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July 9, 2004

Chairman Pat Miller
c/o Sharla Dillon
Docket Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket 04-00128, Interconnect Agreement, Aeneas Communications and Jackson Energy Authority

Dear Chairman Miller,

I am enclosing an original and thirteen copies of the Aeneas "Disaster Plan" to supplement our prior filing under this docket. Thank you for your attention to this matter.

Sincerely,

Paul F. Rice
Attorney for Aeneas

Enc.

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T.R.A. DOCKET ROOM

July 9, 2004

Mr. Lewis DeBoard
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket 04-00128, Interconnect Agreement
Aeneas Communications and Jackson Energy Authority

Dear Mr. DeBoard,

I filed this interconnect agreement back in April pursuant to paragraph 32.1 of the agreement, which allows either party to file it with the TRA. I relayed your instructions for the parties to supplement the document with a 'disaster plan' to management at the Jackson Energy Authority the same day that you brought this omission to my attention. Management at JEA has advised that they do not believe this document is required to be filed with the TRA. Please contact JEA for further information regarding its position.

I am enclosing a "Disaster Plan" written unilaterally for Aeneas just to assure the Authority that we do have one. Of course, this CLEC is the same one that was destroyed by a tornado in June of last year and was operational some 72 hours later. Likewise, I am confident in mentioning JEA's prowess as a utility in disaster management. My point here again is to assure the Authority that regardless of the outcome of the filing situation, protecting the services to the customers is first on both our minds.

Sincerely,

Paul F. Rice

Enc: Disaster Plan

Cc: Teresa Cobb, Atty for JEA

RECEIVED
JUL 15 2004
TN REGULATORY AUTHORITY
TELECOMMUNICATIONS DIVISION

DISASTER PLAN FOR AENEAS COMMUNICATIONS, LLC WITH RESPECT TO ITS INTERCONNECT AGREEMENT WITH JACKSON ENERBY AUTHORITY EFFECTIVE MARCH 1, 2004

1.0 PURPOSE

In the unlikely event of a disaster occurring that affects the parties long-term ability to deliver regulated traffic to consumers, general procedures have been developed to hasten the recovery process in accordance with the Telecommunications Service Priority (TSP) Program established by the Federal Communications Commission to identify and prioritize telecommunication services that support national security or emergency preparedness (NS/EP) missions Since each location is different and could be affected by an assortment of potential problems, a detailed recovery plan is impractical. However, in the process of reviewing recovery activities for specific locations, some basic procedures emerge that appear to be common in most cases.

These general procedures should apply to any disaster that affects the delivery of traffic for an extended time period Each Local Exchange Carrier (LEC) providing service over the JEA network should be given the same consideration during an outage, and service should be restored in non-discriminatory fashion as quickly as possible.

This document should cover the basic recovery procedures that would apply to every LEC.

2.0 SINGLE POINT OF CONTACT

When a problem is experienced, regardless of the severity, the Jackson Energy Authority will be able to observe traffic anomalies and begin monitoring the situation Controls can be appropriately applied to insure the continuity of JEA's network, and JEA can attempt to circumvent any failure using available reroutes.

If interconnection with the Incumbent Local Exchange Carrier is an issue, Aeneas will notify the ILEC so that it may contact any parties it deems appropriate for its response.

Contact Information for the JEA Master Telecommunications Control Center as published in Telcordia's National Network Management Directory, is 125 E. College Street, Jackson, TN 38301 (underground bunker facility), 731-422-7200; contact information for Aeneas Communications LLC shall be Jonathan Harlan, 300 N. Cumberland, Jackson, TN 38301, (731) 554-9200.

3.0 IDENTIFYING THE PROBLEM

During the early stages of problem detection, JEA will be able to tell which LECs are affected by the catastrophe. Further analysis and/or first hand observation will determine if the disaster has affected LEC equipment only, JEA equipment only or a combination The initial restoration activity will be largely determined by the equipment that is affected. Once the nature of the disaster is determined and after verifying the cause of the problem, then JEA can initiate reroutes and/or transfers that are jointly agreed upon by the affected LECs' and JEA. The type and percentage of controls used would depend upon available network capacity. Controls necessary to stabilize the situation can be invoked and JEA can attempt to re-establish as much traffic as possible.

3.1 SITE CONTROL

The local fire marshal with the assistance of the police will control the site until the building is no longer a threat to surrounding properties and the companies have secured the site from the general public. During this time, the majority owner of the building should be arranging for a demolition contractor to mobilize to the site with the primary objective of reaching the cable entrance facility for a damage assessment The results of this assessment would then dictate immediate plans for restoration, both short term and permanent.

In a less catastrophic event, i.e., the building is still standing and the cable entrance facility is usable, the situation is more complex. The site will initially be controlled by local authorities until the threat to adjacent property has diminished. Once the site is returned to the control of the companies, the following events should occur.

An initial assessment of the main building infrastructure systems (mechanical, electrical, fire and life safety, and others) will establish building needs. Once these needs are determined, the majority owner should lead the building restoration efforts. There may be situations where the site will not be totally restored within the confines of the building The companies must individually determine their needs and jointly assess the cost of permanent restoration to determine the overall plan of action

Multiple restoration trailers from each company will result in the need for designated space and installation order. This layout and control is required to maximize the amount of restoration equipment that can be placed at the site, and the priority of placements.

Care must be taken in this planning to ensure other restoration efforts have logistical access to the building. Major components of telephone and building equipment will need to be removed and replaced. A priority for this equipment must also be established to facilitate overall site restoration. (Example: If the AC switchgear has sustained damage, this would be of the highest priority in order to regain power, lighting, and HVAC throughout the building.)
If the site will not accommodate the required restoration equipment, the company would then need to quickly arrange with local authorities for street closures, rights of way or other possible options available.

3.2 ENVIRONMENTAL CONCERNS

In the worse case scenario, many environmental concerns must be addressed. Along with the police and fire marshal, the state environmental protection department will be on site to monitor the situation.

Items to be concerned with in a large central office building could include:

1. Emergency engine fuel supply. Damage to the standby equipment and the fuel handling equipment could have created "spill" conditions that have to be handled within state and federal regulations.

2. Asbestos-containing materials that may be spread throughout the wreckage. Asbestos could be in many components of building, electrical, mechanical, outside plant distribution, and telephone systems.

3. Lead and acid. These materials could be present in potentially large quantities depending upon the extent of damage to the power room.

4. Mercury and other regulated compounds resident in telephone equipment.

5. Other compounds produced by the fire or heat.

Once a total loss event occurs at a large site, local authorities will control immediate clean up (water placed on the wreckage by the fire department) and site access. At some point, the companies will become involved with local authorities in the overall planning associated with site clean up and restoration. Depending on the clean up approach taken, delays in the restoration of several hours to several days may occur. In a less severe disaster, items listed above are more defined and can be addressed individually depending on the damage.

In each case, the majority owner should coordinate building and environmental restoration as well as maintain proper planning and site control.

4.0 THE PARTIES' DISASTER FACILITIES

The JEA underground bunker facility is located at 125 E. College, Jackson, TN 38301. Aeneas' Network Operations Center is located in an especially designed nuclear fallout shelter, featuring pre-stressed steel reinforced concrete 'bunker-style' construction. During an emergency, the affected Aeneas staff will convene a group of pre-selected experts to inventory the damage and initiate corrective actions. These experts have full access to personnel and equipment and will assume control of the restoration activity. In the past, the JEA has been involved with utility restoration activities resulting from ice and wind storms and floods. Likewise, Aeneas has recovered from total building and equipment destruction by wind in 2003. Each has demonstrated their capabilities during these calamities as well as during outages caused by human error or equipment failures. Both parties have an excellent record of restoring service as quickly as possible.

During past major disasters, the parties moved emergency equipment to the affected location, and directed recovery efforts of local personnel and coordinated service restoration activities to restore service as quickly as possible using whatever means were available Permanent solutions, such as the replacement of damaged buildings or equipment, need not be addressed prior to re-establishing service

5.0 RECOVERY PROCEDURES

The nature and severity of any disaster will influence the recovery procedures. One crucial factor in determining how Aeneas will proceed with restoration is whether or not Aeneas's equipment is incapacitated. Regardless of whose equipment is out of service, Aeneas will move as quickly as possible to aid with service recovery, however, the approach that will be taken may differ depending upon the location of the problem.

5.1 LEC OUTAGE

For a problem limited to one LEC (or a building with multiple LECs), JEA, as operator of this "open network" will eventually have several options available for restoring service quickly For those LECs that have agreements with other LECs, JEA can immediately start directing traffic to a provisional LEC for completion. This alternative is dependent upon JEA having concurrence from the affected LECs. Whether or not the affected LECs have requested a traffic transfer to another CLEC will not legally impact JEA's obligation to re-establish traffic to the original destination as quickly as possible.

5.2 JEA OUTAGE

Because JEA's equipment has varying degrees of impact on the service provided to the LECs, restoring service from damaged JEA equipment is different. The outage will probably impact a number of Carriers simultaneously

A disaster involving any of JEA's equipment locations could impact the LECs, some more than others A disaster at a Central Office (CO) would only impact the delivery of traffic to and from that one location, but the incident could affect many Carriers.

Shortly after a disaster, JEA can begin applying controls and finding re-routes for the completion of as much traffic as possible. These reroutes may involve delivering traffic to alternate Carriers upon receiving approval from the LECs involved. In some cases, changes in translations may be required. Aeneas could, as a last resort, migrate all customers to copper or coaxial or other available networks.

5.2.1 Loss of a Central Office

When JEA loses it's Central Office, JEA should
a) Place specialists and emergency equipment on notice;
b) Inventory the damage to determine what equipment and/or functions are lost;
c) Move containerized emergency equipment and facility equipment to the stricken area, if necessary;
d) Begin reconnecting service on a parity basis for Hospitals, Police and other emergency agencies or End Users served by the LEC in accordance with the TSP priority restoration coding scheme entered in the JEA Maintenance database immediately prior to the emergency.

5.2.2 Loss of a Central Office with Serving Wire Center Functions

The loss of a Central Office that also serves as a Serving Wire Center (SWC) should be restored as described in Section 5 2.1.

5.2.3 Loss of a Central Office with Tandem Functions

The loss of a LEC's Central Office building that serves as an Access Tandem and as a SWC will be addressed as follows.
a) Place specialists and emergency equipment on notice;
b) Inventory the damage to determine what equipment and/or functions are lost,
c) Move containerized emergency equipment and facility equipment to the stricken area, if necessary;
d) Begin reconnecting service on a parity basis for Hospitals, Police and other emergency agencies or End Users served by the LEC in accordance with the TSP priority restoration coding scheme entered in the LEC's maintenance database immediately prior to the emergency;

e) Re-direct as much traffic as possible to the alternate access tandem (if available) for delivery to those LECs utilizing a different location as a SWC;
f) Begin aggregating traffic to a location near the damaged building. From this location, begin re-establishing trunk groups to the LECs for the delivery of traffic normally found on the direct trunk groups. (This aggregation point may be the alternate access tandem location or another CO on a primary facility route.)

5.3 COMBINED OUTAGE (LEC AND JEA EQUIPMENT)

In some instances, a disaster may impact JEA's equipment as well as the LECs'. This situation should be handled in much the same way as described in Section 5.2.3. Since JEA and the LECs will be utilizing temporary equipment, close coordination will be required.

6.0 Tennessee Regulation 1220-4-2-.23

6.1 Aeneas utilizes electrical power from the Jackson Energy Authority's power grid in Jackson, Tennessee, however, Aeneas also maintains emergency AC and DC power sources on premises sufficient to provide an indefinite source of electricity dependant only upon the availability of diesel fuel.

6.2 Aeneas maintains far more capacity with respect to switching than it is reasonable to expect it will need for several years and the equipment is scale-able. Aeneas' equipment can also control the amount of bandwidth utilized and react to sudden and prolonged increases in traffic. Multiple employees can operate each component of the Aeneas equipment, lessening the impact of any absences of operators.

6.3 Aeneas has located its equipment in a non-combustion environment within a steel reinforced concrete nuclear fallout shelter to lessen risks from fire, storm or acts of God or terrorists.

6.4 Aeneas has contracts with its switch manufacturers for provision of replacement switches on an emergency basis which can be operational in as little as four days from order.

6.5 Aeneas has informed its employees of procedures to be followed in the event of emergency in order to prevent or mitigate interruption or impairment of telephone service. As other providers utilize the open network, agreements to stand as 'alternate carriers' as mentioned above will be considered. As stated, as a last resort, customers can be migrated to other available networks, if necessary.

7.0 ACRONYMS

LEC - Local Exchange Carrier, and includes Aeneas Communications, LLC.
CO - Central Office
NMC - Network Management Center
SWC - Serving Wire Center (switch)
TSP - Telecommunications Service Priority

8.0 Hurricane Information

Hurricane wind damage is unlikely in Jackson, Tennessee. No additional preparations are needed.

9.0 JEA Disaster Management Plan

The JEA network has geographical and redundant communication capabilities within a remote building in North Jackson. In the event of a disaster removing the downtown bunker from service, Aeneas is informed that the other geographical center would assume responsibilities.

This Disaster Plan, effective March 1, 2004, executed on the 9 day of July, 2004.

Aeneas Communications, LLC

Signature _____

Name Jonathan W Harlan

Title CEO

Date 7-9-04

Cc: Kim Kersey, VP
Jackson Energy Authority
125 E College Street
Jackson, TN 38301