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November 1, 2012

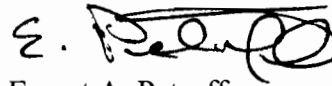
Mr. John Hutton
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

**RE: Traffic Exchange Agreement
 Highland Telephone Cooperative, Inc./ Sprint/Nextel
 TRA Docket No. 12-00118**

Dear John:

Enclosed please find the Emergency Restoration Plan of Highland Telephone Cooperative, Inc. We appreciate your assistance, and if you require any additional materials, please advise.

Sincerely yours,



Ernest A. Petroff

EAP:bjh
Enclosure
cc: G. Mark Patterson

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TN REGULATORY AUTHORITY
UTILITIES DIVISION

**EMERGENCY RESTORATION PLAN
HIGHLAND TELEPHONE COOPERATIVE, INC.**

Revised: January 1, 2012

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EMERGENCY RESTORATION PLAN HIGHLAND TELEPHONE COOPERATIVE, INC.

I. PURPOSE

This plan defines the mission and responsibilities of the Engineering, Plant and Customer Operations Departments in responding to a natural disaster or emergency situation that causes widespread service outages.

II. EMERGENCY RESTORATION COMMITTEE

The Emergency Restoration Committee (ERC) shall be staffed by the following personnel:

- Principal Executive Officer –
G. Mark Patterson
- Executive Director of Engineering Operations -
Lawrence S. Diden
- Engineering Manager – Jared Carson
- Field Services Manager – Phillip Ward
- Customer Service Manager – Rhonda Davis

The order above is defined as the "Priority List" and in the absence of the Executive Director of Engineering Operations the next available position on the list will assume the Chair responsibilities.

III. CONCEPT OF OPERATIONS

A. Organization and Responsibility

The ERC directs and coordinates damage assessments and then formulates and implements restoration plans. Personnel, material, and supply augmentation above the normal levels will be coordinated through Highland's Purchasing Coordinator.

Decisions to replace, reroute, or repair strategic facilities are the responsibility of the ERC. The ERC is responsible for rapid restoration of service and to protect the well-being of employees and customers.

The Executive Director of Engineering Operations, acting as committee Chair, is responsible for activating the plan and formulating an action plan of restoration after each committee member has reported the outages in their area of interest. The Chair will provide updates to the Public Relations Department and Executive Staff as appropriate.

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The Engineering Manager shall be responsible for tracking equipment outages and power outages at all equipment locations and coordinate with other departments in providing portable generators to sites as needed. The Engineering Manager will keep the Chairperson and other committee members apprised of the status of equipment and power outages at the central offices and remote sites.

The Field Services Manager will be responsible for monitoring trouble reports, for analyzing these reports to determine areas of significant damage so that repair forces can be utilized in a way that will maximize the effect of their efforts. The Field Services Manager will keep the Chairperson and other committee members apprised of the status of troubles.

The Customer Service Manager shall be responsible for staffing Support Services staff to aide those employees working in the field to restore services. The Customer Service Manager will also be responsible for ensuring all incoming calls are answered and that customers are properly informed. This includes keeping after-hours and technical support centers updated.

Update of this practice annually in January shall be the responsibility of the ERC Chair or his/her designee(s).

B. Emergency Procedures

1. Initial Notification

In an emergency or disaster, the individual first recognizing the condition notifies his or her immediate supervisor, or one of the ERC members listed in Section II. If possible, follow the chain of command until notification is made.

Listings of contact information for all outside and central office personnel, portable emergency generators and the NCTIA

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listing of available manpower and equipment can be found on the Highland Home Page. It shall be the responsibility of each manager serving on the Emergency Restoration Committee to provide personnel updates to the designee of the Customer Service Manager [currently Rhonda Davis].

When the person initiating the notification is able to contact a member of the ERC committee listed above, the ERC member contacted will handle the rest of the notification.

The ERC Chairperson will analyze the situation and make the determination to activate the Emergency Restoration Command Post (ERCP). If the ERC chairperson is unavailable the determination will be made by the first available committee member according to the priority list in Section II.

NOTE: The ERC Chairperson may activate the ERC before damage occurs if he/she feels that damage is imminent.

2. Emergency Restoration Command Post (ERCP)

The Emergency Restoration Command Post will be located in the mini-conference room located upstairs in the Corporate Principal Office Building at Sunbright, TN (former Network Lab) so communications can be made easily with Support Services and it is convenient to the MetaSwitch/ DMS-100 for ease of access for switch communications.

It is the responsibility of the Field Services Manager to ensure the command post is equipped with the equipment and supplies as listed in Section 4.

Each member on the ERC shall follow the procedures for his or her respective area of responsibility.

The ERC will remain manned as long as personnel are still working in the field. Personnel will advise the ERC when they end work for the day.

The chairperson or first person on the priority rank shall determine if an ERC member or members can be better utilized in the field.

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It is the responsibility of the Field Services Manager to keep a copy of this plan, the current employee contact list, the manpower and equipment availability list and the Portable Generator List in the ERCP at all times.

3. Personal Safety

The FIRST PRIORITY in any emergency situation is the health and safety of Highland employees, contractors and customers. If necessary, all persons will be evacuated using the existing building evacuation plans.

No personnel will be dispatched to assess or repair damages in an area unless it can be determined beyond a reasonable doubt that it is safe to work in the area. No employee should attempt to access an area or repair damages if they feel it is an unsafe work area.

It is the responsibility of each department manager to verify that all personnel are accounted for before leaving the command post.

4. Equipment and Supplies

It is the responsibility of the Field Services Manager to ensure the Emergency Restoration Command Post (ERCP) is equipped with the following during activation:

- A group of telephone lines for each county impacted and five additional lines for calling into and out of the Command Post. (The numbers are as follows:
 - o McCreary County, KY 606/376-5311 or 611
 - o Scott County, Tennessee 423/663-3939 or 611
 - o Morgan County, TN 423/628-2121 or 611
- Three Network Connections
 - o One PC for access.
 - o One PC for access to the MetaSwitch 3100 and/or DMS-100 switches and carrier equipment.
 - o One PBX extension line.
- One large wall mounted white board for posting updates.

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- A TV (with a video hookup) and an AMIFM radio

The Field Services Manager is responsible for the up keep of the center during its activation.

The departmental equipment and supplies needed for the emergency restoration operations shall be determined by each individual department manager and each manager shall ensure that appropriate quantities are on hand at all times.

5. Field Communications

Field forces will be instructed to call the ERCP every two hours to give status reports and/or get instructions.

In case of cellular outages, the ERC will immediately investigate the feasibility of using Citizens Band radio for communications.

6. Restoration Operations

Upon notification that the Emergency Restoration Plan is activated, each committee member shall compile all of the available information they have at the time and report to the command post as soon as possible.

The ERC will discuss the outages and work jointly in developing a plan of action with the Chairperson leading the plan.

It is important that accurate information be reported and the information be kept up to date in order to keep the plan going efficiently and effectively.

If it is determined that work orders are required to address any damages, the Engineering Manager will confer with the Accounting

Manager and determine if any special measures are needed to track costs on asp and COE work orders.

Crucial information will be posted on the whiteboard for all the members to have available.

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Listed below are some of the specific responsibilities of each member:

- Executive Director of Engineering Operations
 - o Initiates Emergency Restoration Plan
 - o Compiles and analyzes the outage data and reports information to Public Relations Manager and to Executive Staff.
 - o Coordinates with ERC members and develops plan of action.
 - o Contacts other telephone companies and contractors for assistance if needed.
- Engineering Manager
 - o Generates list of central offices and remotes without commercial power, and any other non-power related outages to ERC staff.
 - o Supervises and dispatches repair forces to restore power to remote switches and to address switch and network troubles.
 - o Coordinates with Plant Manager in supervising and dispatching appropriate personnel to deploy portable generators and assuring that permanent generators are fueled and operational.
 - o Tracks locations of emergency generator deployment.

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- Field Services Manager
 - Generates list of subscriber count outages grouped by county and provides to ERC staff.
 - Supervises and dispatches repair forces for restoring customer services and maintaining accurate records for facility assignments.
 - Ensures ERCP remains staffed and equipped during duration of plan activation.
- Customer Service Manager
 - Ensures Support Services staff members are available to assist field personnel with restoration of service.
 - Responsible for keeping after-hours and technical support personnel updated of status of repair.
 - Assists Field Services Manager in maintaining reporting and ensuring ERCP remains properly equipped.
 - Responsible for maintaining updated information on all contact lists associated with this plan.

7. Departmental Priorities

The primary service priority of each department is the restoration of service in accordance with that department's primary responsibility and with an emphasis on safety, security, and internal communications.

8. Public Information

Dissemination of public information for customer service and the media is the primary responsibility of the Public Relations Department (or the Marketing Supervisor if the Public Relations Administrator is unavailable). Information to be released to the public or the media will be channeled to and coordinated with that department via the Emergency Restoration Committee Chair or next priority level available.

9. Status Reporting

Information on the status of the current situation will be reported from the field to the ERC at the ERCP. This information will be funneled to the Chairperson who will keep Public Relations and the Executive staff informed of status and

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any additional resource requirements in accordance with the schedule that the Executive staff request.

10. Mechanized Records

It is the responsibility of the Customer Service Manager to update the copy of mechanized customer facility records every six months and store updated copy in the ERCP.

11. Priority Restoration

The ERC will establish priorities for the restoration of permanent service at the time of the emergency or disaster as conditions dictate. The ERC may amend the following considerations of restorations, but only after essential company facilities are restored.

- a. E911
- b. Local Government Emergency Operations Centers
- c. Medical and Emergency Services
- d. Company Communications
- e. Government
- f. Utilities
- g. Large customers-IXC's
- h. Other customers.

12. Staff Information

The ERC Chairperson or a designated representative will brief Highland employees on the situation and any special notices that apply to them (such as hours to be worked, safety or hazardous conditions, location of alternate work sites and transportation arrangements, etc.) The ERC Chairperson will brief the ERC Committee members on the status of response and recovery operations. Each department involved will provide input to this briefing.

13. Follow-up/Debriefing

Following any activation of the ERC to address an emergency situation, the ERC will meet and discuss performance during the emergency, and make modifications to the plan as deemed necessary to make it more effective and efficient.

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Appendix A

Material Sources:

Power & Tel
Ron Davis
1-901-866-3203
Ron.Davis@ptsupply.com

Graybar
Dale Olsen
1-800-933-9831

CSSA
Sue Cabe
1-800-252-2772

KGP
Chris Williamson
cwilliamson@kgptel.com
706-270-3236

Contract Labor:

Galloway Construction
Richard A. Nitzschke
423-628-2575
**Aerial & Buried Installation Construction, Splicing,
Installation/Repair**

Red Stag Construction LLC
Rod Huff
931-858-1181
**Aerial & Buried Installation Construction, Splicing,
Installation/Repair**