



Davis Wright
Tremaine LLP

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2024 June 27 PM 5:00
IDAHO PUBLIC
UTILITIES COMMISSION

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Portland, OR 97205

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June 27, 2024

Via E-Filing: Secretary@puc.idaho.gov

Jan Noriyuki, Commission Secretary
Idaho Public Utilities Commission
Suite 201-A
11331 W. Chinden Boulevard, Bldg. 8
Boise, Idaho 83714

Re: Assurance Wireless USA, L.P. Annual Certification Filing for Docket GNR-t-24-01

Dear Ms. Noriyuki,

Assurance Wireless USA, L.P. (“Assurance Wireless”) submits the attached Certification Compliance Letter, Emergency Operations Plan and Signed Affidavit in support of its Annual Lifeline Report for filing into Docket GNR-t-24-01.

Please contact the undersigned should you have any questions.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in blue ink, appearing to read 'Mark P. Trincherro'.

Mark P. Trincherro
MPT/ksh/Encl.

State of Kansas)
) SS
County of Johnson)

CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS CARRIER
OF COMPLIANCE WITH SERVICE QUALITY AND CUSTOMER
PROTECTION, ABILITY TO REMAIN FUNCTIONAL IN EMERGENCIES,
AND USE OF FEDERAL HIGH-COST SUPPORT.

AFFIDAVIT OF BUSINESS OR CORPORATE OFFICER

The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers (ETC) certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the USAC and the FCC that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am an officer of Assurance Wireless USA, L.P., an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. N/A
3. Assurance Wireless USA, L.P. is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.202(a)(2).
5. N/A
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.

Larry J. Weians, Vice President
Name/Title

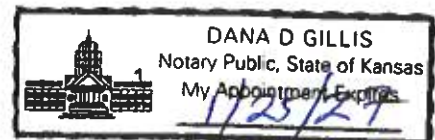
[Signature]
Date 6-13-24

SUBSCRIBED AND SWORN to before me on
this 13 day of June

[Signature: Dana D. Gillis]
Notary Public for T-Mobile USA, Inc., residing

at 6160 Sprint Parkway, Overland Park, KS 66251

My Commission expires 1/25/27





June 29, 2023

Mr. Neville Ray
President & Strategic Network Advisor to the CEO
T-Mobile USA
12920 SE 38th Street
Bellevue, WA 98006-1350

Dear Neville:

Congratulations! This letter is to notify you that T-Mobile USA, Metro by T-Mobile (“T-Mobile”) and Assurance Wireless have completed the certification process for the CTIA Consumer Code for Wireless Service (“Voluntary Consumer Code”) for the period of July 1, 2023 through June 30, 2024, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, T-Mobile is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of T-Mobile review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. We are providing two specimens (color and black/white) of the Seal for T-Mobile’s use on its website or collateral materials. If you should have any questions concerning the certification process or use of the Seal, please contact Kathryn Dall’Asta, CTIA’s Vice President and Deputy General Counsel, at (202) 736-3677 or kdallasta@ctia.org.

CTIA commends T-Mobile for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with T-Mobile on this important industry initiative.

Sincerely,

A handwritten signature in black ink that reads "M. Baker" with a long horizontal line extending to the right.

Meredith Attwell Baker
President & Chief Executive Officer

c.c. David Edwards, Managing Corporate Counsel
Molly Malouf, Senior Director, Legal Affairs
Andrea Talaga, Senior Paralegal, Marketing Communications

Attachment



CONSUMER CODE FOR WIRELESS SERVICE

CONSUMER CODE CERTIFICATION SEAL

TERMS OF USE (2023)

Subject to your compliance with the terms contained herein (“**Terms**”), CTIA-The Wireless Association (“**CTIA**”) hereby grants your organization (“**Company**”) a non-exclusive, world-wide, royalty-free license (“**License**”) to use CTIA’s Consumer Code Certification Seal (“**Seal**”) to represent that Company voluntarily adopts and adheres to the CTIA Consumer Code for Wireless Service for the period of July 1, 2023 through June 30, 2024 (“**Voluntary Consumer Code**”) and has certified such to CTIA. The Seal is attached hereto at Exhibit A and fully incorporated herein by reference.

This License shall become effective immediately upon the date of your receipt of CTIA’s written acknowledgement of Company’s certification and shall remain in effect until June 30, 2024. CTIA permits the use of the Seal, solely in connection with the Voluntary Consumer Code program. Company may use the Seal in Company’s advertising, promotional materials, other literature, or on Company’s website(s) to indicate its voluntary compliance with the Voluntary Consumer Code.

Use of the Seal shall not be misleading as to the extent of Company’s voluntary support and participation in the Voluntary Consumer Code program. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon the written request of CTIA. Company shall immediately cease use of the Seal upon receipt of CTIA’s written notice to do so. If at any time, Company’s practices and policies fail to comply, or CTIA has reason to believe that such practices and policies fail to comply with the Voluntary Consumer Code, Company will cease use of the Seal and all rights and permissions will immediately revert to CTIA.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the Voluntary Consumer Code.

Use of the Seal for other purposes than those stated in these Terms is an unauthorized use of the Seal and is strictly prohibited, unless otherwise agreed upon by CTIA in writing.

This License may be renewed annually subject to Company’s successful completion of the certification process.

Use of the Seal constitutes acceptance of these Terms.

EXHIBIT A



EMERGENCY OPERATIONS PLAN

T-Mobile is able to function in emergency situations as set forth in Section 54.201(a)(2), which includes “a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”¹ In particular, T-Mobile has the following capabilities to remain functional in emergency situations:

- Availability of fixed and portable back-up power generators at various network locations throughout T-Mobile’s network that can be deployed in emergency situations.
- Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels (“COWs”), redundant facilities, and dynamic rerouting of traffic over alternate facilities.
- A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-term solutions, such as additional capacity and antenna towers can be deployed.
- The majority of sites not equipped with fixed generators have battery back-up systems installed to maintain service in the event of a widespread power outage.

¹ 47 C.F.R. § 54.202(a)(2).

T-Mobile USA Business Continuity Program Summary

T-Mobile USA, Inc. (“T-Mobile”) is committed to safeguarding the interests of our customers, employees and stakeholders in the event of an emergency or significant business disruption. As a result T-Mobile has and maintains an enterprise-wide Business Continuity Program designed to provide effective responses to a wide variety of disruptive events. T-Mobile’s Business Continuity Program is centralized in its design and decentralized in its implementation, promoting active involvement in the program by all lines of business in all locations.

Primary components of the T-Mobile Business Continuity Program include:

- Enterprise Business Continuity Project Initiation and Oversight
- Risk Evaluation and Controls
- Business Impact Assessment and Analysis
- Business Continuity and Disaster Recovery Strategic Direction
- Crisis Response, Emergency Response, and Operations
- Business Continuity Plan Development, Maintenance, and Exercising
- Awareness and Training Programs
- Public Relations and Crisis Response and Resumption Coordination
- Coordination with External Agencies

A team of certified Business Continuity professionals is responsible for documenting and developing enterprise standards, processes, and policies for all business continuity and disaster recovery needs throughout T-Mobile. This group supports the line of business continuity planning and defines enterprise tools and methodologies. This level of consistency across the lines of business enhances T-Mobile’s overall planning and resumption efforts.

T-Mobile also maintains backup and alternate power sources at mission critical locations, and has information processing and telecommunications back-up sites that provide redundancy that is important to protecting key business information and services. Business Continuity Plans are housed in a centralized online repository, accessible to employees in office and remotely through a web browser. Additionally, hard copies of plans are available at multiple sites throughout the enterprise.

The T-Mobile USA Business Continuity Program is designed and maintained to proactively mitigate the risk of threats to T-Mobile’s customers, employees, and stakeholders. As such the program is revised and updated as needed to address potential and emerging hazards.

For additional details on the Disaster Readiness and Emergency Response, please see the attached document. For more information on the T-Mobile Business Continuity Program, please send inquiries to: BusinessContinuity@T-Mobile.com

DISASTER READINESS AND EMERGENCY RESPONSE

TO HELP KEEP YOU
CONNECTED WHEN YOU
NEED IT MOST



T-Mobile Emergency Management is ready when disaster strikes. Customers can rely on dedicated personnel and critical resources to help maintain seamless connectivity to emergency services and loved ones.

T EMERGENCY
MANAGEMENT

OUR MISSION

AMERICA'S UNCARRIER

We are invested in safeguarding the interests of our customers, stakeholders, and employees. We maintain an Enterprise Continuity Program to provide effective, timely responses to a wide variety of disruptive events. Our program is centralized in its design and decentralized in its implementation, enabling us to maximize our full capabilities while taking advantage of our scale across multiple lines of business and locations to promote active involvement.

Reliable communications and connectivity are essential during critical events.

We understand the importance of reliable communications and connectivity during critical events. T-Mobile incorporates business continuity into our overall corporate business philosophy. Our Enterprise Business Continuity Program promotes the use of business continuity principles, guidelines, and standards by all company employees during routine business operations to assure the continuation of our mission-critical enterprise operations and services. This level of consistency across T-Mobile lines of business enhances our overall planning and business resumption efforts.

The T-Mobile Enterprise Business Continuity Program is industry-leading with proactive measures to reduce operational risks and implement recovery solutions that minimize the impact to customers and services during potential business disruptions. We maintain multiple



dedicated enterprise-wide teams to address business continuity, disaster recovery, network availability, emergency response, and customer support, ensuring our continued focus on safeguarding the interests of our customers, employees, and stakeholders in the event of an emergency or significant business disruption. These teams work in partnership to provide coordinated and effective responses to a wide variety of disruptive events.

A team of dedicated, certified, and seasoned business continuity professionals works with all lines of business to help ensure that our business continuity plans are current, comprehensive, and effective. This group supports our business continuity planning for each line of business and defines enterprise recovery tools and methodologies.

The T-Mobile Enterprise Business Continuity Program is reviewed and approved by leadership on an annual basis and is guided by the following governing principles:

- Commitment to employee and customer safety
- Commitment to preserving business operations and services
- Business continuity as a shared responsibility across all levels of management, all lines of business, and the Enterprise Continuity Team
- Continual business continuity plan assessment, improvement, flexibility, and maturity are necessary for success
- Plan development with an “all hazards” mindset and focus on a full range of natural and man-made hazards and risks that could impact employees, customers, operations, and assets in countries around the globe

Critical operations, processes, and services across the enterprise are identified along with criticality ratings, risks, gaps, and potential impacts of a service disruption. Process, criticality, and risk reviews are conducted on a regular basis.



Capable device required; coverage not available in some areas and may be impacted in emergencies. Some uses may require certain plan or feature; see T-Mobile.com. Fastest: Based on median, overall combined 5G speeds according to analysis by Ookla® of Speedtest Intelligence® data for Q2 2023. Ookla trademarks used under license and reprinted with permission.

ENTERPRISE BUSINESS CONTINUITY PLANNING FOCUSED ON THE CUSTOMER EXPERIENCE

The T-Mobile Enterprise Business Continuity Program considers the full range of natural and man-made hazards that could impact employees, customers, operations, and assets across the country. T-Mobile uses information obtained through Business Impact Analysis and the development of business continuity (risk reduction) strategies to preserve business functions that are required in the face of a disaster.

Business Impact Analysis

Through various assessments, including Business Impact Analysis (BIA), we evaluate the criticality of different aspects of each part of the business, including:

- Business processes
- Applications
- Suppliers
- Partners
- Sites
- Network elements

This evaluation determines the tolerance for disruption, ensuring minimal impact on employees, customers, operations, and assets. The results of these assessments guide our prioritization efforts, helping us make informed decisions about mitigation and planning. Critical business processes are closely matched with the criticality of their associated applications, suppliers, and dependencies. We conduct annual BIA reviews to maintain our preparedness.

Business continuity strategies and planning

- **Process and standards:** We deploy common terminology, standards, policies, methodologies, and documentation to reinforce consistency across the company.
- **Reporting:** Executive management receives a quarterly risk report inclusive of the efforts and status of the Enterprise Continuity Program.
- **Plan maintenance:** Annually, the owning team and enterprise continuity experts review each organization's plan. Key stakeholders are responsible for reviewing program documents at least annually.
- **Supplier business continuity:** T-Mobile has a Business Continuity and Disaster Recovery Plan (BC/DR) assessment process that is designed to inform us of partner plans along with the ability to request the business continuity plans used by our partners, suppliers, and vendors, as needed.
- **Accessible plans:** Our business continuity plans are housed in a centralized redundant repository that is accessible to internal stakeholders regardless of their physical location.



**ENTERPRISE
BUSINESS
CONTINUITY**

Primary components of the T-Mobile Business Continuity Program

- Enterprise business continuity project initiation and oversight
- Risk evaluation and controls
- Business Impact Assessment and analysis
- Business continuity and disaster recovery strategic direction
- Business continuity plan development, maintenance, and exercises
- Awareness and training programs
- Public relations and crisis response and resumption
- Coordination with external agencies
- Incident command structure integrated into each engineering team nationwide



CUSTOMER SATISFACTION DRIVES OUR PREPARATION AND RESPONSE TO DISASTER EVENTS

When T-Mobile becomes aware of an upcoming event such as a hurricane or storm, our organization acts before a disaster occurs. Highly detailed emergency operations plans have been created and implemented nationwide and technical personnel have been trained. This preparation allows us to maximize resource availability and reduce response time. Here are some examples of how we prepare and act.

BEFORE A DISASTER STRIKES: T-MOBILE PREPARATIONS

- Analyze storm conditions for anticipated landfall.
- Prepare and test back up power sources in probable areas of impact
- Ensure supportive equipment, such as portable generators, Cell-On-Wheels (COWs) and Cell-On-Light-Trucks (COLTs) on standby nationwide
- Establish a command center that will mobilize teams of technicians and engineers as conditions permit
- Engage our national vendors regarding fuel, generators, technicians, staging yards, security, accommodations, and catering, so teams can focus on the tasks at hand
- Create staging areas for incoming equipment and personnel
- Forward deploy resources in safe zones
- Coordinate with local and state officials, state offices of emergency management, DHS, FEMA, and the FCC as appropriate
- Monitor evacuation efforts and routes
- Identify opportunities to adjust wireless capacity in certain hubs/zones such as shelters, transport hubs, arenas, etc.

DURING AND FOLLOWING DISASTERS: T-MOBILE RESPONSE ACTIONS

- Deploy portable generators, COWs, satellite or microwave as needed
- Establish comprehensive strategy for network recovery dependent upon impact and immediate needs
- Coordinate with local, state, and federal officials and government organizations as appropriate
- Offer options to ensure public safety officials, emergency first responders, and others have adequate support
- Support impacted communities in various ways depending on circumstances and need, such as Wi-Fi calling and charging stations
- Deploy EVTs to respond to impacted markets
- Maintain consistent command and control calls to coordinate efforts between teams
- Deploy response personnel to the impacted area
- Establish virtual Emergency Operations Center to provide operational control for event
- After-action reviews completed for events with best practices defined and processes updated

Keeping our network reliable, resilient, and redundant

Reliable connectivity is a must for our customers. We have spent many years focused on network and operational redundancy along with hardening and improving resiliency on our infrastructure, critical sites, and operations such as network operations centers, data centers, and call centers. Network design plays a critical part in hardening our network. MSO locations significantly reduce the chance of network failure due to third-party fiber damage, equipment failures, or other potential causes of service interruptions. We continue to make significant investments in our network's redundancy, resiliency, and reliability and maintain an organized and integrated suite of disaster plans and procedures.

Our network operations centers are geographically redundant and diverse, fostering a proactive approach through regular operations rollovers. Our geo-redundant teams handle daily operations at each site and actively participate in operational rollovers between centers.

Our data centers also exhibit geo-diversity and redundancy, supporting primary and alternate systems for critical operations, tools, and systems. Our teams of experts span across engineering, facilities, network operations centers, IT teams, network support, and data centers to ensure comprehensive support and robustness.

NETWORK PREPARATION

T-Mobile plans and designs the entire network infrastructure—from local endpoints to IP backbone connecting it all—for resiliency as well as pre-staging assets to enable a rapid response.



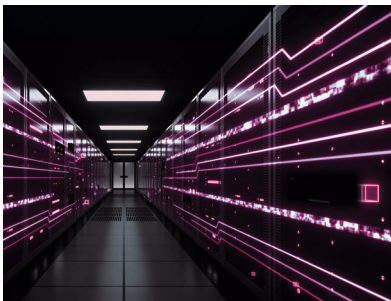
Cell site disaster planning

Cell sites are strategically equipped to accommodate backup power sources (e.g., batteries, fixed generators, portable generator connectors) to provide continuous coverage regardless of the scale of a disaster. We've also implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at switch locations. Communications from T-Mobile cell sites are backhauled with various combinations of ethernet, copper, fiber, and microwave systems. The T-Mobile radio network provides significant overlapping coverage areas, which often allow cell sites to fully or partially compensate for a neighboring cell site.



Switch disaster planning

Site recovery plans have been developed for major switch locations. Prioritizing available options for relocation, to help ensure agility when faced with disaster recovery issues. Mobile switching centers have permanent, on-site emergency backup power for use in the event of a momentary or extended power failure. They are protected by FM-200 or Pre-Action Dry Fire Systems. They are also equipped with spare equipment inventory for all critical network elements. Switching systems are designed with geo-redundancy for continuity of operations.



IP backbone failover and recovery

The T-Mobile IP network uses multiple logical adjacencies over physically diverse paths. There are multiple diverse paths between any two nodes on the backbone. These backbone links travel over fiber that is physically diverse from other fiber paths. The IP backbone is regularly reviewed and augmented for capacity needs and can reroute traffic based on dynamic routing protocols. Thanks to the high level of diversity and fast convergence of the network, most fiber outages will go completely unnoticed by our customers. The IP backbone uses technology to take advantage of potential fiber paths during a disruption. The capacity available in the backbone helps ensure congestion-free service during normal operations and provides failover bandwidth in the event of one or more link outages. IP backbone network routers have at least two physical connections, redundant processors, and redundant power supplies (such as batteries and diesel generators) at all sites. Equipment is installed in secure T-Mobile facilities that are built to withstand natural disasters.



Network deployable assets and response vehicles

Our response fleet of vehicles is pre-staged across our operational areas to enable rapid response and includes COLTs, COWs, generators, mobile command centers, and customized communication Jeeps, to help provide satellite service in the worst conditions. Our Satellite Cell on Light Trucks (SatCOLTs) can deploy within minutes and operate in some of the toughest terrains to support our customers when they need us most. In addition, we have a full array of response vehicles such as tow vehicles, snowmobiles, airboats, and high-water vehicles that allow us to access areas hardest hit by disaster. We will never stop working to make our network the best for our customers.

HOW WE RESPOND

Response operations

T-Mobile has multiple strategies in place for emergency management and rapid response to quickly address and respond to all types and sizes of events and to support our customers across the globe. We understand the importance of reliable communications and always-on connectivity. We have a long history of moving quickly and efficiently in emergency situations to ensure our customers can stay connected when they need it the most.

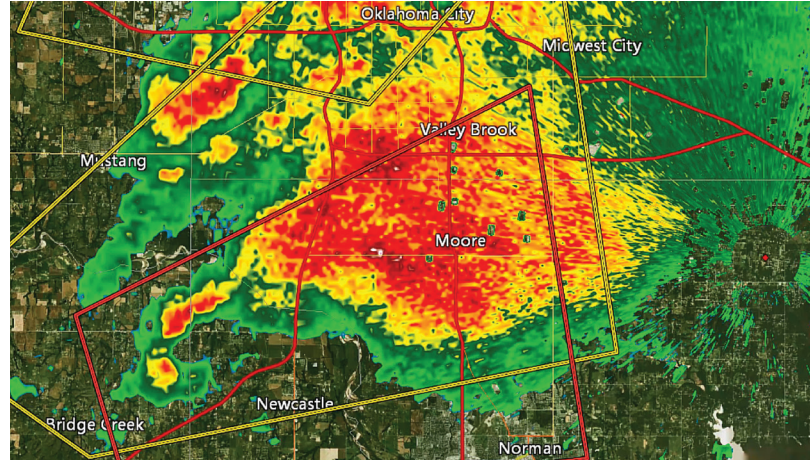
When our network team receives notification of an actual or potential situation that requires activation (such as a hurricane, earthquake, regional power outage, or another event where business as usual would not resolve the situation), a virtual T-Mobile Emergency Operations Center (EOC) is established to oversee and manage the company's response to an event from the beginning to end. This EOC performs an initial overall assessment, establishes monitoring bridges, coordinates between agencies impacted by the event, assigns tasks, gathers status information, and performs executive notifications at prescribed times.

We maintain an organized and integrated suite of disaster plans and procedures. To aid in situation assessment, response, and resource tracking, our network teams leverage tools such as:

- Hardened GPS-enabled phones
- Wireless modems
- Custom applications
- IoT solutions
- Smartphones

These multilayered investments are designed to deliver industry-leading service continuity.

When disaster strikes in one area of the country and there is a need for additional on-the-ground support, we have an **Emergency Volunteer Team** comprised of T-Mobile employees across the US who personally volunteer to go into disaster-impacted areas to help keep our customers connected.



Public safety grade preparedness and response

Strengthening emergency response plans for our public safety customers and critical infrastructure partners is a long-standing practice at T-Mobile. A component of the T-Mobile Emergency Management Team is our Emergency Response Team (ERT)—a national group with vast experience in all aspects of public safety operations and mission-based support. ERT is available 24/7, coordinating the necessary resources to help ensure reliable network services are available for public safety and first responders.



SatCOLT deployed for Hurricane Ian response.

Preparedness

ERT personnel engage proactively with local, state, federal, and critical infrastructure planners. This includes collaboration with leaders from organizations such as the Department of Defense, the Federal Emergency Management Agency, the Department of Homeland Security's Critical Infrastructure Security Agency (CISA), and the Federal Communications Commission. Long before events occur, they work on:

- Policy development
- Response frameworks
- Best practices
- Training coordination
- Exercises
- Enhancing national readiness

This collaboration promotes the readiness and operational capacities of new T-Mobile as well as local, state, and federal entities, and other critical infrastructure and essential service partners.

Response

During times of crisis, T-Mobile National Emergency Management personnel who are coordinating recovery seek to remain in lockstep with emergency management, Homeland Security, and public safety officials. Through our collaboration with the National Communications Coordination Center and through state and local emergency operations centers, T-Mobile representatives can:

- Gather and share information
- Mitigate environmental and operational concerns
- Facilitate protective measures
- Enhance rapid response and recovery capabilities

Enhancing first response

Our Emergency Management and Emergency Response Team (EM/ERT) provides a full suite of first response capabilities. This includes:

- **A national cache** of handsets, hotspots, charging stations, and Wi-Fi equipment to help address surge demands on emergency management and public safety operations.
- **A national fleet of mobile deployable assets**, including SatCOLTs, portable satellite antenna systems, and other tactical communications systems provide necessary and specialized infrastructure to support government and operations.

This collaborative approach not only ensures our continuing capabilities to serve but also helps address the restoration of critical resources overall.



Sales and retail operations

We monitor the impact of events on our local stores to protect the safety of our employees and customers. Depending on the unique impacts of each natural disaster, we have offered account relief, enhanced services, free devices, and accessories to help customers and the broader community meet their communication needs. Working with local officials, our fleet of T-Mobile trucks is deployed for community support efforts at evacuation centers, shelters, distribution points, and damaged stores, providing a point of contact for supplies and information.



Community support

T-Mobile has invested over \$2.5 million to increase our fleet size and flexibility with the goal of maximizing community support. By the end of 2023, the fleet will feature over 30 different units, some with state-of-the-art technology allowing support when coverage is challenging. Most assets are equipped with technology that aggregates SIM cards and Starlink simultaneously to provide up to ½ mile Wi-Fi coverage throughout most U.S. areas. Assets also provide mobile charging solutions for a wide array of devices including phones, computers, and medical equipment.

Maintaining a dynamic approach

The T-Mobile Enterprise Continuity Program dynamically evolves to adapt to ever-changing events, technology, and disruptions and our policies and procedures will change over time from what is described in this document.