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June 30, 2015

Ms. Jean Jewell (Filed Via Email: jean.jewell@idaho.puc.gov)  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, ID 83720-0074

**RE: Eligible Telecommunications Carriers' Annual Filing to the Federal  
Communications Commission Pursuant to 47 C.F.R. Section 54.313 and 47  
C.F.R. Section 54.422 (Form 481) – Docket No. GNR-T-15-01**

Dear Ms. Jewell:

Enclosed for filing with the Commission is Virgin Mobile USA, L.P.'s 2014 Annual Carrier Report (Form 481) filed with the FCC. Please note that the funding year for this report is 2016.

Also included with the report you will find two attachments: (1) a letter from CTIA congratulating Sprint for having completed the recertification process and (2) "Sprint's Business Continuity Program Overview".

Please contact me with any questions you may have regarding this transaction and/or any other matters.

Very truly yours,

*/s/ Kristin L. Jacobson*

Kristin L. Jacobson

**Meredith Attwell Baker**  
President/CEO

July 1, 2014

Mr. Dan Hesse  
Chief Executive Officer  
Sprint Nextel Corporation  
6200 Sprint Parkway  
Mailstop: KSOPHF0410-4A421  
Overland Park, KS 66251

Dear Dan:

Congratulations! This letter is to notify you that Sprint Nextel Corporation ("Sprint") and the Sprint Prepaid Group (Virgin Mobile USA, Boost Mobile, and Assurance Wireless) have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2014 – December 31, 2014, and are deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless are authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, CTIA will provide two specimens (color and black/white) of the Seal for use on Sprint's, Virgin Mobile USA's, Boost Mobile's and Assurance Wireless' respective websites and in their respective collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or [maltschul@ctia.org](mailto:maltschul@ctia.org).

CTIA commends Sprint for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with Sprint on this important industry initiative.

Sincerely,



Meredith Baker

cc: Charles McKee, VP Government Affairs

Attachment

## SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

### LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

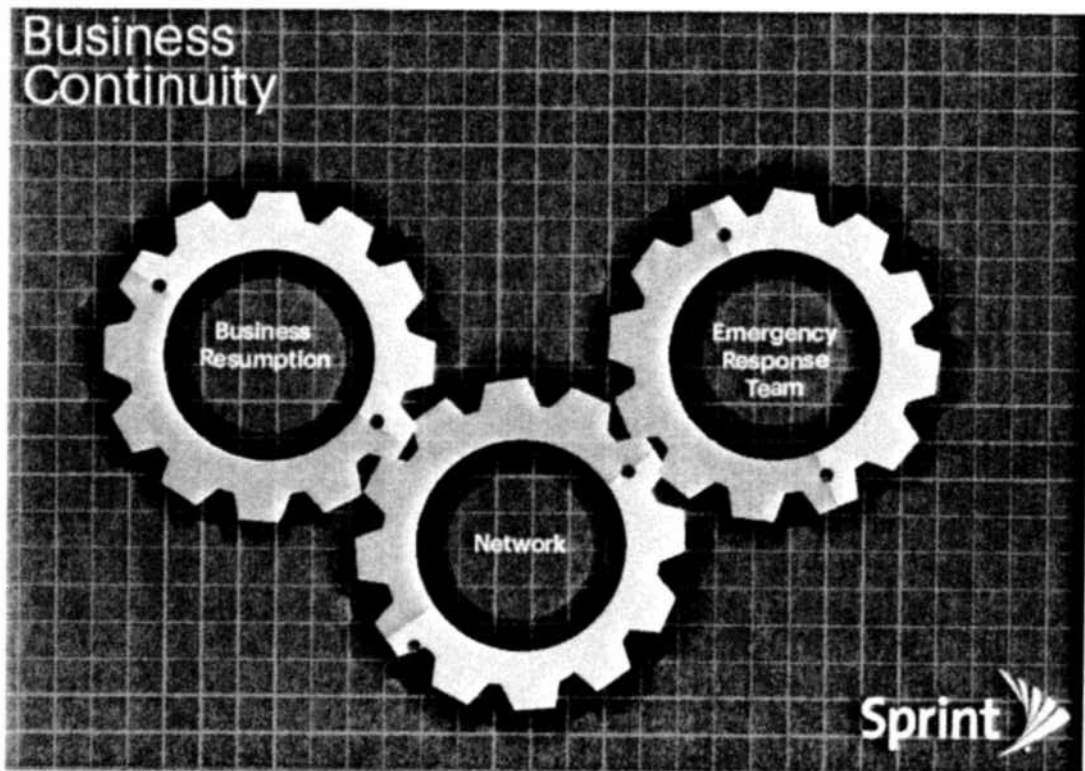
Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.

# Sprint Business Continuity Program Overview



## Document Information and Revision History

<b>File Name</b>	Sprint Business Continuity Program 2015
<b>Current Revision Author(s)</b>	Customer Sharing subcommittee 2015
<b>Overall Plan Owner</b>	Director of Business Continuity at Sprint

## Change Control

Listing of current year's changes, previous changes are available by contacting the Business Continuity Office.

Change Description	Name	Date
Removed reference to full functional exercises	Shah Daneshkhah	May 18, 2015
Added document owner information-NSA compliance	BCO	May 19, 2015
Corrected NCS to NCC	Chuck Brownawell	May 21, 2015
National Security and Compliance Team functions	Chuck Brownawell	May 22, 2015

## Business Continuity Office On-Call Contact

Title	Phone	Email
Business Continuity Office Point of Contact	1-877-747-2124	bco@sprint.com

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## **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

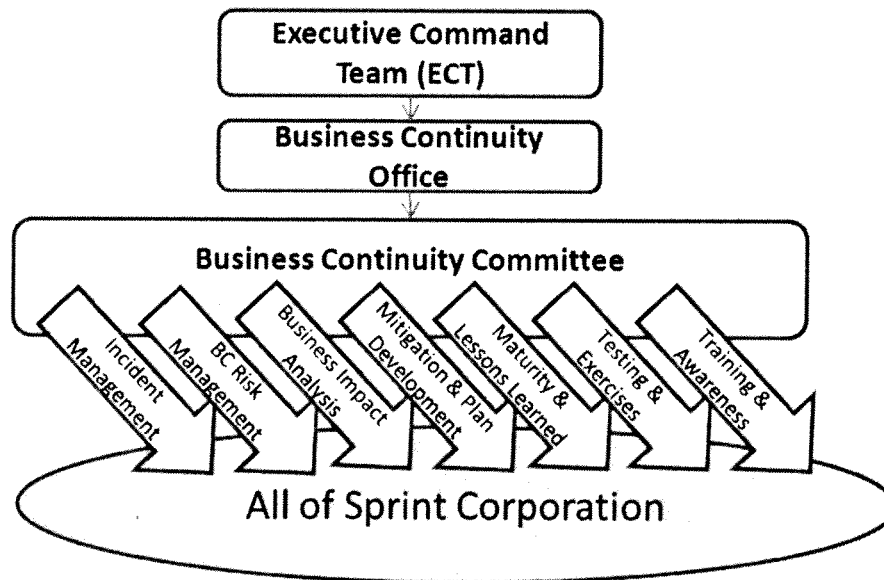
# Sprint

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.

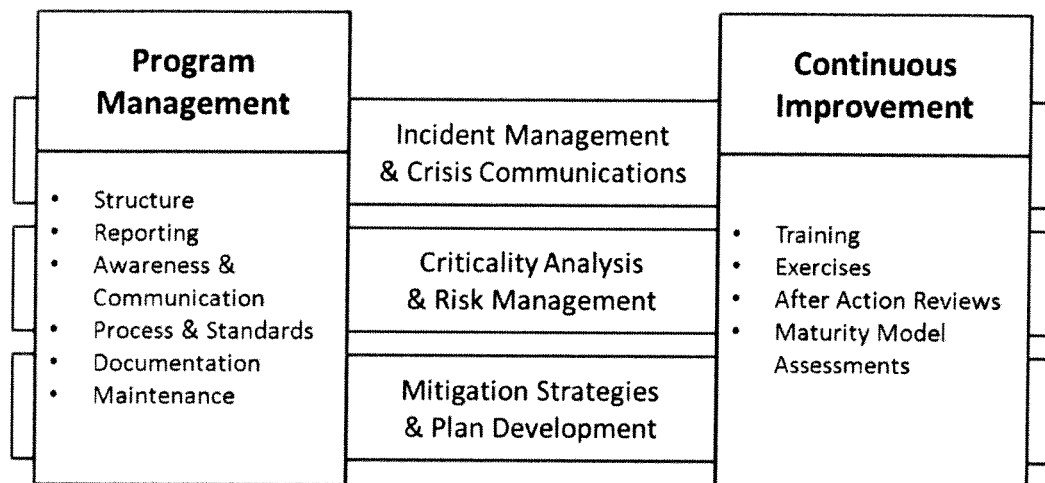
## Program Governance Structure





## 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, and functional drills.

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.

- 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 16 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.

## **National Security & Compliance (NSC)**

The NS&C team works to improve the physical and cybersecurity of Sprint's critical infrastructure networks and facilitates information sharing within and across the communication industry as well as with the government. Today's threat environment reminds us of our imperative to protect our Nation's critical functions that support national and economic security and public safety. A partnership leveraging public and private sector capabilities is essential for providing a realistic approach for protection and response.

The NS&C team is the primary point of contact to the Department of Homeland Security during times of increased threat and attack and during significant all hazards events. Members of the NS&C team serve as Sprint's onsite representatives at the Department of Homeland Security's National Coordinating Center (NCC) for Communications to provide a line of communication between corporate leadership, other telecommunication providers and government officials. This public / private partnership supports the mission of the NCC who leads emergency communications response and recovery efforts under Emergency Support Function #2 of the National Response Framework.





## **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](http://www.sprint.com/ert), become a fan on Facebook at [www.facebook.com/SprintEmergencyResponseTeam](http://www.facebook.com/SprintEmergencyResponseTeam) email us at [ERTRequests@sprint.com](mailto: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.