

TSP for PUBLIC UTILITY COMMISSIONS

FREQUENTLY ASKED QUESTIONS

Q. How does the telecommunications service priority (TSP) program work?

A. There are two aspects of the TSP program: restoration and provisioning. For priority restoration, a qualifying organization must first enroll its essential telecommunications lines in the telecommunications service priority (TSP) program. For a Public Utility Commission, this would include communications lines to its emergency operations center and lines that are used by PUC personnel who are essential members of state or local emergency teams with management or operational responsibilities for emergency response.

If any of these TSP services become inoperable, the telecommunications service provider must restore them on a priority basis before it restores any non-TSP services. Having TSP coverage is especially important following a major disaster in which the telecommunications infrastructure has been damaged and large numbers of customers are without telecommunications service.

Qualifying organizations can also use the TSP program to have essential communications services installed on a priority basis. This can ensure that essential communications services are available without lengthy delays that can occur otherwise. For example, if the existing communications circuits into a Public Utility Commission's facilities are inadequate to accommodate all of the emergency traffic and additional circuits are needed to prevent the loss of emergency calls, the administrator can request priority provisioning of additional lines through the TSP program.

For more information, visit the Department of Homeland Security's National Communications System (NCS) web site at <http://tsp.ncs.gov>.

Q. Do all Public Utility Commissions qualify for TSP?

A. Yes. To qualify for the TSP program, an organization must: (1) be engaged in activities essential to the nation's security or emergency preparedness and response functions (e.g., the promotion of public health, safety, and maintenance of law and order), and (2) rely on telecommunications services to provide these essential functions. Public Utility Commissions meet these criteria and therefore will qualify.

Q. When should a Public Utility Commission enroll in TSP?

A. A Public Utility Commission should enroll in the TSP program at its earliest convenience. It should not wait until there is a major disaster or emergency. During a disaster or emergency, the telecommunications service providers must restore services to those organizations that **are already enrolled** in the program. An attempt to enroll in the program during the disaster would not be effective since the enrollment process itself takes a considerable amount of time and would delay rapid restoration of essential telecommunications services.

A TSP application can be completed via the Internet on the NCS web-site at: <http://tsp.ncs.gov>. The Federal Communications Commission (FCC), as the Federal sponsor for Public Utility Commissions, will work with the NCS to process all applications submitted by Public Utility Commissions in a timely manner.

Q. How does a Public Utility Commission enroll in the TSP program?

A. A Public Utility Commission should take the following steps:

- Consult with its telecommunications service provider to determine its essential services and the cost of TSP coverage. From this they should determine which services to cover;
- Contact the FCC via email (tspinfo@fcc.gov) to request Federal sponsorship for TSP.
- Go to the TSP website at <http://tsp.ncs.gov> to establish an account. (Select “E-forms”, then “Register to use E-forms”). NCS will provide a login ID and password via an email;
- After receiving the login and password, re-enter the TSP web-site and fill out the application form. [Select “E-forms”, then “Access to e-forms application”, then “TSP request for service users (Form 315)].” List FCC as the Federal sponsor.
- The NCS approves TSP coverage and provides the Public Utility Commission Administrator with TSP authorization codes for each circuit (e.g., TSP02H682.)
- Provide those authorization codes to the telecommunications carrier so that they can be assigned to specific essential communications lines identified as TSP circuits via enrollment in the program. This enables the carrier to quickly identify TSP enrolled circuits and work to restore service or replace them with new lines.

For more information regarding enrollment via email, contact the “NCS Priority Programs” hotline at 1-866-NCS-CALL (1-866-627-2255) or send an e-mail to tsp@ncs.gov.

Q. Who is involved in the TSP program?

A. Four organizations are involved:

- (1) User -- a telecommunications service customer that has its essential telecommunications services enrolled in the program.
- (2) Telecommunications service provider -- the service provider develops internal operating procedures and practices to ensure that TSP-designated services are given priority restoration and installation.
- (3) NCS -- this organization provides the day-to-day administration of the TSP program, including approval of TSP requests.

(4) Federal sponsor -- any non-Federal TSP user must have a Federal sponsor; the FCC serves as the sponsor for Public Utility Commissions.

Q. What is the Federal sponsor's role in the TSP process?

A. Any non-federal organization that requests TSP coverage must be sponsored by a federal agency. The federal sponsor's responsibilities include: (1) ensuring that the telecommunications service for which TSP coverage is requested supports a national security or emergency preparedness or response function; and (2) determining the appropriate priority level assignment.

Q. Who is my Federal sponsor for TSP?

A. The FCC is the Federal sponsor for Public Utility Commissions. Public Utility Commissions rely on telecommunications services to provide the emergency functions that they perform for the protection of lives and property of American citizens. As a result, many of their telecommunications services qualify for TSP coverage. In order to help ensure that Public Utility Commissions have full and timely access to the TSP program, the FCC will sponsor their participation. Any Public Utility Commissions administrator who desires to obtain FCC sponsorship in the TSP program may contact the FCC by e-mail at tspinfo@fcc.gov.

Q. How long does the enrollment process take?

A. In most cases, the NCS will complete the sponsorship and approval process within 30 days of the receiving the request from the Public Utility Commissions. The telecommunications service provider also needs time to issue service orders and make the changes in its records to enable the priority service. The amount of time the service provider requires to process the orders depends on the number of circuits requested.

Q. What should the Public Utility Commission do with the authorization codes once they are received from NCS?

A. The Public Utility Commission should notify the service provider of the TSP authorization codes and request TSP service. The service provider generates a service order and enrolls the designated circuits in the TSP program by entering them into its priority service operations support systems. The service provider then has 45 days in which to send a confirmation report back to the TSP Program Office.

Q. What recourse does the applicant have if the application is disapproved?

A. The applicant is afforded due process and may appeal a decision to disapprove the application with the FCC. Applicants who wish to appeal a denial of a request to enroll in TSP may file an appeal in writing with the FCC at tspinfo@fcc.gov. Applicants may also contact the FCC's Public Safety and Homeland Security Bureau at 202-418-1300 for additional information on the appeals process.

Q. How much does it cost to participate in the TSP program?

A. The Federal government does not charge for TSP. Your vendor may have a tariff charge for TSP. The charge normally varies by telecommunications service provider and depends on the number of lines covered. Typically, service providers have a one-time charge for each line selected as well as a monthly per-line charge. The one-time charge for a local line is approximately \$100; the monthly per-line charge is approximately \$3. Each service provider has its own price list; therefore, a user must consult with its service provider in order to determine its cost for TSP coverage.

Q. Does a user such as a Public Utility Commission need to purchase TSP coverage for all of its telecommunications lines?

A. Due to the critical role of a Public Utility Commission during an emergency, it is recommended that these organizations enroll *all* of their essential telecommunications lines in the TSP program. Although a Public Utility Commission can limit its TSP costs by purchasing coverage for only a portion of its essential lines, a disaster that results in significant damage to communications infrastructure is likely to create a need to handle a significant increase in call volume. It is therefore highly recommended that a Public Utility Commission ensure that they enroll a sufficient number of lines to fulfill their mission during an emergency situation.

Q. What is TSP restoration?

A. When a telecommunications service covered by the TSP program fails for any reason, including due to a major disaster, the telecommunications service provider must restore the service on a priority basis. TSP restoration can be thought of as an insurance policy for existing circuits (both voice and data). By paying minimal amounts to enroll essential communications services in the program, during a major disaster when it may take days or weeks to restore service to many subscribers, TSP enrollees will have their services restored much more quickly than telecommunication users who are not enrolled in the program.

Q. What is TSP provisioning?

A. TSP provisioning is used when new, essential communications services must be installed on a priority basis to ensure they are available without lengthy delays that would occur otherwise. For example, if a Public Utility Commission needed to relocate during a disaster, it can request priority provisioning of new circuits at its pre-designated, alternate facility through the TSP program. To request priority provisioning, contact the TSP Program Office at 1-866-627-2255.

Q. During a crisis how long will it take to have service restored for the lines covered by the TSP program?

A. It depends on the extent of the damage to the critical telecommunications infrastructure and the amount of resources (personnel and spare parts) available to the telecommunications service provider to repair the damage. In any event, the telecommunications service provider must restore all TSP-designated services, on a priority basis, before any others. **This is a legal requirement.**

A good example of how quickly restoration can be made under the TSP program is the situation in Lower Manhattan following the attacks on the World Trade Center in September 2001. Despite unprecedented damage to the telecommunications infrastructure that took many weeks to restore, the telecommunications services supporting the New York Stock Exchange were back in operation in just three days.

Q. Does TSP restoration only apply to situations in which the Federal government has declared an emergency?

A. No. Under the TSP program, there is no requirement for any authority (Federal, state, or local) to declare an emergency or disaster. TSP priority restoration applies at all times. When any TSP-designated service is disrupted it goes to the front of the line for restoration, regardless of the cause of the outage -- whether it was caused by a hurricane, flood, terrorist attack, or backhoe.

Q. If my service contract requires the service provider to restore my service within a specified time frame, e.g., within 24 hours, should I consider TSP coverage?

A. Yes. In accordance with FCC rules, service providers must restore TSP-designated lines before any others, regardless of whether their service contracts specify rapid restoration time frames. Without TSP coverage, a Public Utility Commission's lines may not be restored until all other TSP lines are restored and until commercial customers' lines which have contract-designated restoration periods have been restored.

Q. Are there TSP priority levels higher than that which is designated to a Public Utility Commission Call Center? If so, why is it important for Public Utility Commissions to participate in TSP?

A. There are five TSP priority restoration levels. Public Utility Commission emergency communications lines will qualify for level three, which includes communications lines necessary for public health, safety, and maintenance of law and order. The higher priority levels, i.e., levels one and two, include national security leadership and certain high-level military communications lines. Fortunately, very few communications lines actually have a priority one or two assignment. In fact, less than one-tenth of one percent of the nation's access lines has been assigned a TSP priority level of one or two. Therefore, it is highly unlikely that restoration of higher priority TSP lines will appreciably slow restoration of level-three TSP lines.

If a Public Utility Commission does not enroll its lines in the TSP program, its telecommunications service provider cannot restore these lines until it has restored all TSP lines in priority levels one, two, three, four, and five. More importantly, the organization's lines would also have to compete with all other (non-TSP) lines for telecommunications service provider maintenance and repair resources. During major disasters, all telecommunications customers would likely be clamoring for rapid service restoration, thereby severely overextending the telecommunications service providers' maintenance and repair resources. Under such circumstances, the only way the organization can be certain it will go near the front of the line is by participating in the TSP program.

Q. If a Public Utility Commission's telecommunications lines are working but the public telecommunications networks are congested, will the TSP program help complete its calls?

A. The TSP program is designed to ensure that the most critical telecommunications lines are working. It does not, however, provide for priority completion of calls. That role is provided by Government Emergency Telecommunications Service (GETS) for wireline service and Wireless Priority Service (WPS) for mobile cellular phones.

GETS and WPS are emergency telecommunications programs administered by the NCS that provide for priority completion of out-bound calls when the public telecommunications networks are congested. GETS does not provide priority completion of in-bound calls. Since Public Utility Commission may originate large numbers of calls during emergencies, the FCC and NCS recommend that they participate in all three programs, GETS, WPS, and TSP. For information on these programs please visit the NCS web-site at: <http://gets.ncs.gov/> for GETS and <http://wps.ncs.gov/> for WPS.

For further information about the TSP program, call or email:

Allan Manuel
202-418-1164 (desk)
202-391-5331 (mobile)
allan.manuel@fcc.gov
tspinfo@fcc.gov