

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the matter of	)	
	)	
Telecommunications Relay Services and Speech to Speech Services for Individuals With Hearing and Speech Disabilities	)	CC Docket No. 98-67
	)	
Americans With Disabilities Act of 1990	)	CG Docket No. 03-123
	)	

**COMMENTS OF VERIZON**

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**COMMENTS OF VERIZON<sup>1</sup>**

**Introduction**

It is important for the Commission to continue to work to ensure that the hearing- and speech-impaired community has access to telecommunications services that are functionally equivalent to those available to the rest of the nation. Creating a nationwide outreach program, funded through the Interstate TRS Fund, is one important step in reaching that goal. However, the Commission should be careful not to impose requirements that are unnecessary for functional equivalence, and that could result in higher costs – or even greater harms – for all customers.

In particular, the Commission should *not* adopt the tentative proposal for incorporating TRS into the National Security/Emergency Preparedness priority system. As currently worded, the proposed rules do not give carriers sufficient guidance on how to comply with the functional equivalence directive in the case of emergency, and do not adequately address whether complying with the TRS regulations would compromise other national security priorities.

The Commission also should grant Verizon’s petition for reconsideration of that portion of the Commission’s order that requires emergency TRS calls to be routed to the exact same

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<sup>1</sup> The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications Inc., and are listed in Attachment A.

Public Safety Answering Point (“PSAP”) that would have been reached had the caller dialed 911 from his wireline phone. Such a rule is not necessary to achieve functional equivalence, and would likely take years, and hundreds of millions of dollars, to implement.

**I. The Commission Should Not Adopt Its Proposed Rules Regarding TRS Participation in the National Security/Emergency Preparedness Program**

In 1988, the Commission established a Telecommunications Service Priority Program (“TSP”).<sup>2</sup> Part of that program is the National Security and Emergency Preparedness (“NS/EP”) recovery priority system, in which certain critical telecommunications services are assigned priority status so that carriers will know to restore service to them before other services in the event of an emergency. *Id.*; see also 47 C.F.R. § 64.401 & Part 64, Appendix A. In the Notice, the Commission, “tentatively conclude[d] that it is appropriate to assign at least the same NS/EP priority to TRS that applies to LECs or other telecommunications services available to the general public.” Notice, ¶ 105. It reasoned that, if “TRS and TRS facilities receive an NS/EP priority status commensurate with that given to LEC facilities . . . if operation of the LEC and the TRS facility were compromised during an emergency, both facilities would be reinstated simultaneously.” *Id.*

The proposed rule should not be adopted, because it does not give clear guidance to carriers, and it likely would have the unintended effect of slowing down carriers’ ability to respond to other priorities that are important for national security. As an initial matter, the Commission’s proposal suggests the adoption of a sweeping reform of the complicated priority system, without any analysis of the effect the rule would have on other national security

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<sup>2</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Americans With Disabilities Act of 1990*, Notice of Proposed Rulemaking, 18 FCC Rcd 12379, ¶ 104 (2003) (“Notice”).

priorities. In addition, the language in the tentative proposed rule gives no guidance to telecommunications carriers on how to comply with the new regulations. As explained below, requests for priority status normally are submitted to the National Communications System, which processes the priority requests and determines how to balance the requests with other top national security priorities. However, the Commission's proposed rule appears to require that service to TRS providers supersede that system. The Commission should invite experts to advise it on how to best address the goals of functional equivalence within the priority program, before adopting a new set of rules that is at best confusing and, at worst, that would conflict with other national security priorities or demand standards that are impossible to meet. This could be achieved by asking for a report from the Network Reliability and Interoperability Council or the Telecommunications Service Priority Oversight Committee, either of which could advise the Commission on many of the practical aspects of the priority system.

The National Security and Emergency Preparedness priority system is extremely complicated, and some statements in the Notice appear to reflect a misunderstanding of the nature of the system. For example, the Notice states that, “[t]hese priorities [in the National Security and Emergency Preparedness priority system], include restoring telecommunications services for the general public, but they do not presently address the provision of TRS.” Notice, ¶ 104. That statement is not correct. As explained below, telecommunications services for the general public are *not* included in the priority system, but are taken care of only after the most significant priorities – such as restoring service to national security leaders, emergency service providers, and public health officials – have been addressed. In addition, the Notice appears to foresee a world in which, “if operation of the LEC and the TRS facility were compromised during an emergency, both facilities would be reinstated simultaneously.” Notice, ¶ 105.

However, the priority system was adopted precisely because, during an emergency, telecommunications carriers *cannot* make all necessary repairs “simultaneously.” During an emergency situation when resources are scarce, carriers must make a choice about which services to restore first. Requiring carriers to elevate TRS facilities to the top of the list would necessarily make all other priorities – such as repairs to emergency service providers, or national security leaders – a lower priority. While that may be the result that the Commission ultimately wishes to direct, it should not make such a choice without first analyzing the operational and national security implications of this policy.

In order to understand where TRS services would fit in the priority system, it is imperative to have a full understanding of the nature of the program, and which services currently receive priority service. The National Security and Emergency Preparedness system establishes four categories (A through D) of “essential” services, and one category (E) for emergency services, that are eligible for priority treatment. The categories are as follows:

Category A: National Security Leadership

Category B: National Security Posture and United States Population Attack Warning

Category C: Public Health, Safety, and Maintenance of Law and Order

Category D: Public Welfare and Maintenance of National Economic Posture

Category E: Emergency

*See* 47 C.F.R. Part 64, Appendix A, § 12(a)(1).

Once a user applies for NS/EP priority status, the National Communications System, which manages the priority system, decides whether the user will receive priority status, and

where to categorize that service among other priorities.<sup>3</sup> However, the priority for restoring telecommunications services is not based purely on the Category (A through E) to which those services are assigned. Rather, eligible services are accorded a priority level of 1 through 5, with level 1 classification having the highest priority, and level 5 the lowest, among the priority services.<sup>4</sup> Even services within the same category (A through E) may be classified at different priorities in the level 1-5 system. *Id.*, § 12(a)(2), § 12(c). For example, as the chart from the Telecommunications Priority Service website demonstrates, some services in Category A (National Security Leadership), may receive level 1 priority, while others may receive 2d, 3rd, 4th or 5th level priority. *See* Attachment B.

Setting different priority levels even within the same category of service is necessary because, if every important service was accorded “priority 1” status, telephone companies would not have any direction in determining which among the highest categories of service should be restored first. For that reason, the Telecommunications Priority Service website chart encourages users to set different levels of priorities within their categories, and “to request no higher priority level than is actually required.” *See* Attachment B. Thus, for example, while it instructs that all Category A (National Security Leadership) services “qualify for priority level 1,” it also states that “service users should consider distributing some portion of these services

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<sup>3</sup> *See* 47 C.F.R., Part 64, Appendix A, § 6(b). The National Communications System is an organization within the Executive Office of the President. *Id.* § 3(d). The FCC has final authority over most decisions made by the National Communications System. *See Id.*, § 6(a), § (9)(a).

<sup>4</sup> The system also has an “E” priority for emergency services, which is higher than level 1. *See* 47 C.F.R., Part 64, Appendix A, § 3(i) (defining priority levels). However, not all Category E emergency services will be classified as “E,” because they may receive lower priority. *Id.*, § 12(a)(2).

among priority levels 2, 3, 4 and 5, to avoid concentrating services at the same priority level.”

*Id.*

In an emergency, the telecommunications carrier is able to look at the National Security and Emergency Preparedness priority list to determine which services are to be restored first. However, the carrier generally does not have any specific information about the purpose of the service being restored. For example, the carrier may know that it is repairing a voice or data circuit, but it normally would not know what information normally travels over that circuit, or whether the user of that circuit uses a TTY device.

Most telecommunications services are *not* included in the five priority levels of the National Security and Emergency Preparedness priority system, but are instead accorded a priority that is either below or above the 5 National Security and Emergency Service Preparedness priority levels enumerated above. For example, the 5-level priority system does *not* address basic telecommunications services to the general public; rather, those services are prioritized *below* the top five priority levels, so they are to be addressed only after all other priority services have been dealt with. *See* 47 C.F.R. Part 64, Appendix A, § 12(e) (defining “non-NSEP” services as those that do not meet the criteria for Categories A-E). And not all of those who are eligible to receive priority status are in the priority system. Services are accorded priority status in the National Security and Emergency Preparedness priority system only if the user of that service submits a request for priority status that is approved by the National Communications System. Thus, users are instructed to request priority status *before* an emergency occurs.<sup>5</sup> Private entities, and state, local, and foreign government entities, normally

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<sup>5</sup> *See* <http://tsp.ncs.gov>, Frequently Asked Questions (“Users should be aware that TSP restoration priorities must be requested and assigned before a service outage occurs”).

can apply for priority status only if they are sponsored by a federal government organization. 47 C.F.R., Part 64, Appendix A, § 6(c), (e). Moreover, the priority system only addresses telecommunications carriers' obligations for ensuring that the relevant portions of the public switched telephone network are working. It does not address repairs to inside wiring or the customers' own premises equipment.

Telephone companies are permitted to make repairs to their own networks even *before* restoring service to those on the National Security and Emergency Preparedness priority list.<sup>6</sup> The reason for allowing telephone companies' network repairs to supersede all other priority levels is simple: if the telephone company's own equipment does not work, none of the "priority" service repairs will work. Telecommunications carriers must get their own systems up and running before they can begin to restore service to the five priority levels established by the National Security and Emergency Preparedness priority system. However, if service providers who lease services wish to obtain priority repair of their services from the leasing provider, they must request priority within the 5-level NS/EP system. *Id.* ("[T]he NSEP TSP System and procedures established by this appendix are applicable to control services or orderwires leased by a service vendor."); *see also* 47 C.F.R., Part 64, Appendix A, § 3(u) (defining "service vendor").

The more one understands the complexity of the emergency preparedness system, the more questions there are about the Notice's tentative proposals for incorporating TRS service into the system. For example, if the Commission adopts a rule that "it is appropriate to assign at

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<sup>6</sup> *See* 47 C.F.R., Part 64, Appendix A, § 4(b) ("The NSEP TSP System and procedures established by this appendix are not applicable to authorize priority treatment to control services or orderwires owned by a service vendor and needed for provisioning, restoration, or maintenance of other services owned by that service vendor. Such control services and orderwires shall have priority provisioning and restoration over all other telecommunication services (including NSEP services) and shall be exempt from preemption.").

least the same NS/EP priority to TRS that applies to LECs or other telecommunications services available to the general public,” Notice, ¶ 105, does this mean that TRS services would be restored at the same time as services to the general public (after all five priority levels have been addressed)? Or does it mean, as the Notice suggests, that “TRS facilities” have the same priority as “LEC facilities” in the sense that both have a superpriority over all five priority levels? If TRS service is considered part of the “LEC network” that is able to supersede the five National Security and Emergency Preparedness levels, in the event of an emergency, does that mean that telephone companies would be required to give priority to restoring service to TRS facilities *before* such service was restored to, for example, the President of the United States, the Department of Defense, 911 providers, state and local police and fire departments, and hospitals? One alternative is to direct TRS providers to apply for participation in the National Security and Emergency Preparedness priority system, and have the National Communications System assign them a priority that balances TRS with other national security priorities in the 5-level system. Another question is how are “TRS facilities” to be defined? Are they all of the parts of the public switched telephone network available to TRS providers, so that if the network does not work for the general public, the carrier must work to make it available so that the TRS facilities can use it?

Before the Commission establishes a rule regarding TRS facilities’ place in the National Security and Emergency Preparedness recovery priorities program, it should invite recommendations from experts with experience administering the program. For example, the Commission could ask that the Network Reliability and Interoperability Council or the TSP Oversight Committee to give a report on how they believe the Commission’s goals could best be

achieved.<sup>7</sup> Although it is unquestionably important to restore service to TRS users during an emergency, this priority must be balanced with other priorities, such as restoring service to hospitals, emergency service operators, and national security leaders. The worst possible result would be to adopt rules that are confusing to telecommunications providers, and that would create inconsistent priorities that might delay response time during an emergency. The issue of setting clear and coherent priorities for restoring telecommunications services in the case of an emergency is too important to risk getting it wrong.

## **II. The Commission Should Grant Verizon’s Petition For Reconsideration About Routing Emergency Wireline Calls to an “Appropriate PSAP”**

The Notice seeks comments on “what it would entail for TRS facilities to route a wireless TRS call to the same PSAP that would receive the call if the same caller dialed 911 on a wireless telephone.” Notice, ¶ 108. Instead, the Commission should reconsider this requirement with respect to wireline carriers. Simultaneously with today’s filing, Verizon is filing a Petition for Reconsideration of the Second Report and Order’s requirement that *wireline* calls be routed to same PSAP that would have been reached if the caller had dialed 911. *See* Verizon Petition for Reconsideration, CC Docket No. 98-67 (filed Sept. 24, 2003) (“Verizon Petition”). As that filing points out, adopting a rule to require emergency TRS calls be routed to the exact same PSAP that the caller would have reached if he dialed 911, is not required by functional equivalence, because 911 operators are already required to be able to handle TTY calls. In the case of an emergency, it is always better for TRS users to call 911 directly. Moreover, because of the way 911 calls are

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<sup>7</sup> *See* <http://tsp.nc.gov/tsp/responsibilities.html> (TSP Oversight Committee is “responsible for identifying, reviewing, and recommending actions to correct or prevent any systemic problems in the TSP Program”); <http://www.nric.org> (goal of organization is to “[a]ssure homeland security, optimal reliability, interoperability, and interconnectivity of, and accessibility to, the public telecommunications network”).

routed, it likely would take years of work, and cost hundreds of millions of dollars, to try to attempt to ensure that TRS emergency calls are routed to the exact same PSAP that the caller would have gotten if he dialed 911. Verizon Petition at 5-7. This cost would be borne by consumers, and would provide very little benefit, since TRS providers already have in place an effective system for routing calls to a PSAP that can handle the caller's emergency. *Id.*, at 2-5.

These problems would only be exacerbated if the Commission attempted to adopt the same rule for wireless carriers. Notice, ¶ 108. Rather than expanding this requirement to wireless carriers, the Commission should modify the rule for wireline carriers, and work with wireless carriers to adopt requirements that are appropriate for their technology.

### **III. The Commission Has the Authority to Fund Outreach Programs Administered By the Interstate TRS Fund Administrator or Other Neutral Government Body**

In response to the prior notice of proposed rulemaking in this docket, several commenters supported the creation of a national TRS outreach program that would be administered by a neutral, non-carrier entity, and financed either by the TRS fund, or out of the Commission's annual operating budget.<sup>8</sup> In this Notice, the Commission asks "how, if the Commission were to require a coordinated outreach campaign (instead of or in addition to the outreach required of individual TRS providers), such a campaign could be funded." Notice, ¶ 133. In particular, the Commission seeks "comment, including legal analysis, on whether the Interstate TRS Fund may

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<sup>8</sup> See, e.g., Comments of the People of the State of California and the California Public Utilities Commission, at 4-5 (filed May 5, 2000); WorldCom Comments, at 4-13 (filed May 5, 2000); Sprint Comments, at 7 (filed May 5, 2000). See also *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 5140, ¶ 134 (2000) (noting "the suggestion made by a number of commenters that the outreach effort be supported by the interstate TRS Fund and that the interstate TRS Fund administrator administer the funding for educational outreach programs").

be used to compensate third parties (*i.e.*, non-providers) for the cost of a coordinated outreach program.” *Id.*

The Commission can use the Interstate TRS Fund to pay for a national coordinated outreach program, under its general authority pursuant to Section 225 of the Act. Section 225 states that the Commission “shall ensure that interstate and intrastate telecommunications relay services are available, *to the extent possible and in the most efficient manner*, to hearing-impaired and speech-impaired individuals in the United States.” 47 U.S.C. § 225(b)(1) (emphasis added). Pursuant to this statute, the Commission has approved funding for the TRS Administrator, in order to facilitate the efficient provision of TRS services. *See, e.g., Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, 18 FCC Rcd 12823, ¶ 22, n.59 (2003). The same authority that allows the Commission to fund reasonable administrative costs relative to the TRS Administrator’s duties allows it to fund a national outreach program to ensure that TRS services are made available in “the most efficient manner.”

Moreover, the Commission already has allowed the use of the TRS Fund to pay for outreach efforts by TRS Providers. *See Use of N11 Codes and Other Abbreviated Dialing Arrangements*, 15 FCC Rcd 15188, ¶ 61 (2000) (“[T]o the extent costs of education and outreach are attributable to the provision of interstate TRS, as stated above, relay providers should include these costs as part of their annual data report of their total TRS operating expenses”).<sup>9</sup> It would promote form over substance if the law allowed the TRS fund to pay for outreach when

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<sup>9</sup> *See also* Notice, ¶ 78, n.257 (noting that some TRS providers have sought compensation for outreach). The Commission has previously approved the adoption of voluntary outreach requirements, because it found such efforts necessary to encourage effective use of TRS. *See e.g., Telecommunications Relay Services and the Americans with Disabilities Act of 1990*, Fifth Report and Order, 17 FCC Rcd 21233, ¶ 21 (2002) (“Coin Sent Paid Order”).

performed by TRS providers, but not when implemented through a coordinated, national effort. Because the Commission has allowed TRS providers' outreach expenses to be paid by the TRS fund, it also has the ability to fund outreach efforts that are conducted by the TRS Fund Administrator.

#### **IV. The Commission Does Not Have the Authority To Fund Foreign Language Translation Services Through the TRS Fund**

In a prior order, the Commission noted that, “some TRS providers may be offering ‘translation’ services to TRS users (*i.e.*, communication between two parties who each use a different language) including Spanish-language and [American Sign Language] ASL translation services.”<sup>10</sup> The Commission approved reimbursement of ASL translation services, finding such services necessary to provide “functional equivalency” to ASL users. Notice, ¶ 112 & n.339; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, 15 FCC Rcd 5140, ¶¶ 44-46 (2000). However, it tentatively concluded that foreign language translation services “are value-added TRS offerings that go beyond ‘relaying’ of conversation between two end users,” and should not be reimbursed by the TRS fund.<sup>11</sup> This conclusion is correct. The Commission does not have the authority to reimburse foreign language translation through the TRS fund, because it would go beyond the functional equivalence mandate of the Act.<sup>12</sup> The ADA requires that telecommunications relay services

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<sup>10</sup> Notice, ¶ 111 (quoting *Telecommunications Services for Hearing-Impaired and Speech Impaired Individuals, and the Americans with Disabilities Act of 1990*, Notice of Proposed Rulemaking, 13 FCC Rcd 14187, ¶ 39 (1998) (“1998 TRS Notice of Proposed Rulemaking”).

<sup>11</sup> Notice, ¶ 111 (quoting 1998 TRS Notice of Proposed Rulemaking, ¶ 39).

<sup>12</sup> See generally *Coin Sent Paid Order*, ¶ 21 (“Because the ADA only mandates functionally equivalent service, we see no reason to impose an additional requirement that would provide better than functional equivalence”).

“provide the ability for an individual who has a hearing impairment or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment . . .” 47 U.S.C. § 225(a)(3). Telephone callers do not normally have the ability to have their calls translated from English to another language. Therefore, foreign language translation does not fit within the definition of “telecommunications relay services” authorized to be funded by Section 225 of the Act. *See Id.*

There do exist commercial services, accessible by telephone, that provide translation services for a fee.<sup>13</sup> However, these services already are equally accessible to TRS users. TRS users can direct the communication assistant to call the translation service, and (like other callers) pay for the translation service using a credit card. Therefore, there already exists functional equivalence with regard to these services as well.<sup>14</sup>

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<sup>13</sup> *See, e.g.*, [www.languageline.com](http://www.languageline.com) (offering over-the-phone translation services, including personal interpreter pay-as-you-go services).

<sup>14</sup> The Texas PUC argues that the Commission should fund Spanish translation services through the TRS fund, because it asserts that deaf Hispanic children who learn ASL and English otherwise have difficulty communicating with family members. Notice, ¶ 113. While the goal of funding translation services for deaf Hispanic children is a noble one, that does not mean it falls within the “functional equivalency” mandate of the ADA. If these services are cost-prohibitive, Texas and other states with large Hispanic populations should consider subsidizing the cost of these “value-added” services to the hearing-impaired community, or seek Congressional approval for federal subsidies.

Conclusion

The Commission should not adopt the proposed regulations regarding the treatment of TRS in the National Security and Emergency Preparedness priority system. It has authority to fund national outreach efforts through the TRS fund, but it does not have the authority to fund foreign language translation services.

Respectfully submitted,



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THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States  
GTE Midwest Incorporated d/b/a Verizon Midwest  
GTE Southwest Incorporated d/b/a Verizon Southwest  
The Micronesian Telecommunications Corporation  
Verizon California Inc.  
Verizon Delaware Inc.  
Verizon Florida Inc.  
Verizon Hawaii Inc.  
Verizon Maryland Inc.  
Verizon New England Inc.  
Verizon New Jersey Inc.  
Verizon New York Inc.  
Verizon North Inc.  
Verizon Northwest Inc.  
Verizon Pennsylvania Inc.  
Verizon South Inc.  
Verizon Virginia Inc.  
Verizon Washington, DC Inc.  
Verizon West Coast Inc.  
Verizon West Virginia Inc.

TSP Priority Levels

After the TSP category and service profile elements are determined, you can then determine the priority level(s) (E, 1, 2, 3, 4, and 5) for which your service(s) qualifies. Note that priority level "E" is assigned only to Emergency provisioning requests, and priority levels 1 through 5 are assigned to all other restoration and provisioning services.

CATEGORY	Service Profile Elements				
A National Security Leadership*	A1 &/or AZ B1	A1 &/or AZ B1	A1 &/or AZ B1	A1 &/or AZ B1	A1 &/or AZ B1
B National Security Posture and U.S. Population Attack Warning	A1 &/or AZ B1	A1 &/or AZ B1 C1 G1, G2, or G3	A1 &/or AZ B1 C1 D1 &/or D2 E1 G1 or G2	A1 &/or AZ B1 C1 D1 &/or D2 E1 F1 or F2 G1 or G2	
C Public Health, Safety, and Maintenance of Law and Order	A1 &/or AZ B1	A1 &/or AZ B1 C1 G1, G2, or G3	A1 &/or AZ B1 C1 D1 &/or D2 E1 G1 or G2		
D Public Welfare and Maintenance of National Economic Posture	A1 &/or AZ B1	A1 &/or AZ B1 C1 G1, G2, or G3			
<b>PRIORITY LEVELS</b> ➔	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	

\* National Security Leadership services qualify for priority level 1. However, service users should consider distributing some portion of these services among priority levels 2, 3, 4, and 5 to avoid concentrating services at the same priority level.

Notes:

1. Service profile elements such as Customer Premises Equipment and Customer Premises Wiring must always be maintained/restored in a manner consistent with the response expected of the telecommunications service vendor for the priority level requested.
2. For all subcategories, service users are encouraged to request no higher priority level than is actually required.