



William R. Atkinson
Senior Counsel & Director
State Regulatory Affairs

Sprint
GAATLD0704
3065 Akers Mill Rd. S.E., 7th Floor
Atlanta, GA 30339

April 24, 2015

VIA HAND DELIVERY

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-5701

RE: Docket No. 31297 -- Petition of Virgin Mobile USA, L.P. for Limited Designation as
an Eligible Telecommunications Carrier

Dear Mr. McAlister:

Please find for filing in the above-styled docket an electronic original on a 3.5" diskette, a hard copy original, and fifteen (15) copies of Virgin Mobile's Application to Amend its Eligible Telecommunications Carrier Designation. Thank you for your assistance, and please call me if you have any questions regarding this matter.

Sincerely,


William R. Atkinson

WRA/hvp

Enclosures

cc: Mr. Patrick Reinhardt
Mr. Leon Bowles
William Maycock, Esq.

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re:

Petition of Virgin Mobile USA, L.P.)
For Limited Designation as an Eligible) Docket No. 31297
Telecommunications Carrier)

**APPLICATION OF VIRGIN MOBILE TO AMEND ITS ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION**

Virgin Mobile USA, L.P., d/b/a Assurance Wireless Brought to You by Virgin Mobile (“Virgin Mobile” or “Company”) through its undersigned counsel, respectfully submits this Application to Amend Its Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e) of the Telecommunications Act of 1996 (the “Act”), 47 U.S.C. § 151, *et. seq.*, the Federal Communications Commission’s (“FCC”) rules, and regulations governing universal service, 47 C.F.R. Part 54 (“FCC Rules”). As set forth herein, Virgin Mobile seeks to expand its current ETC designated area in Georgia by adding the Georgia portions of four wire centers with Common Language Location Identifiers (“CLLIs”) located in Tennessee.¹ The CLLIs involved are BNTNTNMT, CHTGTNBR, CHTGTNRO, and CHTGTNSE. To be clear,

¹ As the Commission knows, a CLI is a unique building location where one or more telecommunications providers house their equipment. Wire centers and CLLIs are roughly equivalent in wireline telephony. While the concept of a “wire center” is somewhat meaningless in relation to wireless networks such as Sprint’s/Virgin Mobile’s, wire centers are used occasionally to describe a geographic area served by a wireless carrier. In connection with the present Application, only the portions of wire centers associated with Georgia geographic areas are involved.

Virgin Mobile is not asking this Commission to designate it as an ETC for any areas outside the State of Georgia. In support of its Application, Virgin Mobile respectfully shows as follows:

I. INTRODUCTION

1.

Virgin Mobile seeks to amend the limited ETC designation granted to the Company in the Commission's Order issued on March 18, 2011, as amended, in the above-styled docket.² Specifically, Virgin Mobile requests that the Commission amend its ETC designation to expand the Company's designated ETC areas to include Georgians residing in areas of Georgia near the Tennessee border, as set forth in the attached **Exhibit A** map and **Exhibit B** list of additional wire centers and affected Georgia NPA-NXXs associated with those wire centers.

2.

Granting Virgin Mobile's Application in this proceeding will enable the Company to receive federal low-income universal service support for each qualified Lifeline subscriber it serves within its newly expanded designated areas in Georgia. It also will provide Lifeline subscribers in northern Georgia with an additional choice of service providers.

3.

Virgin Mobile experienced a similar situation in Mississippi, where the Mississippi Public Service Commission's designated ETC area for Virgin Mobile did not include the Mississippi portions of five wire centers located in Tennessee, Alabama, and Louisiana. Earlier

² Georgia Public Service Commission ("GPSC" or "Commission") Docket No. 31297, Order on Petition for Designation as Eligible Telecommunications Carrier (issued March 18, 2011) ("Order"). On July 6, 2012, the Commission granted a June 4, 2012 Motion to amend the Company's ETC designation in order to reflect the Company's trade name. On September 11, 2014, the Commission issued an Order granting an August 8, 2014 application to amend the Company's ETC designation to add 82 wire centers.

this year, Virgin Mobile successfully petitioned the Mississippi Commission to amend Virgin Mobile's designated ETC area to include the Mississippi portions of those wire centers. A copy of the Mississippi Commission's order granting Virgin Mobile's petition to add the Mississippi portions of the wire centers with CLLIs in other states is attached hereto as **Exhibit C**.

4.

As the Commission knows, Virgin Mobile is a subsidiary of Sprint Corporation ("Sprint") and certain Sprint wireless entities are authorized by the FCC to provide commercial mobile radio services ("CMRS") in Georgia. Sprint is a communications services company that creates more and better ways to connect its customers to the things they care about most. Sprint served nearly 56 million connections as of December 31, 2014 and is widely recognized for developing, engineering and deploying innovative technologies, including the first wireless 4G service from a national carrier in the United States. A copy of Sprint's 2013 10-K as filed with the Securities and Exchange Commission ("SEC") is available on the SEC's web site at the following link: <http://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0000101830&type=10-K&dateb=&owner=include&count=40>

Accordingly, Sprint and Virgin Mobile possess the requisite technical, financial and managerial expertise and resources necessary in order to provide ETC services in the additional designated areas requested herein.

5.

On March 18, 2011, the Commission issued its Order designating Virgin Mobile as an ETC in Georgia for the limited purpose of providing Lifeline service in Georgia. Subsequently, the Commission expanded Virgin Mobile's ETC designation in an Order dated September 11, 2014. Virgin Mobile has complied with the requirements and terms and conditions of the

Commission's Order in this docket and avers that it will comply with these same requirements, terms and conditions in the additional designated areas requested herein.

6.

As stated above, Virgin Mobile is requesting that it be designated as an ETC in the Georgia portions of four (4) additional wire centers. The CLLIs of the four wire centers are BNTNTNMT, CHTGTNBR, CHTGTNRO, and CHTGTNSE. See **Exhibit A** (map highlighting the requested additional wire centers) and **Exhibit B** (list of additional wire centers and affected Georgia NPA-NXXs), attached hereto. Pursuant to the standard articulated in the Commission's 2012 T-Mobile ETC designation Order³, Virgin Mobile attests that it covers 40% or more of the population in the Georgia portions of each of these four additional wire centers.

II. VIRGIN MOBILE CONTINUES TO SATISFY EACH OF THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

7.

To qualify for ETC designation under 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201, an applicant must satisfy the following requirements:

- (a) The applicant must be a "common carrier" under federal law;
- (b) The applicant must offer or be capable of offering the services or functionalities set forth in 47 C.F.R. § 54.101(a) (the "Supported Services") using its own facilities, or a combination of its own facilities and resale of another carrier's services; and

³ See GPSC Docket No. 32967, *In Re Application of T-Mobile South LLC for Designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(2) of the Communications Act of 1934*, Order Granting in Part and Denying In Part ETC Status (issued Mar. 21, 2012) ("T-Mobile Order"), at pp. 6, 8: "[T]he Staff also used 40% of the population as its standard. However, . . . the Staff applied the same standard on a wire center basis. . . . The Commission adopts the Staff's analysis with respect to the wire centers for which T-Mobile serves 40 percent of the population."

(c) The applicant must commit to advertise the availability and charges for the Supported Services using media of general distribution.

8.

In its March 18, 2011 Order, the Commission previously determined that Virgin Mobile satisfied the applicable requirements for designation as a competitive ETC. As demonstrated below, Virgin Mobile continues to satisfy each of the applicable requirements in the additional wire centers for which it seeks designation.

A. Virgin Mobile Is A Common Carrier

9.

One requirement for ETC designation is that the applicant is a common carrier. 47 U.S.C. § 214(e)(1). A common carrier is defined by the Act as “any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio” 47 U.S.C. § 153(11). The FCC has determined that wireless telecommunications is a common carrier service. *See* 47 C.F.R. § 20.9(a). Virgin Mobile is, therefore, a common carrier for purposes of ETC designation.

B. Virgin Mobile Provides Each of The Supported Services

10.

Another requirement for ETC designation is that the applicant be capable of and committed to providing each of the Supported Services upon designation. 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.101. As discussed in detail beginning at page 10 of Virgin Mobile’s original Petition for Limited ETC Designation filed on Feb. 1, 2010 in these proceedings, Virgin Mobile continues to be capable of, and currently does provide, the Supported Services over Sprint’s existing network infrastructure in Georgia. Moreover, Virgin

Mobile will make these services and functionalities available to any qualified Georgia Lifeline customer in the Company's designated service area.

C. Functionality in Emergency Situations

11.

As required by 47 C.F.R. § 54.202(a)(2), Virgin Mobile continues to be able to remain functional in emergency situations. Attached hereto as **Exhibit D** is the most current version of Sprint's Business Continuity Plan Overview, which includes a detailed discussion of Sprint's and Virgin Mobile's emergency preparedness and disaster recovery capabilities.

D. Virgin Mobile Will Continue To Offer And Advertise The Availability Of, And Charges For, The Supported Services Throughout Its ETC Service Areas

12.

Another requirement for ETC designation is that an applicant advertise the availability of, and charges for, the supported services using media of general distribution. 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2). Virgin Mobile continues to offer and advertise its wireless telecommunications services in Georgia using media of general distribution, including radio, television, billboard, print advertising and the Internet at <http://www.assurancewireless.com/Public/Welcome.aspx> . Virgin Mobile also maintains various retail locations and sales agents throughout its Georgia market areas, which provide an additional source of advertising. Virgin Mobile will continue to advertise the availability of its service offerings and the corresponding rates for those services throughout its ETC designated areas through media of general distribution.

III. GRANTING THE APPLICATION WILL SERVE THE PUBLIC INTEREST

13.

Granting Virgin Mobile's Application will serve the public interest by providing more qualifying Georgia Lifeline subscribers the opportunity to select the Company's affordable and high-quality telecommunications services. This in turn will facilitate competition and incent other carriers to strengthen and improve their existing offerings.

14.

As evidence of Virgin Mobile's continuing commitment to high-quality service, the Company annually certifies its compliance with CTIA's Consumer Code for Wireless Service, and continues to win awards for outstanding customer service, including its selection as the top-rated non-contract wireless carrier in the 2015 J.D. Power Wireless Customer Care rankings:

<http://ratings.jdpower.com/telecom/ratings/909202041/2015-Wireless+Customer+Care+Performance+Study/index.htm>

15.

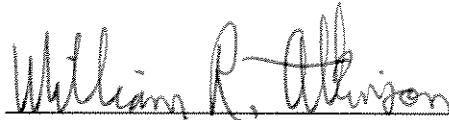
Granting Virgin Mobile's Application will also serve the public interest by motivating Sprint to continue investing in Georgia. Sprint currently operates hundreds of cell sites in Georgia and invests tens of millions of dollars in its network serving the state. Granting Virgin Mobile's request will, therefore, further benefit Georgia's telecommunications infrastructure and thereby make Georgia even more attractive for business and development. A more detailed discussion of the public interest benefits of Virgin Mobile's ETC designation in Georgia can be found at pp. 15-18 of the Company's original Feb. 1, 2010 ETC designation Petition.

IV. CONCLUSION

Virgin Mobile has the technical, financial and managerial abilities and resources to offer its services in the Georgia portions of the additional wire centers. Virgin Mobile has complied with the requirements, terms and conditions included in the Commission's March 18, 2011 Order, and confirms that it will comply with the Order's requirements, terms and conditions with regard to the additional wire centers. Virgin Mobile continues to satisfy the applicable statutory and regulatory requirements for designation as an ETC. And finally, it is in the public interest to grant this Application and amend Virgin Mobile's ETC designation as requested herein.

WHEREFORE, Virgin Mobile respectfully requests that the Commission grant the Company's Application to amend and expand its current ETC designation in order to include the Georgia portions of the four additional wire centers identified herein.

Respectfully submitted this 24th day of April, 2015.



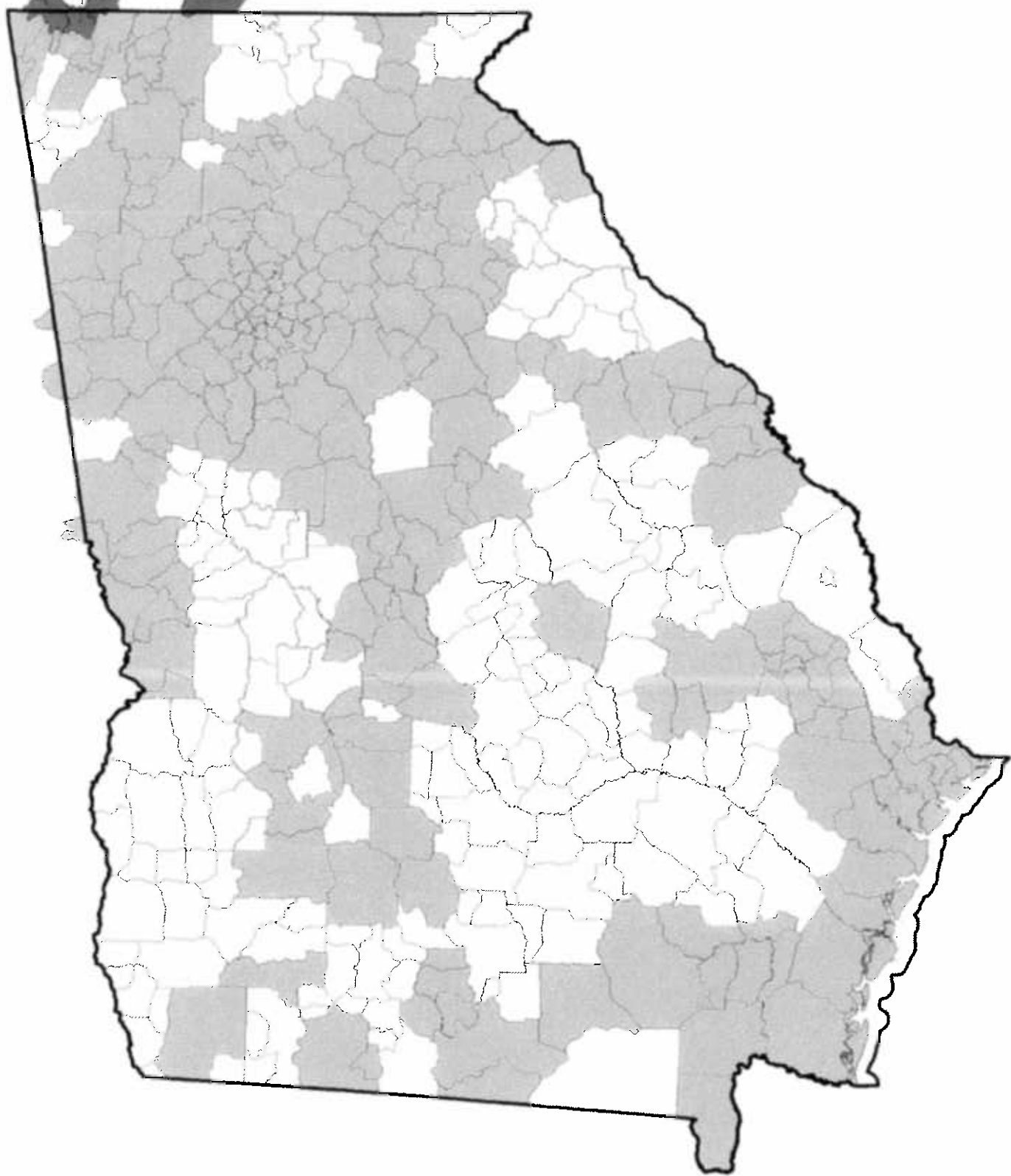
William R. Atkinson
John R. Monroe
Sprint
3065 Akers Mill Rd., SE
MailstopGAATLD0704
Atlanta, GA 30339
(404)-649-8981 (direct)
Bill.atkinson@sprint.com

William W. Maycock
Smith, Gambrell & Russell, LLP
1230 Peachtree Street, NE
Suite 3100, Promenade II
Atlanta, GA 30309-3592
(404) 815-3587 (direct)
bmaycock@sgrlaw.com

Attorneys for Virgin Mobile USA, L.P.

EXHIBIT A

CHTGTNRO
CHTGTNBR
CHTGTNSE
BNTNTNMT



Virgin Mobile Eligible Wire Centers
Requested Wire Centers

EXHIBIT B

CLLI	Wire Center Name	ILEC
BNTNTNMT	BENTON	BELLSOUTH TELECOMM INC
CHTGTNBR	CHTG-BRAINERD	BELLSOUTH TELECOMM INC
CHTGTNRO	CHTG-ROSSVILLE	BELLSOUTH TELECOMM INC
CHTGTNSE	CHTG-ST. ELMO	BELLSOUTH TELECOMM INC

NPA	NXX	Start Range	End Range	State	CLLI
706	328	0	9999	GA	BNTNTNMT
706	891	0	9999	GA	CHTGTNBR
706	858	0	9999	GA	CHTGTNRO
706	861	0	9999	GA	CHTGTNRO
706	866	0	9999	GA	CHTGTNRO
706	820	0	5999	GA	CHTGTNSE
706	820	7000	9999	GA	CHTGTNSE

EXHIBIT C

**BEFORE THE
MISSISSIPPI PUBLIC SERVICE COMMISSION**

**VIRGIN MOBILE USA, L.P.
TC 123 2339 00**

MPSC DOCKET NO. 2010-UA-118

**IN RE: PETITION FOR LIMITED DESIGNATION AS AN ELIGIBLE
 TELECOMMUNICATIONS CARRIER**

**ORDER AMENDING EXHIBIT A
TO DESIGNATION OF VIRGIN MOBILE USA, L.P.**

Virgin Mobile USA, L.P. (“Virgin Mobile”) on February 27, 2015, petitioned the Mississippi Public Service Commission to amend Exhibit A of its Order designating Virgin Mobile as an Eligible Telecommunications Carrier (“ETC”) dated October 25, 2010 (“October 25 Order”), to clarify that its ETC designated area in Mississippi includes the Mississippi portions of five (5) wire centers with out-of-state Code Common Language Location Identifiers (“CLLIs”): CRVLTNMA, MMPHTNSL, MMPHTNWW, BGLSLAMA, and MOBLALSE. The coverage of the Mississippi portions of the five wire centers were identified on a map submitted in connection with Virgin Mobile’s earlier Petition for designation filed March 24, 2010, that the Commission granted. The Commission finds that the Petition is well taken and that Exhibit A to the October 25 Order should be amended *nunc pro tunc*, and the effective date for these changes should be the same as the Commission’s original ETC designation in this docket, October 25, 2010.

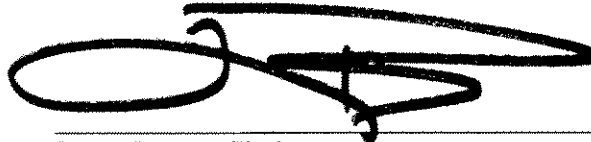
IT IS THEREFORE ORDERED that Exhibit A to the Commission’s Order dated October 25, 2010, in the above stated docket is hereby amended *nunc pro tunc* to substitute the Exhibit A attached to this Order which includes the Mississippi portions of five wire centers with out-of-state CLLIs that were left off the Exhibit A originally attached to the October 25 Order. The

effective date for these changes is the same as the Commission's original ETC designation Order in this docket, October 25, 2010. The Mississippi portions of the five additional wire centers are described further in Exhibit B, attached to this Order, which is a list of the NPA-NXXs that constitute the Mississippi portions of those wire centers. The Mississippi portions of all five wire centers are served by BellSouth Telecommunications, LLC d/b/a AT&T Mississippi (SAC Code 285184).

Chairman Lynn Posey voted Aye; Vice Chairman R. Stephen Renfroe voted Aye; and Commissioner Brandon Presley voted Aye.

SO ORDERED on this the 7th day of April, 2015.

MISSISSIPPI PUBLIC SERVICE COMMISSION



Lynn Posey, Chairman

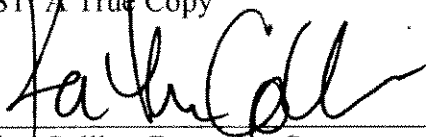


R. Stephen Renfroe, Vice Chairman



Brandon Presley, Commissioner

ATTEST A True Copy



Katherine Collier, Executive Secretary



This Order is effective the 7th day of April, 2015.

EXHIBIT A

CLLI	LOCALITY	CARRIER
BGCKMSXA	BIG CREEK	BAY SPRINGS TELEPHONE CO., INC.
BYSPMSXA	BAYSPRINGS	BAY SPRINGS TELEPHONE CO., INC.
HMWDMSXA	HOMEWOOD	BAY SPRINGS TELEPHONE CO., INC.
LOUNMSXA	LOUIN	BAY SPRINGS TELEPHONE CO., INC.
OLTYMSXA	OLDTYLRSVL	BAY SPRINGS TELEPHONE CO., INC.
PLVLSXA	POLKVILLE	BAY SPRINGS TELEPHONE CO., INC.
PTMNMSXA	PITTMAN	BAY SPRINGS TELEPHONE CO., INC.
RSHLMSXA	ROSE HILL	BAY SPRINGS TELEPHONE CO., INC.
SOSOMSXA	SOSO	BAY SPRINGS TELEPHONE CO., INC.
SYLVMSXA	SYLVARENA	BAY SPRINGS TELEPHONE CO., INC.
WHOKMSXA	WHITE OAK	BAY SPRINGS TELEPHONE CO., INC.
WLTRMSXA	WALTERS	BAY SPRINGS TELEPHONE CO., INC.
ABRDMSES	ABERDEEN	BELLSOUTH TELECOMM INC
AMRYMSMA	AMORY	BELLSOUTH TELECOMM INC
ASLDMSMA	ASHLAND	BELLSOUTH TELECOMM INC
BEMTMSMA	BLUE MOUNTAIN	BELLSOUTH TELECOMM INC
BENTMSSU	YAZOO CITY	BELLSOUTH TELECOMM INC
BGCHMSSU	BROOKHAVEN	BELLSOUTH TELECOMM INC
BILXMSDI	BILOXI-MAIN	BELLSOUTH TELECOMM INC
BILXMSMA	BILOXI-MAIN	BELLSOUTH TELECOMM INC
BKVLMSU	MACON	BELLSOUTH TELECOMM INC
BLDWMSMF	BALDWYN	BELLSOUTH TELECOMM INC
BNITMSMA	BENOIT	BELLSOUTH TELECOMM INC
BNVLSMA	BOONEVILLE	BELLSOUTH TELECOMM INC
BOTNMSMA	BOLTON	BELLSOUTH TELECOMM INC
BRHNMSMA	BROOKHAVEN	BELLSOUTH TELECOMM INC
BRNDMSES	BRANDON	BELLSOUTH TELECOMM INC
BRVLSMA	BURNSVILLE	BELLSOUTH TELECOMM INC
BRWDMSMA	BRIARWOOD	BELLSOUTH TELECOMM INC
BSLSMSMA	BAY ST LOUIS	BELLSOUTH TELECOMM INC
BTVLMSDS	BATESVILLE	BELLSOUTH TELECOMM INC
BUMTMSMA	BEAUMONT	BELLSOUTH TELECOMM INC
CAFBMSMA	COLUMBUS AFB	BELLSOUTH TELECOMM INC
CDWRMSMA	COLDWATER	BELLSOUTH TELECOMM INC
CFVLSMA	COFFEEVILLE	BELLSOUTH TELECOMM INC
CHNKMSU	MERIDIAN2	BELLSOUTH TELECOMM INC
CHTNMSMA	CHARLESTON	BELLSOUTH TELECOMM INC
CLDNMSMA	CALEDONIA	BELLSOUTH TELECOMM INC
CLMAMSMA	COLUMBIA	BELLSOUTH TELECOMM INC

CLMBMSMA*	COLUMBUS	BELLSOUTH TELECOMM INC
CLNSMSMA	COLLINS	BELLSOUTH TELECOMM INC
CNTNMSMA	CANTON	BELLSOUTH TELECOMM INC
CNVMSMA	CENTREVILLE	BELLSOUTH TELECOMM INC
COMOMSMA	COMO	BELLSOUTH TELECOMM INC
COVLMSSU	MERIDIAN2	BELLSOUTH TELECOMM INC
CRNSMSMA	CRENSHAW	BELLSOUTH TELECOMM INC
CRNTMSMA	CORINTH	BELLSOUTH TELECOMM INC
CRSPMSMA	CRYSTAL SPRINGS	BELLSOUTH TELECOMM INC
CRTHMSMA	CARTHAGE	BELLSOUTH TELECOMM INC
CRTNMSMA	CARROLLTON	BELLSOUTH TELECOMM INC
CSVLMSSU	MERIDIAN2	BELLSOUTH TELECOMM INC
DCHLMSMA	DUCK HILL	BELLSOUTH TELECOMM INC
DFFEMSMA	DUFFEE	BELLSOUTH TELECOMM INC
DKLBMSMA	DEKALB	BELLSOUTH TELECOMM INC
DRNTMSMA	DURANT	BELLSOUTH TELECOMM INC
EDWRMSDS	EDWARDS	BELLSOUTH TELECOMM INC
ELVLMMSMA	ELLISVILLE	BELLSOUTH TELECOMM INC
ENTRMSMA	ENTERPRISE	BELLSOUTH TELECOMM INC
EUPRMSFA	EUPORA	BELLSOUTH TELECOMM INC
FLORMSMA	FLORA	BELLSOUTH TELECOMM INC
FORSMSMA	FOREST	BELLSOUTH TELECOMM INC
FYTTMSMA	FAYETTE	BELLSOUTH TELECOMM INC
GDMNMSMA	GOODMAN	BELLSOUTH TELECOMM INC
GLPTMSLY	GULFPORT1	BELLSOUTH TELECOMM INC
GLPTMSTS*	VANCLEAVE	BELLSOUTH TELECOMM INC
GLSTMSMA	GLOSTER	BELLSOUTH TELECOMM INC
GNVLMMSMA	GREENVILLE	BELLSOUTH TELECOMM INC
GRNDMSMA	GRENADA	BELLSOUTH TELECOMM INC
HDLBMSMA	HEIDELBERG	BELLSOUTH TELECOMM INC
HLSPMSMA	HOLLY SPRINGS	BELLSOUTH TELECOMM INC
HMTNMSSU	ABERDEEN	BELLSOUTH TELECOMM INC
HODLMSMA	HOLLANDALE	BELLSOUTH TELECOMM INC
HPVLMSSU	FOREST	BELLSOUTH TELECOMM INC
HRLYMSMA	HURLEY	BELLSOUTH TELECOMM INC
HRNNMSDS	HERNANDO	BELLSOUTH TELECOMM INC
HSTNMSMA	HOUSTON	BELLSOUTH TELECOMM INC
HTBGMSWE	HATTIESBURG-WEST	BELLSOUTH TELECOMM INC
HZLHMSMA	HAZLEHURST	BELLSOUTH TELECOMM INC
INDPMSSU	COLDWATER	BELLSOUTH TELECOMM INC
INVRMSMA	INVERNESS	BELLSOUTH TELECOMM INC
ITBNMSMA	ITTA BENA	BELLSOUTH TELECOMM INC

JCSNMSBL	JACKSON	BELLSOUTH TELECOMM INC
JCSNMSCB	JACKSON	BELLSOUTH TELECOMM INC
JCSNMSCP	JACKSON	BELLSOUTH TELECOMM INC
JCSNMSMB	JACKSON	BELLSOUTH TELECOMM INC
JCSNMSNR	BRANDON	BELLSOUTH TELECOMM INC
JCSNMSPC	JACKSON	BELLSOUTH TELECOMM INC
JCSNMSRW*	JACKSON	BELLSOUTH TELECOMM INC
KLMCMSMA	KILMICHAEL	BELLSOUTH TELECOMM INC
KSCSMSMA	KOSCIUSKO	BELLSOUTH TELECOMM INC
LAKEMSMA	LAKE	BELLSOUTH TELECOMM INC
LARLMSMA	LAUREL	BELLSOUTH TELECOMM INC
LBRTMSMA	LIBERTY	BELLSOUTH TELECOMM INC
LCDLMSMA	LUCEDALE	BELLSOUTH TELECOMM INC
LELDMSMA	LELAND	BELLSOUTH TELECOMM INC
LENAMSSU	CARTHAGE	BELLSOUTH TELECOMM INC
LMTNMSSS	LUMBERTON	BELLSOUTH TELECOMM INC
LXTNMSMA	LEXINGTON	BELLSOUTH TELECOMM INC
LYVLMSMA	LYNVILLE	BELLSOUTH TELECOMM INC
MABNMSMA	MABEN	BELLSOUTH TELECOMM INC
MACNMSMA	MACON	BELLSOUTH TELECOMM INC
MAGEMSMA	MAGEE	BELLSOUTH TELECOMM INC
MCCLMSMA	MCCOOL	BELLSOUTH TELECOMM INC
MCCMMSMA	MCCOMB	BELLSOUTH TELECOMM INC
MCCMMSSM	MCCOMB	BELLSOUTH TELECOMM INC
MCLNMSMA	MCLAIN	BELLSOUTH TELECOMM INC
MDSNMSSES	MADISON	BELLSOUTH TELECOMM INC
MGNLMSMA	MAGNOLIA	BELLSOUTH TELECOMM INC
MIZEMSMA	MIZE	BELLSOUTH TELECOMM INC
MNASMSMA	NAVAL AIR STATION	BELLSOUTH TELECOMM INC
MNDNMSMA	MENDENHALL	BELLSOUTH TELECOMM INC
MNTIMSMA	MONTICELLO	BELLSOUTH TELECOMM INC
MRDNMSTL	MERIDIAN1(MAIN)	BELLSOUTH TELECOMM INC
MRHDMSMA	MOORHEAD	BELLSOUTH TELECOMM INC
MRKSMSHW	MARKS	BELLSOUTH TELECOMM INC
MRTNMSMA	MORTON	BELLSOUTH TELECOMM INC
MSPNMSMA	MOSS POINT	BELLSOUTH TELECOMM INC
MSTFMSCU	BAY ST LOUIS	BELLSOUTH TELECOMM INC
MTOLMSMA	MT OLIVE	BELLSOUTH TELECOMM INC
NTCHMSMA	NATCHEZ	BELLSOUTH TELECOMM INC
NTTNMSMA	NETTLETON	BELLSOUTH TELECOMM INC
NWALMSMA	NEW ALBANY	BELLSOUTH TELECOMM INC
NWTNMSHC	NEWTON-HICKORY(HCKORY)	BELLSOUTH TELECOMM INC

NWTNMSMA	NEWTON-HICKORY(NEWTON)	BELLSOUTH TELECOMM INC
OBDHMSMA	OBADIAH	BELLSOUTH TELECOMM INC
OCSPMSGO	OCEAN SPRINGS	BELLSOUTH TELECOMM INC
OKLDMSMA	OAKLAND	BELLSOUTH TELECOMM INC
OKLNMSMA	OKOLONA	BELLSOUTH TELECOMM INC
OSYKMSMA	SOUTH OSYKALA	BELLSOUTH TELECOMM INC
OXFRMSMA	OXFORD	BELLSOUTH TELECOMM INC
PCKNMSMA	PICKENS	BELLSOUTH TELECOMM INC
PCYNMSMA	PICAYUNE	BELLSOUTH TELECOMM INC
PGSNMSMA	PORT GIBSON	BELLSOUTH TELECOMM INC
PHLAMSMA	PHILADELPHIA	BELLSOUTH TELECOMM INC
PLHTMSMA	PELAHATCHIE	BELLSOUTH TELECOMM INC
PNTTMSMA	PONTOTOC	BELLSOUTH TELECOMM INC
PPVLMSMA	POPLARVILLE	BELLSOUTH TELECOMM INC
PRVMSMA	PURVIS	BELLSOUTH TELECOMM INC
PSCGMSGGA	PASCAGOULA	BELLSOUTH TELECOMM INC
PSCGMSMA	PASCAGOULA	BELLSOUTH TELECOMM INC
PSCHMSLT	PASS CHRISTIAN	BELLSOUTH TELECOMM INC
PTCMMSSU	HOLLY SPRINGS	BELLSOUTH TELECOMM INC
QTMNMSMA	QUITMAN	BELLSOUTH TELECOMM INC
RCTNMSMA	RIGHTON	BELLSOUTH TELECOMM INC
RLGHMSMA	RALEIGH	BELLSOUTH TELECOMM INC
ROXIMSMA	ROXIE	BELLSOUTH TELECOMM INC
RYMNMSDS*	RAYMOND	BELLSOUTH TELECOMM INC
SCOBMSMA	SCOOBA	BELLSOUTH TELECOMM INC
SHAWMSES	SHAW	BELLSOUTH TELECOMM INC
SHBTMSMA	SHUBUTA	BELLSOUTH TELECOMM INC
SHNNMSMA	SHANNON	BELLSOUTH TELECOMM INC
SHQLMSMA	SHUQUALAK	BELLSOUTH TELECOMM INC
SKVLMSMA	STARKVILLE	BELLSOUTH TELECOMM INC
SLTLMSSU	TUPELO	BELLSOUTH TELECOMM INC
SMDLMSSU	MCCOMB	BELLSOUTH TELECOMM INC
SMRLMSMA	SUMRALL	BELLSOUTH TELECOMM INC
SNRYMSMA	SEMINARY	BELLSOUTH TELECOMM INC
SNTBMSPS	SENATOBIA	BELLSOUTH TELECOMM INC
SOHNMSDC	MEMPHISMS1	BELLSOUTH TELECOMM INC
SRDSMSMA	SARDIS	BELLSOUTH TELECOMM INC
STRGMSSU	STARKVILLE	BELLSOUTH TELECOMM INC
TCHLMSMA	TCHULA	BELLSOUTH TELECOMM INC
TMSBMSMA	TOOMSUBA	BELLSOUTH TELECOMM INC
TRRYMSMA	TERRY	BELLSOUTH TELECOMM INC
TUNCMSMA	TUNICA	BELLSOUTH TELECOMM INC

TYTWMSMC	TYLERTOWN	BELLSOUTH TELECOMM INC
TYVLSMSA	TAYLORSVILLE	BELLSOUTH TELECOMM INC
UNINMSDS	UNION	BELLSOUTH TELECOMM INC
UTICMSDS	UTICA	BELLSOUTH TELECOMM INC
VADNMSMA	VAIDEN	BELLSOUTH TELECOMM INC
VCBGMSMA	VICKSBURG	BELLSOUTH TELECOMM INC
VNCLMSMA	VANCLEAVE	BELLSOUTH TELECOMM INC
VRNAMSMA	VERONA	BELLSOUTH TELECOMM INC
WDVLSMSA	WOODVILLE	BELLSOUTH TELECOMM INC
WESTMSMA	WEST	BELLSOUTH TELECOMM INC
WGNSMSMA	WIGGINS	BELLSOUTH TELECOMM INC
WLGVMSSU	CARTHAGE	BELLSOUTH TELECOMM INC
WNRDMSSU	PORT GIBSON	BELLSOUTH TELECOMM INC
WSPNMSMA	WEST POINT	BELLSOUTH TELECOMM INC
WSSNMSMA	WESSON	BELLSOUTH TELECOMM INC
WYBOMSMA	WAYNESBORO	BELLSOUTH TELECOMM INC
YZCYMSMA	YAZOO CITY	BELLSOUTH TELECOMM INC
BNTNMSSU	YAZOO CITY	CENTURYTEL ACQ., LLC D/B/A KMC TELECOM III
CLEVMSMA	CLEVELAND	CENTURYTEL ACQ., LLC D/B/A KMC TELECOM III
INDNMSMA	INDIANOLA	CENTURYTEL ACQ., LLC D/B/A KMC TELECOM III
WINOMSMA	WINONA	CENTURYTEL ACQ., LLC D/B/A KMC TELECOM III
BYHLMSXA	BYHALIA	CENTURYTEL OF NORTH MISSISSIPPI, INC.
CHLHMSXA	CHULAHOMA	CENTURYTEL OF NORTH MISSISSIPPI, INC.
OLBRMSXA	OLIVE BRANCH	CENTURYTEL OF NORTH MISSISSIPPI, INC.
TUPLMSMA	TUPELO	CROSSROADS WIRELESS, INC.
DCTRMSXA	DECATUR	DECATUR TELEPHONE CO., INC.
CHESMSXA	CHESTER	DELTA TELEPHONE CO., INC.
EGLKMSXA	EAGLE LAKE	DELTA TELEPHONE CO., INC.
ISOLMSXA	ISOLA	DELTA TELEPHONE CO., INC.
ARTSMSXA	ARTESICWFD	FRANKLIN TELEPHONE CO., INC.
BRLWMSXA	BARLOW	FRANKLIN TELEPHONE CO., INC.
CRSBMSXA	CROSBY	FRANKLIN TELEPHONE CO., INC.
EDTNMSXA	EDDICETON	FRANKLIN TELEPHONE CO., INC.
HRVLSMSXA	HERMANVL	FRANKLIN TELEPHONE CO., INC.
JNCEMSXA	JANICE	FRANKLIN TELEPHONE CO., INC.
MDVLSMSXA	MEADVILLE	FRANKLIN TELEPHONE CO., INC.
NWAGMSXA	NEWAUGUSTA	FRANKLIN TELEPHONE CO., INC.
NWHBMSXA	NEW HEBRON	FRANKLIN TELEPHONE CO., INC.
GNTWMSXA	GUNTOWN	FRONTIER COMMUNICATIONS OF MISSISSIPPI,
RINZMSXA	RIENZI	FRONTIER COMMUNICATIONS OF MISSISSIPPI,
FLTNMSXA	FULTON	FULTON TELEPHONE CO., INC.
GRTWMSXA	GEORGETOWN	GEORGETOWN TELEPHONE CO.

GLALMSXA	GLEN ALLAN	LAKESIDE TELEPHONE CO., INC.
MYRTMSXA	MYRTLE	MYRTLE TELEPHONE CO., INC.
SNFLMSXA	SUNFLOWER	SLEDGE TELEPHONE CO., INC.
SMVLMSXA	SMITHVILLE	SMITHVILLE TELEPHONE CO., INC.
BSFDMSXA	BASSFIELD	WINDSTREAM MISSISSIPPI, INC.
FLRNMSXA	FLORENCE	WINDSTREAM MISSISSIPPI, INC.
PRNTMSXA	PRENTISS	WINDSTREAM MISSISSIPPI, INC.
BILXMSD**	BILOXI	BELLSOUTH TELECOMM INC
HTBGMSMA**	HATTIESBURG	BELLSOUTH TELECOMM INC
GNWDMMSMA**	GREENWOOD	BELLSOUTH TELECOMM INC
LULAMSMA**	LULU	BELLSOUTH TELECOMM INC
SRISMSMA**	PASCAGOULA	BELLSOUTH TELECOMM INC
SNSDMSSU**	GREENWOOD	BELLSOUTH TELECOMM INC
BGLSLAMA***	CROSSROADS	BELLSOUTH TELECOMM INC
MOBLALSE***	TANNER WILLIAMS	BELLSOUTH TELECOMM INC
CRVLTNMA***	MOUNT PLEASANT	BELLSOUTH TELECOMM INC
MMPHTNSL***	MEMPHIS	BELLSOUTH TELECOMM INC
MMPHTNWW***	MEMPHIS	BELLSOUTH TELECOMM INC

Added nunc pro tunc by the following dated orders to conform to original service area:

* July 8, 2014

** November 4, 2014

*** April 7, 2015 Added only For Mississippi areas of 5 CLLI codes

CLLI	NPA	NXX	StartRange	EndRange	CompanyName	OCN	RateCenter
BGLSLAMA	601	772	0	9999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	CROSSROADS
BGLSLAMA	601	958	0	9999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	CROSSROADS
CRVLTNMA	662	851	0	1999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	MTPLEASANT
CRVLTNMA	662	851	3000	8999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	MTPLEASANT
MMPHTNSL	662	280	0	9999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	MEMPHIS
MMPHTNSL	662	342	0	9999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	MEMPHIS
MMPHTNSL	662	393	0	9999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	MEMPHIS
MMPHTNSL	662	510	3000	3999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	MEMPHIS
MMPHTNWW	662	781	0	9999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	MEMPHIS
MOBLALSE	228	641	0	4999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	TANNERWLMS
MOBLALSE	228	641	6000	9999	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	9419	TANNERWLMS

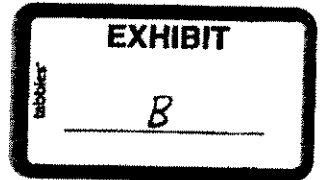


EXHIBIT D

Sprint Business Continuity Program Overview

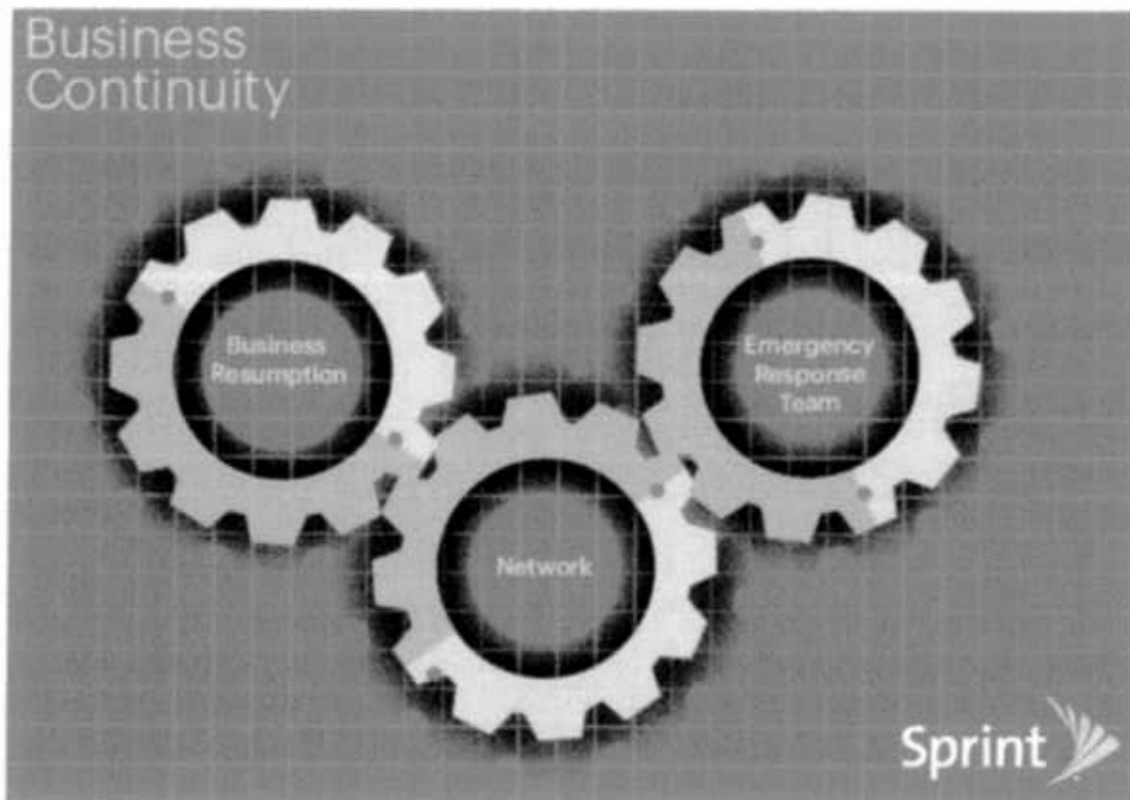


Table of Contents

Executive Summary	3
Sprint's Business Continuity Program Has C-Level Sponsorship.....	3
Program Management & Continuous Improvement Is Essential.....	5
Sprint's IMT and CCT Teams Trained	6
Sprint Conducts Criticality Analysis & Develops Risk Mitigation Strategies.....	6
Sprint's New Network.....	7
Sprint's Information Technology	9
Sprint's Workforce Remote Work and Alternate Site Capabilities.....	10
Emergency Response Team	10

Executive Summary

As businesses, government agencies, and individual consumers become more and more reliant on wireline and wireless communications, as well as remote access to information, the concept of business continuity has never been more important. Sprint takes business continuity to the next level by ensuring that it is part of the corporation's business philosophy. This philosophy promotes utilizing business continuity principles, guidelines, and standards by all company employees in their daily business operations to assure the continuation of Sprint's mission critical business operations and services. The goal of Sprint's Business Continuity (BC) Program is to minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Industry accepted principles are the basis for Sprint's Business Continuity (BC) Program. Sprint has adapted key principles from the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, Federal Emergency Management Agency (FEMA), Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, and several Military Specifications (Mil-Spec) standards, into three BC Program Elements: Program Governance, Incident Management, and Continuity Analysis & Planning.

Program Governance

Program Governance Structure– Program structure, mandate and executive sponsorship is required to ensure a comprehensive Business Continuity Program.

Program Management & Continuous Improvement - Overall program management and continuous improvement includes all of the documentation and efforts designed to ensure a well-defined BC program that seeks to continually mature performance and processes.

Incident Management

Incident Management & Crisis Communications – Enterprise Incident Management Team (EIMT) and Incident Management Team (IMT) documentation, training, exercises and continuous improvement are required for those teams that have roles and responsibilities before, during or after an incident that significantly affects Sprint's employees, customers and/or shareholders.

Criticality Analysis & Risk Mitigation Strategies

Criticality Analysis & Risk Management – Criticality Rating is necessary for prioritizing tasks and recovery. Risks that threaten the company's critical functions, vendors, sites, systems and network elements, require due diligence that result in decisions to mitigate or accept the risks.

Mitigation Strategies & Plan Development - After determining criticality and risks, the next steps include devising the appropriate mitigation strategies and recovery capabilities. BC plan development is formalized using on-line tools.

Sprint's Business Continuity Program Has C-Level Sponsorship

A comprehensive business continuity program requires executive sponsorship, a structure for decision-making, and a means to direct and manage incremental changes towards goals and objectives. Sprint's program governance structure achieves each of these requirements and accomplishes them through inclusion and diversity of thought and viewpoint. The following describes the program governance structure that begins with the highest levels of the company and leverages management and expertise for optimal effectiveness.

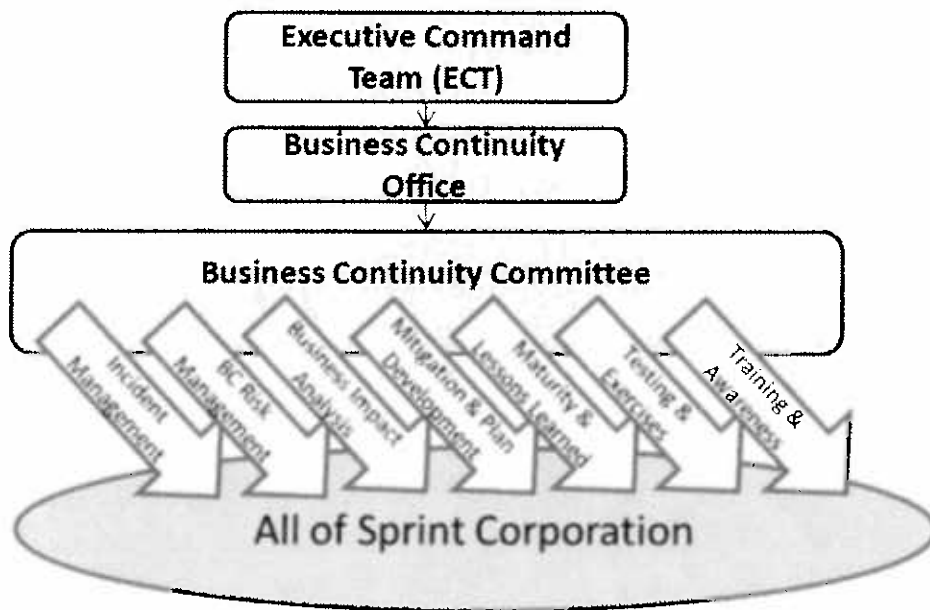
Executive Command Team (ECT) - The ECT consists of Sprint's highest-level executives, representing all critical Sprint functions. The ECT receives briefings on issues and status of projects that require

senior executive attention and provide executive sponsorship to the overall Business Continuity Program.

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

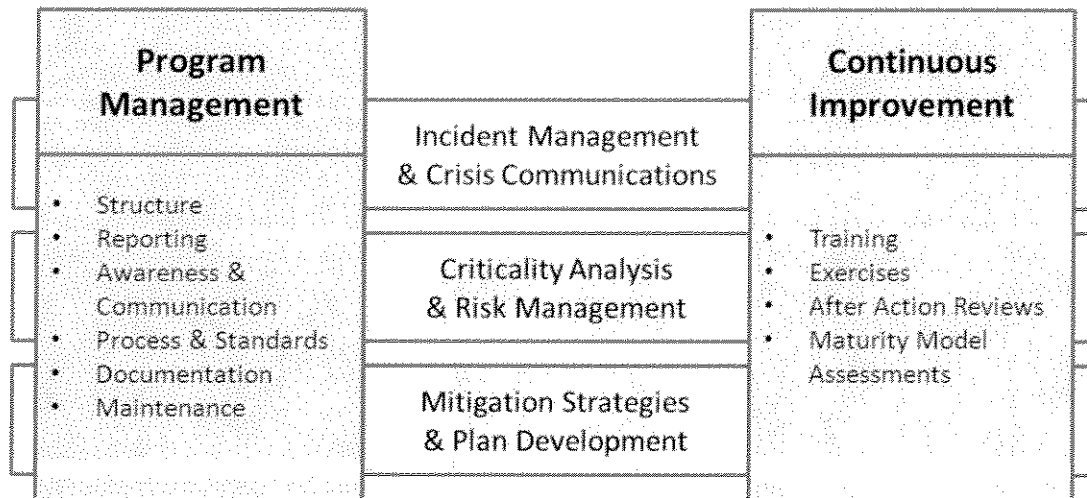
Business Continuity Committee (BCC) – The BCC is comprised of Business Continuity Teams (BCTs). Consistency across the company for assuring business continuity policies, guidelines, standards and tools are the responsibility of the BCC. BCTs have overall responsibility for the implementation of business continuity initiatives within their individual business units and act as business unit Incident Management Teams (IMT) for their business units when disasters occur. The BCC has various sub-committees that focus on proactive planning, incident management, tools and training, awareness, pandemic planning and other issues that require attention.

Program Governance Structure



Program Management & Continuous Improvement Is Essential

The concepts of program management and continuous improvement are the overarching control elements that bookend all other aspects of the BC Program. For each of the other Program Elements, Program Management efforts will provide definition of what the Program Element should accomplish and the methods used to achieve objectives. The continuous improvement efforts provide a means to keep the program elements evergreen, current, and striving for maturity.



Program Management:

- Awareness & Communications – Employees and management are informed of current business continuity efforts or awareness campaigns through internal communication methods that often target all employees in the company.
- Process, Standards & Documentation– Common terminology, methodologies and formal documentation on standards and procedures help our large company stay consistent and current. All key stakeholders are responsible for reviewing programs documents at least annually.
- Reporting – Each year, the Business Continuity Office formally reports to Sprint's Executive Management on the efforts and status of the Business Continuity Program and partners with Corporate Audit on reporting risk information to the Board of Directors.
- Maintenance – Frequent reviews of plan details and processes are updated in a timely manner, following changes to contacts, suppliers, processes, organizational structures, etc.

Continuous Improvement:

- Training – To ensure familiarity with systems, processes and peer organizations use annual training cycles in addition to ad-hoc, training has new team members are added or procedure changes.
 - Exercises – Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with FEMA, the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster. The most common types of exercises conducted are: Tabletop, Walk-through, Functional drills, and Full-scale.

Tabletop Exercises - In a round-table setting, members of the response team meet to discuss their responsibilities and describe how they would react as a team to an emergency scenario. They identify areas of overlap and confusion in a cost-effective and efficient manner.

Walk-Through Drills - Both management and the response team perform their emergency functions within the emergency response location.

Functional Drills - Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. In most cases, these functions should be tested separately to help identify improvement areas and to eliminate confusion. Observers are often used to evaluate these exercises.

Full-scale Exercises - Exercises simulated to be as close as possible to a real-life disaster. They may involve a combination of response teams, management, field operations, and outside agencies. During the simulated exercise, team members are expected to actually perform their disaster responsibilities.

- After Action Reviews (AARs) – Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- Maturity – Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Sprint's Incident Management & Crisis Communications Teams Are Continually Trained

Knowing that unexpected events occur, Sprint's Incident Management and Crisis Communications teams are highly trained and tested. As with the overall program governance structure, full executive support and authority is integrated into the incident management structure. Sprint's seasoned professionals, across multiple fields of expertise, have responded to all major disasters impacting the United States in the last 13 years.

Executive Command Team (ECT) – During a disaster, the ECT is kept apprised of all activities and status. If the incident requires chief executive involvement, the ECT members engage to provide guidance and approval to make necessary response and recovery decisions. The Chief Executive Officer (CEO) is the Chairperson of the ECT.

Enterprise Incident Management Team (EIMT) – The Enterprise Incident Management Team (EIMT) convenes quickly as a way of sharing impact, status and critical decision-making during an incident. This team is flexible and scalable and built on the premise of an all-hazards response approach.

Incident Management Teams (IMTs) – An IMT consists of members of a single business unit and is designed to meet the needs of the company, customers and employees at the time of an incident. Examples of IMTs include IT, Network, Human Resources, Customer Care, Corporate Security and others. In all, there are more than 20 IMTs, each of varying size and complexity, capable of responding quickly and effectively to a wide array of issues. Each IMT have a designated chairperson that represents their organization on the EIMT call when the incident requires an EIMT response posture.

Sprint Conducts Criticality Analysis & Develops Risk Mitigation Strategies for All Aspects of the Business

Sprint formally analyzes risks and criticality of all parts of the business that could cause impacts or disruptions, if not properly mitigated and planned. These elements of the program ensure the proper priority and attention is applied to mitigation and plan development efforts.

Criticality Analysis:

Through various forms of analysis, such as Business Impact Analysis (BIA), criticality of business processes, applications, vendors, sites, network elements and other business aspects are determined. The criticality defines the appropriate level of mitigation and planning that is necessary. Critical business

processes require a comparable criticality assigned to the applications they use, the suppliers they need and other dependencies.

Risk Management:

Sprint considers resiliency and business continuity risks to be a matter that requires tight management and controls. Determining appropriate mitigation and business continuity planning efforts based on evaluating potential risks using an internal algorithm.

Mitigation Strategies & Plan Development:

Upon identification of potentially significant risks, Sprint makes every attempt to mitigate and plan for any eventuality that could affect Sprint's customers and employees. In most cases, the risks are marginalized or eliminated due to mitigation efforts. In some cases, the risks are highly improbable, but still require alternative planning, in the event that it should occur.

Sprint's New Network Is Built for Survivability and Speed

As a Mobile Telecommunications Leader, the resiliency of Sprint's network is of paramount interest to our customers.

Network Incident Management Team

Network Services' implementation of the Incident Command System (ICS), stays true to the principles of ICS. This enables Sprint to leverage this best practice in wide-scale responses, using common terminology and standard organizational structures, to communicate efficiently internally and with customers such as Public Safety agencies as many of these agencies utilize ICS as well. Teams train on and deploy in standard ICS sections, branches, units and strike teams, and emphasize span of control, comprehensive resource management, and other ICS principles.

Network teams leverage Sprint tools such as ruggedized GPS-enabled phones, wireless modems custom applications, M2M solutions, and smart phones to aid in response communication, situation assessment and resource tracking. The teams also maintain a pool of Satellite phones as a contingency for use in restoration. Teams continue to create innovative response tools, such as the unique backhaul Satellite Cell on Light Trucks (SatCOLTs) that enable restoration of service when a traditional backhaul is not available.

The Network IMT receives notification of an actual or potential situation that requires activation (hurricane, earthquake, regional power outage, other event where business as usual would not resolve the situation). An Emergency Operations Center (EOC) is established and performs an initial overall assessment, establishes monitoring bridge(s), coordinates between agencies impacted by the event, assigns tasks, gathers status information, and performs executive notifications at prescribed times.

Cell Site Disaster Planning

Sprint's priority site restoration plan focuses resources and expedites recovery partly by making sure that existing infrastructure is operating properly under normal circumstances and by having a response plan for abnormal circumstances. To accomplish this, Sprint has implemented a detailed preventative maintenance program to insure all systems and redundant equipment are in proper working order. Sprint sites are equipped with battery backup. Some sites have fixed generators or fuel cells for additional back-up power. Sprint maintains a fleet of mobile generators deployable to Sprint service areas. Formal cell site classification designates all sites as critical, coverage and capacity sites. These prioritizations aid in properly allocating response personnel, generators and other resources.

Cellular Network Disaster Planning

Communications from Sprint cell sites are backhauled with various combinations of ethernet, copper, fiber, and microwave systems. Most Sprint hub locations are placed on bi-directional fiber rings. These rings significantly reduce the chance of network failure due to third party fiber damage, equipment failures, or other potential causes of service interruptions. Sprint's radio network provides significant overlapping coverage areas, which often allow cell sites to fully or partially compensate for a neighboring cell site. Also in an effort to minimize service impact when a site is down, Sprint maintains a fleet of Cell Sites on Wheels (COWs) which are portable self-contained cell sites. COWs can be deployed to restore coverage from a damaged site or provide additional capacity in the immediate vicinity of an incident.

Switch Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at switch locations. Switch locations have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes that readily connect the output of a portable generator in the event of primary generator issues.

Overall Network Performance Management Efforts

The performance of Sprint's networks is monitored 24 hours a day, 7 days per week, and 365 days a year by the Network Monitoring Centers. In addition, local switching offices staffed by trained technicians and management coordinate with these larger operations centers, to ensure that Sprint's networks are properly maintained.

Network Restoration Prioritization

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, TSP (Telecommunications Service Priority) and Critical Life Circuits are re-established. Sprint has an established cell site classification and service restoration process.

Special Event Planning

Special events have the potential for adversely affecting the customer experience due to greatly increased wireless traffic demands. Sprint has a formal mature special events process with dedicated project management personnel and a cross-functional management tool. Teams archive records of recurring special events for future planning, and proactively search for one-time special events and leverage capacity planning teams in implementing enhancements to optimize the customer experience. Sprint has leveraged its experience in managing very large temporary users at NASCAR events in managing special events.

As a specialized type of special event, Sprint also interfaces with the NCS (National Communications System) in managing capacity needs at National Security Special Events, NSSEs.

Sprint's Information Technology Is Resilient and Redundant

Information Technology Incident Management Team

The IT Incident Management Team (IT IMT) proactively integrates business continuity methodology into every phase of IT Operations business processes in order to facilitate rapid response and resolution to any critical Business disruption. The IT IMT process is developed to minimize the incident duration, expedite and control the recovery efforts. The IT IMT provides a structured approach for responding to unplanned incidents that threaten an IT infrastructure, which includes hardware, software, networks, processes and people.

During day-to-day operations, IT IMT is managed by and reports up through the IT line of business. The IT IMT is responsible for business continuity planning for all IT assets located in Data Centers, Sprint owned Call Centers, Retail Stores and general office facilities.

Information Technology Application Recovery Strategy

IT IMT identifies and prioritizes the recovery of IT applications by using the Design for Criticality' (D4C) process which follows the business strategy of "Serve, Sell, Bill, Report". This criterion allows IT to assess and align each application based on the business function and impact to Sprint to a Design Class. An Application Alignment process will be used to determine the priority of the application in the recovery timeline. These priorities relate to the tolerance level of the applications and systems to the length of downtime after a disaster.

Data Center Resiliency Planning

Sprint data centers containing IT assets are managed by IT resources are in scope for IT IMT planning and testing initiatives. The Sprint Data Centers are held to exceptionally high and stringent industry, but more importantly, self-imposed standards of structural design, engineering, technology, redundancy, security, maintenance and 24x7 operations. Data Centers are geographically diverse and serve as alternate site failovers for each other. Strategic IT vendors critical to Sprint operations are in scope for IT CPR planning solutions.

Sprint Owned Call Center IT Resiliency Planning

Call Centers have proven failover processes. ITCPR is responsible for providing the centers with recovery planning for IT assets such as:

- Network
- Desktop
- Server
- Voice Technologies

Sprint Retail Store IT Resiliency Planning

ITCPR provides support to Retail facilities by leveraging existing Sprint strategies to ensure functionality and communications between stores and the Sprint Enterprise

Sprint's Workforce Has Remote Work and Alternate Site Capabilities

Employee Continuity Overview

Sprint has implemented a strategic employee continuity plan that anticipates and prepares in the event there is a significant and sustained absenteeism. Examples include a pandemic, or infectious disease that poses life-threatening risks to employees and their families or an unplanned school closing due to a natural disaster or a man-made incident requiring parents to be absent from the work place.

Sprint's plan allows for flexibility and scalability to adjust to changing events. The plan also incorporates a wide range of strategies that are available for the business units while ensuring communication and information sharing on status and success.

Alternate Site and Remote Access Overview

Sprint utilizes information obtained through business impact analysis and risk reduction strategies in order to preserve business functions that are required in the face of a disaster. Depending on the size and scale of the event, Sprint has strategies in place to provide added capacity, alternative work locations and remote access if necessary to retain operations.

Business functions that require alternate sites, geographic redundancy and remote access capabilities are identified proactively and plans are periodically reviewed and revised as necessary in anticipation of any event.

Sprint's Emergency Response Team (ERT) Is Ready to Serve

Who is the ERT?

The Sprint Emergency Response Team (ERT) is the first of its kind and was created in 2002. It has conducted more than 6,100 deployments, participated in over 300 training exercises, and provided emergency wireless support for close to 2,500 events.

Sprint's ERT is an experienced cross functional group, which consists of a national team of full time, dedicated personnel as well as over a thousand of ERT Reservists across the country. The ERT provides wireless telecommunications equipment, infrastructure and personnel operations support to federal, state and local public safety, law enforcement, military agencies and private sector organizations during declared emergencies, field training exercises, agency specific short term communication needs and National Special Security Events.

Support for Urgent Crisis Needs

The ERT designs and implements the internal policies and procedures necessary to enable timely and effective deployments of Sprint's products and services. The ERT fully supports high volume, short notice voice and data communication needs of emergency, disaster personnel and communication liaisons with its SatCOLTs (Satellite Cell on Light Truck), Satellite IP VSAT Equipment, satellite earth stations, and inventory of over ten thousand handsets, aircards and mobile hotspots, which can be rapidly deployed to support short-term communications.

ERT in the EOCs

During a number of recent disasters, ERT reservists staffed State and Local Emergency Operations Centers (EOC) to relay first-hand information back to agencies that rely on critical communications. Having reservist representation at EOC's is valuable for a number of reasons: Reservists provide real time information and status updates to the EOC's on the progress of our network recovery efforts ; Allows State EOC's to provide direction on priority areas for Network restoration; Coordinate information from other critical infrastructure functions, such as Energy/Power and Transportation; and obtain location of



FEMA and other emergency responder command posts using Sprint handsets to help plan for influx of capacity needs. The EOC initiative is an example of Sprint's proactive approach during an incident, through partnership, involvement and communications support. Partnering with Emergency Management agencies in cities and counties throughout the United States provides better coordination of Sprint and ERT support resources for Disaster Preparation and Response. Trained ERT Reservists are more actively involved in providing their communities with critical volunteer support. Agencies are able to have a direct channel into Sprint approved support organizations with more expedited response times and capabilities, providing critical communications support when needed the most.

Contact The ERT:

For more information on Sprint's Emergency Response Team, please visit us at www.sprint.com/ert, become a fan on Facebook at www.facebook.com/SprintEmergencyResponseTeam email us at ERTRequests@sprint.com or for emergency communications support, contact our 24x7x365 ERT Hotline at 1-888-639-0020 or for GETS users 254-295-2220.