LUMEN

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November 14, 2025

VIA ELECTRONIC FILING

Mr. Adam Teitzman, Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ATTN: Division of Engineering

RE: **Docket No. 20220000-OT (Undocketed Filings for 2025)**
Lumen's Emergency Response and Storm Restoration Procedures and Protocols, Subsection (5) of Rule 25-18.020, F.A.C.

Dear Mr. Teitzman:

In accordance with Rule 25-18.020(5), F.A.C, Pole Inspection and Maintenance, attached please find the emergency response and storm restoration procedures and protocols for Embarq Florida, Inc d/b/a CenturyLink ("Lumen").

Lumen's Business Continuity Management Plan Overview, attached as Attachment A, serves as the cornerstone for the company's comprehensive business continuity and emergency restoration strategy across its entire service area. In addition to the foundational framework detailed in the plan, Lumen has enhanced its procedures and protocols in several key areas to improve operational resilience and emergency response capabilities. Lumen provides information below specifically addressing Rule 25-18.020(5).

Testing: Lumen now conducts real-time storm tracking, risk modeling, and infrastructure vulnerability assessments, enabling more focused testing and resource allocation ahead of disasters. Field teams use advanced geospatial tools to assess vulnerabilities, prioritize asset protection, and respond faster. To maintain service continuity during severe weather, Lumen strategically stages backup generators near disaster-prone areas, allowing field teams to quickly restore and support power to vital network infrastructure, thereby minimizing service interruptions. Proactive maintenance relies on real-time, analytics-driven inspections to address increasing commercial power outage rates, helping ensure ongoing network stability.

Additionally, Lumen's dedicated national incident management team provides round-the-clock support and maintains direct communication with customers to guarantee effective incident response. Lumen - Lumen Technologies Ensures Enterprise Connectivity During Hurricane and Wildfire Season

Weather Monitoring: Lumen now conducts real-time storm tracking, risk modeling, and infrastructure vulnerability assessments, which enable more focused testing and resource allocation ahead of disasters. Field teams use advanced geospatial tools to assess vulnerabilities, prioritize asset protection, and respond more quickly. Network Operations Centers (NOCs) are staffed 24/7/365 to monitor weather conditions and their potential impacts using dedicated field operations personnel, weather agencies such as NOAA, and network impact detection software.

Both local and national teams are immediately alerted to respond and address any potential adverse effects, while Lumen's dedicated national incident management team provides round-the-clock support and maintains direct communication with customers to guarantee effective incident response.

Resource Staging: In response to increased commercial power outage rates, Lumen now stages larger backup generators (1MW+) in Florida ahead of storms, replacing the previous practice of deploying smaller units.

National Incident Management Team: There is now a dedicated national team providing 24/7 support and direct customer communication, with incident status reports distributed after each event.

Government Communications Procedures and Protocols:

- Federal: Lumen continues to participate in daily coordination calls with FEMA's ESF#2, NCC, and Comm-ISAC, but now with expanded leadership roles and more frequent updates. Lumen updates its ESF#2 contact lists annually to ensure rapid notification and coordination.

  Lumen also participates in the Regional Emergency Communications Coordination Working Group ("RECCWG") for FEMA Region IV, which includes Florida. Lumen personnel are listed on the State EOC ESF#2 Distribution list and participate in calls organized by the State EOC, providing updates on storm impact and restoration efforts as appropriate. Contact information is updated annually to ensure ongoing coordination

  During an incident, the NCC/Comm-ISAC integrates with FEMA's Emergency Support Function #2 – Communications ("ESF#2") and typically conducts at least once-daily coordination calls at both the federal (National Response Coordination Center) and regional level (Regional Response Coordination Center). FEMA's

regional ESF#2 calls typical include State representatives such as the ESF#2 State lead, the Statewide Interoperability Coordinator (SWIC), and/or the State 911 coordinator.

Lumen coordinates internally to ensure consistency across federal, state, and local engagement. Lumen personnel engaged at both the state and national levels participate in the internal Emergency Incident Management Team to ensure bi-directional information flows across federal, state, local and company response decision-makers.

- State: Lumen maintains an active relationship with the Florida Emergency Operations Center (EOC), participating in regular preparedness calls and exercises. Representatives from Lumen's State Government Affairs, Service Assurance, Repair, and Field Operations groups are included on the State EOC ESF#2 Distribution list. Contact information for these representatives is updated annually to ensure rapid communication during emergencies.

  When the State of Florida Emergency Operations Center ("EOC") identifies an incident that causes the State EOC to be on alert or active, the State EOC sends out communications to a list of specific Lumen employees that are engaged in the company's Emergency Incident Management Team for Florida. Currently, representatives from Lumen's State Government Affairs group, Service Assurance group, Repair group, and Field Operations group are all on the State EOC ESF#2 Distribution list. Lumen updates contact information with ESF#2 annually. Lumen representatives will participate in calls organized by the State EOC and/or provide updates for data on storm impact/restoration efforts as appropriate. Lumen works closely with ESF#2 to escalate and complete restoration work in coordination with the State.

- Local Emergency Operations Officials: Based on Lumen's experience, local emergency operations needs are communicated through ESF#2. For example, Lumen will receive escalations from ESF#2 to perform Missions to address local emergency operations priorities for restoration. Additionally, during storm events, local government IT departments often communicate with Lumen via Lumen's SLED Sales group, as this group often has direct customer contact with local governments. Public safety answering points ("PSAPs") generally communicate with Lumen's Public Safety Services NOC. Lumen maintains a list of designated points of contact for all PSAPs it serves and that list is audited annually for accuracy. Through this audit process, Lumen also provides PSAPs with Lumen's Public Safety Services NOC contact information. Lumen's Government Affairs group also engages with local county EOCs to provide updates, facilitate escalations and act as a liaison between counties and the company.

How the Public Can Report Issues to Lumen:

Lumen offers a variety of ways for the public to contact us to report issues with our poles, such as broken poles, downed overhead facilities, or obstructive vegetation.

- Customers or members of the general public can email or call our repair lines to report issues with our facilities. Through this process, a ticket is created to alert the company of the issue and begin the restoration process.
  - Online https://repairescalations.lumen.com/
  - Lumen Service Assurance: 877-453-8353

- Customers who would like to communicate with a CenturyLink or Quantum Fiber representative to report an outage can connect with us most effectively through chat by using these links, which are accessible by mobile device, or by telephone:
  - CenturyLink customers: https://www.centurylink.com/home/help.html or by telephone at 800-201-4099
  - Quantum Fiber customers: https://www.quantumfiber.com/support.html or by telephone at 833-250-6306.
- Although the primary reporting channels (online portal, hotlines, and customer support links) remain the same and are still referenced in the latest emergency response protocols and public filings, Lumen has improved the online portal's interface for easier ticket creation and tracking. Customers can now receive real-time updates on restoration progress via email or SMS. For large-scale incidents, the RAM tool and other live monitoring platforms automatically highlight affected areas and prompt public reporting through targeted notifications. The reporting process is now more mobile-friendly, allowing users to report issues directly from smartphones and receive status updates.

Process to Repair and/or Replace Damaged Pole Facilities:

Below is a description of Lumen's procedures to repair and replace damaged poles and overhead facilities, including protocols for coordinating with public utilities, through emergency response and storm restoration efforts.

- Public or internal teams report damaged poles via:

  ✓ Online portal or mobile app.
  ✓ Service assurance hotline.
  ✓ Customer support channels.

- Lumen determines if the pole is:

  ✓ Power company-owned: Power company leads repairs; may reattach Lumen facilities if undamaged.

- ✓ Lumen-owned: Lumen initiates damage assessment and restoration.

- Damage Assessment: Field teams use Mobile apps and AI-powered image recognition for rapid assessment and Geospatial mapping tools to visualize affected infrastructure.
- Safety Verification: Remote safety checks are performed using sensor data and live video feeds before dispatching crews.
- Ticket Creation & Prioritization: Automated restoration tickets are generated and routed to appropriate teams. Tickets are prioritized based on safety, feasibility, and impact.
- Coordination & Resource Staging: Lumen's NOC coordinates with ESF#2, utility partners, and public works, field teams and external agencies
- Repair & Restoration Execution: Crews repair or replace damaged poles and overhead facilities. Collaboration with other utilities ensures safe and efficient restoration.
- Status Updates & Communication: Real-time updates are provided to stakeholders and the public via:

  - ✓ Online portal, email, or SMS
  - ✓ Incident status reports.

- Post-Restoration Review: After repairs are completed, remote verification is conducted to confirm restoration, and lessons learned are documented to improve future processes.

Lumen's process for repairing and replacing damaged pole facilities is now faster, safer, and more technology-driven, with real-time coordination and improved public reporting integration.

Should you have any questions concerning this filing, please contact myself or David Zechman at 717-817-3902 or David.Zeckman@lumen.com

Very truly yours,

/s/ *Monica Echevarria-Garica*

Monica Echevarria-Garcia

cc: David Zechman

ATTACHMENT A

Attachment A

Business Continuity Overview

March 15, 2022

LUMEN®

Executive summary

Lumen is committed to business resiliency and survivability during an incident or business disruption. Our Corporate Business Continuity Management program ("program") supports an environment of prevention, collaboration, communication, response, and recovery, ultimately allowing us to serve customers, shareholders and employees in the face of disruptive events.

As one of four core members of the Communication Sector Coordinating Council partnering with the Department of Homeland Security National Coordinating Center (NCC), it is of paramount importance for Lumen to protect the operation of our company and our customers' business.

This document summarizes Lumen's BCM program and its resiliency and preparedness capabilities.

Program goals

The program supports Lumen's vision, strategy, and corporate objectives with the following goals. Annually:

- Evaluate the purpose and operations of every business unit in the company, identifying threats, hazards, and potential impacts to critical business priorities
- Develop strategies for mitigation, continuity, and recovery
- Maintain uninterrupted service whenever possible, and when necessary, coordinate recovery from business disruptions safely and quickly
- Enable continuous improvement by periodically reviewing program strategy and performance.

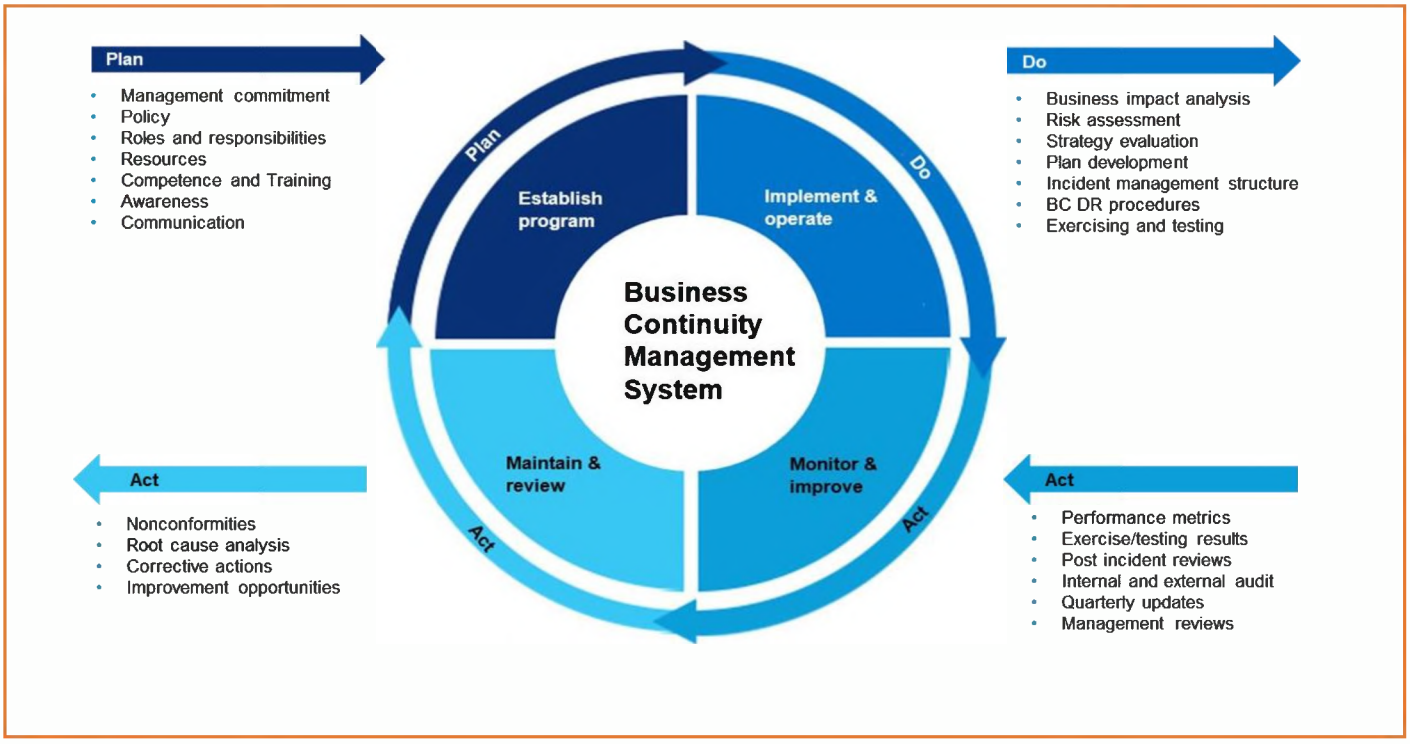
Program governance

Standards: Lumen has aligned its program to adhere to ISO 22301:2012, the International Standard for Business Continuity Management (BCM).
Leadership: Lumen's highest-level executives support the program by assigning program partners to represent their organization's interest in operational resiliency.
Policy: In adherence to our company policy, Lumen is committed to maintaining a Corporate BCM team, framework, program objectives, and assignment of resources to execute the program. The BCM program policy is reviewed and updated on an annual basis.
Metrics: The Corporate BCM team maintains a dashboard to monitor and evaluate the performance of program activities.
Audit: Lumen engages internal and external audit firms to perform multiple types of assessments designed to address our customers' diverse compliance requirements.

Program framework

As supported by policy, the key to resiliency is the program's framework. In alignment with ISO 22301:2019.

Lumen's BCM program is based on a Plan-Do-Check-Act model comprised of the following key components:



Establish program

- **Program management:** Dedicated resources establish accountability and reinforce Lumen's commitment to the business continuity standards required to provide customers reliable and resilient service.
- **Competence, training & awareness:** The program utilizes role-based training curriculum to help ensure participants are competent to the responsibilities for executing required tasks.

Implement and operate

- **Business impact analysis (BIA):** Annual interviews are conducted to identify the company's key operational functions and the impact(s) a disruption would have on them. This analysis provides an understanding of time-critical priorities, key resources, and interdependencies so that recovery time objectives (RTO's) can be established, approved, and integrated into planning strategies.
- **Risk assessment (RA):** Annual interviews are conducted to evaluate threats, hazards, and potential causes of interruptions, the probability of their occurrence, and the severity of their impact when they occur.
- **Strategy evaluation and plan development:** The BIA and RA collectively provide data integral to evaluating, developing, and implementing strategies for reducing the likelihood and impacts of disruptive incidents.
- **Incident management and business continuity/disaster recovery plans:** The incident management process and BC/DR plans provide procedures for maintaining continuity of operations and are implemented to effectively respond to and recover from company-wide operational disruptions.
- **Exercising and testing:** To test viability and develop a state of readiness, Lumen requires critical plans to be updated and exercised annually.

Monitor and review

- **Tracking performance metrics:** The progress of each organization's compliance with the program objectives and requirements is continually tracked and communicated to key program personnel on a quarterly basis.
- **Post incident reviews (PIR):** Provide impacted/activated groups an opportunity for recovery process feedback, reflection on lessons learned, and address any issue(s) which may require follow-up action.
- **Management reviews:** Conducted annually or when significant business changes occur, to review the state of the program and confirm alignment with company strategy and operational initiatives.

Maintain and improve

- **Non-conformities, corrective actions, and improvement opportunities:** Are tracked and periodically reviewed to address findings or gaps are addressed and to enable continuous improvement of the program.

Key plan elements

While business continuity plans are proprietary, Lumen uses a company-wide planning model that incorporates information as outlined in the plan's Table of contents below:

Table of Contents

Program roles and responsibilities

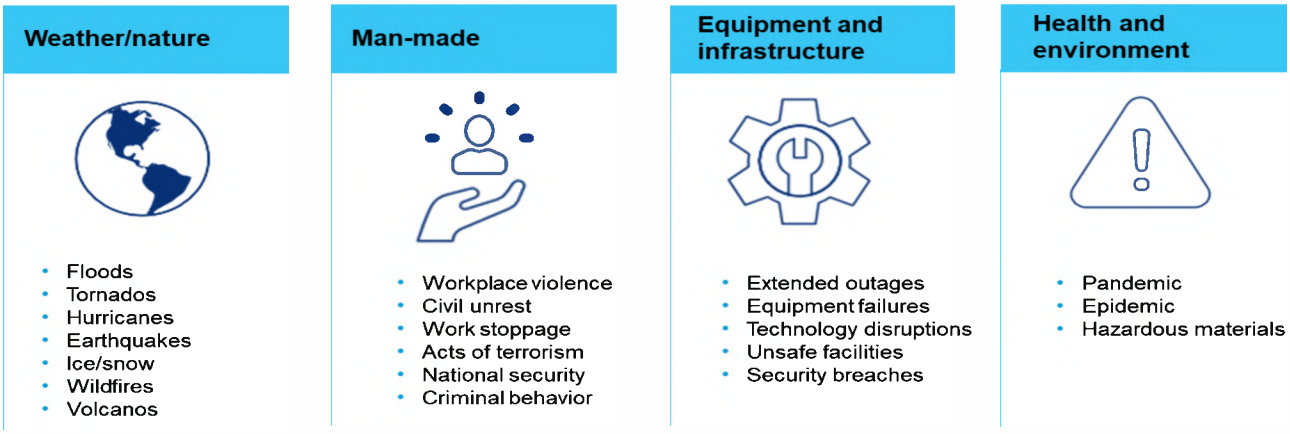
Roles	Responsibilities
Corporate business continuity management office	Lumen's program is managed by full-time business continuity professionals who govern and support the corporate BCM program. Responsibilities include: • Developing and maintaining the program methodology and framework for recovery of business operations, facilities, applications, and the incident response structure • Maintaining a BCM Guidebook containing the detailed procedures for how to execute the components of the program • Facilitating Incident Management activities, to include: – developing and maintaining program structure and processes - team membership, role-based training, and exercises – facilitating and managing event communications with interested parties – conducting Post Incident Reviews and tracking action items to closure • Tracking and reporting execution results to determine recoverability and maturity • Directing and supporting continuous program improvements • Conducting reviews with management on BCM capabilities • Maintaining, managing, and administering the BCM-related tools (i.e. planning repositories, incident communications, training modules, etc.)
Senior leadership	Lumen's highest level of leadership, representing all major organizations of the company. Responsibilities include: • Championing the program and instilling the values of the program within the organization • Appointing an Executive Sponsor(s) to implement and execute the program framework within their organization and subsequent functional group(s) • Identifying unacceptable levels of BCM risk
Executive sponsors	• Accountability for the management, prioritization, implementation, and continuous improvement of the program in their functional groups/organizations • Appointing Business Continuity Coordinators (BCCs) and granting them the authority to coordinate execution of the program and verify their responsibilities • Appointing Incident Management Team Commanders to provide efficient command and control over recovery activities and concise communications to stakeholders
Business continuity coordinators (BCCs)	• Establishing the structure within their functional group to coordinate execution of the program • Obtain ongoing training and education necessary to design, implement, and maintain the program's desired execution outcome
Plan owners / incident commanders	• Responsible for the development, approval, and distribution of plans • Verifying plan recovery strategies are implemented, maintained, and exercised • Revising plans as business conditions require (i.e., changes in roles, environment, technology, or operations) • Assuming command over an appropriate response structure • Activating plans when pre-defined triggers have been met and recovering the critical activity within its desired timeframe
Plan builders	• Support Plan Owner in developing and maintaining plan(s) in the required planning repository • Assisting Plan Owner with any maintenance, exercise, and QA activities

Incident management teams (IMTs)	IMTs are comprised of team members representing key functional groups that may serve a critical role during life safety incidents or business disruptions • Primary team members are paged out for all activations and secondary teams are paged out if they are impacted or needed to support an incident • Each team is accountable for the overall command, control, and communication within their functional group during recovery
General employees	• Complete program awareness training on an annual basis and other additional training as needed by periodic objectives, projects, or initiatives

Managing and responding to an incident

Defining an incident

Lumen defines an *incident* as a man-made or naturally occurring disruptive event where the impacts affecting its employees, assets, or critical business operations meet predefined activation triggers. Activation triggers would include, but are not limited to: life threatening situations (severe weather, natural disasters, pandemic epidemic, workplace violence), extended outages or security breaches for top critical systems or applications, or extended evacuations due to building infrastructure failures or environmental emergencies.



Activating incident management teams (IMTs)

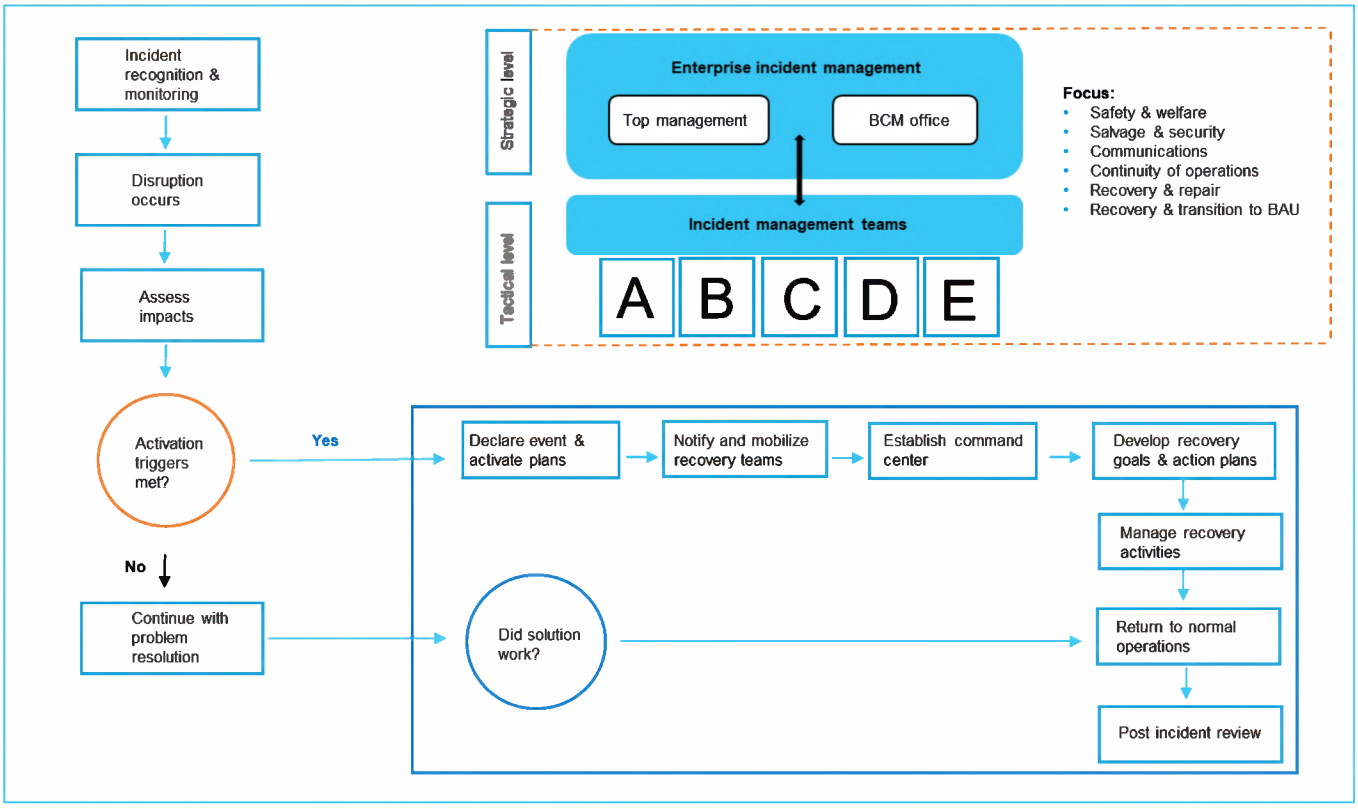
Lumen IMTs are operational 24/7 and convene virtually when any member becomes aware of an actual or impending situation within their support area. Incident Commanders are engaged to determine if the incident has met an activation trigger or threshold. If the situation warrants, the Incident Commanders coordinate the activation of the team and the necessary notifications. The IMT(s) reconvene at agreed upon time intervals to provide status updates on their team's tactical recovery and any resources or logistics requirements. Incident Status Reports are updated and distributed after each meeting and disseminated appropriately to top management, functional groups, and other interested parties. A post-incident review incorporating lessons learned and after-action items from all activated teams are created to track action items to closure.

Communicating during an incident

Lumen implements redundant communications capabilities utilizing alternate carriers. Primary and back-up conference bridges are supplied by separate vendors using diverse networks and routes. The company owns and maintains an automated paging system, utilized for activating its Incident Management teams and notifying registered employees of disruptive events or critical situations. Additionally, in times of network congestion or domestic emergencies affecting normal telecommunications means, Lumen critical personnel are afforded priority access through the Government Emergency Telecommunications Service (GETS) for public switch telephone networks (PSTN) and the Wireless Protection Service (WPS) for cellular phones.

Recognition, response, and recovery flow

The figure below illustrates how the incident management process unfolds and interested parties are kept informed.



Resiliency and preparedness capabilities

As a leader in global communications and IT services, Lumen's preparedness capabilities and resiliency strategies include, but are not limited to:

Network & IT infrastructure | **Facilities** | **Personnel**

Network & IT infrastructure

Network footprint

Lumen serves customers in more than 60 countries across the globe, with network and fiber capabilities that connect more than 350 metropolitan areas with 100,000-plus on-net buildings. This globally diverse network, including approximately 450,000 route miles of fiber, enables a broad range of services and solutions to meet customers' evolving demands for capacity and reliable connectivity.

Network reliability

Geographically dispersed network operations centers are staffed 24/7/365 to monitor, identify, and isolate causes of potential network disruptions, and coordinate resolution of system outages. During a network outage or event, this may include opening event tickets, tracking and correlating events, running event bridges when required, and providing status to interested parties.

Network security

To support the security of the company's information and networks, Lumen utilizes a team of subject matter experts with diverse technical expertise from Operating Systems, Web Applications, Networking, Computer Forensics and Cryptography. These investigation and response capabilities are maintained 24/7/365 to protect Lumen assets from cyber threats.

IT operations

Lumen owns and manages geographically dispersed data centers, which are equipped with infrastructure, environment and connectivity to support the company's processing capabilities, and essential business functions. Access to data centers is restricted and backed up by battery and generators when commercial power is disrupted. Information Technology (IT) partners with BCM program personnel to provide management recovery plans for critical applications and hardware, as well as integrating communication activities during an incident.

Facilities

All critical facilities have plans for recovering their critical infrastructure from loss of access, power, HVAC, etc. Periodic inspections and evacuation drills are conducted to protect the safety of our employees, customers, and vendors.

Fire and life safety

Lumen is committed to the safety of its employees and guests, protecting company assets, providing continuity of company operations, and complying with applicable regulations and codes. Fire and Life Safety plans and subsequent procedures are customized according to each facility.

Corporate security

The Corporate Security group establishes security policies, manages access control systems, and coordinates security improvements to Lumen properties. This group manages the 24/7 Security Command Center which responds to alarms, monitors video, monitors global events, supervises security officers, and serves as the central point of contact for all security related events.

Alternate work arrangements

During a disaster or emergency related event, Lumen utilizes an alternate workspace process and team to address the needs of business units which occupy impacted facilities. Additionally, Lumen deploys remote access strategies providing the ability for employees to work remotely in support of minimizing the impact to customers during disruptive events.

Personnel

With personnel located around the globe, Lumen has incorporated into its planning a methodology to address potential or significant disruptions in staffing levels, focusing on the following areas:

- Keeping mission-critical functions operational
- Personnel remote access and staff reduction contingency strategies
- Providing an appropriate level of awareness for our employees and customers
- Anticipating and responding to our customers' needs and possible disruptions to our supply chain

Health and safety

Lumen is committed to protecting the health and safety of our employees, customers, and communities we serve by conducting our business in a safe and environmentally responsible manner. Health risks and/or pandemic preparedness are integrated into the planning process of the Business Continuity program, where health and safety policies and staff provide support and guidance during significant business disruptions or disasters.

Suppliers and vendors

To minimize risk and provide supplier accountability, multiple Lumen groups collaborate for negotiating and executing the contractual agreement terms of sourced products and/or services. This provides Lumen the ability to assess the control measures of our suppliers, vendors, business partners and resiliency strategies are adequately implemented to address service level commitments and continuity of operations.