible for coordinating disaster response efforts within their respective departments. All IMTs have an IMT chair that will represent their department on the EIMT to provide status updates as well as present any issues that may require corporate guidance, support, and escalation.

Corporate Structure Diagram



6. Corporate Business Continuity Program Implementation

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In implementing the Business Continuity Program, Sprint uses practices as defined by the industry common body of knowledge. FEMA, Business Continuity Institute (BCI), Disaster Recovery Institute International (DRII), and the American National Standards Institute (ANSI) have endorsed this methodology. Components of the program include:

- Program Initiation
- Risk Identification & Assessment
- Risk Reduction
- Plan Building
- Develop and Conduct Exercises
- Training and Awareness
- Sustainability and Process Improvement
- Program Performance Reporting

#### 6.1 Program Initiation

During this timeframe the business continuity scope, project plan, and deliverables are determined by the Business Continuity Teams and other stakeholders involved in the program. Kick-off meetings are conducted to familiarize management and employees within the business unit of the purpose of the program. Division leads send out formal written communication that acknowledges their support and sponsorship of Business Continuity and outlines the expectation of support from all of their respective organization's associates in meeting key BCP objectives.

#### 6.2 Risk Identification & Assessment

This phase includes performing Business Impact Assessments and Location Risk Assessments. The process involves identifying significant exposures that can, if not addressed, adversely impact Sprint's ability to perform its critical processes.

#### 6.3 Risk Reduction

This portion of the process focuses on investigating cost effective measures by which the company can minimize impact to identified exposures. Mitigation strategies are documented and reviewed for approval.

#### 6.4 Plan Building

Building and maintaining detailed plans is an integral part of Sprint's continuity strategy. This phase includes documenting contact information and task lists required to mobilize and recover critical business processes and systems during a crisis event. Sprint's plans include: Business Resumption Plans, Disaster Recovery Plans and Incident/Crisis Management Plans. Plans are kept current and relevant by reviewing and updating annually or if any of the previously mentioned triggers occur.

#### 6.5 Develop and Conduct Exercises

The BC Program routinely conducts exercises to evaluate plans, educate personnel, and to test functions and operational capability of Sprint's Internal Emergency Operating Centers. Sprint conducts exercises routinely to validate plans and train employees. Information related to these exercises is proprietary to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in many coordinated situation drills with FEMA, the Department of Homeland Security, and state emergency management agencies to ensure our coordinated preparedness and response during a disaster. The most common types of exercises conducted are: Table Top, 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.

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#### **Walk-Through Drills**

Both management and the response team perform their emergency functions within the emergency response location.

#### **Functional Drills**

These drills are designed to test specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. In most cases, these functions should always be tested separately to help identify improvement areas and to eliminate confusion. Outside 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 usually involve the entire disaster team, management, field operations, and outside agencies. During the simulated exercise, team members are expected to actually perform their disaster responsibilities.

### **6.6 Training and Awareness**

To ensure all employees are aware of the program and prepared for a crisis event, Sprint has a formal Business Continuity training and awareness program. Sprint utilizes the internal training organization, Sprint University, to develop a variety of training resources for Sprint associates. Company training and awareness resources include online training, a corporate continuity website, and orientation and educational sessions. These sessions are regularly scheduled discussion seminars that provide information, answer questions, and identify needs and concerns from employees.

### **6.7 Sustainability and Process Improvement**

The Business Continuity Program is considered an ongoing and ever evolving initiative. Company-wide After Action Reviews (AAR) are hosted by professional facilitators from the Sprint University. In addition, individual departments will host AAR sessions. Information from these reviews is used to improve efficiency of business continuity and disaster response processes. Lessons learned, exercise results, or major organizational changes are all examples of triggers that would cause Sprint to re-evaluate existing procedures and modify them for optimal response.

### **6.8 Performance Reporting**

The Business Continuity Office reports to Sprint's Executive Management and the Board of Directors, on an annual basis, regarding the status of the Sprint's Business Continuity Program and Sr. Management's overall assessment of risk to the organization. Sprint has an internal Maturity Model for benchmarking Business Continuity Program success and progress. In addition, 3rd party auditors have been brought in to measure Sprint's Business Continuity and Disaster Response programs.

## **7. Declaring Company Threat Levels**

Sprint Nextel has defined four incident severity levels with internal triggers to escalate when an incident escalates. These incident severity levels in increasing order are: Business As Usual, Threat, Incident Command and lastly Company Jeopardy.

## **8. EIMT Incident Command Center (ICC)**

The EIMT ICC serves as a centralized incident management center to manage disaster-related response operations. This center is a central work location for EIMT members to join together to manage response and restoration activities. There are two geographically redundant EIMT ICCs, and alternate locations identified as well.



## 9. Network Resiliency Overview

### 9.1 Network Incident Management Team

Network Services' implementation of 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 Priority Connect, Direct Talk units, (off-network unit-to-unit communications) GPS hand held units, camera phones, laptop wireless cards, and Blackberry devices 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.

### 9.2 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 all site hardware to insure all systems and redundant equipment is in proper working order. Sprint sites are equipped with battery backup. This is often enough time to deploy a generator until the power can be restored. Sprint maintains a fleet of mobile generator sets, which can be deployed to all Sprint service areas.

### 9.3 Cellular Network Disaster Planning

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

### 9.4 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.

### 9.5 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.

#### **9.6 Network Restoration Prioritization**

Sprint's Interconnection Solutions team works closely with Sprint Business Solutions (SBS) in establishing the 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.

### **10. Information Technology Resiliency Overview**

#### **10.1 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).

#### **10.2 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.

#### **10.3 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-Nextel 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.

#### **10.4 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.

### **11. Emergency Response Team**

Sprint Nextel's Emergency Response Team (ERT) is an experienced, cross-functional group consisting of a dedicated, full-time core team and hundreds of 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 events and National Special Security Events.

The ERT designs and implements the internal policies and procedures necessary to enable timely and effective deployments of Sprint Nextel's products and services. The ERT fully supports high-volume, short-

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notice equipment needs of emergency and disaster personnel with its portable cellular sites, microwave facilities, and inventory of twenty thousand ruggedized iDEN handsets and 1200 CDMA handsets.

ERT has deployed in support of a number of for Free & for Fee deployments supporting federal, state and local Public Safety, Law Enforcement and Military organizations; including 22 Presidential declared disasters since 2002. Sprint Nextel's ERT supports 4 types of deployments: Disaster Support, Field Training Exercises, Agency Specific Event Support and National Special Security Event support.

#### The EOC Initiative

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 the other critical infrastructure functions, such as Energy/Power and Transportation; and obtain location of FEMA and other emergency responder command posts using Sprint-Nextel 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 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.


**ATTACHMENT 6**

**Sample Advertisements for Lifeline and Link Up**



## Federal Lifeline Notice

Certain low-income Washington residents may be eligible to receive reduced-rate wireless telecommunications service under the Federal Lifeline Program if they satisfy specified eligibility criteria. If you think you qualify, contact Sprint at 1-866-827-3290 for further information.




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**REF #: 2**

**STATE: WASHINGTON**


**PUB: SPOKESMAN REVIEW**

<b>THE STUDIO TERRACHATRAY</b>	DATE/ACTIVITY	STUDIO MANAGER	PROJECT MANAGER	JOB: <b>M0372</b>	CLIENT: <b>SPRINT</b>	FILE: <b>M0372_01_Lifeline_Program_01_04</b>	QA: <b>BRILL</b>	
	REFERENCES	ACT. APPROVAL	ART DIRECTOR	SA: <b>L</b>	PA: <b>BANNIP W</b>	CAM: <b>STREIBT</b>	BLEED: <b>PRINT SCALE 100%</b>	
	COPY/EDITOR	PROOF REVISIONS	PRINTING/PRODUCTION	TRA: <b>8" X 7"</b>	SAFETY:	ROUNDS: <b>0</b>		
	PRINTING/PRODUCTION	PRINTING/PRODUCTION	PRINTING/PRODUCTION	TAGGER: <b>BRILL/TERRACHATRAY</b> / <b>Capri @ 25.0K</b>				
				COLORS: <b>Neon, Magenta</b>				
				FONTS: <b>Helvetica, Helvetica-Bold, Helvetica-Light, Helvetica-Condensed, Helvetica-Condensed-Oblique, Helvetica-Condensed-Bold, Helvetica-Condensed-Oblique</b>				
				DOC PATH: <b>\\msbagn01-25\SPEINT\COMBINA_M0372\001_01_LIFELINE</b>				
				PROGRAM/VERSION: <b>CALLS\M0372_01_Lifeline_Program_01_04</b>				
				DATE: <b>4/14/04 - 1:45 PM</b>				
				NOTE:				



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**STATE: WASHINGTON**

**PUB: SEATTLE TIMES / POST INTELLIGENCER**

THE STUDIO	PROGRAMS	PROGRAM MANAGER	PROJECT MANAGER	<b>JOB# M0372</b> CLIENT: SPRINT BILLING: 1 AD: 4211 TIME: 8:30" 8:45" DESC: PUB: 01 LIFELINE	FILE: M0372_01_LifeLine_Program_ML_ILM SALES: SPRINT ROUND: 6 PAPER: SCALE: 100%
	PROGRAMMER	ADVERTISING	ART DIRECTOR		
	CITY/STATE	PAPER INFORMATION	SHOW/STATION ID		
	PUBLICATION DATE	PUBLICATION TIME	CLASS		
BRAND: SPRINT WIRELESS "OH YEAH" CODES: Blank, Elements FONTS: Helvetica, Interstate Bold, TimesNewLT Light, TimesNewLT-Bold, TimesNewLT-Italic, TimesNewLT-Italic-Condensed, Helvetica				DOC PATH: \\workshop-01\SPRINT\STUDIO\M0372_01_LIFELINE PROGRAMMAN: M0372_01_LifeLine_Program_ML_ILM DATE: 4/15/06 - 1:54:44 PM TEXT:	



**CONFIDENTIAL ATTACHMENT 7**

**ANNUAL PLAN AND MAP**

**Entire Attachment Redacted**

**THE INFORMATION CONTAINED IN CONFIDENTIAL ATTACHMENT 7  
CONTAINS NETWORK PLANNING, COST AND NETWORK DESIGN  
INFORMATION THAT IS VALUABLE COMMERCIAL INFORMATION AS  
PROVIDED IN RCW 80.04.095.**