



RECEIVED
RECORDS MANAGEMENT

03 DEC 18 AM 10:45

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Qwest Corporation
1600 Seventh Avenue Room 3206
Seattle, Washington 98191
Phone 206-345-1568

Mark S. Reynolds
Senior Director
Public Policy

December 17, 2003

Ms. Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA. 98504-7250

Attention: Dave Dittmore Re: UT-031755

Dear Ms. Washburn:

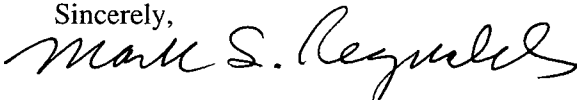
Qwest Corporation herein responds on behalf of Qwest Corporation, Qwest LD Corporation and USLD Communications, Inc. (the companies) to the Commission's November 4, 2003, request for emergency operations information pursuant to WAC 480-120-414(1).

During an emergency, questions from the Commission should continue to be directed to:
Mark Reynolds, Senior Director – Public Policy at 206-345-4341 (or)
Kirk Nelson, President - Washington Public Policy at 206-345-2002.

The companies' emergency response team leader for Washington is Robert Greenwood, Vice President – Local Network Operations at 206-345-3322. The alternate team leader is Bill Vance, Director – Local Network Operations at 206-345-1261.

Enclosed are Qwest Communications International, Inc.'s Disaster Preparedness Overview and Qwest's Corporate Disaster Preparedness Program Summary.

Please direct questions concerning this response to Sue Henson at 206-345-4341.

Sincerely,


Enclosures



Corporate Disaster Preparedness Program Summary

**Qwest Risk Management
Disaster Preparedness Staff
1801 California Street, Suite 2200
Denver, CO 80202**

**Updated: 12/02
Updated: 7/03
Last Updated: 10/03**

The information contained in this document is intended to serve as an overview of Qwest Disaster Preparedness capabilities for use in responding to Request For Proposals and similar documents. This document has not been prepared for any specific product offering. The contents of this documents should not be altered without providing contact information for the source of the changes.

TABLE OF CONTENTS

I. Purpose	3
II. Governance	3
III. Business Continuity/Disaster Recovery Planning.....	3
IV. Emergency Response Responsibilities and Organization	4
V. Emergency Response Process.....	5
VI. Crisis Communications	7
VII. Restoration Priorities.....	8
Appendix A: Corporate Policy - Crisis Management and Communication.....	9
Appendix B: Qwest Disaster Preparedness Compliance Plan	10
Appendix C: Qwest Emergency Response Certification Standards	13

I. Purpose

This document describes the corporate program that Qwest has established for the purpose of planning for, and responding to, emergency situations impacting Qwest services, employees, or assets, and is intended to supplement existing department-level problem management processes.

II. Governance

Qwest's commitment to effective disaster preparedness is reflected in its corporate mandates associated with planning and response standards. The following documents detail specific requirements:

A. Corporate Policy - Sets out requirements for disaster planning and crisis communications. (See Appendix A)

B. Corporate Compliance Plan - Details the specific standards to be used in business continuity/disaster recovery planning and emergency response. (See Appendix B)

C. Emergency Response Certification - Establishes minimum standards for Emergency Response Teams. The standards pertain to staffing, training, exercises, and Emergency Operations Center capabilities. (See Appendix C)

Qwest's Corporate Disaster Preparedness Staff maintains the responsibility for auditing compliance with corporate standards and reporting compliance results to senior management.

III. Business Continuity/Disaster Recovery (BCDR) Planning

A. General

Qwest requires that all business units develop BCDR plans for critical functions. Critical functions include those that directly impact services, generate revenue, enable Qwest to meet legal/regulatory obligations, or provide essential support functions.

B. Planning Elements

Qwest has developed standard BCDR planning components to ensure that plans are consistent and integrated. Qwest uses Strohl Systems LDRPS web-based planning system as a tool that enables the manipulation and rapid dissemination of planning data. The specific planning components are contained in Appendix B.

C. Plan Testing. All plans must be tested annually. Dependent upon the maturity of the plan, tests may be "paper tests", tabletops, or simulations.

IV. Emergency Response Responsibilities and Organization

A. General

Emergency operations will be directed by the organizational entity best suited to identify impacts on the Qwest network and initiate response activities. Responsibility will normally be assumed at the lowest viable operational level, and escalate as appropriate.

B. Responsibilities

Network Operations. Operations Centers for all network services are responsible for implementing established tactical restoration plans and leading tactical response activities. The Centers will monitor network functionality and initiate appropriate network controls in the event of an abnormal network condition. Centers will operate in coordination with the activities of the appropriate Field Operations department or other operational entities.

Regional Emergency Response Teams. Regional Emergency Response Teams (ERTs) are comprised of representatives from all business units that operate or support Qwest operations in each respective geographical area. ERTs are activated following disasters that have a major impact on Qwest services, employees, or assets, and for which a cross-functional, integrated response is required. (See Appendix C for Qwest Emergency Response Certification Standards).

Corporate Emergency Response Team. The Corporate Emergency Response Team is comprised of senior executives representing all business units across the corporation. The Corporate ERT is activated in the event that a Regional ERT requires additional corporate support, or in the event that a disaster is geographically widespread and requires strategic direction and resource allocation.

Corporate Disaster Preparedness Staff. In addition to organizing, training, and exercising all Emergency Response Teams, the Corporate Disaster Preparedness Staff will monitor potential emergency situations and determine whether Emergency Response Team activation is required. Following the activation of an ERT, the Disaster Preparedness Staff and the Emergency Response Team Leader will form the Unified Command with overall responsibility for emergency response activities. This staff is responsible for working with all business units to identify critical functions and develop business continuity plans for those functions.

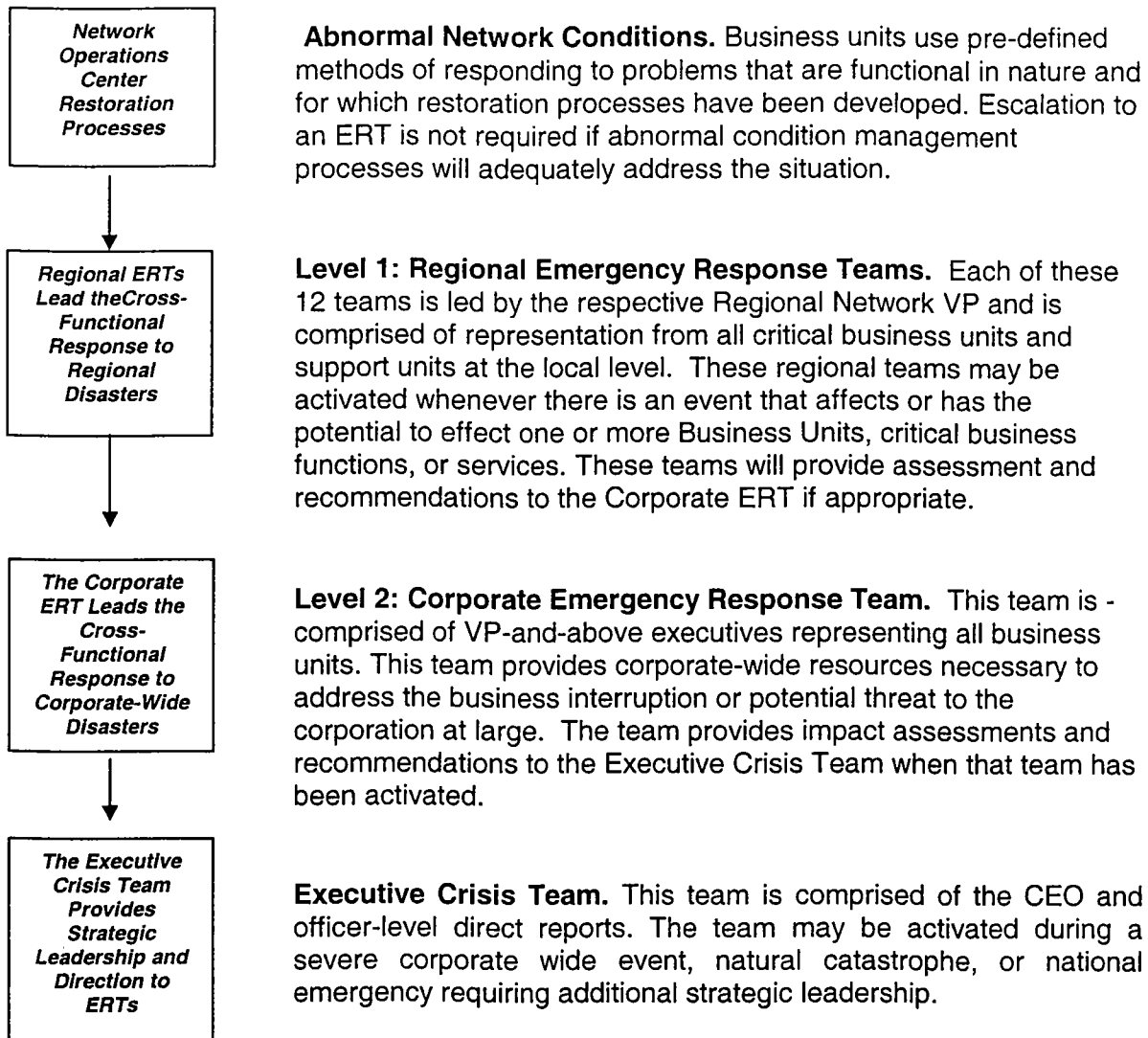
Executive Crisis Team. The Executive Crisis Team is comprised of Officer-level executives that will support ERTs as necessary with strategic direction and corporate resource allocation.

Departmental Unit Business Continuity Managers

Departmental Business Continuity Managers serve as the focal point for both business units and the Qwest Disaster Preparedness Staff on matters regarding the business unit's Business Continuity/Disaster Recovery capabilities and compliance status. These individuals are knowledgeable of their business unit functions and organization, and serve as an interface between continuity planners and Emergency Response Teams.

These individuals also identify business continuity planning needs and provide coaching, training and planning guidance to continuity planners.

C. Emergency Response Structure and Escalation



V. Emergency Response Process

A. Emergency Response Steps are led by Corporate Disaster Preparedness Staff, in conjunction with appropriate Emergency Response Teams.

STEP 1 - Activate appropriate Emergency Response Team(s). The Disaster Preparedness Staff will consult with the Risk Management Threat Assessment Team, impacted Business Unit Leaders, and the appropriate Emergency Response Team Leader to determine whether ERT activation is necessary. If activation is necessary, Corporate Disaster Preparedness will execute the activation process.

STEP 2 - Assess the impacts to Qwest and our customers in order to develop the appropriate recovery strategies. Each business unit is responsible for detailed checklists for internal activities.

STEP 3 - Implement action plans to mitigate or eliminate adverse impacts

- Obtain cost tracking codes and provide to the ERT
- Develop strategies and prioritize schedules for:
 - Phase I - Emergency response
 - Phase II - Short-term recovery
 - Phase III - Long-term reconstitution
- Invoke technical / tactical plans
- Invoke Business Continuity plans
- Invoke event-specific contingency plans
- Verify integration of all business unit plans

STEP 4 - Transition to Normal Operations.

Ensure operations transition to a normal state in a controlled manner by accomplishing the following:

- Give special attention to coordinating and integrating the efforts of each business unit.
- Verify that all facilities are restored and tested prior to assuming that normal operations can be resumed.
- Avoid releasing resources before normal operations have resumed.
- Review contingency plans for all temporary solutions.

STEP 5 - Resolve any identified gaps to improve response processes

Following a Level 1 or 2 event, the Disaster Preparedness Staff will schedule the overall event de-briefing, to be led by the event leaders, for the purpose of reviewing the following aspects of the response operations:

- Restoration activities performed by the teams.
- The adequacy of the Command Center/Emergency Operations Center.
- The effectiveness of the Business Continuity / Disaster Recovery Plans.
- Identify what worked well, and areas for continuous improvement

Based on debriefing results, the Disaster Preparedness Staff will incorporate improvements into overall plans, processes, tools, and work with business units to update their respective business continuity disaster recovery plans.

VI. Crisis Communications.

A. Media Communications. Qwest Corporate Communications is responsible for managing all communications with local/national media.

B. Regulatory Agency Communications. Qwest Public Policy, in conjunction with Qwest Public Relations, will coordinate all communications with regulatory agencies, with the exception of emergency management agencies.

C. Government Emergency Management Agency Communications. The Disaster Preparedness Staff will manage communications with government emergency management agencies in order to ensure that government needs, concerns, and support resources are factored into the overall response process.

D. Customer Communications

Communications with Qwest customers during an emergency situation occurs in several manners. 1) Qwest Business and Government Marketing Departments are represented on all Emergency Response Teams, which is responsible for identifying customer impacts. These marketing departments are responsible for disseminating appropriate information to impacted customers; 2) Qwest may determine that customer information may be effectively disseminated through media outlets. These communications will be managed by Qwest Media Relations; 3) If appropriate, Qwest may recommend that government emergency management agencies Public Information Officers assist in information dissemination; 4) Qwest Customer Call Centers will also receive information necessary to respond to inquiries related to a local emergency.

1. Wholesale Customers: Carrier Repair Center: 800-261-6795

2. Federal Services (Government Customers): 866-354-3993

3. Business Customers -

Large Business Service: 877-375-4448

Small Business Repair: 800-954-1211

Major Account Support Team: 800-524-5249

Data Customers (Frame Relay/ATM): 877-879-9999

Hosting Services: 800-884-3082

4. Residential Customers-Repair: 800-573-1311

D. Internal Employee Communications.

In the event of an emergency situation that necessitates a mass-employee communication throughout the corporation or limited to a geographical region, Corporate Internal Communications will develop and execute messaging via voice mail, e-mail, and toll-free employee emergency information hotlines.

VII. Restoration Priorities

The appropriate Network Operations Center, in coordination with the Emergency Response Team, will establish priorities for the restoration of permanent service at the time of the emergency or disaster as conditions dictate. The ERT will use the following restoration priority sequence, after restoring critical network components required to facilitate the response and recovery effort.

1. Telecommunications Service Priority (TSP)
2. E911 and Emergency Services
3. Business Customers with Restoration Contracts
4. Business and Residential Customers

Appendix A: Corporate Policy - Crisis Management and Communication

Crisis Management and Communications

Policy 104

Qwest reasonably anticipates and manages crisis situations in order to help avoid or reduce the potential adverse effects of the situation.

It is the responsibility of each business unit's management to evaluate the need for crisis management plans and, if a plan is necessary, implement a plan that includes the following elements:

- Processes for implementation and ongoing maintenance, commensurate with risk;
- A process for integration with other business units, as appropriate;
- An educational process including initial coverage and required follow-up;
- Identification of a crisis manager, as appropriate;
- A process for the business unit to evaluate the effectiveness of its plan on a periodic basis; and
- Coordination with specific fire/life safety, evacuation, security and EHS plans.

The Corporate Disaster Preparedness Program establishes the detailed requirements for the Crisis Management/Business Continuity portion of this policy. Questions relating to Crisis Management/Business Continuity should be directed to the designated manager in the business unit responsible for Crisis Management/Business Continuity or to the Disaster Preparedness Hotline (*restricted number*).

In the event of a crisis Corporate and Regional Emergency Response Teams can be activated by calling the Qwest Disaster Recovery (*restricted number*). In addition, Risk Management must be notified of such events as well as events impacting corporate security, safety, environmental issues and other incidents that may require response or that may result in press coverage. Risk Management can be contacted 24x7 via UNICall (*restricted number*). Risk Management will, in turn, contact the appropriate corporate communications spokesperson. A crisis can include, but is not limited to, service emergencies, such as major service outage, fire, flood, significant environmental or safety related incidents or loss of critical data.

To ensure timely and coordinated release of information regarding a crisis, Qwest has appointed spokespersons in Corporate Communications who are the only personnel authorized to discuss crisis situations at Qwest with persons outside the company.

All communication with the media (including press releases and answers to reporters' questions, etc.) must go through these spokespersons. Corporate Communications will handle questions of a company wide nature and approve all press releases.

The following Qwest corporate policies have related information: Company Property - Protection of Assets; Disclosure of Information; Public Speaking; Environmental Issues; Safety and Industrial Hygiene; and Information Security Classification & Use.

Compliance with this policy is mandatory and subject to audit. Failure to comply may result in disciplinary action, up to and including termination of employment.

Questions relating to this policy should be directed to Disaster Preparedness (*restricted number*) or the Corporate Compliance Advice Line (*restricted number*).

Effective: 6/30/00
Revised: 5/29/03

Appendix B: Disaster Preparedness Compliance Plan

General

This document defines the requirements necessary to comply with the Qwest Corporate Policy for Crisis Management and Crisis Communication. It is designed to ensure that Qwest can efficiently restore its most critical functions in the event of a major disruption; it is not intended to apply to all business functions. This Compliance Plan addresses the following areas--

- Business continuity plans that define alternate work processes enabling critical business functions to continue in the event of a business interruption.
- Disaster Recovery plans that define how critical business functions or components are restored following a significant impact.
- Emergency response standards defining the structure and process to be employed in the event of a major disaster requiring an integrated, corporate-wide response.

This Compliance Plan is not intended to duplicate, supercede, or replace any Qwest Risk Management standards relating to Qwest Fire and Life Safety, Security, Environmental, or employee Health & Safety. However, Business Continuity and Disaster Recovery plans are an integral component of Risk Management and should account for these standards as appropriate.

Compliance Requirements:

1. **Crisis Management:** All business units must assign a representative or representatives to serve as a focal point for the Business Unit's Crisis Management activities and act as a primary interface with the Qwest Disaster Preparedness Staff. The scope of these responsibilities is dependent upon the criticality of functions performed by the business unit, and may range from minimal staffing resource to a full-time position. Crisis management responsibilities generally include:

- Identify critical functions/components requiring business continuity or disaster recovery plans.
- Coordinate BC planning efforts for the respective business unit.
- Identify Regional Emergency Response Team members.
- Communicate with Business Unit leadership about status of business continuity and disaster recovery activities.

The Disaster Preparedness Staff will provide each Crisis Manager with support in plan development, coaching, plan testing, and plan reviews.

2. **Business Impact Analysis:** In conjunction with the Qwest Disaster Preparedness, business units are required to conduct a bi-annual Business Impact Analysis to identify the most critical functions or components that require business continuity and/or disaster recovery plans. Critical business functions or components are defined as those that when subject to interruption will result in immediate and significant impact on Qwest revenue or services.

3. **Disaster Recovery and Business Continuity Plans:** For those critical functions/components that require business continuity and/or disaster recovery plans, the following compliance criteria must be met:
- Business Continuity and Disaster Recovery plans must be developed in accordance with established planning elements and must reside on the Qwest plan integration application.
 - Business Continuity and Disaster Recovery plans must be kept current.
 - Business Continuity and Disaster Recovery plans must be tested at least once annually. Invoking a plan during an actual event will be accepted in lieu of a test if testing objectives are met.
4. **Emergency Response Teams:** Standards for Emergency Response Team Certification are contained in Appendix B. The Certification standards contain requirements that are necessary to enable Qwest to rapidly respond to a disaster and effectively manage response activities.

Annual Compliance Commitments

An Executive (VP or above) within each Business Unit for which critical business functions/components have been identified must acknowledge the number and type of Business Continuity and Disaster Recovery plans that have been identified for development and testing in the current year. This acknowledgement will serve as the annual compliance obligation for the respective business unit.

Compliance Reporting

The Corporate Disaster Preparedness and National Security Staff will monitor each Business Unit's compliance with commitments pertaining to Corporate Critical Business Functions and report status results to the Qwest executive leadership team on a quarterly basis. Compliance with Business Unit Critical Functions will be reported at the end of each calendar year.

BC/DR Plan Components for Critical Functions

Critical business functions or components are defined as those that, when subject to interruption, will result in immediate and significant impact on Qwest revenue, services, or will expose Qwest to significant liability; or, those support functions that are necessary to avoid such impacts. The following plan elements apply to each Critical Function/Component identified by each business unit:

1. System Failures
 - a) Internal notification process and critical employee data
 - b) Critical support contacts; internal and external
 - c) Client contacts
 - d) Manual work-around processes
 - e) System down-time planning assumptions
 - f) Planned IT-system recovery time-frame
 - g) Outage/event notification scripts
 - h) Restoration interdependencies and procedures (if appropriate)
 - i) Vital records storage requirements

2. Equipment/Hardware Failures
 - a) Internal notification process and critical employee data
 - b) Client contacts
 - c) Critical support contacts; internal and external
 - d) Manual work-around processes
 - e) Equipment down-time planning assumptions
 - f) Outage/event notification scripts
 - g) Restoration interdependencies and procedures (if appropriate)

3. Building/Site Impacts (building evacuation, etc.)
 - a) Internal notification process and critical employee data
 - b) Critical support contacts; internal and external
 - c) Client contacts
 - d) Alternate work location processes/required capabilities
 - e) Building down-time planning assumptions
 - f) Outage/event notification scripts
 - g) Process for transition from Fire & Life Safety evacuation points to BC procedures
 - h) Restoration interdependencies and procedures (if appropriate)

4. Personnel & Staffing
 - a) Internal notification process and critical employee data
 - b) Client contacts
 - c) Alternate work processes
 - d) Employee replacement procedures
 - e) Notification scripts

5. Common Planning Elements
 - a) 24x7 Disaster Recovery Duty Manager, Emergency Response Team lists and activation procedures
 - b) Key Contacts:
 - c) 24x7 Network Operations Centers
 - d) Media Contact Lists
 - e) UniCALL
 - f) Health Services
 - g) Security
 - h) Corporate Safety
 - i) Workplace intervention counseling
 - j) 24x7 Procurement Support
 - k) IT Desk-top support Help Desk
 - l) OCS Communications
 - m) Business Unit HR Representatives
 - n) Labor Relations Representatives
 - o) Fire and Life Safety Procedures
 - p) Tornado Procedures
 - q) Bomb Threat Procedures
 - r) Earthquake Procedures
 - s) Employee Communication Scripts

APPENDIX C: Qwest Emergency Response Team Certification Standards

Emergency Operations Center (EOC) Standards

1. EOC capable of operating 24x7 under extreme conditions.
2. EOC infrastructure and equipment on back-up power.
3. Ample workspace, telephones, speaker phones, computers w/ access to internet & Qwest intranet, fax, copier.
4. EOC is easily accessible.
5. EOC provisioned with redundant communication capabilities.
6. Voice circuits from at least 2 Central Offices (minimum 1 FX line).
7. High Frequency radio functional and tested quarterly.
8. Primary and Alternate Radio Operators identified on ERT lists (only EOCs with HF Radios).
9. Satellite Phone Available for use by EOC personnel.
10. EOC has access to critical information.
11. Access to TV/Radio.
12. Internal and external contact lists available in EOC.
13. Adequate maps in EOC - Network, Road, Topographic, others as required.
14. Office supplies and first aid kit on-site.

Emergency Response Team Standards

1. The ERT represents all critical business functions in the state.
2. All Business Units/Critical Functions represented by both a Primary and an Alternate.
3. All ERT members have a notification device registered in Mobile Village paging system.
4. Web-based contact list current.
5. Alternate EOC location identified.
6. ERT activation process tested tri-annually - at least 2 tests resulting in 100% Business Unit response.
7. ERT members have access to appropriate business continuity plans.
8. All ERT members have been trained on roles, responsibilities, EOC capabilities and disaster recovery processes.
9. ERT exercise conducted annually. (Note: an actual event that meets the objectives of an ERT exercise will be accepted in lieu of an exercise.)

Qwest Communications International, Inc.

Disaster Preparedness Overview

January, 2003

Qwest Company Profile

- **National Network - voice and data**
- **Local Exchange Carrier in 14 States**
- **Long Distance (limited within LEC region)**
- **National/International**
- **Services:**
 - Voice Communications**
 - Wireless Communications**
 - Data/Internet Communications**
 - Web Hosting**
 - Remote IT Solutions**
- **55,000 employees in U.S./International**

Qwest Services

Frame Relay/ATM

Web Hosting

Wireless

Local Dialtone

Long Distance

Enhanced Services

DSL and VDSL

QwestLink

CPE

Private Line Networks

SONET

ISDN

Audio Conferencing

International

Preparedness - Corporate Standards

- **Emergency Response Certification**
- **Required continuity planning for all Critical Business Functions**
- **All plans tested/updated annually**
- **All departments have Crisis Managers and Business Continuity Planners**
- **Corporate-wide network of Crisis Managers**

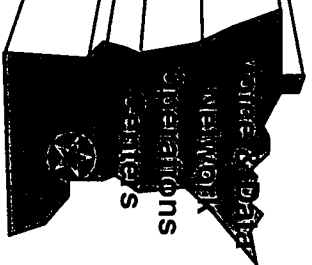
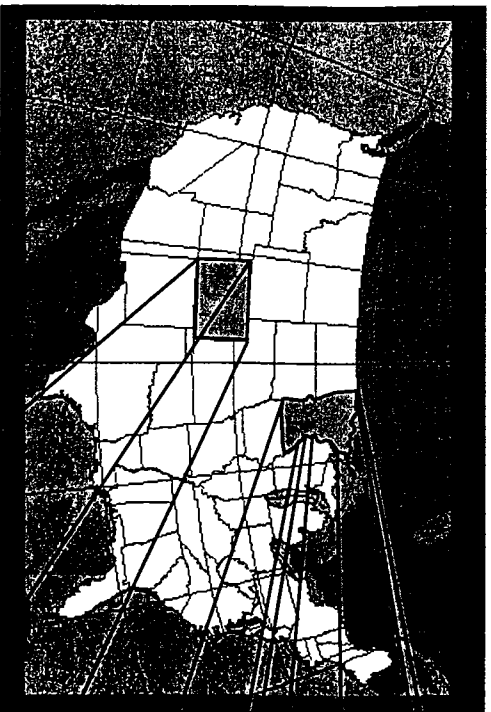
Qwest Recovery Capabilities

- **Disaster Preparedness Staff**
- **Tiered, Multi-Hazard Disaster Recovery Approach**
- **Corporate/Regional Emergency Response Teams and Emergency Operations Centers**
- **Emphasis on Training, Exercises, and Pre-Identification of Resources**

24x7 Network Monitoring

- **Global Network Operations Centers**
- **Local Network Operations Centers**
- **Data Networks Operations Center**
- **Wireless Network Operations Center**
- **Web Hosting Operations Center**
- **IT Systems Operations Center**

Disaster Recovery First Tier - Network Operations Centers Manage Most Outages



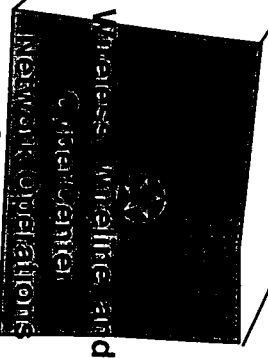
Network Controls

Power Surveillance

Switching Surveillance

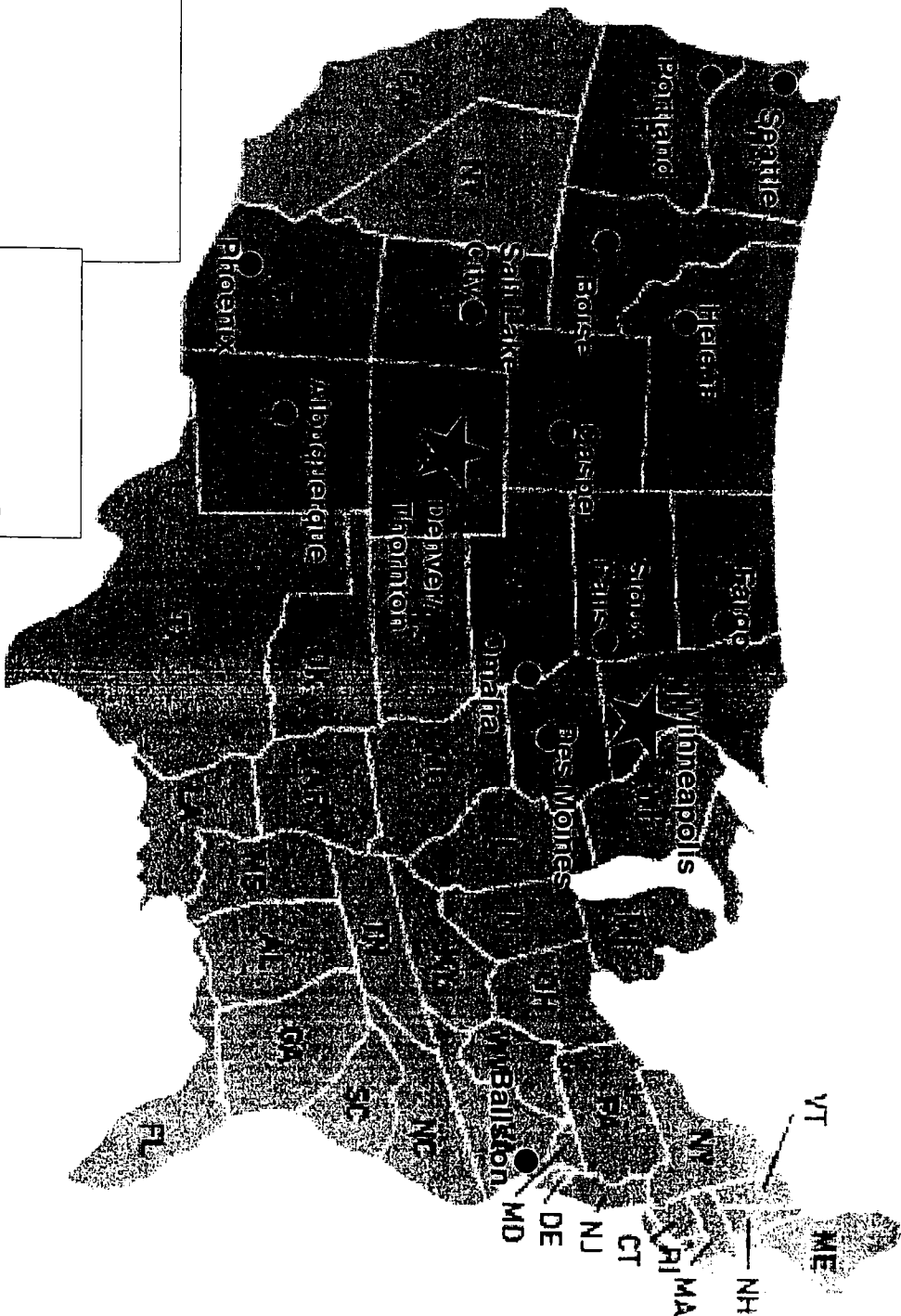
Technical Support

Problem Management

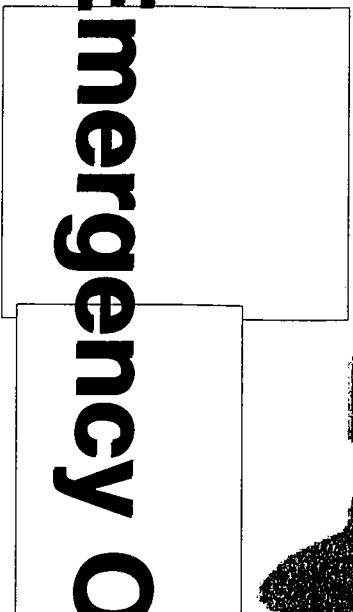


Centers:
IT Command Center

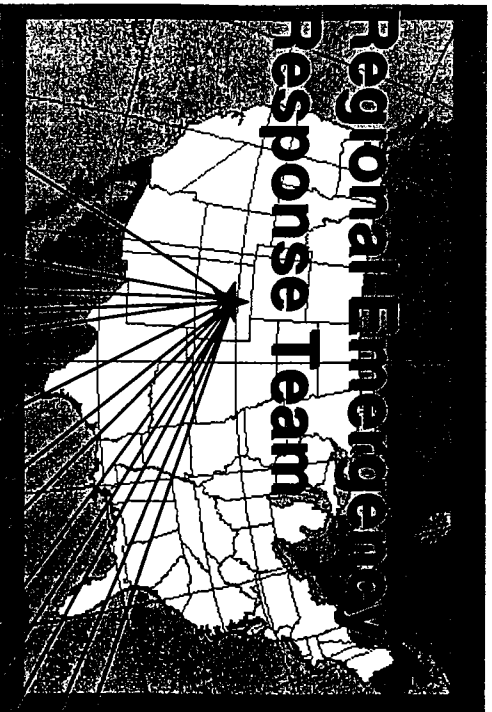
Qwest



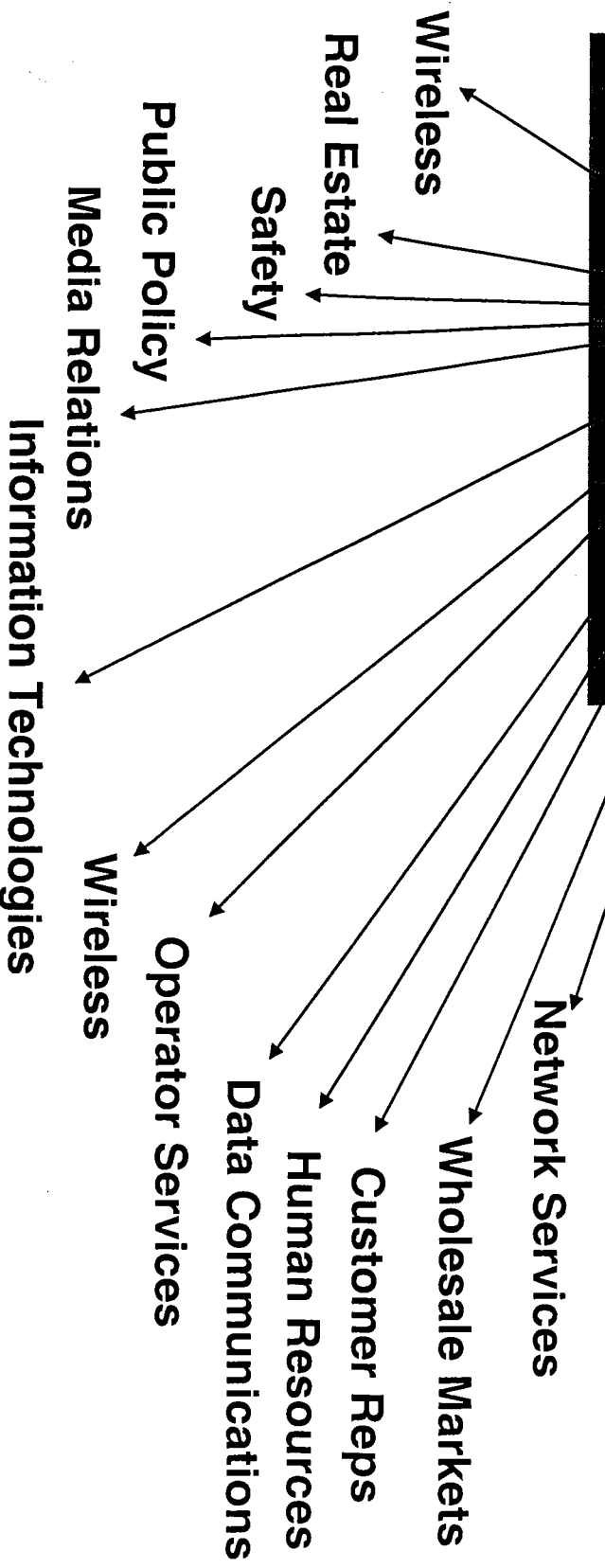
Emergency Operations Centers



Disaster Recovery Second Tier - Regional Emergency Response Teams



Regional Emergency Teams respond to problems that require the coordinated response of several business units in a state(e.g., Regional Network outage)



Disaster Recovery Third Tier - Corporate Level Emergency Response Team

The Corporate Emergency Response Team forms Unified Command with State Teams in response to problems that exceed regional resources or are multi-state events



Corporate Emergency Response Team



- Safety
- Wireless
- Real Estate
- Public Policy
- Media Relations
- Human Resources
- Data Communications
- Information Technologies
- Network Services
- Operator Services
- Wholesale Markets
- Customer Reps

Disaster Recovery Resources

- **Pre-negotiated Vendor Agreements**
- **Telcordia Disaster Prevention and Support**
- **Mobile DMS-100 switches, Mobile POP Restoration Trailers, Mobile Cellular and Radio Equipment**
- **LEC/IXC Mutual Aid Agreement Process in Place**
- **Alternate Communications–**
 - High Frequency Radios in 10 EOCs**
 - Satellite Phones Deployed to Response Teams and Key Executives**
 - Alerting and Coordinating Network (ACN)**
 - Gov't Emergency Telecommunications System**

Service Restoration Priorities

- **Critical Qwest Network Components Required to Facilitate Restoration**
- **Telecommunication Service Priority (TSP)**
 - **TSP Restoration Priority**
 - **TSP Provisioning Priority**
- **Emergency Services**
- **Business/Residential**