

TSP for FINANCIAL INSTITUTIONS

FREQUENTLY ASKED QUESTIONS

Q. How does the telecommunications service priority (TSP) program work?

There are two aspects of the TSP program: restoration and provisioning. For priority restoration, a qualifying organization must first enroll its essential telecommunications lines in the telecommunications service priority (TSP) program. For a financial institution, this would include circuits used primarily for maintaining national monetary, credit, and financial systems, such as those for emergency calls (incoming and outgoing) at primary locations, critical circuits needed for data transfers and transactions, satellite downlink hubs, and circuits designated for emergency use at alternative emergency locations.

If any of these TSP services become inoperable, the telecommunications service provider must restore them on a priority basis before it restores any non-TSP services. Having TSP coverage is especially important following a major disaster in which the telecommunications infrastructure has been damaged and large numbers of customers are without telecommunications service.

Qualifying organizations can also use the TSP program to have essential communications services installed on a priority basis. This can ensure that essential communications services are available without lengthy delays that can occur otherwise. For example, if the existing communications circuits into a financial institution's facilities are inadequate to accommodate all of the emergency traffic and additional circuits are needed to prevent the loss of emergency calls, the financial institution can request priority provisioning of additional lines through the TSP program.

For more information, you may visit the Department of Homeland Security's National Communications System (NCS) website at <http://tsp.ncs.gov> or call the NCS Priority Programs hotline at 1-866-NCS-CALL (1-866-627-2255).

Q. Do all financial institutions qualify for TSP?

Yes, if their missions meet the TSP enrollment criteria. To qualify for the TSP program, an organization must: (1) be engaged in activities essential to the nation's security or emergency preparedness and response functions (*e.g.*, U.S. population warnings; the promotion of public health, safety, welfare, and maintenance of law and order; maintenance of the national economic posture), and (2) rely on telecommunications services to provide these essential functions.

Q. When should a financial institution enroll in TSP?

A financial institution should enroll in the TSP program at its earliest convenience. It should not wait until there is a major disaster or emergency. During a disaster or emergency, the telecommunications service providers must restore services to those organizations that **are already enrolled** in the program. An attempt to enroll in the program during the disaster would not be effective since the enrollment process itself takes a considerable amount of time and would delay rapid restoration of essential telecommunications services.

A TSP application can be completed on the NCS website at: <http://tsp.ncs.gov>. The financial institution TSP applicant's sponsor will be that Federal department or agency that has regulatory jurisdiction over the applicant. If you have any questions about your financial institution's regulatory Federal sponsoring entity, please contact Kenneth Burnley or Allan Manuel at the Federal Communications Commission (FCC). Their contact information is listed below. The NCS will process all applications in a timely manner.

Q. How does a financial institution enroll in the TSP program?

- Consult with its telecommunications service provider to determine its essential services and the cost of TSP coverage. Based on this information, it should determine which circuits to cover.
- Go to the TSP website at <http://tsp.ncs.gov> to establish an account. Select "E-forms," then "Register to use E-forms." The NCS will provide a login ID and password via an email.
- After receiving the login and password, re-enter the TSP web-site and fill out the application form. Select "E-forms," then "Access to e-forms application," then "TSP request for service users (Form 315)." List your Federal regulatory sponsoring entity as the Federal sponsor.
- The NCS approves TSP coverage and provides your TSP Administrator with TSP authorization codes for each circuit (*e.g.*, TSP02H682).
- Provide those authorization codes to the telecommunications carrier so that they can be assigned to specific essential communications lines identified as TSP circuits via enrollment in the program. This enables the carrier to identify quickly TSP enrolled circuits and work to restore service or replace them with new lines.

For more information regarding enrollment via email, contact the NCS Priority Programs hotline at 1-866-NCS-CALL (1-866-627-2255) or send an e-mail to tsp@ncs.gov.

Q. Who is involved in the TSP program?

Five entities are involved:

- (1) User—a telecommunications service customer that has its essential telecommunications services enrolled in the program.
- (2) Telecommunications service provider—the service provider develops internal operating procedures and practices to ensure that TSP-designated services are given priority restoration and installation.
- (3) NCS—this organization provides the day-to-day administration of the TSP program, including approval of TSP requests.

- (4) Federal sponsor—any non-Federal TSP user must have a Federal sponsor; the Federal agency that regulates the financial institution TSP applicant serves as the sponsor for that financial institution.
- (5) FCC—sets the policy and rules for the TSP program. The FCC also handles TSP appeals.

Q. What is the Federal sponsor’s role in the TSP process?

Any non-Federal organization that requests TSP coverage must be sponsored by a Federal department or agency. The Federal sponsor’s responsibilities include: (1) ensuring that the telecommunications service for which TSP coverage is requested supports a national security or emergency preparedness or response function; and (2) determining the appropriate priority level assignment.

Q. Who is my Federal sponsor for TSP?

The Federal agency that regulates the financial institution TSP applicant serves as the sponsor for that financial institution.

Q. How long does the enrollment process take?

In most cases, the NCS will complete the sponsorship and approval process within 30 days of receiving an application. The telecommunications service provider also needs time to issue service orders and make the changes in its records to enable the priority service. The amount of time the service provider requires to process the orders depends on the number of circuits requested.

Q. What should the financial institutions do with the authorization codes once they are received from NCS?

You should notify the service provider of the TSP authorization codes and request TSP service. The service provider generates a service order and enrolls the designated circuits in the TSP program by entering them into its priority service operations support systems. The service provider then has 45 days in which to send a confirmation report back to the TSP Program Office.

Q. What recourse does the applicant have if the application is disapproved?

The applicant is afforded due process and may appeal a decision to disapprove the application with the FCC. First, you may wish to speak with the FCC informally. At your election, however, you may appeal a denial of a request to enroll in TSP in writing to the FCC at tsinfo@fcc.gov. For more information about the appeals process, contact Allan Manuel or Kenneth Burnley at the FCC’s Public Safety and Homeland Security Bureau:

Allan K. Manuel
202-418-1164 (desk)
202-391-5331 (mobile)
allan.manuel@fcc.gov

Kenneth Burnley
202-418-0664 (desk)
kenneth.burnley@fcc.gov

Q. How much does it cost to participate in the TSP program?

The Federal government does not charge for TSP. Your vendor may have a tariff charge for TSP. The charge normally varies by telecommunications service provider and depends on the number of lines covered. Typically, service providers have a one-time charge for each line selected as well as a monthly per-line charge. The one-time charge for a local line is approximately \$100; the monthly per-line charge is approximately \$3. Each service provider has its own price list; therefore, a user must consult with its service provider in order to determine its cost for TSP coverage.

Q. Does a financial institution need to purchase TSP coverage for all of its telecommunications lines?

Due to the need for maintenance of national monetary, credit, and financial systems, such as safe and reliable banking operations, it is recommended that these organizations enroll their essential telecommunications lines in the TSP program. Although you could limit TSP costs by purchasing coverage for only a portion of essential lines, a disaster that results in significant damage to communications infrastructure is likely to create a need to handle a significant increase in call volume. It is therefore recommended that a financial institution ensures that it enrolls a sufficient number of lines to fulfill its mission during an emergency situation.

Q. What is TSP restoration?

When a telecommunications service covered by the TSP program fails for any reason, including due to a major disaster, the telecommunications service provider must restore the service on a priority basis. TSP restoration can be thought of as an insurance policy for existing circuits (both voice and data). By paying minimal amounts to enroll essential communications services in the program, during a major disaster when it may take days or weeks to restore service to many subscribers, TSP enrollees will have their services restored much more quickly than telecommunication users who are not enrolled in the program.

Q. What is TSP provisioning?

TSP provisioning is used when new, essential communications services must be installed on a priority basis to ensure they are available without lengthy delays that would occur otherwise. For example, if you need additional communications circuits to accommodate an increase in traffic volume, and the service provider's standard installation schedules would result in a substantial installation delay, you can request priority provisioning of the additional circuits through the TSP program. To request priority provisioning, contact the NCS Priority Programs hotline at 1-866-NCS-CALL (1-866-627-2255).

Q. During a crisis how long will it take to have service restored for the lines covered by the TSP program?

It depends on the extent of the damage to the critical communications infrastructure and the amount of resources (personnel and spare parts) available to the telecommunications service provider to repair the damage. In any event, the telecommunications service provider must restore all TSP-designated services, on a priority basis, before any others. **This is a legal requirement.**

A good example of how quickly restoration can be made under the TSP program is the situation in Lower Manhattan following the attacks on the World Trade Center in September 2001. Despite unprecedented damage to the communications infrastructure that took many weeks to restore, the telecommunications services supporting the New York Stock Exchange were back in operation in just three days.

Q. Does TSP restoration only apply to situations in which the Federal government has declared an emergency?

No. Under the TSP program, there is no requirement for any authority (Federal, tribal, state, or local) to declare an emergency or disaster. TSP priority restoration applies at all times. When any TSP-designated service is disrupted it goes to the front of the line for restoration, regardless of the cause of the outage—whether it was caused by a hurricane, flood, terrorist attack, or backhoe cut.

Q. If my service contract requires the service provider to restore my service within a specified time frame, e.g., within 24 hours, should I consider TSP coverage?

Yes. In accordance with FCC rules, service providers must restore TSP-designated lines before any others, regardless of whether their service contracts specify rapid restoration time frames. Without TSP coverage, your network connections may not be restored until all other TSP lines are restored and until commercial customers' lines which have contract-designated restoration periods have been restored.

Q. Are there TSP priority levels higher than that which is designated for financial institutions? If so, why is it important for financial institutions to participate in TSP?

There are five TSP priority restoration levels. Financial institutions typically will qualify for level four, which includes communications lines necessary for the maintenance of the national economic posture (maintenance of national monetary, credit, and financial systems). The higher priority levels, *i.e.*, levels one two, and three, include telecommunications services that support national security leadership, certain high-level military activities, public health, safety, and law and order. Less than one percent of all domestic communications lines actually have a priority one, two, or three assignment. Therefore, it is highly unlikely that restoration of higher priority TSP lines will appreciably slow restoration of lower level TSP lines.

If a financial institution does not enroll its lines in the TSP program, its telecommunications service provider cannot restore these lines until it has restored all TSP lines at all priority levels.

More importantly, the organization's lines would also have to compete with all other (non-TSP) lines for telecommunications service provider maintenance and repair resources. During major disasters, all telecommunications customers would likely be clamoring for rapid service restoration, thereby severely overextending the telecommunications service providers' maintenance and repair resources. Under such circumstances, the only way the organization can be certain it will go near the front of the line is by participating in the TSP program.

Q. If a financial institution's telecommunications lines are working but the public telecommunications network is congested, will the TSP program help complete its calls?

The TSP program is designed to ensure that the most critical telecommunications lines are working. It does not, however, provide for priority completion of calls. That role is provided by Government Emergency Telecommunications Service (GETS) for wireline service and Wireless Priority Service (WPS) for cellular phones.

GETS and WPS are emergency telecommunications programs administered by the NCS that provide for priority completion of out-bound calls when the public telecommunications network is congested. GETS does not provide priority completion of in-bound calls. Since financial institutions may need to originate a large number of calls during emergencies, the FCC and NCS recommend that they participate in all three programs, GETS, WPS, and TSP. For information on these programs please visit the NCS website at: <http://gets.ncs.gov/> for GETS and <http://wps.ncs.gov/> for WPS.

For further information from the FCC about the TSP program, call or email:

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