

**PHYSICAL –
BUILDING ACCESS, SECURITY, AND
COMPLIANCE**

SBC
Interconnector’s Collocation Services Handbook
for Physical Collocation

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Collocator Request for ID and Access Cards

To obtain a Photo ID card and/or access card/device, the following items must first be completed by the Collocator for each employee and long term contractor and submitted to their Collocation Services Center:

- Felony Background Check (see paragraph below)
- Drug Test (see paragraph below)
- Collocator Acknowledgement of Specific SBC Policies and Practices, refer to Internet web site (<https://clec.sbc.com/clec>).
- SBC ID Badge and Electronic Access Control Request Form for Collocators & Associated Contractors (Contact Collocation Service Center for Form SBC-30101 and instructions).

The Collocation Services Center will process these forms and if appropriate, authorize the ID Badge and Electronic Access Control Request Form (ID Form). The ID Form will be routed it to the appropriate SBC Access Control Center. All requests for new or replacement Photo ID Badge or access cards/devices must be referred to the Collocator's Collocation Service Center.

SBC policy is to issue Photo ID Badges only to long term Collocator employees and their contractors (those providing continuous long-term contract work). These individuals will be authorized by the Collocator to have unescorted access to the Collocator's workspace 7 days a week, 24 hours a day and they assume full responsibility and are liable for their actions while on SBC property.

The Collocator may request temporary ID badges from the Collocation Service Center for their short-term contractors and temporary personnel. Requests must be sponsored by a Collocator employee. Persons requesting the temporary ID must display their own company photo ID showing their name and their company's name. Temporary IDs are valid for no more than 30 days. However, the expiration date should be set as early as practical, preferably no more than 5 days. Personnel with temporary ID's will not be given an access card/device. Temporary ID's are to be used for identification purposes only. Personnel with temporary ID's do not have 7 days a week, 24 hours a day access and they will need to be escorted at all times by their Collocator employer. Temporary IDs may also be requested, on an exception basis, from the LFO manager responsible for the specific CO.

The Collocator is responsible for obtaining felony background checks for its employees or agents who could possibly have access to SBC building(s). SBC reserves the right to deny access to its premises, at SBC's sole discretion, to: (a) any person having a record of conviction, guilty plea, plea of no contest, probation, deferred adjudication, or any

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equivalent disposition, of any misdemeanor or felony charge in any state or federal court of competent jurisdiction, or (b) any person who previously has resigned or been dismissed from employment with SBC or any affiliated company under circumstances that, in the sole judgment of SBC, present an unacceptable risk to SBC if such person is granted access to SBC premises. The Collocator, at the time of a request for a SBC Photo ID Badge, must also submit a report of its employees and/or agents who fall within the above criteria to its SBC Collocation Service Center (refer to Collocator Acknowledgment Form in Appendix A). The Collocation Service Center will coordinate with the appropriate SBC Asset Protection organization and determine the level of access, if any, that SBC will permit such a person. SBC will strive to provide the Collocator a response within 72 hours. This process is intended to protect the safety of SBC employees and its agents and it is in concert with the arrangements SBC has in place with other contractors that SBC has working in its buildings.

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Collocator ID Badge and Access Card/Device Expiration

The Collocator SBC issued Photo ID Badge and access cards/devices will expire in one year unless a shorter time interval is specified. Where the technology permits, access cards/devices will also self terminate if not used within six months.

The Collocator must go to the Collocation Services Center for renewal of the ID badge and/or access card/device. The Collocator must immediately report to the Collocation Service Center any terminations of employees with an SBC Photo ID Badge and/or access card/device as well as any lost or stolen Photo ID Badge or access cards/devices. Replacement costs for Photo ID Badge and access cards/devices will be as set in each state tariff or each collocation agreement.

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Building Access

In order to gain entry into an SBC CO, the Collocator must use the electronic access control system installed at the designated entry. In a few cases the SBC provided Photo ID Badge may need to be used to gain entry at those locations that have a guard service or employees controlling access to the designated central entry into the SBC CO.

No person is permitted in an SBC facility without displaying and wearing an appropriate and valid SBC Photo ID Badge. In addition, Collocators and their contractors working in an SBC facility must also wear their own company's Photo ID Badge. SBC security policies do not permit individuals to "tailgate" into the SBC COs behind another person.

During the turnover walkthrough (IA or MOP session), instructions will be provided to the Collocator's management on the authorized entry path to Collocator's equipment area and restrooms and proper use of the electronic access control system and other security measures at the site.

An "authorized" person is one who has both:

1. A valid business need to be in the facility and
2. An implied or express request by SBC to be in the facility

An "unauthorized" person is one who cannot meet both of the above conditions. Possession of an SBC employee or Collocator Photo ID Badge and/or access card therefore does NOT necessarily constitute an authorized person. All contractors must wear an SBC Photo ID Badge and be able to display a current work order or MOP in order to be in an SBC equipment area to be considered "authorized".

Except as allowed by the FCC, SBC may only impose security arrangements on Collocators as stringent as the security arrangements for their own employees or authorized contractors, whichever is most stringent. All access is provided subject to compliance by the Collocator's employees, agents and contractors with SBC's policies and practices pertaining to fire, safety, security and network security. Security in SBC COs are a high priority. Collocator's are required to comply with all security requirements, rules and regulations while in SBC eligible structures and central office premises just as they apply to SBC employees as well as authorized contractors. SBC, upon the request of the Collocator, will provide training information to the Collocator to conduct their own training. (Reference FCC Order 99-48)

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Drug Testing

As per SBC's Substance Abuse Policy, SBC is committed to protecting the safety, health, and well being of its employees and all people who come in contact with its workplace(s) and property, and/or use its products and services. Recognizing that drug and alcohol abuse pose a direct and significant threat to this goal, SBC is committed to assuring a drug-free working environment. Therefore, SBC requires that all Collocator companies submit their employees and long term contractors to the Enzyme Multiplied Immunoassay Test, or an equivalent, as the initial method to detect drugs in the urine. All presumptive positives shall be confirmed by the Gas Chromatography/Mass Spectrometry method, or an equivalent. If the results are positive, the Collocation Service Center will coordinate with the appropriate SBC Asset Protection organization and determine the level of access, if any, that SBC will permit such a person. SBC will strive to provide the Collocator a response within 72 hours. This process is intended to protect the safety of SBC employees and its agents and it is in concert with the arrangements SBC has in place with other contractors that SBC has working in its buildings. The results of this test and the felony background check must be negative in order for these individuals to obtain a SBC Photo ID Badge and/or access card/device and thereby allowing them access to SBC CO facilities.

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Collocator Compliance Items

This section addresses the key SBC policies, practices, code issues and/or restrictions regarding the visiting and occupancy of an SBC CO. A complete list of compliance items can be found in various SBC documents and adopted codes.

- ◆ Collocators cannot use their collocation cages for storage of any kind.
- ◆ Fire standards and regulations prohibit the storage of flammable material, e.g. cardboard boxes, paper, packing material, etc.
- ◆ Safety standards prohibit the storage of chemicals of any kind.
- ◆ Collocators must be in compliance with the Safe Drinking Water and Toxic Enforcement Act of 1986, and Hazardous Materials Warning requirements.
- ◆ No storage or staging area will be provided outside of the licensed space.
- ◆ Collocation areas may not be used for office administrative space, and may not be used as a reporting location.
- ◆ Collocators are not permitted to use their collocation area for sleeping.
- ◆ The Collocators are not permitted to use their collocation areas to send or receive items through the U.S. Postal Service, UPS, Federal Express or any other carrier service.
- ◆ The use of cellular or PCS telephones, or any other type of radio frequency (RF) devices (two-way radios, cordless telephones or other RF sources) in equipment rooms containing telecommunications equipment is strictly forbidden. The only exception will be RF devices that have successfully undergone "technical testing" for interference to SBC networks and are approved for use in SBC central offices. In the event of a wide spread network outage that disables available landline communications, cellular telephones may be utilized for communications necessary to restore the network.
- ◆ The Collocator is not permitted the use of any equipment belonging to the SBC.
- ◆ Smoking is not permitted in any SBC building.
- ◆ Food or drink is not permitted in any SBC equipment area.
- ◆ Photography is not permitted in any SBC building.
- ◆ Video cameras are not permitted in any SBC building.
- ◆ Firearms and explosives are not permitted in any SBC building.

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- ◆ All doors into and within an SBC CO are to remain closed at all times.
- ◆ Open flames are not permitted in any SBC CO.
- ◆ The SBC CO telephones are for use by SBC employees only. Collocator personnel are not allowed to use telephones under any circumstances, except for dialing 911 in an emergency.
- ◆ Collocators are only permitted in their equipment area, their agreed upon path to their equipment, their designated restroom area or in the agreed upon path to their restroom area as delineated by a security partition, tape or some other means.
- ◆ Tours of the CO equipment are not allowed under any circumstances except as provided by the Collocation Agreement, FCC 99-48, local, state and federal laws or orders. Any other tours are prohibited by SBC policy.
- ◆ The Collocator's management is responsible to inform their employee's of the areas at SBC COs that are authorized for their employee's access and which areas are restricted. All non-collocation areas that are caged, taped, designated restricted or locked are considered restricted areas in which the Collocator and their contractors are not allowed to enter. All caged areas that are not designated as authorized areas for a particular Collocator also are restricted.

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Collocator Violation of Safety and Security Provisions

This section describes what violation(s) of SBC's safety and security practices will result in disciplinary action to be taken against a collocator technician or company. There are three categories of violations, one being the most and three being the least severe.

Category 1 (Most Severe) violations include, but are not limited to, the following:

- a. Actions that damage or place in jeopardy the equipment, facilities, network or personnel of the collocators and / or collocator vendors, or SBC-13STATE.
- b. Theft or destruction of property belonging to SBC-13STATE or Collocator.
- c. SBC-13State service interruptions intentionally caused by the Collocator.
- d. Collocator viewing or copying proprietary information without SBC – 13STATE authorization.
- e. Use/sale or attempted use/sale of alcohol or illegal drugs on SBC – 13STATE property.
- f. Threats or violent acts against other person(s) on SBC – 13STATE property.
- g. Violations of any local, state or federal law on SBC – 13STATE property.
- h. Violation of Safe Drinking Water and Toxic Enforcement Act of 1986. Unauthorized introduction and storage of Hazardous Chemicals or authorized introduction and storage of Hazardous Chemicals without Material Safety Data Sheet (MSDS). See OSHA Hazardous Communication requirement, 29 C.F.R. sections 1910.1200(b)(3)(ii) and (b)(4)(ii).
- i. Collocator in unauthorized areas including but not limited to:
 - the CO frame area,
 - CO cable vault,
 - CO transport equipment area, except when the Collocator has cageless collocation equipment located in SBC – 13STATE's CO line-up,
 - CO switch area and
 - CO power room.
- j. Permitting unauthorized persons (i.e., anyone without proper ID and access card) access to SBC – 13STATE or collocator's equipment on SBC – 13STATE property.

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- q.** Carrying a weapon on SBC - 13STATE property.

Violations of Category 1 items may result in one or more of the following actions:

- a.** Immediate escort of the offender out of the central office or premises.
- b.** Local Field Operations (LFO) will submit an incident report to document the violation to the Account Management (AM) team. AM will notify the Collocator of the violation and allow the Collocator ten days to respond.
- c.** The offender's ID card will be confiscated and their access card will be temporarily revoked/disabled, disallowing entry into any of SBC - 13STATE's Central Offices, pending review of the matter and permanently revoked/disabled upon SBC - 13STATE's confirmation of the violation.
- d.** A report will be filed with the PUC detailing the violation.
- e.** In addition, appropriate actions may be initiated against the Collocating CLEC itself (in addition to the above actions affecting the offending employee or vendor of the Collocating CLEC). Additional actions taken (e.g., revocation/disablement of the CLEC's entry or a complaint against the CLEC) may depend on the particular circumstances of the violation, including but not limited to the severity of the particular violation and whether there have been repeat violations by employees or agents of the same Collocating CLEC.
- f.** When appropriate, local authorities or building security may also be called to assist in a situation or to report a criminal violation.

Collocator Violation Category 2 (Moderate Severity) items include, but are not limited to, the following:

- a.** Collocator in building without ID's.
- b.** Collocator smoking in any SBC - 13STATE building.
- c.** Collocator not carding in on access card reader (e.g. Authorized Collocator tailgating behind someone).
- d.** Collocator not following TP76300MP methods as required in the Installation Section of the Collocator's Handbook, which includes safety and network reliability policies and practices.
- f.** Collocator performing Volatile Work Activity on critical equipment out of maintenance window time frame.
- g.** Collocator performing work without Method of Procedure (MOP) and/or Job Start Agreement (JSA).

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- h.** Collocator not removing debris when work is complete or at the end of workday thereby creating a fire hazard. Removal must be completed within 10 business days, or as agreed by SBC and CLEC.
- i.** Collocator not using fiberboard (e.g. masonite) on floors, creating a safety hazard and property damage.
- j.** Collocator not covering temporary storage items with fire-resistant tarp.
- k.** Collocator using SBC - 13STATE LEC test equipment.
- l.** Collocator taking photographs of SBC - 13STATE equipment.
- m.** Collocator parking violations - blocking drive, taking up two slots, etc...
- n.** Collocator eating or drinking in equipment areas.

Violations of Category 2 items will result in:

- a.** Challenge offender – based on information found, expels, warns, or advises offender depending on severity.
- b.** LFO will submit an incident report to document the violation to the Account Management (AM) team. AM will notify the Collocator of the violation.
- c.** Collocator is expected to respond to incident reports within 10 business days. If no timely response is received, then SBC - 13STATE may temporarily revoke/disable the offender's access card on the 11th business day.
- d.** If the removal of Collocator's debris is not completed within 10 days, SBC - 13STATE may hire a contractor to remove the debris and bill the Collocator for the charges.
- e.** Repeated violations of Category 2 type will have greater consequences, of which will be decided at SBC - 13STATE's discretion, after discussion with Collocator company representative.

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Collocator Violation Category 3 (Least Severe) include, but are not limited to, the following:

- a.** Unauthorized Collocator use of telephone.
- b.** Collocator not wearing safety glasses when required.
- c.** Collocator use of cell phone or portable radio transmitters in CO.

Violations of Category 3 will result in:

- a.** Educate the person on particular rule or requirement.
- b.** LFO will submit an incident report to document the violation to the Account Management (AM) team. AM will notify the Collocator of the violation. Collocator is expected to respond to incident reports within 10 business days. If no timely response is received, then SBC - 13STATE may temporarily revoke/disable the offender's access card on the 11th business day.
- c.** Repeated violations of Category 3 will have greater consequences, of which will be decided at SBC - 13STATE's discretion, after discussion with Collocator company representative.

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Emergency Action Plan

This section is intended for use in the entire SBC 13-states. It was developed in response to the 9-11-01 Terrorist Activities against the United States. It was originally intended to protect critical central offices across the Enterprise. However, depending on the emergency situation, it can be used on a local, state, region or Enterprise-wide basis.

Emergency Security Levels

- a. **Level 1** – Normal operating procedures
- b. **Level 2** – A Heightened level of security is declared due to warning from a credible source that an emergency is expected in the near future or when activity is known to be occurring in the United States, but does not affect SBC's infrastructure.
- c. **Level 3** – A Lockdown is declared because of an imminent threat. SBC received information from a credible source that SBC's facilities are a target.

Process

- a. Upon declaration of a Security Level 3, Corporate Real Estate is responsible for limiting access to the Central Office(s) to only those individuals with the authorized job titles covered in Section 9.6.3 (b). CRE will coordinate with the Local Field Operations (LFO)/ Field Operations Group (FOG) Manager to identify the specific individuals with the authorized job titles/personnel for the Central Office.
- b. The following are the job titles that are allowed to enter the Central Office during a Security Level 3 – Lockdown situation.
 - LFO/ FOG Manager
 - LFO/ FOG Area Manager
 - LFO/FOG Director
 - Central Office Technicians assigned to the office with work required to support the emergency situation and authorized by the LFO/ FOG Manager.
 - Corporate Real Estate (CRE) Manager
 - CRE Area Manager
 - CRE Director
 - Asset Protection Area Managers
 - Asset Protection Director
 - Collocators. If the portion of the Central Office containing SBC equipment can't be secured due to changes associated with the security level change, the Collocators will need an SBC escort. If a guard is required, this will be coordinated through Corporate Real Estate. The Collocators will not be charged for being escorted in a Lockdown situation and will not be delayed in accessing their

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collocation space. Per FCC 99-48, Collocators must have access to their physically collocated equipment 24x7.

- NSEP Managers, Fire Protection Managers and Hardware Disaster Prevention and Recovery Managers and their Area Managers and General Manager.

This list is subject to the local discretion of the LFO/ FOG Manager.

Security Measures for Emergency Situations

Security Level 2 – Heightened Level of Security

Contractors/ Collocators/ Vendors

- Contractors/ Collocators/ Vendors must use the access card reader at the designated entrance and present both their SBC ID and their own company's picture ID to the Guard for inspection.
- Both ID cards must be worn and visible at all times.
- Random searches of briefcases, bags, packages, toolboxes, etc.

Security Level 3 - Lockdown

a. All of the Security Level 2 measures in Section 9.6.4.1 plus the following:

- Close loading docks.
- No shipments received.
- No vendor activity (e.g, installation of equipment) for SBC or Collocators
- Access through guarded door. Only those employees on Lockdown list for that Central Office are allowed to enter (see Section 3.0).
- Stop all C.O. work with the exception of work necessary to aid emergency services.

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Parking Access

Parking at Eligible Structures will be provided on a first come, first served basis if such space is available. Collocators may not park in spaces that are reserved for SBC use. SBC shall not unreasonably reserve for its own use all parking at the Eligible Structure. Collocators shall be allowed to have reasonable use of and access to loading docks. In Access-Controlled parking lots, if access to the collocation space does NOT require entrance from the parking lot and parking is available nearby, Collocators will not be provided access to the parking lot. If no other parking is available and access to the collocation space DOES require access to the parking lot, parking access arrangements will be made. In SBC lots requiring paid parking on an individual basis, if such space is available SBC will offer such parking to Collocators on the same terms and conditions, unless there is other available parking nearby and access to the collocation space does NOT require entrance from the parking lot. Collocators and SBC are required to follow all posted traffic and SBC signs and follow all applicable parking and traffic laws and ordinances. SBC may have a vehicle removed/towed at the owner's expense for violation of the parking access rules. SBC enforcement of parking access rules will be applied on a non-discriminatory basis to SBC employees, SBC contractors, Collocator employees, Collocator contractors, and other non-SBC employees.