TO: Senator John Fonfara, Co-Chair, Energy & Technology Committee
   Representative Vicki Nardello, Co-Chair, Energy & Technology Committee
   Senator Steve Cassano, Co-Chair, Planning and Development Committee
   Representative Linda Gentile, Co-Chair, Planning and Development Committee
   Senator Edith Prague, Co-Chair, Labor and Public Employees Committee
   Representative Bruce Zalaski, Co-Chair, Labor and Public Employees Committee
   Senator Joan Hartley, Co-Chair, Public Safety and Security Committee
   Representative Stephen Dargan, Co-Chair, Public Safety and Security Committee

FROM: John Wolfe, Vice President of Government Affairs, Cox Communications
      Rob Howley, Senior Director of Regulatory Affairs, Cox Communications

DATE: September 19, 2011

RE: Cox Communications’ Tropical Storm Irene Planning and Recovery

On behalf of Cox Communications, we thank you for the opportunity to update the Committees on Cox Communications’ preparedness and recovery efforts in the wake of Tropical Storm Irene. Rob Howley and Peter Talbot from Cox will be available on Monday, September 19, to answer any questions you may have.

Overview:

For Cox Communications, the primary impact of Tropical Storm Irene was not network damage; indeed, our network weathered the storm well. We were, however, significantly impacted by the widespread and prolonged loss of commercial power. The overwhelming majority of service interruptions were due to the loss of commercial power in Connecticut and our service restoration efforts were closely tied to the restoration of power by CL&P. In addition to commercial power outages, fallen trees and utility poles also contributed to service outages.

Like our customers’ homes and business, our network relies on commercial power to deliver the services our customers enjoy. Our network is replete with standby and battery backup power to remain operational during relatively short-term power outages, but these back-up power sources are not created to withstand protracted, multi-day commercial power outages.

For the overwhelming majority of our customers, voice, video and data services were available as soon as electricity was restored to their homes or businesses. In other instances, we needed to repair downed drops (i.e., the cable that runs from the street to a customer’s home) or await tree removal or other safety measures in order to access a particular area.
Before, during and after the storm, Cox used several forms of communication including proactive media relations to make state and local authorities as well as our own residential and commercial customer base aware of the storm by providing Cox’s 24/7 emergency contact information; tips for customers to help maintain services; and restoration activity after the storm.

**Storm preparation:**

As a provider of video, high-speed Internet and telephone services with operations in Louisiana (including New Orleans) and Florida’s Gulf Coast, Cox Communications is no stranger to the impact of hurricanes and tropical storms. Based on lessons we learned from Hurricane Katrina and other weather events in the region, Cox Communications has a detailed and well-rehearsed Business Continuity Plan (BCP) to prepare for emergency situations such as hurricanes, and has identified a Business Continuity Team (BCT) within its New England operation, supported by our corporate offices in Atlanta.

The BCT convened regular daily meetings the week of August 22, as it became increasingly likely that Irene would affect the East Coast. On August 24, with the storm still 100 hours from Connecticut, storm preparation was largely complete. We were fully staffed with field technicians and maintenance crews, had additional crews on standby, had arranged for additional generators to be delivered, and had made arrangements for Cox call centers throughout the country to assist with the anticipated heavy call volume following the storm.

**Outage Impact/Damage:**

From a network standpoint and from a business continuity perspective, Cox was ready and responded well to the storm aftermath. We had materials and generators staged, job numbers set up for tracking purposes and a solid plan for how, who, where and when our people would be activated for restoration.

Our restoration priority was to have all police/fire, medical and other public safety facilities running first and our plan called for fiber restoration before coaxial. Thus all crews were able to immediately move to coax restoration once an area was made safe by CL&P. We were in constant contact with our public safety and other fiber-fed customers and restored service immediately following power company efforts.

For Cox Communications, Irene did not result in widespread or significant damage to our broadband network in Connecticut. Cox has approximately 2,600 miles of plant in its Connecticut broadband network; post-Irene, we needed to repair or replace fewer than 10 miles of plant. Moreover, Cox’s network passes approximately 200,000 homes in our 19-town service area. Post-Irene, we replaced a total of 548 drops to customer homes as a result of the storm.

For Cox Communications, the primary issue in the wake of Irene was the prolonged and widespread loss of commercial power. At the peak of the storm, we had approximately 39,000 telephone access lines reporting out of service, primarily due to a loss of electricity at these customers’ premises. Fortunately, Cox had approximately 100 generators running in the State as well as 4 of our technical buildings on generator. By 9:00 a.m. on Tuesday, August 30th that
number of out of service was halved. And enormous progress was made throughout that same week so that by Friday, September 2nd, Cox was fully operational for all of our products.

**Staffing:**

Cox conducted workforce assessments prior to the arrival of the storm. We doubled the amount of construction crews normally on hand, employed equipment from other Cox systems and re-deployed field personnel to back up powering duties. And when the storm was within 100 miles of the Cox network, we conducted twice daily internal conference calls with key department leaders to ensure that communication and coordination processes were in place. All of our employees were accounted for within 24 hours of the storm passing through Connecticut.

**External and Customer Communications:**

A letter from Cox summarizing our storm preparations as well as offering 24/7 telephone and e-mail contact information was sent on Friday, August 26 to the Connecticut Public Utilities Regulatory Authority (PURA) and the Office of Statewide Emergency Telecommunications Office so that a single point of contact could be established should officials have any questions. Thereafter, state and local authorities were regularly updated on Cox’s recovery efforts with towns, as commercial customers, receiving priority restoral if needed.

Notably, the Chairman of PURA held conference calls daily (and, in some cases, several times each day) to assess and coordinate telecommunications companies’ response to the storm. Cox Communications participated in each of those calls.

Cox also issued daily media updates on service restoration efforts beginning the day of the storm, and utilized the company’s Facebook page and other social media tactics to update customers.

In addition, our automated answering system was modified to provide customer information regarding restoral times. Finally, Cox’s employees were given regular updates in order to respond to customer inquiries. For our commercial customers, Cox offered call forwarding or voice mail services. These options were communicated both before and during the storm based on individual customer needs and circumstances. Also, where possible, generators were offered to commercial customers to continue power at their business locations.

**Lessons Learned:**

As a company with experience dealing with hurricanes and other tropical weather events, Cox had anticipated and prepared for greater network damage than we actually experienced due to Irene. Conversely, we were surprised by the extent and duration of power outages not just in Connecticut, but in Rhode Island and Virginia as well (where Cox also provides broadband service). It was these power outages that ultimately disrupted broadband services to customers. Fortunately, Cox was able to rely on literally hundreds of electrical generators to keep our network powered, and our field technicians were pressed into duty monitoring and refilling these generators to keep them running. Although Cox did not experience any shortage of gasoline to fuel these generators, the state may consider taking steps to make gasoline available to utility
companies who rely on generators for back-up power in the event of future severe weather events where long-term power disruption is likely.

Moreover, one of Cox’s generators was stolen during our post-Irene recovery efforts, effectively hindering telephone and emergency 911 access to customers served by that node until Cox was able to replace that generator. Cox is working with local law enforcement authorities to investigate this theft, and has notified the Department of Homeland Security as well. Cox would welcome any state-sponsored effort to remind consumers that it is a violation of federal law, as well as a significant public safety concern, to tamper with, disable or remove any portion of a service provider’s network.