



**Comments of Xspedius Communications, LLC  
to the Independent Hurricane Katrina Panel**

**March 6, 2006**

Xspedius Communications, LLC submits these comments in response to the Independent Hurricane Katrina Panel's request for comments. Xspedius Communications, LLC is a competitive local exchange carrier ("CLEC") that offers local, long distance, and integrated communications services in over 20 states, primarily across the South and Southwest. Xspedius has deployed Class 5 local switches throughout the area impacted by Hurricane Katrina, including New Orleans, Lake Charles, Mobile, Birmingham, and Montgomery. Xspedius also offers communications services in Jackson, Lafayette, and Shreveport and owns and operates hundreds of miles of redundant fiber optic networks from Tampa to Houston.

As an interested telecommunications carrier in the Region, Xspedius attended the first Panel meeting, and has been working with the Working Groups to provide input from the CLEC perspective. Xspedius offers the following comments on improvements that should be made based on lessons learned from Hurricane Katrina prior to the next hurricane season.

## **I. Issues Relating to Access for Personnel and Fuel to the Impacted Area**

### **A. Access Issues**

Like many other telecommunications carriers, Xspedius personnel, and contractors that Xspedius relies upon, were restricted from gaining access to our key facilities locations during the aftermath of the Hurricane. Xspedius offers redundant local facilities in many markets, facilities which were relied upon by other carriers during the aftermath of Katrina. The access issue for Xspedius and other Louisiana CLECs such as NuVox and Network Telephone is compounded by the fact that CLECs do not always have the same name recognition of larger utilities such as BellSouth and Entergy. Xspedius agrees with the many carriers that have argued that providing first responder status to communications providers is necessary. In addition, similar advance status should be provided to select, pre-identified contractors (insider wire contractors and fuel companies, for example) that work closely with these companies.

With respect to Xspedius' experience during Katrina, like other companies, Xspedius was able to operate its New Orleans switch off of back-up generators designed for such emergencies. Back-up generators, however, required a steady stream of fuel, and it was access to such fuel that became one of the greatest challenges during the crisis.

On August 30th, the day after the Hurricane made landfall in New Orleans, Xspedius personnel trying to get to New Orleans to join our New Orleans-based personnel were turned around in Baton Rouge. It was not until late the following day, August 31<sup>st</sup>, that Xspedius was able to obtain the necessary passes.

The individuals to whom Xspedius made requests for emergency access were diligent and professional, but they were working within an ad hoc process that did not

function smoothly, with no clear direction even as to which agency had authority to issue the necessary authority. After two days of attempting to obtain the required Department of Transportation {"DOT"} waiver to gain access to the highways, Xspedius ultimately obtained our {"DOT"} waiver from the Department of Homeland Security ("DHS"). While the fuel truck authorization came from DHS, the authority for the personnel accompanying the truck ultimately came from the incident commander with the Louisiana State Police, who gave the final approval for the fuel truck and personnel to enter. Streamlined approval processes and pre-approval of certain individuals and companies would represent a significant improvement to current processes.

Again, recognizing only the communications providers themselves will not be sufficient. It will also be necessary to recognize as first responders certain designees of those companies: fuel providers, outside plant fiber repair crews, general maintenance contractors, commercial electrical and air conditioning contractors, and so on. Ready access to these types of secondary contractors would have created additional network stability and permitted better focus on the technical telecom challenges at hand.

## **B. Security Issues**

Hurricane Katrina brought many challenges in its wake, including looting and sniper fire that added to an already chaotic situation. In order to gain access to New Orleans, Xspedius was able to piggyback on the armed escorts of another provider. In general, however, government security is strongly preferred to private escorts, which is no doubt the preference of government security forces, as well. Local, state and federal security escorts should be made available to escort private communications companies to critical locations, to the extent available, recognizing that local, state and federal forces

were stretched thin and working night and day throughout the crisis. As with the case of access issues, to the extent orderly government escort processes can be established in advance of a hurricane, they will work more smoothly in the midst of a crisis. These processes should include not only security escorts but also on-site security where necessary to protect communications facilities.

With respect to both access and security processes, communicating those processes to companies through public sources, such as websites, in advance of the next hurricane season will be critical. Coordinated websites with critical contact information and Frequently Asked Questions are necessary to ensure seamless communications. Such websites and information distribution should be closely coordinated, as challenging as that may be, so that information from different local, state and federal agencies provides a clear, consistent message to the public, including communications companies.

## **II. Network and Other Telecommunications Issues**

Due to the overwhelming nature of Hurricane Katrina, Xspedius was not able to maintain continuous switch operations through every hour of the Hurricane. Xspedius outages were intermittent, however, and the Xspedius network was for the most part operational throughout the crisis.

As with other carriers, Xspedius was dependent upon the BellSouth tandem for connectivity to some carriers, and on other terminating local providers to guarantee the terminating end of its calls. In cases where Xspedius was direct-connected to other carriers, however, such as long distance carriers, Xspedius customers were able to make long distance calls into and out of the region throughout the Hurricane.

Many larger metropolitan areas, such as Atlanta and Miami, are seeing the rise of alternative tandem providers. Alternative tandem providers represent one of the many beneficial developments of the new competitive telecommunications landscape created by the Telecommunications Act of 1996. These providers establish an alternative to the traditional Bell tandem, and provide a secondary point where multiple carriers can exchange traffic. If such an alternative company tandem were established at a strategic location in New Orleans, for example, it could eliminate tandem chokepoints and allow for better communication between local communications networks in a crisis. As others have mentioned, new entrant CLECs such as Xspedius have also positioned switches in New Orleans and Mobile at second story or higher locations. Such positioning creates a more sustainable network.

In general, alternative providers such as Xspedius, US LEC, NuVox, ITC DeltaCom, and Network Telephone provide critical redundant and alternative facilities to provide alternative communications pathways in the event of a minor or major network failure. Xspedius is already the service provider at many locations for municipalities, health care facilities, news and weather stations, and the American Red Cross. During Hurricane Katrina, carriers and other private and public entities came to Xspedius for alternative phone and data access capabilities.

Part of the government communications strategy should include the dissemination of information about alternative communications facilities in a time of crisis. Providing basic contact information and a brief description of the types of facilities available with links to further information would go a long way towards opening up communications between network providers, utilities, and private entities. There should be one location

with crisis contact information for all utilities, a one-stop shop for individuals seeking any kind of utility support during the next hurricane. It would be extremely useful to have one website with this type of utility information, but which would also offer information on the availability of power, water, road closures, weather, and other emergency-related updates. If this information is splintered off into multiple agency sites and sources, it makes it significantly harder to access in an emergency.

### **III. Conclusions**

While there is ample room for improvement of the processes and procedures in place to respond to hurricanes such as Hurricane Katrina, Xspedius would like to take this opportunity to thank the many local, state, and federal authorities who went out of their way to assist Xspedius during Hurricane Katrina. The individuals with whom Xspedius worked responded in a diligent, professional manner and worked their way through conflicting bureaucracies to meet Xspedius' requests.

Xspedius would like to note that we also own and operate facilities from Charleston south to Miami, in Tampa and across the Gulf Coast to Houston. The Panel and Working Groups are identifying important lessons learned from Katrina, and these solutions should be implemented not only in New Orleans, but also across the broad swath of our coastline that is vulnerable to similar hurricanes.

In sum, Xspedius recommends: the availability of broader first responder status to companies and their contractors; improved access to public rights of way through such status; improved access to public security for access escorts and on-site for communications facilities; consideration of alternative tandem and other available

networks to provide redundant routing alternatives; and streamlined information dissemination so that all such improvements are communicated in a one-stop manner to public and private entities. Xspedius appreciates the work of the Panel and the Working Groups and this opportunity to provide our input into the process.