



## **OFFICE OF INSPECTOR GENERAL**

### **MEMORANDUM**

**DATE:** December 6, 2005

**TO:** Chairman

**FROM:** Inspector General

**SUBJECT:** Report on the Audit of the Commission's Continuity of Operations Program

The Office of Inspector General (OIG) has completed an Audit of Commission's Continuity of Operations Program (COOP). A copy of our Audit Report, titled "Audit of the Commission's Continuity of Operations Program" (Audit Report No. 04-AUD-09-17) is attached. The objective of this audit was to assess adequacy of the FCC's COOP and report upon its progress. The scope of this audit encompassed a review of FCC's COOP. This included a review of the COOP of the Universal Service Administrative Company (USAC). The results of the USAC COOP audit were the subject of a separate report. The Pinnacle exercise was also excluded from this audit and was the subject of a separate report.

To accomplish the objectives of this audit, we engaged Job Performance Systems, Inc. (JPS). Under our supervision, the JPS audit team interviewed staff, reviewed documentation, and performed other tests deemed necessary. Finally, JPS compared the Commission's COOP to authorities and best practices, and reviewed prior tests of the Commission's COOP. JPS also evaluated COOP activities at FCC facilities at Gettysburg, PA and Columbia, MD.

During the audit we noted several positive observations relating to the Commission's COOP. Those observations include:

- The FCC conducted a successful COOP test in 2004.
- The High Frequency Directional Finder Center (HFDFC) has a backup site.

Overall, considerable effort has been exercised in development of the COOP program.

While we noted these positive findings, we did identify six (6) conditions for improvement. Five (5) related to the FCC COOP. The details of these findings can be found in Appendix A, Detailed Findings & Recommendations. One (1) finding related to USAC's COOP. The USAC finding will be reported in the separate report on the results of the audit of the USAC COOP.

On September 22, 2005, we provided a draft to the Office of Managing Director (OMD) and the Enforcement Bureau (EB) for review and comments. In a response dated November 14, 2005, prepared by OMD in consultation with EB, both indicated concurrence with all findings. Furthermore, management stated that two findings have been closed and no further action or tracking is necessary. We have included a copy of the response to this report in its entirety as Appendix B, Management Response.

Because of the sensitive nature of the information contained in the body and appendices to this report, we have marked all as "Privileged and Confidential, Non-Public – For Internal FCC Use Only" and have limited distribution of this report. Those persons receiving this report are requested not to photocopy or otherwise distribute this material.

A handwritten signature in cursive script, reading "H. Walker Feaster III". The signature is written in black ink and is positioned above the printed name and title.

H. Walker Feaster III  
Inspector General

Attachment

cc: Chief of Staff  
Managing Director  
Chief, Enforcement Bureau