

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
New Part 4 of the Commission’s Rules ) ET Docket No. 04-35  
Concerning Disruptions in Communications )

**COMMENTS OF  
INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE (ITTA)**

ITTA, through its attorneys, submits these Comments in response to the Notice of Proposed Rulemaking issued by the Commission in the above-captioned proceeding (the “*NPRM*”).<sup>1</sup>

**I. LOWERING THE REPORTING THRESHOLD WILL INCREASE BURDENS ON MIDSIZE AND SMALLER CARRIERS WITHOUT MATERIALLY ADVANCING THE COMMISSION’S GOALS IN THIS PROCEEDING**

ITTA applauds the Commission’s focus on streamlining the process for reporting network outages. In an increasingly competitive environment, it is increasingly vital that the Commission streamline any regulatory burdens its rules may impose and make them competitively neutral to allow the various competitors the greatest latitude in offering consumers the broadest options at the most competitive prices. The telecommunications industry should

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<sup>1</sup> ITTA is an organization of midsize incumbent local exchange carriers that collectively serve over ten million access lines in over 40 states and offer a diversified range of services to their customers, including advanced telecommunications capability. Most members qualify as rural telephone companies within the meaning of Section 3(37) of the Communications Act of 1934, as amended. 47 U.S.C. § 153(37).

continue to be the principal source of “best practices” as technology evolves and new challenges are identified.<sup>2</sup>

However, ITTA disagrees with the Commission’s proposal for lowering the threshold criteria for communications outage reporting, to require carriers to report all outages of 30 minutes or more where the potentially affected “user minutes” equals or exceeds 900,000.<sup>3</sup> This proposed change would do little to advance the Commission’s goals in this proceeding, while imposing significant new burdens on midsize and smaller carriers with no articulated justification for doing so.

The stated focus of this proceeding is to ensure “rapid, full and accurate information on service disruptions that could affect homeland security, public health and safety, as well as the economic well-being of our Nation.”<sup>4</sup> The *NPRM* cites no evidence as to how increasing the reporting burden on midsize and smaller carriers will further these goals. The Commission does not claim, for example, that there has been a recent history of serious outages among midsize and smaller carriers. The original reporting requirements were adopted in response to serious outages affecting large carriers in 1991-- a simple case of cause and regulatory effect. No such event or pattern of events has been cited by the Commission to justify expanding reporting, nor is ITTA aware of such an event. Midsize and smaller carriers do not have the personnel resources of larger carriers. For midsize and smaller carriers, the employees charged with complying with reporting obligations often are the same employees that must work to fix the network outage. These employees should be allowed to focus on their responsibility to

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<sup>2</sup> As Chairman Powell noted in his Statement accompanying the *NPRM*, “[t]hese reporting requirements have been successful in permitting the causes of certain types of disruptions in telephone networks to be identified and corrected.”

<sup>3</sup> *NPRM* at ¶ 22.

<sup>4</sup> *Id.* ¶ 1.

restore telecommunications service to the customers, rather than cease this primary task in the middle of a network outage to draft and submit a report to the Commission.

The Commission attempts to downplay the affect of this proposed increase in reporting burdens on midsize and smaller carriers by stating that “the vast majority of these reports will be filed by larger businesses.”<sup>5</sup> The Commission similarly states that “small businesses’ are, we believe, highly unlikely to experience outages of sufficient magnitude to meet the user-minute criterion.”<sup>6</sup> These statements serve only as further evidence that the change in rules are unnecessary. Recognizing that its rules would place increased burdens on midsize and smaller carriers, the Commission posited that if a carrier that qualified as a “small business” experienced an outage that met the Commission’s proposed threshold, “then a likely inference would be that a small number of users had lost service for several days duration, a situation of which we should be apprised.”<sup>7</sup>

The Commission utterly fails to explain *why* the Commission should be apprised of such limited outages in the context of this proceeding. ITTA does not dispute the importance of small system outages, but such outages are less likely to raise the national security concerns that were the driving force behind the *NPRM*.<sup>8</sup> Moreover, carriers already report smaller outages in the customer service context. On an annual basis, for example, all carriers required to file ARMIS reports submit information on any downtime of local switches regardless of duration of

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<sup>5</sup> *Id.* ¶ 54.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* ¶ 2.

the system outage.<sup>9</sup> Further, as described in Appendix A provided by ITTA's member companies (attached hereto), state regulators provide ample oversight over smaller service interruptions. For example, California requires carriers to report all outages affecting 1,000 customers or more for 10 minutes or more, while Alabama requires carriers to report outages that affect 50 or more customers. *See* Appendix A. Service outage reporting traditionally has been the province of state regulators who are primarily responsible for ensuring quality of service. Any additional burdens imposed by the Commission on midsize and smaller wireline carriers in this proceeding will serve only to increase the burdens associated with a duplicative federal layer of reporting requirements.<sup>10</sup>

The Commission must engage in reasoned decision-making as part of the rulemaking process, and its conclusory analysis for increasing reporting burdens of midsize and smaller carriers in the context of this proceeding does not meet this burden. Therefore, the Commission should not change the current threshold for reporting system outages. In the alternative, the Commission should take measures to ensure that midsize and smaller carriers are not disproportionately affected by the proposed rule change.<sup>11</sup>

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<sup>9</sup> *See* ARMIS Form 43-05, Table IV, IV.A (tables summarize the loss of local switch call processing capability for total downtime durations of *less than two minutes* and greater than two minutes respectively).

<sup>10</sup> Ironically, the *NPRM's* proposed conjunctive threshold – 30 minutes *and* 900,000 user-minutes – actually insulates larger switches from reporting incidents shorter than 30 minutes but involving more than 900,000 user-minutes. The logic that limits reporting burdens in this fashion for larger switches should apply equally (as it has up to now) to smaller switches.

<sup>11</sup> At certain other points in the *NPRM*, the Commission appears to suggest additional new burdens on wireline carriers without explicitly defining them or mandating them, producing additional confusion and concern. For example, footnote 19 of the *NPRM* appears to propose a new open-ended obligation to provide “duplicate facilities . . . for all critical resources.” *NPRM* at n.19. It is not clear what the *NPRM* would define as “critical resources,” a term which in the context of the *NPRM* could include, *e.g.*, all switches. It is also not clear what is intended by the term “duplicate facilities” and whether that term is intended to reference,

## II. THE CALCULATION OF REPORTING THRESHOLDS SHOULD BE BASED ON TOTAL NUMBER OF ACCESS LINES, NOT “USERS”

The Commission’s rules currently base network outage reporting thresholds on the number of “customers” potentially affected by a system outage, and define “customer” as “a user purchasing telecommunications service from a common carrier.”<sup>12</sup> The Commission explained that a literal reading of the regulations implies that a large customer (such as a business or the government) with thousands of end-users should be counted only as one “customer” under the reporting rules. To alleviate this ambiguity, the Commission proposes to utilize the word “user” rather than “customer.”<sup>13</sup> However, the term “user” is also open to interpretation.

ITTA suggests that the Commission should instead define reporting obligations based on number of “access lines.” In this way the Commission would receive the most accurate and complete level of reporting for residential, business and government users. A carrier may need to review customer bills or records to determine number of potentially affected “users,” but carriers easily can determine the number of affected access lines.<sup>14</sup> Further, state regulators commonly require network outage reporting based on number of “access lines.” Use of access lines at the federal level thus would simplify reporting requirements. Therefore, the Commission should require reporting based on number of access lines.

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*e.g.*, full redundancy standards. Either or both of these interpretations would increase the cost of compliance for this proposed rule exponentially – costs that have never been found to be necessary up to this point in time and which would ultimately be borne by consumers in the form of higher rates. ITTA recommends the Commission clarify that there is no intent to impose such new, costly standards in the current proceeding.

<sup>12</sup> 47 C.F.R. §§ 63.100(a)(2), (b)-(c).

<sup>13</sup> *NPRM* at ¶ 20.

<sup>14</sup> For example, a cable cut to a DS3 equates to 672 access lines and this would be immediately known at the initial time of an outage.

### **III. THE COMMISSION SHOULD CONFIRM AT WHAT LEVEL OF THE COMPANY CARRIERS MUST REPORT NETWORK OUTAGES**

Currently, it is unclear at what level in the corporate structure the Commission requires carriers to calculate whether they have met the Commission's network outage reporting thresholds. For example, some midsize carriers consist of a corporate holding company with operating subsidiaries in multiple states. Under the current proposal, it is unclear whether a holding company would meet the reporting threshold if several of its subsidiaries experienced relatively small, localized outages that separately would not rise to a reportable event. ITTA suggests that the Commission require carriers to calculate network outage thresholds at the individual operating company level, as appears to be the case under the current rules. This is also the level at which most states require network outage reporting, and therefore would be the most appropriate level for federal reporting.

### **IV. THE NEW REPORTING REQUIREMENTS SHOULD APPLY TO ALL "COMMUNICATIONS PROVIDERS"**

ITTA supports the Commission's proposal to ensure that the same reporting obligations apply to *all* service providers, regardless of the technology they employ or their regulated (dominant/non-dominant) status. ITTA therefore supports the Commission's proposal to apply its outage-reporting requirements to all "communications providers."<sup>15</sup> ITTA respectfully, submits, however, that the *NPRM* is lacking in its omission of voice over Internet protocol ("VOIP") service providers, including software-based VOIP providers. Where a network outage meets the Commission's reporting thresholds, the Commission's reporting requirements should apply equally to failures in transmission facilities and failures in

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<sup>15</sup> The *NPRM* states that "communications provider" includes "any entity that provides two-way voice and/or data communications, and/or paging service, by radio, wire, cable, satellite, and/or lightguide for a fee to one or more unaffiliated carriers." *See id.* at n.1.

communications software. With the imminent shift of a large proportion of voice traffic to IP-based providers, exclusion of VOIP providers from these streamlined reporting obligations would render the Commission's new reporting framework effectively obsolete in a few short years. Clearly, this outcome could not advance the Commission's public interest goals in this proceeding.

Respectfully submitted,

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## APPENDIX A

### Sample State Commission Service Outage Notification Requirements

#### Minnesota

<b>Minnesota PUC</b>	The Minnesota PUC has the following notification requirement: 7810.0600 REPORT TO COMMISSION ON SERVICE DISRUPTION. [Minnesota Rules Part 7810.0600] <ul style="list-style-type: none"><li>• Each telephone utility shall report promptly to the commission any specific occurrence or development which disrupts the service of a substantial number of its customers or which may impair the utility's ability to furnish service to a substantial number of customers.</li></ul>
<b>Substantial Number</b>	A Substantial Number is left to the judgment of the company. <ul style="list-style-type: none"><li>• In the event of a major service disruption, operations managers are to contact PUC regulatory staff, who in turn notify the PUC staff supervisor.</li></ul>
<b>Notification to PUC</b>	Notification to the PUC staff should include the following information: <ul style="list-style-type: none"><li>• Exchange(s) affected</li><li>• Time the outage was discovered</li><li>• Cause of outage</li><li>• Geographic area affected within exchange(s)</li><li>• Estimated number of customers affected</li><li>• Estimated time of restoration of service.</li></ul>

Appendix A (continued)

## Pennsylvania

<b>Pennsylvania PUC</b>	There are 3 categories of outages: <ul style="list-style-type: none"><li>• Critical</li><li>• Major</li><li>• Minor.</li></ul>
<b>Critical Outages</b>	A critical outage is any outage in the following certain designated central offices / remote units. <b>NOTE:</b> <ul style="list-style-type: none"><li>• Any voice mail outage is considered critical at any of the PA companies. This information may be reported to the carrier via customers, emergency personnel, etc.</li><li>• Each individual company reports the company specific outage to the PA PUC.</li></ul>
<b>Major Outages</b>	A Major outage is any outage in a remote unit not otherwise designated (see above), fiber cut, cable cut 100 pairs plus, Cerent ring trouble, voice mail machine malfunctions (i.e. scrambled messages), 100 plus lines out in a concentrated location, slow dial tone network wide.
<b>Minor Outages</b>	Minor outages include any of the following outages and are reported at the carrier's discretion: <ul style="list-style-type: none"><li>• Slow dial tone in 1 unit</li><li>• Fuse-service effecting</li><li>• Halon alarm</li><li>• Cable cut 25 pair or greater, but less than 100 pairs</li><li>• Known central office upgrades or equipment changes</li><li>• Known T1 changes.</li></ul>

Appendix A (continued)

**Michigan**

<p><b>Michigan PSC Rules</b></p>	<p>Michigan rules are as follows:</p> <ul style="list-style-type: none"><li>• Each provider shall report promptly to the commission any specific occurrence or development that disrupts service to a substantial number of its customers or that may impair its ability to furnish service to a substantial number of customers.</li><li>• The provider shall report all disruptions or developments that represent the lesser of 25% or 2,000 of the access lines by exchange for 1 hour or more. Notification shall be provided to the commission within 90 minutes during normal business hours or, if the disruption occurs during the evening or weekend, within 90 minutes of the commencement of the next business day.</li></ul>
<p><b>Michigan PSC rules (continued)</b></p>	<p>In addition, a final report shall be filed with the commission within 30 days of the disruption and shall include all of the following information:</p> <ul style="list-style-type: none"><li>• The reason for the disruption.</li><li>• The geographic area affected by the disruption.</li><li>• The number of customers affected.</li><li>• The type of services affected.</li><li>• The impact upon the provider of the service disruption.</li><li>• Whether the service disruption was avoidable or unavoidable.</li><li>• An explanation of the provider's remedy for the immediate service disruption.</li><li>• A description of the actions that the provider has or could take to avoid future disruptions.</li></ul>

Appendix A (continued)

**Ohio**

<p><b>Ohio PUC Rules</b></p>	<p>Ohio rules define an "Outage" as interruption of the local, toll, or 911 service of a substantial number of the local serving areas subscribers.</p> <p>NOTE: The smaller of twenty-five per cent or two thousand of the local serving area's access lines for a time period in excess of one hour.</p> <ul style="list-style-type: none"><li>• Each facilities-based, local service provider shall, within two hours of discovery, report to the local area news media serving the affected local serving areas and to the PUCO outage coordinator.</li><li>• Pertinent information concerning any specific occurrence or development which disrupts or impairs the local, toll, or 911 service of a substantial number of the local serving area's subscribers (the smaller of twenty-five per cent or two thousand of the local serving area's access lines) for a time period in excess of one hour.</li></ul>
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<p><b>Ohio PUC Rules (continued)</b></p>	<ul style="list-style-type: none"><li>• Each company shall report the disruption or impairment to the PUCO outage coordinator by voice mail message, e-mail, or, during normal business hours, by faxing the outage report on a form approved by the PUCO outage coordinator.</li><li>• Each facilities-based, telecommunications provider shall, within two hours of discovery, report to the PUCO outage coordinator any service disruption that is reported to any federal or state agency or news media.</li><li>• Each facilities-based, local service provider shall, immediately upon discovery, report to each county 911 PSAP serving affected local serving areas and to PUCO outage coordinator, all pertinent information concerning any specific occurrence or development which disrupts or impairs the 911 service within a given county 911 system.</li></ul> <p><b>NOTE:</b> Each facilities-based, local service provider shall provide the PSAP and the PUCO outage coordinator with time estimation on when the repair to the 911 system will be completed and the 911 services will be restored.</p>
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Appendix A (continued)

**Indiana**

<b>Indiana URC Rules</b>	The steps to “Reports of Interruptions” are as follows. <ul style="list-style-type: none"><li>• The Commission shall be informed of any major interruptions to service affecting an entire community or a substantial portion of a community or central office as soon as they come to the attention of the utility.</li><li>• The utility shall provide the Commission a report of such interruption after restoration of service.</li></ul>
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**Illinois**

<b>Illinois CC Rules</b>	<ul style="list-style-type: none"><li>• Each local exchange carrier shall inform the Commission either verbally, followed by a written report within 30 days, or via facsimile, of any complete central office failure or isolation of an exchange due to toll circuit failure when the failure exceeds two minutes.</li><li>• This record shall show the time, duration, extent, and cause of the failure, and shall be retained for a period of one year.</li></ul>
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**Alabama**

<b>Alabama PSC Rules</b>	Report any outages that involve a central office failure or any outage that affect 50 or more customers. Report Estimated restoration time and cause of outage, if known.
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**Mississippi**

<b>Mississippi PSC Rules</b>	Requires notification of the commission of any catastrophic outage of greater than 24 hours duration that affects 50 or more customers.
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Appendix A (continued)

## Tennessee

<b>Tennessee PSC Rules</b>	TN Rules - Proposed rules pending approval will require the following for an “Out of Service Report”. <b>NOTE:</b> Each TSP offering local exchange service is required to provide to the Authority a paper or electronic report regarding any disruption of service when 1,000 or more customers lose service within an exchange for more than four (4) hours. Such out of service report shall be submitted to the Authority within thirty (30) days of the incident and shall describe the disruption, the number of customers affected and what actions the TSP has taken to prevent a similar disruption of service from occurring again.
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## West Virginia

<b>West Virginia PSC Rules</b>	The telephone company shall keep a record of each interruption affecting service to an entire exchange, or any other significant portion of the company's telecommunications network. <ul style="list-style-type: none"><li>• This record shall show the date, time, duration, extent, cause, and resolution of the interruption.</li><li>• A report shall be made that details how the telephone company plans to prevent recurrence of the service interruption.</li><li>• These records and reports shall be made available to Commission Staff upon request.</li></ul> The telephone company shall take all reasonable actions to notify a 911 answering point, or appropriate emergency services personnel, of any service outage that affects, for one (1) hour or more, two hundred (200) or more access lines served by that 911 answering point.
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Appendix A (continued)

## Oregon

<b>Oregon PUC Rules – Interruption of Service</b>	<ul style="list-style-type: none"><li>• Each small telecommunications utility shall keep a record of any interruption of service affecting its whole system, or a major section thereof, including a statement of the time, duration, and cause of interruption.</li><li>• Each small telecommunications utility shall make all reasonable efforts to prevent interruptions of service and when such interruptions occur, shall endeavor to reestablish service with shortest possible delay consistent with the safety of its customers and the general public.</li><li>• To the extent practical, every customer affected shall be notified in advance of any contemplated work, which will result in interruption of service, but such notice shall not be required in case of interruption due to emergency repairs.</li></ul>
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## California

<b>California PUC Reporting Criteria</b>	<ul style="list-style-type: none"><li>• Failure of equipment or facilities affecting service to 1,000 or more customers for 10 minutes or more.</li><li>• Failure of equipment or facilities affecting service to 1,000 to 100 customers for 60 minutes or more.</li><li>• Significant call blockage other than Holidays, i.e., Mothers Day.</li><li>• A cut cable of 100 pairs or more, for 24 hours or more.</li></ul> <p>As far as notification to the California Commission, the signed "reportable" MSI Reports come directly from the NOC via fax on a monthly basis and are then forwarded to the Commission.</p>
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*Appendix A (continued)*

<p><b>California PUC Reporting Criteria</b> (continued)</p>	<ul style="list-style-type: none"> <li>• These same reports also satisfy one of the quarterly NRF reports and are used to develop a quarterly MSI Summary Report to satisfy another NRF report.</li> <li>• Verbal Reportables that affect a large number of customers are reported to the PUC, including the initial outage and follow-up with updates until service is fully restored.</li> <li>• The Commission has not been clear as to what factors constitute a Verbal MSI Reportable but have stipulated that they want to have advance notification in the event they were to receive an inquiry from news media or governmental entities.</li> </ul>
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**Utah**

<p><b>Utah PSC Rules</b></p>	<p>In Utah, Section R746-340-2 (A)(2) of the Utah Public Service Commission rules requires the reporting of local or toll service "disruptions" in central offices with more than 500 lines lasting longer than 2 hours.</p>
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**Kentucky**

<p><b>Kentucky PSC Rules</b></p>	<p>Notify PSCK within 2 hours of discovery when any of the following occurs:</p> <ol style="list-style-type: none"> <li>1. Loss of service for 4 or more hours or for 10% of customers or 500 customers (whichever is less).</li> <li>2. Occurrence of death shock or burn requiring medical treatment at hospital or similar facility, or accident requiring in-patient overnight stay. Written Summary Report required within 7 calendar days to PSCK.</li> <li>3. Actual or potential property damage equal to or greater than \$25,000.</li> </ol>
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Appendix A (continued)

**Texas**

<p>Texas PUC Rules</p>	<p><b>§26.51. Continuity of Service.</b></p> <p>(a) <b>Application.</b> Unless the context clearly indicates otherwise, in this section the term "utility," insofar as it relates to telecommunications utilities, shall refer to local exchange companies as defined in §26.5 of this title (relating to Definitions).</p> <p>(b) <b>Definitions.</b> The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise.</p> <p>(1) <b>Year 2000 compliant</b> -- A computer system or application that accurately processes date/time data (including but not limited to calculating, comparing, and sequencing) from, into, and between the 20th and 21st centuries, the years 1999 and 2000, and leap year calculations, and performs its tasks effectively without any date-related interruptions.</p> <p>(2) <b>Year 2000 ready</b> -- A computer system or application that has been determined to be suitable for continued use into the year 2000 even though the computer system or application is not fully year 2000 compliant.</p> <p>(c) <b>Service interruptions.</b></p> <p>(1) Every utility shall make all reasonable efforts to prevent interruptions of service. When interruptions occur, the utility shall reestablish service within the shortest possible time.</p> <p>(2) Each utility shall make reasonable provisions to handle emergencies resulting from failure of service, and each utility shall issue instructions to its employees covering procedures to be followed in the event of emergency in order to prevent or mitigate interruption or impairment of service.</p> <p>(3) In the event of national emergency or local disaster resulting in disruption of normal service, the utility may, in the public interest, deliberately interrupt service to selected customers to provide necessary service to civil defense or other emergency service agencies on a temporary basis until normal service to these agencies can</p>
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Appendix A (continued)

<p>Texas PUC rules (continued)</p>	<p>be restored.</p> <p>(d) <b>Record of interruption.</b> Except for momentary interruptions due to automatic equipment operations, each utility shall keep a complete record of all interruptions, both emergency and scheduled. This record shall show the cause for interruptions, date, time, duration, location, approximate number of customers affected, and, in cases of emergency interruptions, the remedy and steps taken to prevent recurrence.</p> <p>(e) <b>Report to commission.</b> The following guidelines are a minimum basis for reporting service interruptions. Any report of service interruption shall state the cause(s) of the interruption. Utilities should use judgment in reporting major outages lasting less than four hours. Utilities shall notify the commission in writing of interruptions in service lasting four or more hours affecting:</p> <ul style="list-style-type: none"><li>(1) 50% of the toll circuits serving an exchange;</li><li>(2) 50% of the extended area service circuits serving an exchange;</li><li>(3) 50% of a central office; and</li><li>(4) 20% or more of an exchange's access lines.</li></ul> <p>(f) <b>Change in character of service.</b></p> <ul style="list-style-type: none"><li>(1) In case any change is made by the utility in the type of service rendered which would adversely affect the efficiency of operation or the adjustment of the equipment of customers, all customers who may be affected shall be notified by the utility at least 60 days in advance of the change or if such notice is not possible, as early as feasible.</li></ul> <p><b><u>§26.51(f) continued</u></b></p> <ul style="list-style-type: none"><li>(2) This paragraph applies only to local exchange companies that are dominant carriers. Where adjustments or replacements of a dominant carrier's standard equipment must be made to permit use under such changed conditions, adjustment shall be made by the dominant carrier without charge to the customers, or in lieu of such adjustments or replacements, the dominant</li></ul>
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Appendix A (continued)

<p>Texas PUC rules (continued)</p>	<p>carrier may make cash or credit allowances based on the duration of the change and the degree of efficiency loss.</p> <p>(g) <b>Emergency Operations Plan.</b> By December 31, 1998, or within 60 days of becoming a utility, whichever is later, each utility shall file with the commission a general description of its emergency operations plan. Each utility shall thereafter update its plan by filing revision sheets that clearly indicate any changes in the plan within 30 days of such changes. A general description of the plan shall also be made available at the utility's main office for inspection by the public. A complete copy of the plan shall be made available at the utility's main office for inspection by the commission or its staff upon request. Each emergency plan filed by a utility must include, but need not be limited to, the following:</p> <p>(1) a communications plan that describes the procedures for contacting the media, customers and critical users (including but not limited to hospitals, police stations, fire stations, and critical city offices) as soon as reasonably possible either before or at the onset of an emergency. The communications plan should also:</p> <p style="padding-left: 40px;">(A) address how the utility's telephone system and complaint handling procedures will be augmented during an emergency;</p> <p style="padding-left: 40px;">(B) identify key personnel and equipment that will be required to implement the plan when an emergency occurs;</p> <p>(2) priorities for restoration of service; and</p> <p>(3) the utility's Year 2000 contingency plan and mitigation strategies for dealing with potential failures caused by computers that are not year 2000 compliant or year 2000 ready, whether those failures originate in the utility's own system or in a network partner or supplier's system or operations. This plan should identify potentially vulnerable systems and business processes and prioritize them. The plan should also include the utility's plans for backups for critical users and processes, and report estimated costs for contingency operations.</p>
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