

**FCC/NCS Memorandum:
TSP Program Participation by PSAP Administrators
January 2003**

THE TSP PROGRAM

In 1988, the Federal Communications Commission (FCC) authorized telecommunications service providers to provide priority restoration of pre-designated circuits. The FCC specified that the resulting Telecommunications Service Priority (TSP) program would be administered by the National Communications System (NCS). TSP ensures that the telecommunications lines most necessary to promote the nation's security and emergency preparedness functions are given priority service by telecommunications carriers and, therefore, are installed and restored to service before all others in times of disaster. Telecommunications lines serving federal, state, and local government agencies, as well as private firms can be covered by the program, provided that they are essential for national security or emergency preparedness functions.

FCC/NCS EFFORTS TO SECURE AN EFFECTIVE TSP PROGRAM

Since the events of September 2001, the FCC and the NCS have been working together in reviewing the scope and effectiveness of the TSP program. We have found that the program covers a wide array of key government and private organizations and that it operates very effectively during disasters. We have also found, however, that many eligible organizations do not participate in the TSP program and that this lack of participation by certain key organizations represents a serious vulnerability in our homeland security.

PSAP ADMINISTRATORS

One group that we believe is significantly under-represented in the TSP program is the public safety answering point (PSAP) administrators. PSAP administrators provide services that are essential to the protection of life and property of most American citizens. As such, they readily qualify for inclusion in the TSP program.

Low Participation Rate in the TSP Program. Our examination of the current participants in TSP program found that very few PSAP administrators participate in the program. This lack of participation could jeopardize the restoration of essential services provided by the PSAP administrators during times of disaster and, therefore, put citizens at substantial risk of injury or loss of property at times when they are most vulnerable. Clearly, the continuous and effective operation of PSAPs is critical to the protection of life and property of our citizens, especially during times of crisis. That is why we believe it is essential for as many of these administrators as possible to participate in the TSP program.

Lack of Participation May Be Due to Misunderstanding of TSP Program. In the course of our review of the TSP program, we learned that some PSAP administrators may have chosen not to participate in the TSP program because they believe that their telecommunications service providers would likely give the restoration of their telecommunications lines high priority regardless of whether or not they subscribe to the TSP program. In the past, when TSP participation was very low and when damage to telecommunications facilities may have been

relatively minor, some carriers may have provided rapid restoration for these lines. Recent developments could change this.

From our review, we also found that some PSAP administrators may have chosen not to participate because they believe the cost of participation is too high.

OUTREACH EFFORTS NEEDED

It is becoming increasingly critical for organizations such as the PSAPs to participate in the TSP program. If not, other eligible entities that choose to participate in the TSP program will be in line for restoration ahead of the PSAPs. Since the events of September 2001, there has been a concerted effort to make eligible organizations aware of the TSP program and as a result, there has been a substantial increase in TSP participation by public and private organizations. This increased participation could impede the rapid restoration of PSAPs who choose not to participate in the TSP program. In the future, if disasters result in substantial damage to the telecommunications infrastructure, it could take several weeks to restore non-TSP lines. Thus, a PSAP administrator that chooses not to participate in the TSP program today may remain out of service for unnecessarily long periods of time, thereby putting citizens at unnecessary risk during disasters, at times when they can ill afford extended periods of PSAP outages.

We also have found that there are relatively inexpensive ways to participate in the TSP program and that most participants, including PSAP administrators, can afford some level of coverage. For instance, we have found that most organizations that participate in the TSP program select a relatively small percentage of their lines for TSP coverage. By doing so, they can maximize their ability for quick restoration of connectivity and minimize their cost of participation. PSAP administrators could do the same.

CONTACTS

For information regarding this report or the operation of the TSP program, please call Fred Herr, Chief, Critical Infrastructure Protection Division, NCS at 703-607-4902, or Kenneth Moran, Director, Defense and Security, FCC at 202-418-0802. In addition, detailed materials regarding the TSP program are available on the NCS web-site at <http://tsp.ncs.gov/>.