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Regular Agenda  
2011 JUL 28 PM 1:04  
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RECORDS MANAGEMENT  
STATE OF WA.  
UTIL. AND TRANS.  
COMMISSION

# Sprint

July 26, 2011

Mr. David Danner, Executive Director & 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-037015)**

Dear Mr. Danner:

Enclosed, please find ten (10) copies each of the "Eligible Telecommunications Carrier Certification and Annual Report on Behalf of Sprint Nextel Corporation" (Docket Number TBD), 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 at (707) 816-7583 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- 111383  
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ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION  
AND ANNUAL REPORT ON BEHALF OF  
SPRINT NEXTEL CORPORATION

RECEIVED  
RECORDS MANAGEMENT  
2011 JUL 28 PM 1:08  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

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

) Docket No. UT-  
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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 (“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 2011.

**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, in an order dated January 13, 2005 (“Rural Order”), the Commission also designated Sprint Nextel in areas served by certain rural telephone companies. In Docket No. UT-073023, in an order dated October 23, 2007 (“Expansion Order”), the Commission then expanded the scope of Sprint Nextel’s designation. This order expanded the areas in which Sprint Nextel was designated and also extended the designation to operating entities that provide service using

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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*”).

iDEN technology. The areas in which Sprint Nextel is designated are referred to as its “Designated Areas.”

Sprint Nextel addresses each of the 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 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. 2010 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, 2010 through December 31, 2010, 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.

As reflected in **Confidential Attachment 1**, high cost universal service funding contributed towards upgrades to sites currently “On-Air”. These investments improved the quality of the network.

**B. Local Service Outages in 2010**

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>2</sup>

This information, for the time period January 1, 2010 through December 31, 2010, is contained within **Confidential Attachment 2**.

**C. Unfulfilled Requests for Service in 2010**

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 2010.

**D. Complaints Per 1000 Handsets or Lines in 2010**

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

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<sup>2</sup> The Company cannot know for certain how many of its subscribers are affected (or potentially affected) by a multi-site outage, and so has estimated this by using the number of sites that were out of service and the subscribers served by highest use sites for that number in the service area.

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, 2010 through December 31, 2010, 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 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 carrier’s 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>3</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.

In the Expansion Order the Commission granted Sprint Nextel a partial exemption from the battery power requirements of WAC 480-123-030(1)(g) and WAC 480-123-070(6) regarding the requirement for battery back-up power at cell sites. *Expansion Order* at p. 8. The exemption was in effect until October 23, 2009 (which has been extended until December 31, 2011, as explained below), and by that date Sprint Nextel was to provide four hours of back-up at all cell sites using reliable alternative power sources. *Id.* at pp. 8-9. At the time Sprint Nextel sought the exemption, approximately 36% of the Company's iDEN sites were not in compliance with the Commission's Rules. *Id.* at p. 6.

In 2006, Sprint Nextel reported that it had one microwave hub in Washington without an on-site generator. This hub is located in North Bend, and is a hub for four microwave satellite sites. Sprint Nextel requested and received a temporary waiver as it made the required upgrade. Currently, all of Sprint Nextel's microwave hubs are equipped with on-site generators.

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<sup>3</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.

In Docket No. UT-073023, Order 2, dated September 10, 2009, the Commission granted Sprint Nextel a temporary exemption from the four-hour back-up power rule under WAC 480-123-070(6) and WAC 480-123-030(1)(g), until December 31, 2011. Between August 2007 and August 2010, Sprint Nextel has continued working toward complying with the minimum four-hour battery back-up requirement at its remaining non-compliant sites (*see Confidential Attachment 8* for the 2010 Status Report, which will be filed as an addendum to this Annual Report).

Based on the above, and subject to the partial exemption currently in effect, Sprint Nextel certifies that it has the ability to function in emergency situations based upon these standards.

**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**. Included within Attachment 6 are flyers Sprint Nextel has available to state agencies to be distributed to their offices to try to reach additional potential Lifeline and Link Up customers. Sprint Nextel is also listed on the Universal Service Administrative Company ("USAC") website under the "Find a Provider" option. This can be found under the Low Income Households section of the USAC.ORG website.



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, 2011 through December 31, 2011, is contained within **Confidential Attachment 7a**. Sprint Nextel is only reporting on the planned use of federal support through December 31, 2011 because it intends to relinquish its ETC designation and will no longer be receiving federal support in WA as of that date. *See* Docket No. UT-111325 Sprint Nextel Application for ETC Relinquishment.

As the Commission is aware, on May 1, 2008 the FCC adopted an order capping the federal high-cost universal service fund for competitive ETCs (“CETCs”). Pursuant to this Order, high-cost universal service support to CETCs is capped for each state based on support received by CETCs in March 2008, as annualized. Thus, a CETC’s high-cost support will change – potentially significantly – if new carriers are designated as CETCs, and in response to line count shifts among existing CETCs.

Under the state-based interim cap, the Universal Service Administrative Company (“USAC”) will calculate support using a two-step approach. First, the support each of the state’s CETCs would have received absent the cap under the per-line identical support rule will be calculated and the sum for all state CETCs determined. Second, if the sum of uncapped support

is greater than the capped support for the state, a state reduction factor will be calculated by dividing the state cap support amount by the total state uncapped amount. The reduction factor will then be applied to the uncapped support amount for each CETC in the state to reduce the CETC's capped support level.

In addition, on November 3, 2008, Sprint Nextel filed a written ex parte communication with the FCC in connection with Sprint-Clearwire transfer proceedings in WT Docket No. 08-94, in which Sprint Nextel committed to reducing by no later than December 31, 2008 its total federal high-cost support funding by 20%, and also by an additional 20% per year for each of the following four years. Accordingly, Sprint Nextel's funding reduction commitment to the FCC in the Clearwire proceedings necessarily impacts the timing and level of capital expenditures both in Washington and in other jurisdictions where Sprint Nextel is designated as an ETC.

Due to this recent change in the method for determining CETC high-cost support and lack of information on the likely value of the Washington cap reduction factor, it is impossible to project with any confidence what Sprint Nextel's actual USF support is likely to be on a going forward basis. However, Sprint Nextel is able to estimate the amount of support it would have received but for the operation of the cap. Based on the most recent per-line support projections of USAC, Sprint currently estimates that, but for the cap, it would receive approximately \$2.8 million in federal high-cost universal service support for the provision of universal service within its Designated Areas. The estimate is based on current information and may vary as federal 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 7a** 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 has and will use federal high-cost universal service support to assist it in completing these improvements between October 1, 2010 and December 2011. The map within **Confidential Attachment 7b** shows the new cell sites included within the Company's Annual Plan, as modified to reflect.

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, and in light of the fact that it will no longer be receiving federal support after January 1, 2012, 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 Attachments 7a** and **7b** are subject to change.

**I. .shp File Showing Coverage**

WAC 480-123-080 requires a wireless ETC's filing in 2007 (and at least once every three years thereafter) to include a map in .shp format that shows the general location where it provides commercial mobile radio service signals. A CD was included with the 2009 report filed last year.

**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 54.314.

Dated: July 26, 2011



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Office: (415) 278-5314  
Fax: (415) 278-5303

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

) Docket No. UT-  
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**CERTIFICATION**

The undersigned, John Chapman, does hereby certify as follows:

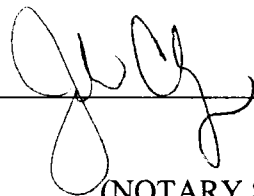
I serve as Vice President and Assistant Secretary for Sprint Nextel Corporation, and each of its affiliates and subsidiaries.

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").

On behalf of Sprint Nextel Corporation, I certify that the Company will use federal high-cost universal service support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.

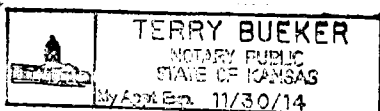
I have reviewed the Annual Filing and the facts stated therein, of which I have personal knowledge, are true and correct to the best of my present knowledge, information and belief.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

  
\_\_\_\_\_  
(NOTARY SEAL)

Subscribed and sworn to before me  
this 26<sup>th</sup> day of JULY, 2011.

Terry Bueker  
Notary Public



**CONFIDENTIAL ATTACHMENT 1**

**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

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 1,000 Handsets or Lines**

**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**

**Steve Largent**  
President/CEO

June 24, 2011

Mr. Dan Hesse  
President and Chief Executive Officer  
Sprint Nextel Corporation  
6200 Sprint Parkway, Mailstop: KSOPHF0410-4A421  
Overland Park, KS 66251

Dear Dan:

Congratulations! This letter is to notify you that Sprint Nextel Corporation ("Sprint") and the Sprint Prepaid Group (Virgin Mobile USA, Boost Mobile, and Assurance Wireless) have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2011 – December 31, 2011, and are deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless are 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, Virgin Mobile USA, Boost Mobile and Assurance Wireless review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, CTIA will provide two specimens (color and black/white) of the Seal for use on Sprint's, Virgin Mobile USA's, Boost Mobile's and Assurance Wireless' respective websites and in their respective collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Andrea Williams, CTIA's Vice President of Law and Assistant General Counsel, at (202) 736-3215 or [awilliams@ctia.org](mailto:awilliams@ctia.org).

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

Sincerely,

  
Steve Largent

Attachment

cc: Charles McKee  
Vice President – Government Affairs



## 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.



**ATTACHMENT 5**

**Sprint Business Continuity Program Overview**



# **Sprint**

## **Business Continuity Planning**

### **Program Overview**

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## Disclaimer

This document may not be duplicated, modified, used by, disclosed or forwarded 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. 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.

### 3. 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.

### 4. 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.

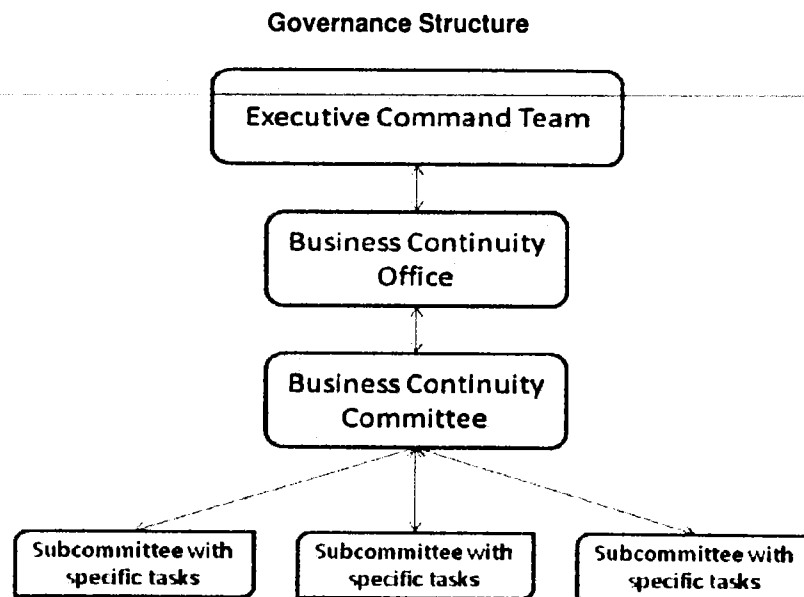
**Business Continuity Office (BCO)** - The BCO is the program office responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide Continuity and Disaster Response Plans. During an incident, the BCO is responsible for coordinating cross functional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

**Business Continuity 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 for their business units when disasters occur. The BCC has various sub committees that focus on Proactive Planning, Incident Management, Tools and Training, Awareness and Pandemic Planning.

# Sprint

**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. When an incident 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.



## 5. Corporate Business Continuity Program Implementation

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



### **5.1 Program Initiation & Governance**

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.

### **5.2 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.

### **5.3 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.

### **5.4 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.

### **5.5 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.

#### **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.



### **5.6 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.

### **5.7 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.

### **5.8 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.

## **6. Declaring Company Threat Levels**

Sprint 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, Incident Management Team, Enterprise Incident Management and lastly Company Jeopardy.

## **7. 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. Alternate redundant EIMT ICCs, are identified as well.

## **8. 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 IMT is responsible for the recovery efforts for the IT Infrastructure at all Sprint locations, including internal procedures, available systems, resources, call trees and points of contact. 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 Data Center and System Resiliency Planning**

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 where one Data Center functions as the recovery site for another Data Center.

### **10.3 IT Application Priority and Data Restoration**

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. Application Business Impact Analysis and strategic planning are based on federal telecommunications service models and financial ramifications. Data required for recovery of operating systems, production libraries, and application systems are backed up nightly via industry leading backup technologies.

A robust program ensures safe data transport of encrypted archived electronic data to industry standard offsite storage vendors.

## **11. Workforce Resiliency Overview**

### **11.1 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.

### **11.2 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.

## **12. Emergency Response Team (ERT)**

Sprint's ERT is an experienced cross functional group which consists of a national team of full time, dedicated personnel as well as hundreds 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.

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 communication needs of emergency and disaster personnel with its SatCOLTs (Satellite Cell on

# Sprint

Light Truck), satellite earth station, and inventory of over twenty five thousand handsets and aircards which can be rapidly deployed to support communications.

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 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.

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.

**ATTACHMENT 6**

**Sample Advertisements for Lifeline and Link Up**



## *Sprint Presents Lifeline and Link Up Service*

*Lifeline and Link Up are public assistance programs offering wireless telephone discounts to qualified, low-income consumers. Under the Lifeline program, eligible subscribers may receive a discounted monthly charge of \$16.49 per month in most areas. Eligible residents of federally recognized Tribal lands may qualify to receive additional discounts off the monthly charge for Lifeline service. Link Up assistance helps qualified, low-income customers pay the activation fee.*

*Eligibility requirements vary by state. In many states, you may qualify for Lifeline assistance if you comply with certain income level requirements or you currently participate in certain public assistance programs.*

*For further information about Lifeline and Link Up assistance or to receive an application form, please call Sprint toll free at 866-827-3290.*

**NOTICE:** *Lifeline is only available to Sprint subscribers in limited geographic areas, and for one wireline or wireless phone line per household. You may only receive the Link Up discount once at the same address. Additional restrictions apply. ©2011 Sprint Nextel. All rights reserved. SPRINT, the logo and other trademarks are trademarks of Sprint Nextel.*



## Programas Lifeline Y Link-Up De Sprint

### Lifeline

Lifeline es un programa de asistencia pública que ofrece un descuento en la factura mensual del teléfono móvil a clientes de bajos ingresos que califiquen.

#### Solicítelo y Ahorre

Bajo el programa Lifeline, los suscriptores que califiquen pagan un cargo mensual descontado de \$16.49 al mes en la mayoría de las áreas. Los residentes de territorios tribales reconocidos a nivel federal que califiquen, podrían recibir descuentos adicionales en su cargo mensual por el servicio Lifeline.

#### Servicio Lifeline de Sprint

El servicio Lifeline incluye 200 minutos a cualquier hora y minutos ilimitados de noche y fin de semana, los cuales pueden ser usados para llamadas locales o de larga distancia. Los minutos de noche y fin de semana pueden ser usados antes de las 7 a.m. y después de las 9 p.m. de lunes a viernes, y durante todo el día los sábados y domingos. El servicio Lifeline también incluye correo de voz, llamada en espera, identificador de llamadas, mensajería numérica y llamada entre tres personas sin cargo adicional. Aunque el *roaming* está incluido en la mayoría de las áreas del país, no está incluido en los territorios de las Filiales de Sprint.

#### Cómo calificar para Lifeline

Los requisitos de elegibilidad varían según el estado. En muchos estados, usted podría calificar para recibir asistencia de Lifeline si el ingreso total de su hogar está por debajo de los lineamientos de los niveles de pobreza establecidos por el estado donde vive o por el FCC, o si actualmente califica para recibir beneficios de alguno de los siguientes programas de asistencia pública:

- > Medicaid
- > Cupones de alimentos (Food Stamps)
- > Ingreso de Seguridad Suplementario (Supplemental Security Income, SSI)
- > Asistencia Federal de Vivienda Pública/sección 8  
(Federal Public Housing Assistance/section 8)
- > Asistencia de Energía para Hogares de Bajos Ingresos  
(Low-Income Home Energy Assistance, LIHEAP)
- > Programa Nacional de Almuerzos Escolares (National School Free Lunch Program)
- > Asistencia Temporal para Familias Necesitadas  
(Temporary Assistance for Needy Families, TANF)

Si el cliente vive en territorios tribales reconocidos a nivel federal, también podría calificar para recibir asistencia optimizada de Lifeline, si cumple con los requisitos mencionados arriba, o si actualmente el cliente califica para recibir beneficios de alguno de los siguientes programas de asistencia pública:

- > Asistencia general provista por la Dirección de Asuntos Indígenas  
(Bureau of Indian Affairs general assistance)
- > Asistencia Temporal para Familias Necesitadas Administradas a Nivel Tribal  
(Tribal Administered Temporary Assistance for Needy Families, Tribal TANF)
- > Head Start (sólo para aquellos que cumplan con las normas de calificación según los ingresos/only those meeting income qualifying standards)

## Lifeline & Link-Up Programs from Sprint

### Lifeline

Lifeline is a public assistance program that offers qualified, low-income customers a discount on their wireless monthly telephone bill.

#### Apply And Save

Under the Lifeline program, eligible subscribers pay a discounted monthly charge of \$16.49 per month in most areas. Eligible residents of federally-recognized Tribal lands may qualify to receive additional discounts off the monthly charge for Lifeline service.

#### Lifeline Service from Sprint

Lifeline service includes 200 Anytime Minutes and Unlimited Night and Weekend Minutes, which may be used for local or long-distance calls. Night and weekend minutes may be used before 7am and after 9pm Monday through Friday, and all day Saturday and Sunday. Lifeline service also includes Voice Mail, Call Waiting, Caller ID, Numeric Paging and Three-Way Calling at no additional charge. While roaming is included in most areas of the country, it is not included in Sprint Affiliate territories.

#### Qualify For Lifeline

Requirements vary by state. In many states, you may qualify for Lifeline assistance if your total household income is less than the poverty guidelines set by your state or the FCC, or if you are currently eligible to receive benefits from any of the following public assistance programs:

- > Medicaid
- > Food Stamps
- > Supplemental Security Income (SSI)
- > Federal Public Housing Assistance (section 8)
- > Low-Income Home Energy Assistance (LIHEAP)
- > National School Free Lunch Program
- > Temporary Assistance for Needy Families (TANF)

If you live on federally-recognized Tribal lands, you may also qualify for enhanced Lifeline assistance if you satisfy the above requirements or if you are currently eligible to receive benefits from any of the following public assistance programs:

- > Bureau of Indian Affairs general assistance
- > Tribal Administered Temporary Assistance for Needy Families (Tribal TANF)
- > Head Start (only those meeting income qualifying standards)

*If you live in a state that administers its own Lifeline program, you must satisfy the eligibility requirements that appear in the Lifeline application form for your state available from Sprint.*

#### **Sign Up Now**

To receive a copy of the Lifeline application form for your state, please call Sprint toll-free at 866-827-3290 or visit [www.sprint.com](http://www.sprint.com) to download an application form. Simply complete the Lifeline application form and mail it, along with copies of any supporting documentation, to the following address:

Lifeline/Link-Up Assistance Program - Sprint  
ACS  
2432 Fortune Drive  
Lexington, KY 40509

#### **Restrictions Apply**

Lifeline is only available to subscribers in limited geographic areas. Lifeline assistance is only available for one wireline or wireless phone line per household. Data services and other enhanced services or features, international long distance and access to "900" numbers are not available to Lifeline subscribers. Other restrictions may apply.

#### **Pay No Service Deposit**

Lifeline subscribers may avoid paying a service deposit by choosing an account spending limit (ASL) of \$75 or less.

## **LINK-UP**

**Link-Up assistance helps qualified, low-income customers pay the service activation fee for Lifeline service. You automatically qualify for Link-Up if you satisfy the requirements to receive Lifeline. Link-Up will pay up to \$18, one-half of the \$36 activation fee.**

#### **Restrictions Apply**

You may only receive the Link-Up discount once at the same address. The discount cannot be applied to activation or installation charges you paid prior to signing up for Lifeline assistance. The discount cannot be applied to the purchase of customer equipment. Other restrictions may apply.

#### **DTV Alert For Consumers With Analog TVs**

After 02-17-09, analog-only televisions will need a converter box to receive over-the-air broadcasts with an antenna. Analog-only TVs should continue to work as before with cable and satellite TV services, gaming consoles, VCRs, DVD players, and similar products. For coupons for a digital converter box, call 888-388-2009 or visit [www.dtv2009.gov](http://www.dtv2009.gov). For more info about the digital transition, call 888-225-5322 or visit [www.dtv.gov](http://www.dtv.gov).

## **TERMS AND CONDITIONS**

Lifeline and Link-Up service from Sprint is subject to the terms and conditions included in your separate Subscriber Agreement and the Lifeline Service Agreement attached to the Lifeline application form for your state. You may be required to verify your continued eligibility for Lifeline assistance at any time. A two-year agreement is required and an early termination fee of \$200 per line applies.

*Si el cliente vive en un estado que administra su propio programa Lifeline, entonces debe cumplir con los requisitos que aparecen en el formulario de solicitud Lifeline de su estado, que Sprint tiene a la disposición.*

#### **Inscríbese Ya**

Para recibir una copia del formulario de solicitud Lifeline de su estado, favor de llamar a la línea gratuita de Sprint al 1-866-827-3290 o visitar [sprint.com](http://sprint.com) para descargar un formulario de solicitud. El cliente simplemente debe llenar el formulario de solicitud Lifeline y enviarlo por correo, junto con las copias de cualquier documento de apoyo, a la siguiente dirección:

Lifeline/Link-Up Assistance Program - Sprint  
ACS  
2432 Fortune Drive  
Lexington, KY 40509

#### **Aplican Restricciones**

Lifeline está disponible únicamente para suscriptores en áreas geográficas limitadas. La asistencia Lifeline está disponible únicamente para un teléfono de línea fija o móvil por hogar. Los servicios de datos y otros servicios y funciones optimizados, larga distancia internacional y el acceso a números "900" no están disponibles para suscriptores de Lifeline. Podrían aplicar otras restricciones.

#### **No tiene que pagar depósito de servicio**

Los suscriptores de Lifeline pueden evitar pagar un depósito de servicio, si eligen un Límite de Gastos de la Cuenta (ASL, por sus siglas en inglés) de \$75 o menos.

## **LINK-UP**

**La asistencia Link-Up ayuda a clientes de bajos ingresos que califican a pagar el cargo por activación del servicio Lifeline. El cliente califica automáticamente para Link-Up si cumple con los requisitos para recibir Lifeline. Link-Up pagará hasta \$18, la mitad del cargo por activación de \$36.**

#### **Aplican Restricciones**

El cliente puede recibir el descuento de Link-Up sólo una vez en la misma dirección. El descuento no puede aplicarse a los cargos por activación o instalación pagados antes de inscribirse en el programa de asistencia Lifeline. El descuento no puede usarse para comprar equipo del cliente. Podrían aplicar otras restricciones.

#### **Aviso DTV para clientes con TVs análogas**

Después del 17 de febrero del 2009, los televisores que son solamente análogos necesitarán una caja de conversión para poder recibir transmisiones inalámbricas con una antena. Los televisores que son solamente análogos seguirán funcionando como antes con los servicios de cable y TV por satélite, consolas de juegos, equipos VCR y reproductores de DVD, y productos similares. Para obtener cupones y así poder recibir una caja de conversión, favor de llamar al 1-888-388-2009 o visitar [www.dtv2009.gov](http://www.dtv2009.gov). Para obtener más información sobre la transición digital, favor de llamar al 1-888-225-5322 o visitar [www.dtv.gov](http://www.dtv.gov).

## **TÉRMINOS Y CONDICIONES**

Los servicios Lifeline y Link-Up de Sprint están sujetos a los términos y condiciones incluidos en el Acuerdo de Suscripción y el Acuerdo de Servicio Lifeline adjuntos al formulario de solicitud Lifeline del estado del cliente. Se le podría requerir al cliente en cualquier momento, que proporcione información para verificar que continúa siendo elegible para el programa Lifeline. Se requiere un acuerdo por dos años y aplica un cargo por terminación anticipada de \$200 por línea.



**CONFIDENTIAL ATTACHMENT 7**

**Annual Service Improvement Plan**

**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.**

**CONFIDENTIAL ATTACHMENT 8**

**Back Up Power Status**

**WILL BE SUBMITTED AS A SEPARATE ADDENDUM**

**Entire Attachment Redacted**

**THE INFORMATION CONTAINED IN CONFIDENTIAL ATTACHMENT 8  
CONTAINS NETWORK PLANNING, COST AND NETWORK DESIGN  
INFORMATION THAT IS VALUABLE COMMERCIAL INFORMATION AS  
PROVIDED IN RCW 80.04.095.**