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November 14, 2012

RECEIVED

NOV 14 2012

PUBLIC SERVICE  
COMMISSION

*Via Hand Delivery*

Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

***In the Matter of: Mountain Rural Telephone Cooperative Corporation, Inc.,  
Alleged Failure to Comply with 807 KAR 5:006 and 807 KAR 5:061, Case No.  
2012-00370***

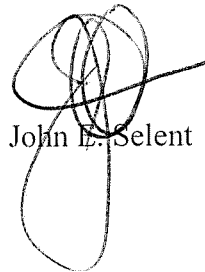
Dear Mr. Derouen:

At the direction of the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), enclosed is one (1) copy of the materials prepared by Mountain Rural and distributed to the Commission's staff at the Informal Conferences on Thursday, November 8, 2012. The Commission's staff asked that one (1) copy of the materials be filed on the record with the Commission for further review.

Thank you and if you have any questions, please call me.

Sincerely,

DINSMORE & SHOHL LLP



John E. Selent

JES/kwi  
Enclosures

MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

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**Informal Conference Materials**

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PUBLIC SERVICE  
COMMISSION

**MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION, INC.**

**INFORMAL CONFERENCE MATERIALS**

- 1. General Statement Regarding Mountain Rural's Management and Mountain Rural's Safety Policies and Procedures**
- 2. Notification of Reportable Incidents**
  - A. November 1, 2012 Memorandum to Employees
  - B. Accident Notification Business Cards Distributed to Mountain Rural Employees and Independent Contractors
  - C. Accident Notification Business Cards Distributed to Mountain Rural Management
  - D. Safety Meeting Sign-In Sheets for Meetings Addressing Notification of Incidents
- 3. Precautions When Working Near Roadways**
  - A. November 1, 2012 Memorandum to Employees
  - B. New Safety Standards Distributed to Employees on November 1, 2012
  - C. Safety Meeting Sign-In Sheets for Meetings During Past Two Years Addressing Working Near Roadways
- 4. Precautions When Climbing Structures**
  - A. November 1, 2012 Memorandum to Employees
  - B. New Safety Standards Distributed to Employees on November 1, 2012
  - C. Safety Meeting Sign-In Sheets for Meetings During Past Two Years Addressing Climbing Structures and Poles
- 5. Communications with Independent Contractors**
  - A. Proposed Letter to Send to Independent Contractors Regarding Safety Policies
  - B. August 30, 2011 Meeting with R&L Contractors Regarding Safety Policies
- 6. Investigation Reports for Shaun Dalton Incident, Case No. 2012-00370**
- 7. Investigation Report for Ryan Rose Incident, Case No. 2012-00371**
- 8. Employee Handbook & Safety Manual**
- 9. Previously Adopted Safety Policies and Procedures**



**GENERAL STATEMENT REGARDING MOUNTAIN RURAL'S MANAGEMENT AND  
MOUNTAIN RURAL'S SAFETY POLICIES AND PROCEDURES**

**Mountain Rural's Management**

Mountain Rural has two members of management that are primarily responsible for safety code compliance: Teresa Littrel and Rick Pelfrey.

Teresa Littrel has more than seventeen (17) years of experience working for Mountain Rural and more than seven (7) years of experience in her role as Human Resources and Safety Director. In her current role, Teresa is primarily responsible for Occupational Safety and Health Administration ("OSHA") compliance for the entire Company and promulgates all of the Company's safety policies and procedures, subject to the approval of both Allen Gillum and Rick Pelfrey. Teresa has gained her expertise in OSHA compliance by both formal training and experience. Teresa has a Professional in Human Resources ("PHR") certification and has obtained both OSHA 10 and OSHA 30 certification. During the past seven (7) years, Teresa has been primarily responsible for all OSHA compliance for Mountain Rural and has gained a tremendous amount of experience dealing with compliance issues. Teresa also attends the National Telecommunications Cooperative Association's annual conference which regularly includes seminars discussing compliance with both the Occupational Safety and Health Administration laws and regulations and the National Electrical Safety Code, and maintains several OSHA resources and compliance manuals which she consults on a regular basis.

Rick Pelfrey has more than thirty-five (35) years of experience working for Mountain Rural. In his current role as Outside Plant Manager, Rick is primarily responsible for National Electrical Safety Code ("NESC") compliance for the entire company. Rick gained his experience in NESC compliance by attending several trainings specifically addressing NESC compliance, including the J.J. Keller & Associates three-day training course. In addition, Rick has gained extensive NESC experience from working both inside and outside Mountain Rural's plant, as well as from working with other utility companies where their services intersect with Mountain Rural. Rick consults both the 1990 Edition and 2012 Edition of the NESC, as well as a number of NESC compliance manuals, on a regular basis in the performance of his job responsibilities. Rick has been and continues to be primarily responsible for the Public Service Commission's inspection of Mountain Rural's plant. Rick was previously a volunteer firefighter for twenty (20) years and an emergency medical technician for more than fifteen (15) years, and routinely teaches the American Red Cross certification classes for Mountain Rural employees.

Teresa and Rick work in tandem with one another to address all safety issues and, together, hold monthly safety meetings for Mountain Rural's employees who work outside the plant. Teresa also holds safety meetings every second month for Mountain Rural's employees who work inside the plant. Each safety meeting addresses a particular safety issue and employee attendance at the meeting is mandatory.

## Mountain Rural's Safety Policies and Procedures

Since 2009, Mountain Rural has had in place its current Employee Handbook and Safety Policies and Procedures. These documents specifically contain provisions addressing safety when climbing poles and structures (P. 102 of Employee Handbook), roadway safety (P. 103 of Employee Handbook, P. 25 of Policies and Procedures), and notification of accidents and injuries (P. 103 of Employee Handbook). Employees are required to review and attest to their compliance of the Employee Handbook and Mountain Rural's Safety Policies and Procedures. Employees are also made aware that their non-compliance with Mountain Rural's prescribed policies will result in discipline, up to and including termination.

Since the safety incidents at issue occurred, Mountain Rural has addressed each specific safety incident with employees in a formal memorandum, held a number of safety meetings specifically addressing these particular issues, adopted new policies covering both roadway safety and climbing poles and structures, and distributed accident notification business cards to all employees and management to ensure that incidents are reported to the Public Service Commission within the prescribed time limits. The new policies adopted by Mountain Rural were created by both Teresa and Rick and were modeled after materials promulgated by the Kentucky Department of Transportation and used by other utility companies. In addition, Mountain Rural has drafted a letter notifying all of Mountain Rural's independent contractors of the particular issues in these two Public Service Commission orders and reminding the independent contractors that they are required to comply with the National Electrical Safety Code.

Approximately sixty-six of Mountain Rural's seventy-one (71) employees are certified by the American Red Cross to render emergency first-aid and Mountain Rural has been certified a Drug Free Workplace by the State of Kentucky for the past three (3) years. In addition, Teresa has contacted Archie Sebastian of the Kentucky Department of Transportation, and Mr. Sebastian has agreed to hold an employee certification class which will address safety practices and proper warning techniques when working near roadways.

Mountain Rural takes the safety of their employees and the general public very serious, and Mountain Rural's management team works continuously to ensure compliance with all Occupational Safety and Health Administration laws and regulations and the National Electric Safety Code. Mountain Rural is vigilant about enforcing its policies and has previously disciplined, and even terminated, employees for violating the Company's safety policies.







# Memorandum

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**FROM:** Teresa Litteral

November 1, 2012

**TO:** All Employees

**CC:**

**RE:** Safety Precautions Related to Recent Incidents

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As a result of a few isolated safety incidents Mountain Telephone has experienced over the past year, we want to remind each of you about our policies and procedures that govern your work.

First, please note that our primary concern is the safety of each and every one of our employees and independent contractors, as well as members of the general public. It is important for your own safety, and the safety of those around you, that you always follow our adopted safety practices and procedures, which can be found in our Employee Handbook and Safety Manual. If you do not have a copy of our Employee Handbook or Safety Manual, please ask your supervisor or Teresa Litteral for a copy.

Second, as a result of recent incidents in which employees or independent contractors of Mountain Telephone were injured, we thought it best to highlight the following specific rules to ensure that employees are aware of and following the applicable policies and procedures.

## NOTIFICATION OF ACCIDENTS

In the event of any accident where personal injury or death, property damage, or loss of service for four or more hours occurs, **Teresa Litteral must be contacted immediately**. You will each be provided with a business card listing Teresa's mobile number where she can be reached twenty-four hours a day, seven days a week. In the event that any accident occurs, she should be notified at once. Mountain Telephone is required by law to report most incidents to the appropriate government agency **within two hours** of their occurrence.

## POLICIES AND PROCEDURES WHEN WORKING NEAR ROADWAYS

Maintenance and construction work on or near roadways presents serious dangers to employees of Mountain Telephone, as well as members of the general public.

To ensure the safety of both our employees and the public, you must use the appropriate warning signs and traffic control devices provided to you by Mountain Telephone. Supervisors should work with employees to develop a plan to control traffic before any work begins and should supervise appropriately thereafter to ensure that plan is being implemented. Flaggers should also be used when necessary to direct traffic. The attached document entitled "Traffic Control and Flagging Procedures," which is the primary topic of today's Safety Meeting,

TO: All Employees  
RE: Safety Precautions  
DATE: November 1, 2012  
PAGE: 2

describes more specifically what clothing is appropriate for flaggers and how best to use flaggers to protect Mountain Telephone employees and members of the public.

In addition, in the event that a telephone cable is stretched across a roadway, an employee must watch the cable at all times until that cable is either buried or lifted to the appropriate height. Cables that are stretched across roadways and that are not secured present serious threats and, therefore, we must be exceptionally careful in these instances.

#### **POLICIES AND PROCEDURES WHEN CLIMBING POLES**

Before climbing any pole, employees and supervisors should review the structure to ensure it is safe to climb before any work begins. All employees must work together to ensure that precautions are being taken to avoid accidents any time when climbing structures is necessary to perform work.

If the safety of any pole is in question, it should be thoroughly tested before any employee climbs that pole. If there are any indications that the pole is unsafe for climbing, employees should not climb the pole until it is made safe by bracing, guying, or other means.

#### **CONCLUSION**

It is Mountain Telephone's belief that all accidents are preventable and it is the responsibility of every employee to ensure that they are following all of Mountain Telephone's policies and procedures to prevent any accident. Employees that do not follow Mountain Telephone's policies and procedures may be subject to disciplinary action, up to, and including, termination.

It is imperative for your safety and for the safety of those around you that you follow Mountain Telephone's policies and procedures. We ask that you help us keep everyone safe so that unfortunate accidents do not occur in the future.



## Front Side



Accidents that result in personal injury or death, property damage, or loss of service for four or more hours, generally must be reported to the Public Service Commission within two (2) hours following that discovery.

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## Back Side

If any accident occurs that involves personal injury or death, property damage, or loss of service for four (4) or more hours, please contact one of the following individuals immediately.

Teresa Litteral – 606-791-7722  
Shayne Ison – 606-495-5862  
Rick Pelfrey – 606-477-7320  
Allen Gillum – 606-477-6446



## Front Side



Accidents that result in personal injury or death, property damage, or loss of service for four or more hours, generally must be reported to the Public Service Commission within two (2) hours following that discovery.

<b>PSC Contact</b>	<b>Office Number</b>	<b>Residence</b>	<b>Cell Phone</b>
Scott Morris	(502) 564-3940 Ext. 419	(859) 338-5370	(502) 382-7311
Kyle Willard	(502) 564-3940 Ext. 418	(502) 223-7251	(502) 545-8555
Eric Bowman	(502) 564-3940 Ext. 440	(502) 695-9189	(502) 352-5075



8: AM - 4:30 AM. Teresa - 2 New Standards - Traffic Control & Flagging Procedures  
 Rick - covered new standard Talked about & gave notice  
 & affirm must follow that there will be disciplinary action up to & including discharge  
 Day safe SAFETY MEETINGS Date 11-1-12

Gave out cards  
 PSC #12 to all  
 employees.

- |                     |                     |
|---------------------|---------------------|
| 1. Courtney Price   | 23. Blinn Cox       |
| 2. Gary Robison     | 24. Reggie Easterly |
| 3. Jim S. J.        | 25. Jim Cullis      |
| 4. Harry Brown Jr.  | 26. Becky Nicell    |
| 5. Paul D. Cantrell | 27. Jacob Preece    |
| 6. Ricky Penner     | 28. Henry Ferguson  |
| 7. Herb Sauer       | 29. Anthony Fenell  |
| 8. Bl Kane          | 30. Jackie Prater   |
| 9. Jim Pluh         | 31. Andy Well       |
| 10. Carter Edson    | 32. Keith Lyon      |
| 11. K. Coen         | 33. Quentin Simpson |
| 12. Brad Nichell    | 34. David Pence     |
| 13. Tim Evans       | 35. Laura Littell   |
| 14. Tim Mays        | 36.                 |
| 15. Kevin Bruchay   | 37.                 |
| 16. Cy Burtin       | 38.                 |
| 17. Ollie Rogers    | 39.                 |
| 18. Curtis Russell  | 40. John Perry      |
| 19. Michael Howard  | 41.                 |
| 20. Elam D. A.      | 42.                 |
| 21. Boy Burtin      | 43.                 |
| 22. J. E. A.        | 44. Rick Polking    |

Video. Roadway Worker Safety - Covered Excavation & Trenching,  
 Falls, Electrical Hazards, Heavy Equipment, Injuries, Noise, Hazardous Material  
 Hazardous Outdoor Work, Roadway Workzone Hazards Runovers, Flaggers, Nightwork







# Memorandum

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November 1, 2012

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**CC:**

**RE:** Safety Precautions Related to Recent Incidents

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First, please note that our primary concern is the safety of each and every one of our employees and independent contractors, as well as members of the general public. It is important for your own safety, and the safety of those around you, that you always follow our adopted safety practices and procedures, which can be found in our Employee Handbook and Safety Manual. If you do not have a copy of our Employee Handbook or Safety Manual, please ask your supervisor or Teresa Litteral for a copy.

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To ensure the safety of both our employees and the public, you must use the appropriate warning signs and traffic control devices provided to you by Mountain Telephone. Supervisors should work with employees to develop a plan to control traffic before any work begins and should supervise appropriately thereafter to ensure that plan is being implemented. Flaggers should also be used when necessary to direct traffic. The attached document entitled "Traffic Control and Flagging Procedures," which is the primary topic of today's Safety Meeting,

TO: All Employees  
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describes more specifically what clothing is appropriate for flaggers and how best to use flaggers to protect Mountain Telephone employees and members of the public.

In addition, in the event that a telephone cable is stretched across a roadway, an employee must watch the cable at all times until that cable is either buried or lifted to the appropriate height. Cables that are stretched across roadways and that are not secured present serious threats and, therefore, we must be exceptionally careful in these instances.

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Before climbing any pole, employees and supervisors should review the structure to ensure it is safe to climb before any work begins. All employees must work together to ensure that precautions are being taken to avoid accidents any time when climbing structures is necessary to perform work.

If the safety of any pole is in question, it should be thoroughly tested before any employee climbs that pole. If there are any indications that the pole is unsafe for climbing, employees should not climb the pole until it is made safe by bracing, guying, or other means.

#### **CONCLUSION**

It is Mountain Telephone's belief that all accidents are preventable and it is the responsibility of every employee to ensure that they are following all of Mountain Telephone's policies and procedures to prevent any accident. Employees that do not follow Mountain Telephone's policies and procedures may be subject to disciplinary action, up to, and including, termination.

It is imperative for your safety and for the safety of those around you that you follow Mountain Telephone's policies and procedures. We ask that you help us keep everyone safe so that unfortunate accidents do not occur in the future.



# Mountain Telephone

## Traffic Control and Flagging Procedures

### Purpose

Traffic control and safety is one of the most important functions for our employees working on or near our roadways and to protect the public. Every reasonable precaution shall be taken to protect everyone from becoming involved in any accident caused by construction, preconstruction or maintenance operations whether it is aerial or buried cable.

To ensure the safety of both our employees and the public, you must use the appropriate warning signs and traffic control devices provided to you by Mountain Telephone. Supervisors should work with employees to develop a plan to control traffic before any work begins and should supervise appropriately thereafter to ensure that plan is being implemented. Flaggers should also be used when necessary to direct traffic.

Supervisors may delegate their authority on occasion, but ultimately it is the supervisor's responsibility to assure correct jobsite procedures are followed as outlined. A traffic control plan shall be developed in advance before any work begins. In hazardous situations, state or local law enforcement assistance may be requested.

Supervisors or employees that neglect to follow these guidelines may be suspended without pay or may be subject to additional disciplinary action by the company, up to and including discharged depending on the seriousness of the action.

When working with a cable that is lying, or stretched across a roadway a designated employee must at all times watch and is responsible for seeing that traffic is controlled until it is secured either by aerial or buried. Cables that are stretched across roadways and that are not secured present serious threats and, therefore, we must be exceptionally careful in these instances.

See attached for traffic and flagging procedures from the Manual on Uniform Traffic Control Devices (MUTCD) with the Department of Labor.

# Manual on Uniform Traffic Control Devices (MUTCD)

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## 6E. HAND-SIGNALING CONTROL

### 6E-1. FUNCTION

The primary function of traffic control procedures is to move vehicles and pedestrians safely and expeditiously through or around temporary traffic control zones while protecting on-site workers and equipment.

### 6E-2. QUALIFICATIONS FOR FLAGGERS

Because flaggers are responsible for public safety and make the greatest number of public contacts of all highway workers, they should have the following minimum qualifications:

- Sense of responsibility for the safety of the public and workers
- Training in safe traffic control practices
- Average intelligence
- Good physical condition, including sight and hearing
- Mental alertness and the ability to react in an emergency
- Courteous but firm manner
- Neat appearance

### 6E-3. HIGH-VISIBILITY CLOTHING

For daytime work, the flagger's vest, shirt, or jacket shall be orange, yellow, strong yellow green or fluorescent versions of these colors. For nighttime work, similar outside garments shall be retro reflective. The retro reflective material shall be orange, yellow, white, silver, strong yellow-green or a fluorescent version of one of these colors and shall be visible at a minimum distance of 1,000 feet. The retro reflective clothing shall be designed to identify clearly the wearer as a person and be visible through the full range of body motions.

Uniformed law enforcement officers may be used as flaggers in some locations, such as an urban intersection, where enforcement of traffic movements is important. Uniformed law enforcement officers may also be used on freeways where traffic is channeled around work sites and it is necessary to assure that advisory and regulatory speeds are being enforced. For nighttime work and in low-visibility situations, a retro reflective garment as described above should be worn.

### 6E-4. HAND-SIGNALING DEVICES

Hand-signaling devices, such as STOP/SLOW paddles, lights, and red flags are used to control traffic through temporary traffic control zones. The STOP/SLOW paddle, which gives drivers more positive guidance than red flags, should be the primary hand-signaling device. The standard STOP/SLOW sign paddle shall be 18 inches square with letters at least 6 inches high. A rigid handle should be provided. This combination sign should be fabricated from light semi-rigid material, and shall have an octagonal shape. The background of the STOP face shall be red with white letters and border. To improve conspicuity, the STOP/SLOW paddles may be supplemented by one or two symmetrically positioned alternately flashing white high-intensity lamps on each side. The background of the SLOW face shall be orange with black letters and border. When used at night, the STOP/SLOW paddle shall be retro reflectorized in the same manner as signs.

Flag use should be limited to emergency situations and at low-speed and/or low-volume locations which can best be controlled by a single flagger. Flags used for signaling shall be a minimum of 24 inches square, made of a good grade of red material, and securely fastened to a staff about 3 feet long. The free edge should be weighted so the flag will hang vertically, even in heavy winds. When used at night, flags shall be retro reflective red.

#### **6E-5. HAND-SIGNALING PROCEDURES**

STOP/SLOW paddle and flag use are illustrated in figure VI-4. The following methods of signaling with STOP/SLOW paddles should be used:

- To Stop Traffic-The flagger shall face traffic and extend the STOP sign paddle in a stationary position with the arm extended horizontally away from the body. The free arm should be raised with the palm toward approaching traffic.
- To Direct Stopped Traffic to Proceed-The flagger shall face traffic with the SLOW paddle held in a stationary position with the arm extended horizontally away from the body. The flagger should motion with the free hand for traffic to proceed.
- To Alert or Slow Traffic-The flagger shall face traffic with the SLOW sign paddle held in a stationary position with the arm extended horizontally away from the body. The flagger may motion up and down with the free hand, palm down, indicating that the vehicle should slow down.

The following methods of signaling with a flag should be used:

- To Stop Traffic-The flagger shall face traffic and extend the flag staff horizontally across the traffic lane in a stationary position, so that the full area of the flag is visible hanging below the staff. The free arm should be raised with the palm toward approaching traffic.
- To Direct Stopped Traffic to Proceed. The flagger shall face traffic with the flag and arm lowered from view of the driver. With the free hand, the flagger should motion traffic to proceed. Flags shall not be used to signal traffic to proceed.
- To Alert or Slow Traffic. The flagger shall face traffic and slowly wave the flag in a sweeping motion of the extended arm from shoulder level to straight down, without raising the arm above a horizontal position.

#### **6E-6. FLAGGER STATIONS**

Flagger stations shall be located far enough ahead of the work space so that approaching traffic has sufficient distance to stop before entering the work space. Table VI-1, *Guidelines for length of longitudinal buffer space*, may be used for locating flagger stations in advance of the work space. This distance is related to approach speeds, friction factors, and pavement and tire conditions. These distances may be increased for downgrades.<sup>2</sup>

The flagger should stand either on the shoulder adjacent to the traffic being controlled or in the barricaded lane. At a "spot" obstruction, a position may have to be taken on the shoulder opposite the barricaded section to operate effectively. A flagger should stand only in the lane being used by moving traffic after traffic has stopped, and the flagger needs to be visible to other traffic or to communicate with drivers. Because of the various roadway geometrics, flaggers should be clearly visible to approaching traffic at all times. For this reason the flagger should stand alone.

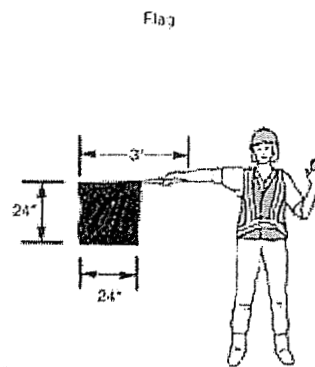
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<sup>2</sup>Table 111-2. A Policy on Geometric Design of Highways and Streets, AASHTO, 1990, p. 125.



PREFERRED METHOD

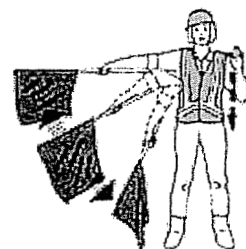
EMERGENCY USE ONLY



To Stop Traffic



Traffic Proceed



To Alert and Slow Traffic

**Figure VI-4. Use of hand signaling devices by flagger.**

Other workers should not be permitted to congregate around the flagger station. The flagger should be stationed far enough ahead of the work force to warn them (for example with horns, whistles etc.) of approaching danger, such as vehicles out of control.

Flagger stations should be visible far enough ahead to permit all vehicles to stop. Table VI-1, *Guidelines for length of longitudinal buffer space*, may be used in selecting the location of flaggers. This distance is related to approach speeds, friction factors, and pavement and tire conditions, these distances may be increased for downgrades.<sup>3</sup> These distances are calculated in a manner similar to those calculated in the first paragraph of 6E-6. Flagger stations should be preceded by proper advance warning signs. Under certain geometric and traffic situations, more than one flagger station may be required for each direction of traffic. At night, flagger stations should be illuminated.

At two-way, unusually low-volume and/or unusually low-speed short lane closings where adequate sight distance is available for the safe handling of traffic, the use of one flagger may be sufficient.

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<sup>3</sup>Table III-2. A Policy on Geometric Design of Highways and Streets, AASHTO, 1990, p. 125.

## Employee Acknowledgement

I have received a copy of the new safety standards, Pole Climbing and Traffic Control and Flagging Procedures. It is my understanding that I am to place the new safety standards in my copy of the Mountain Telephone's safety handbook. I am to review these standards in detail and to consult with my supervisor, or Teresa Litteral, Human Resource & Safety Director if I have any questions concerning its contents.

I understand that if I neglect to follow the safety handbook standards that I may be subject to disciplinary action by the company, up to and including discharged depending on the seriousness of the action.

I understand that as an employee of Mountain Telephone I am required to review and follow the standards set forth, and I agree to do so.

---

Employee Name

---

Date



8: AM - 9:30 AM JERESA - 2 New Standards - Traffic Control & Flagging Procedures  
 Rick - covered new standard Talked about & gave notice  
 & affirm must follow That these will be disciplinary Pole Climbing & Rescues  
 Day safe SAFETY MEETINGS Action up to & including discharge Date 11-1-12

Gave out cards  
 PSC #12 to all  
 employees.  
 & MEMO

1. Courtney Price
2. Gary Robison
3. Jim J.
4. Harry Brown Jr.
5. Paul D. Cantrell
6. Ricky Penner
7. ~~Keith~~
8. Blake
9. Jim Pluh
10. Carter Edin
11. Kase
12. Bud Nichol
13. Tim Evans
14. Tim Mays
15. Kevin Bradley
16. ~~By~~ Burt
17. Ollie Roggs
18. Curtis Howell
19. Michael Howard
20. ~~Ed~~
21. ~~Bob~~
22. ~~Jim~~

23. Bob Cox
24. ~~Roger~~
25. ~~Paul~~
26. Becky Nicell
27. Jacob Preece
28. ~~Henry~~
29. Anthony Ferrell
30. Jackie Proter
31. ~~Stacy~~ Webb
32. Keith Lyon
33. ~~Quentin~~ Hampton
34. ~~David~~ Pence
35. Lenna Littell
- 36.
- 37.
- 38.
- 39.
40. Jim Pugh
- 41.
- 42.
- 43.
44. Rick Palberg

Video. Roadway Worker Safety - Covered Excavation & Trenching,  
 Falls, Electrical Hazards, Heavy Equipment, Injuries, Noise, Hazardous Material  
 Hazards of Outdoor Work, Roadway Workzone Hazards, Runovers, Flaggers, Nightwork

Video - Electric Burns - Very Graphic

Reminded to ck High Voltage gloves + ck dates for cert. Fied Test.  
Reminded in form of New policy on Flaging + Hwy Safety

SAFETY MEETINGS

Date

5-31-12

1. Kelli Puff

2. Daxson Lewis

3. Jacob Preece

4. Henry Ferguson

5. Tim Mays

6. Mike Howard

7. Lohy Wells

8. Shawn Dutton

9. Kevin Esterling

10. Johnny Perry

11. Steve Miller

12. Paul Duffin

13. HOMER BARRETT, Sr.

14. James Lane Jr

15. Keith LYON

16. Jerry Gray

17. Ruby N. Bennett

18. Nick Smith

19. Wm. Anger

20. Tim Tyree

21. ~~Van Stapp~~

22. BC

23. Tim Elans

24. Kevin Brickley

25. Jim Phelps

26. Courtney Brite

27. Ray Burton

28. Blaine

29. Teresa Lott

30. Paul J. Cantrell

31. Jackie Prater

32. Carter Bolin

33. J. E. Cramer

34. Anthony Fennell

35. Ollie Haggerty

36. T. Lee Adkins

37. J. L. S. S.

38. Becky Nicell

39.

40.

41.

42.

43.

44.

gave out new cones, safety glasses, + gloves  
that needed them.

# Video: Heat Stress

Discussed recent incident with Shawn Dalton in detail.  
Rick Pelfrey & Teresa Littoral Trainers

SAFETY MEETINGS

Date

4-19-12

- |                              |                      |
|------------------------------|----------------------|
| 1. HOMER BARRETT, JR.        | 23. Nick Smith       |
| 2. Roy Burtin                | 24. Tim Mayo         |
| 3. Tim Evans                 | 25. Keith Lyon       |
| 4. Reggie Easterling         | 26. Becky Nixell     |
| 5. Braden Rose               | 27. Linda Little     |
| 6. Henry Jagers              | 28. Allen Billum     |
| 7. Alvin Riggley             | 29. Rick Pelfrey     |
| 8. Brian Dart                | 30. Paul D. Cantrell |
| 9. <del>Brian</del>          | 31. Jackie Proter    |
| 10. Lyby Welch               | 32. W.A. Billum      |
| 11. <del>John E. Ayers</del> | 33.                  |
| 12. <del>Carl</del>          | 34.                  |
| 13. Ricky Leasing            | 35.                  |
| 14. RD Spacy                 | 36.                  |
| 15. Johnny PERRY             | 37.                  |
| 16. Jim Phelps               | 38.                  |
| 17. Kevin Brickley           | 39.                  |
| 18. Walter Settle            | 40.                  |
| 19. <del>Karla Gause</del>   | 41.                  |
| 20. <del>Alvin Riggley</del> | 42.                  |
| 21. <del>Jim</del>           | 43.                  |
| 22. Michael Howard           | 44.                  |

# Roadway Safety

SAFETY MEETINGS

Date 7-28-11

- |                     |                     |
|---------------------|---------------------|
| 1. Paul D. Cantrell | 23. J. Peery        |
| 2. Nick Smith       | 24. Becky Nicell    |
| 3. Tim Mays         | 25. J. Murphy       |
| 4. Rick Lantz       | 26. Lawson Lewis    |
| 5. Perry Law        | 27. W. L. Lantz     |
| 6. Keith Stamps     | 28. Sam Guller      |
| 7. J. E. Aragon     | 29. Reggie Asteling |
| 8. Anthony Hensel   | 30. Jackie Prater   |
| 9. Lody Well        | 31. Shaw D. D. A.   |
| 10. Kevin Bruckey   | 32. Jena Little     |
| 11. Tim Evans       | 33.                 |
| 12. Homer Barrett   | 34.                 |
| 13. Tim Tyree       | 35.                 |
| 14. Ollie Riggsby   | 36.                 |
| 15. Keith Lyon      | 37.                 |
| 16. Bryan Cox       | 38.                 |
| 17. Tyler Adkins    | 39.                 |
| 18. Michael Harard  | 40.                 |
| 19. James Lane Jr.  | 41.                 |
| 20. Jim Phelan      | 42.                 |
| 21. Roy Burp        | 43.                 |
| 22. Carter Berlin   | 44.                 |



Paul & Nick  
V-Track

# Roadway Safety Video

## SAFETY MEETINGS

Date 26 Mar 11

- |                             |                               |
|-----------------------------|-------------------------------|
| 1. John E. Cragg            | 23. Bryan Jenkins             |
| 2. James L. Jr.             | 24. Anthony Ferrer            |
| 3. Austin Murphy            | 25. Roy Burton                |
| 4. Brandon Rose             | 26. Bob Williams              |
| 5. Tommy Barrett, Jr.       | 27. <del>James Guller</del>   |
| 6. Toby Wells               | 28. Paul D. Cantrell          |
| 7. Michael Howard           | 29. Keith Lyon                |
| 8. Blayne Cox               | 30. Jackie Porter             |
| 9. Jay Hampton              | 31. Randy Cantrell            |
| 10. Tim Mays                | 32. <del>Tommy Perry</del>    |
| 11. Neil Lester             | 33. Jackie Cantrell           |
| 12. <del>Carter Bolin</del> | 34. Tommy Perry               |
| 13. Manfred Wright          | 35. Olhe Byrd                 |
| 14. <del>Harry Jones</del>  | 36. <del>Walter Self</del>    |
| 15. Jim Evans               | 37. <del>James Cantrell</del> |
| 16. Leslie C. Cantrell      | 38.                           |
| 17. Kevin Bricky            | 39.                           |
| 18. Carter Bolin            | 40.                           |
| 19. Jim Phelps              | 41.                           |
| 20. Tom Tyce                | 42.                           |
| 21. Nick Smith              | 43.                           |
| 22.                         | 44.                           |





# Memorandum

---

**FROM:** Teresa Litteral

November 1, 2012

**TO:** All Employees

**CC:**

**RE:** Safety Precautions Related to Recent Incidents

---

As a result of a few isolated safety incidents Mountain Telephone has experienced over the past year, we want to remind each of you about our policies and procedures that govern your work.

First, please note that our primary concern is the safety of each and every one of our employees and independent contractors, as well as members of the general public. It is important for your own safety, and the safety of those around you, that you always follow our adopted safety practices and procedures, which can be found in our Employee Handbook and Safety Manual. If you do not have a copy of our Employee Handbook or Safety Manual, please ask your supervisor or Teresa Litteral for a copy.

Second, as a result of recent incidents in which employees or independent contractors of Mountain Telephone were injured, we thought it best to highlight the following specific rules to ensure that employees are aware of and following the applicable policies and procedures.

## NOTIFICATION OF ACCIDENTS

In the event of any accident where personal injury or death, property damage, or loss of service for four or more hours occurs, **Teresa Litteral must be contacted immediately**. You will each be provided with a business card listing Teresa's mobile number where she can be reached twenty-four hours a day, seven days a week. In the event that any accident occurs, she should be notified at once. Mountain Telephone is required by law to report most incidents to the appropriate government agency **within two hours** of their occurrence.

## POLICIES AND PROCEDURES WHEN WORKING NEAR ROADWAYS

Maintenance and construction work on or near roadways presents serious dangers to employees of Mountain Telephone, as well as members of the general public.

To ensure the safety of both our employees and the public, you must use the appropriate warning signs and traffic control devices provided to you by Mountain Telephone. Supervisors should work with employees to develop a plan to control traffic before any work begins and should supervise appropriately thereafter to ensure that plan is being implemented. Flaggers should also be used when necessary to direct traffic. The attached document entitled "Traffic Control and Flagging Procedures," which is the primary topic of today's Safety Meeting,

TO: All Employees  
RE: Safety Precautions  
DATE: November 1, 2012  
PAGE: 2

describes more specifically what clothing is appropriate for flaggers and how best to use flaggers to protect Mountain Telephone employees and members of the public.

In addition, in the event that a telephone cable is stretched across a roadway, an employee must watch the cable at all times until that cable is either buried or lifted to the appropriate height. Cables that are stretched across roadways and that are not secured present serious threats and, therefore, we must be exceptionally careful in these instances.

#### **POLICIES AND PROCEDURES WHEN CLIMBING POLES**

Before climbing any pole, employees and supervisors should review the structure to ensure it is safe to climb before any work begins. All employees must work together to ensure that precautions are being taken to avoid accidents any time when climbing structures is necessary to perform work.

If the safety of any pole is in question, it should be thoroughly tested before any employee climbs that pole. If there are any indications that the pole is unsafe for climbing, employees should not climb the pole until it is made safe by bracing, guying, or other means.

#### **CONCLUSION**

It is Mountain Telephone's belief that all accidents are preventable and it is the responsibility of every employee to ensure that they are following all of Mountain Telephone's policies and procedures to prevent any accident. Employees that do not follow Mountain Telephone's policies and procedures may be subject to disciplinary action, up to, and including, termination.

It is imperative for your safety and for the safety of those around you that you follow Mountain Telephone's policies and procedures. We ask that you help us keep everyone safe so that unfortunate accidents do not occur in the future.



## Mountain Telephone

### Pole Climbing and Rescue

#### Purpose

Before climbing any pole, employees should review the structure to ensure it is safe to climb before any work begins. All employees must work together to ensure that precautions are being taken to avoid accidents any time when climbing structures is necessary to perform work.

If the safety of any pole is in question, it should be thoroughly tested before any employee climbs that pole. If there are any indications that the pole is unsafe for climbing, employees should not climb the pole until it is made safe by bracing, guying, or other means. See below for procedures for testing poles.

Supervisors or employees that neglect to follow these guidelines may be suspended without pay or may be subject to additional disciplinary action by the company, up to and including discharged depending on the seriousness of the action.

#### Climbing

Pole climbing is necessary in constructing and maintaining overhead aerial cable systems. The work is not difficult or hazardous if you are careful in selecting, fitting, and maintaining the climbing equipment. You must use sound judgment, use self-discipline, and follow the printed and verbal safety practices that are required in this career field.

The art of pole climbing is like any other art--it takes hard work. When you have mastered the art of climbing, you are about 10 percent efficient in your job. To become 100 percent efficient, you must learn to position yourself on the pole so that you can work at ease and with efficiency.

#### INSPECTION POLE

Inspect the pole for unsafe conditions both before and during the climb. Unsafe conditions include such things as rake (leaning of the pole), shell rot, cracks, breaks, knots, woodpecker holes, and foreign attachments to the pole. Inspect the pole for rot in the center, called *heart rot*, by sounding the pole with a hammer (if it sounds solid when hit with a hammer, it is safe). When the pole has been in the ground for a long time, inspect it for *butt rot* by digging down about 6 inches at the base of the pole and drilling a hole partway into the pole base. The shavings from the hole will indicate if the pole is rotted. Plug the hole after completing this test. Remove rocks and other objects that are within 10 feet of the pole to prevent injury if you fall.

Before an employee climbs a pole or works near foreign or metallic objects, a voltage tester must be used to detect any dangerous voltages.

When proper power clearance requirements are not met or where damages to power lines are hanging down into telephone climbing space, do not climb or test. Call you supervisor.

## **CLIMBING EQUIPMENT**

Pole-climbing equipment is needed to accomplish exterior overhead cable work. Basically, there are five main parts to a lineman's equipment--a set of climbers, a body belt, a safety strap, a hard hat, and leather gloves. Inspect your climbing equipment before climbing a pole.

## **CLIMBING PROCEDURES**

### **BELTING IN**

Climbing is an essential part of your job. In order to have your hands free to perform work up the pole, you must be able to *belt in* at the work position. Practice will help you become skilled in positioning yourself on a pole.

The safety strap is the first consideration. It must be carried on the body belt in the correct way. A right-handed person should carry the safety strap in the left D-ring. Snap the double (looped) end so the keeper will face outward nearest the body. The single end and the keeper will face inward farthest from the body. This will keep the strap from twisting. A left-handed person carries the safety strap the same way but on the right D-ring.

Make initial adjustments to the safety strap before climbing a pole. While belted in at the base of the pole, with your feet at equal heights, place your elbow against your stomach and raise your fist toward the pole. There should be 1 to 2 inches between your fist and the pole. With your elbow still against your stomach, extend your fingers. If your fingers do not touch the pole, your strap is too long and needs to be adjusted.

Position yourself so that both gaffs are firmly set into the pole. If you are right-handed, your left leg will be low and locked. Your right leg will be about 6 inches above your left leg in a comfortable position. Keep your knees and hips away from the pole and unsnap the single end of the safety strap with your left hand while holding onto the pole with your right hand. Pass the single end around the pole to your right hand. Grasp the pole with your left hand and snap the keeper into the right D-ring with your right hand. Both keeper snaps will face outward when you are correctly strapped around the pole. The strap should lie flat against the pole. You can then place your body weight on the safety strap. *Figure 12-1* shows the proper belt-in method.





Figure 12-1. Belt-in method

**CAUTION**  
Always ensure that the  
snaps are secured  
and properly engaged.

**NOTE:** A left-handed person should reverse the belting-in and unbelting procedures.

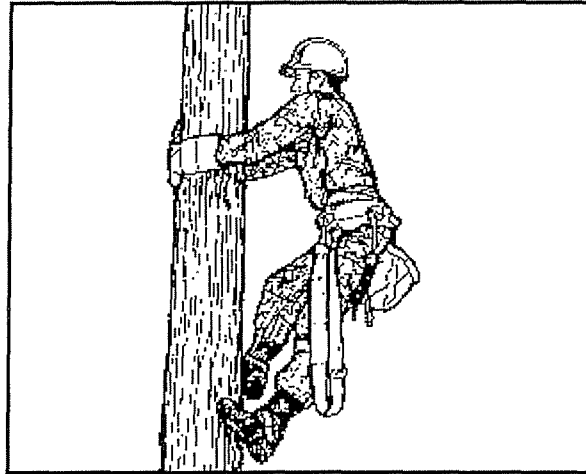
### **UNBELTING**

Reverse these procedures for unbelting. If you are right-handed, your left leg should be low on the pole and locked. Your right leg should be approximately 6 inches above the left leg and in a comfortable position. Grasp the pole with your left hand and pull up on your left leg, being careful to keep the correct angle on the gaff. With your right hand, carefully unsnap the hook from the right D-ring. Pass the safety strap to your left hand. Grasp the pole with your right hand and use your left hand to snap the safety strap into the left D-ring.

### **ASCENDING**

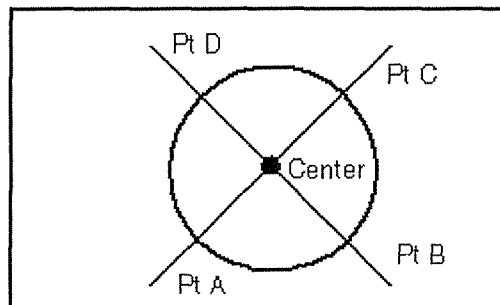
When ascending a pole, always climb the high side if possible. Keep your arms and body relaxed; and keep your hips, shoulders, and knees a comfortable distance from the pole. Climb with short steps (step length should be natural for each individual, approximately 8 to 10 inches), using your hands and arms for balance only. Extend your arms and place your hands on the pole at approximately shoulder level. If you place them at a higher level (above your head), you will have a tendency to pull yourself up with your arms. Your hands should not be overlapped on the back side of the pole

because this will bring your body closer to the pole, which could be unsafe. Aim your gaffs at the heart (center) of the pole, with your toes pointed upward. The distance between your heels will change according to the diameter of the pole. See *Figure 12-2* for the proper climbing position.



**Figure 12-2. Proper climbing position**

In order for the gaff to penetrate into the pole's heart and to ensure a safe position, your feet must be turned out and kept apart so that the gaff, not the side of your foot, will hit the pole. Imagine perpendicular lines through the center of the pole (*Figure 12-3*).



**Figure 12-3. Gaff positions**

The gaffs should be positioned where the perpendicular lines intersect the surface of the pole. Proper gaff positions are at points A and B, B and C, C and D, or D and A. They should not be positioned on opposite sides of the pole such as points D and B or A and C. The horizontal position of gaffs usually ranges from 4 to 6 inches apart.

**WARNING**

If the gaffs are positioned on opposite sides of the pole, they point away from the center and can cause you to cut out (fall).

You must develop an coordination between your hands and feet. As your left foot raises, your left arm must raise; and as your right foot raises, your right arm must raise. This is just the opposite of walking.

Your steps should be short and comfortable. The weight of your body will be transferred to the lower foot with each step. Each time you step with a foot, you will transfer your body weight to that foot and lock the knee. Step length is flexible and can be adjusted to avoid hazards on the pole such as knots, nuts, and holes. Always look where you are going and inspect the pole as you are climbing.

The gaffs must come above the point to be penetrated and then be brought back down into that point at about a 30-degree angle. Always set the gaff firmly into the pole. To maintain the 30-degree angle, keep approximately 8 inches between your knee and the pole. You can accomplish this process by using the inverted-J method (*Figure 12-4*).

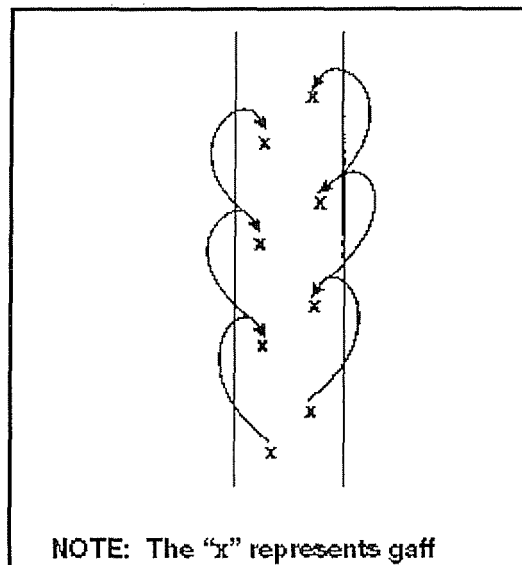


Figure 12-4. Inverted-J method

When using the inverted-J method, keep your gaffs aimed at the heart of the pole and your knees away from the pole. Never *sneak* (ease up a pole by lightly setting the gaffs into the pole) or *slap* (kick horizontally) your gaffs into the pole. Always set your gaffs in firmly. Let your legs do the work. Your weight should be shifted smoothly and easily from one foot to the other. **NOTE: Do not be tempted to pull yourself up with your hands. The shorter the step, the less the temptation; the longer the step, the greater the temptation.** *Figure 12-5* shows the proper body position for ascending a pole.

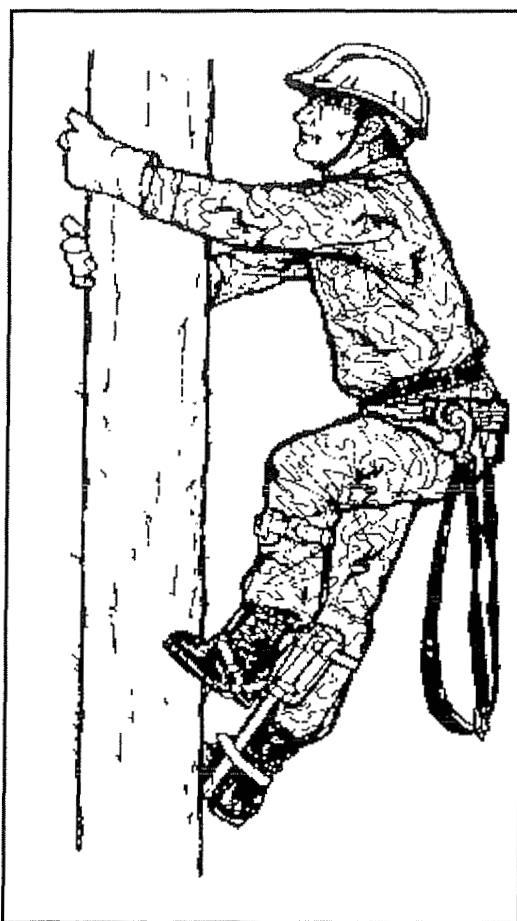


Figure 12-5. Proper position for ascending a pole

## DESCENDING

Descending a pole is just the opposite of ascending. Keep the proper climbing position and ensure that your shoulders, hips, and knees remain a comfortable distance from the pole.

When descending a pole, watch where you are going so that you do not step into a bad spot. Look down your body, between your feet, not from side to side. Your coordination will be the same; your right hand and right foot will move together, and your left hand and left foot will move together. The gaffs should naturally break out of the pole when you roll your knee to the outside during your descent, with an outward and lowering movement of your knee. *Figure 12-6* shows the proper body position for descending a pole.



Figure 12-6. Proper position for descending a pole

Break out the upper gaff by rolling your knee to the outside. Keep the gaff aimed at the heart of the pole at all times. Relax, straighten your leg, and lock your knee. When your straightened and relaxed leg is lined up with the heart of the pole and your body weight has been shifted above the gaff, drop the gaff into the pole. Your leg is merely lowered into position with your body weight behind it. Your steps should be approximately twice as long when descending a pole as they are when ascending a pole, but they should not be excessively long. Do not try to coast or slide like a lumberjack when descending a pole. Try to make your last step to the ground about 6 inches or less to prevent gaffing yourself.

### HITCHHIKING

After you are belted in at the work position, you must move so that work can be done. You can move up and down without unbelting by *hitchhiking*. But, like anything, you must practice to gain confidence.

Climb to the proper height of work. If you are working around a crossarm, climb only until you are at eye level with the lag screw on the crossarm brace, belt in, and then hitchhike to a comfortable working position.

- To hitchhike up, slide the safety strap up the pole by moving your hips slightly toward the pole and moving the strap with your hands. With the strap angled up, take one or two small steps up. These steps should be smaller than normal climbing steps. Remember to lock your leg back when stepping up. Repeat this procedure until you reach the proper height.
- To hitchhike down, reverse the procedure. Slide the strap down slightly by moving your hips in. Use your hands to slide the strap. The belt will naturally fall down when you remove pressure. Take one or two small steps down. These steps should be smaller than normal steps. Use your weight to drive the gaff into the pole. Repeat this procedure until you reach the proper height. If you are close to the ground, unbelt before stepping from the pole.

## **CIRCLING**

You cannot perform all work on a pole from one position. You must move about on the pole to be in a safe, comfortable position.

### **Procedures**

To circle to the left, position your left foot about 6 inches lower than your right foot and lock your left knee. Position your right gaff close to your left foot, about 6 inches higher than your left foot. Shorten the safety strap on the left side by rotating your hips slightly clockwise. This action will create a slight pull to the left to help you swing to the left.

As you step up on your right foot and lock your right knee, the left gaff will come out of the pole and your body will swing to the left. Keep your left knee locked and your left gaff aimed at the heart of the pole at all times. At this time, both knees should be locked. Swing your left foot 3 to 4 inches to the left, unlock your right knee, and drop onto your left gaff. The steps around the pole should not be more than 3 to 4 inches apart (horizontally) because it could cause your right gaff to come out of the pole.

Continue the process of positioning your right foot, shortening your safety strap, stepping up onto your right foot, swinging to the left, and dropping onto your locked left leg until you have reached your desired position. If you do this procedure correctly, you will stay at the same height on the pole.

Reverse this procedure to circle to the right. Keeping your right leg low and locked, bring your left foot close to the right and about 6 inches higher. Shorten your safety strap, step up on your left foot, and swing to the right, keeping the gaff aimed at the pole and dropping down onto your locked right leg.

### **Work Positions**

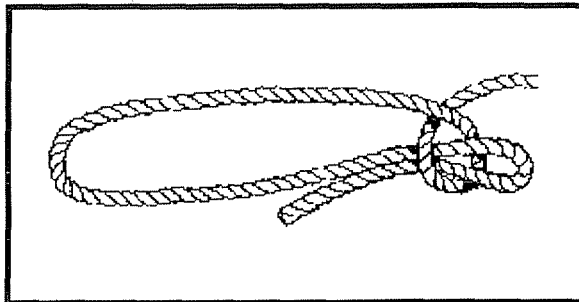
Even though you are in the location of the work, you may have to lean out on occasion. Ensure that you are in the correct position when you do so.

**CAUTION**  
Working in the incorrect  
position could cause back  
injuries.

To get in a work position to the right, keep your right leg low and locked. Lengthen your safety strap slightly to the right, then twist slightly in your body belt to face your work. All your weight will be on your right foot. You are not using your left leg for this, so position it any way you feel comfortable. **NOTE: Reverse this procedure to get to a work position on the left.**

### HOISTING TOOLS AND MATERIALS

Use a lineman's knot (*Figure 12-7*) to tie items to a lineman's rope, and hoist the items to the work position.



*Figure 12-7. Lineman's knot*

### SAFETY

A great portion of your time in the field will be spent working on poles. Both groundmen and linemen should pay particular attention to safety precautions during pole work. It is impossible to list all the hazards you may be exposed to, so you must be constantly alert and on the lookout for potential hazards. Each job or task has its own unique circumstances. Evaluate each situation before the work begins to determine if any hazards exist.

### Section II. Rescue

Electrical shock is one of the hazards of this field that may occur on the ground, on a pole, around several people, or all alone. When it happens, your speed, rescue method, and knowledge of first aid may save a life. In fact, an individual's life could depend on your ability to perform this procedure quickly and safely. Therefore, pole-top rescue is a skill you must develop and maintain proficiency in. This section discusses the one-man concept of pole-top rescue.

### PURPOSE

The purpose of pole-top rescue is to quickly and safely remove a victim from a power pole. There are many reasons why you may need to rescue a person from a pole and lower him to the ground. Some of the reasons are electrical shock, heart attack, heat

stroke, physical injury, and equipment failure. No matter what the reason, when a victim is unable to remove himself from a pole, you must perform a pole-top rescue.

## **EQUIPMENT**

The equipment necessary for pole-top rescue is important and should be available on all line trucks. The equipment should include but not be limited to--

- Personal climbing equipment such as hooks, body belts, and safety straps.
- A rescue rope that is 1/2 inch in diameter and twice the height of the highest crossarm on the base plus 10 feet.
- A knife.
- Rubber protective equipment (used if the victim or the pole is energized).

## **PROCEDURES**

There are four basic steps in accomplishing the one-man concept of pole-top rescue-- evaluate the situation, provide personal protection, climb to the rescue position, and lower the victim to the ground.

### **EVALUATE THE SITUATION**

Call to the man on the pole and ask if he is okay or if he needs help. If there is no response or if the victim seems stunned or dazed, go to his aid. Time is extremely important. Evaluate the surroundings. Determine if the pole or crossarm is split, cracked, or on fire; if the victim is in contact with a live conductor; and if you need rubber goods or hot sticks. Look at the whole scene, not just the victim.

### **PROVIDE PERSONAL PROTECTION**

Your safety is very important to the rescue mission because there will be no rescue without you. Your personal climbing tools and rubber goods must be in good condition. Hot-line tools must be ready in case they are needed. The physical condition of the pole must be surveyed for damaged conductors and equipment, fire, and splits. Remember, do not take chances where your safety is concerned.

### **CLIMB TO THE RESCUE POSITION**

Carefully climb to the rescue position. If necessary, clear the injured of any hazards and then reposition yourself in order to determine the victim's condition. Slightly above the victim and to one side is normally the best position for checking and working with the victim (*Figure 12-8*). The condition of the victim may vary, but this section will discuss the conditions most commonly encountered.





Figure 12-8. Rescue position

### Assess the Victim's Condition

- *Conscious.* If the victim is conscious, he will be able to tell you of his need. Administer first aid, tie the victim off, lower him to the ground, administer further first aid, and call for help.
- *Unconscious, breathing.* Try to revive the victim. If you cannot revive him, tie him off, lower him to the ground, administer first aid, and call for help.
- *Unconscious, not breathing.* Tie the victim off, lower him to the ground, administer first aid (mouth-to-mouth or cardiopulmonary resuscitation [CPR]), and call for help.

### Tie the Rescue Rope to the Victim

Position the rescue line over the crossarm or other part of the structure as shown in *Figure 12-9*.

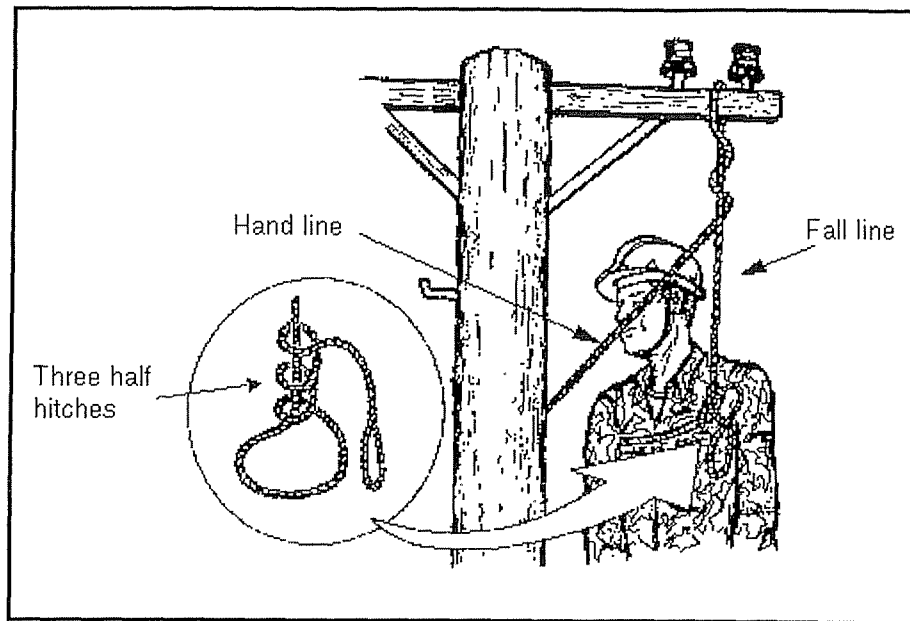


Figure 12-9. Rescue-line position

Placement is normally dictated by the position of the victim, your position in relation to the victim, and whether you are right- or left-handed.

Place the rescue line 2 to 3 feet from the pole for the best operation. Wrap the short end of the line around the fall line twice, then pass it around the victim's chest, and tie it with three half hitches. The knot should be in front of the victim, near one armpit and high on the chest.

### LOWER THE VICTIM TO THE GROUND

Remove the slack in the hand line by pulling on it. Then take a firm grip on the fall line with one hand, and use the other hand to cut the victim's safety strap on the side opposite the desired swing.

Lower the victim and control his descent by tightening and loosening the two twists in the rope with one hand, and use the other hand to guide the victim through any lower obstructions.

#### WARNING

Do not accidentally cut your own safety strap when cutting the victim's safety strap.

## Employee Acknowledgement

I have received a copy of the new safety standards, Pole Climbing and Traffic Control and Flagging Procedures. It is my understanding that I am to place the new safety standards in my copy of the Mountain Telephone's safety handbook. I am to review these standards in detail and to consult with my supervisor, or Teresa Litteral, Human Resource & Safety Director if I have any questions concerning its contents.

I understand that if I neglect to follow the safety handbook standards that I may be subject to disciplinary action by the company, up to and including discharged depending on the seriousness of the action.

I understand that as an employee of Mountain Telephone I am required to review and follow the standards set forth, and I agree to do so.

---

Employee Name

---

Date



8: AM - 4:30 AM. TERESA - 2 New Standards - Traffic Control & Flagging Procedures  
 Rick - covered new standard talked about & gave notice  
 & affirm must follow that these will be disciplinary  
 by safe SAFETY MEETINGS Option up to including discharged Date 11-1-12  
 gave out cards  
 PSC #12 to all  
 employees.  
 & MEMO

- |                     |                     |
|---------------------|---------------------|
| 1. Courtney Price   | 23. Blinn Cox       |
| 2. Gary Robison     | 24. Reggie Easton   |
| 3. Jim S. J.        | 25. Jim Cullis      |
| 4. Harry Brown      | 26. Becky Nicell    |
| 5. Paul D. Cantrell | 27. Jacob Preece    |
| 6. Ricky Penner     | 28. Henry Ferguson  |
| 7. Herb Jones       | 29. Anthony Ferrell |
| 8. Blake            | 30. Jackie Proter   |
| 9. Jim Pluh         | 31. Andy Webb       |
| 10. Carter Egan     | 32. Keith Lyon      |
| 11. Kace            | 33. Quentin Hampton |
| 12. Bud Nichell     | 34. Daniel Pence    |
| 13. Tim Evans       | 35. Lenna Little    |
| 14. Tim Mays        | 36.                 |
| 15. Kevin Buckley   | 37.                 |
| 16. Big Buster      | 38.                 |
| 17. Ollie Roggs     | 39.                 |
| 18. Curtis Thruell  | 40. John Perry      |
| 19. Michael Howard  | 41.                 |
| 20. Elmer D. A.     | 42.                 |
| 21. Ben B.          | 43.                 |
| 22. J. P.           | 44. Rick Polson     |

Video: Roadway Worker Safety - Covered Excavation & Trenching,  
 Falls, Electrical Hazards, Heavy Equipment, Injuries, Noise, Hazardous Material  
 Hazards of Outdoor Work, Roadway Workzone Hazards, Runovers, Flaggers, Nightwork

# Pole Climbing Video Safe Techniques

## SAFETY MEETINGS

Date 7-26-12

- |                        |                    |
|------------------------|--------------------|
| 1. John Craig          | 23. Blinn Cox      |
| 2. Tyler Adkins        | 24. Shaun Datt     |
| 3. Paul D. Connel      | 25. Michael Howard |
| 4. STEVEN Gullett      | 26. Blaine         |
| 5. Tim THREE           | 27. Tim Mays       |
| 6. HOMER BARRETT       | 28. Quentin Murphy |
| 7. Tim Evans           | 29. Jenna Little   |
| 8. Roy Burton          | 30. Jim Hume       |
| 9. Ricky Pennington    | 31. Jackie Prater  |
| 10. Courtney Hill      | 32. Rick PeVrey    |
| 11. Keith Stump        | 33.                |
| 12. Keith Lyon         | 34.                |
| 13. James Lane Jr.     | 35.                |
| 14. Nick Smith         | 36.                |
| 15. Jim Phelps         | 37.                |
| 16. [Signature]        | 38.                |
| 17. [Signature]        | 39.                |
| 18. [Signature]        | 40.                |
| 19. KB                 | 41.                |
| 20. Arthur Finell      | 42.                |
| 21. Walter [Signature] | 43.                |
| 22. [Signature]        | 44.                |

0

Pole & Bucket Truck  
Rescue at RECC

Mountain Telephone

# Memo

**To:** Installer Repairmen

**From:** Rick

**CC:**

**Date:** 6/26/2012

**Re:** Safety Meeting

---

There will be NO Safety Meeting Thursday. Construction linemen will be attending Pole Rescue Training with Licking Valley RECC on Wednesday; this will count for our safety meeting. Make sure to send short list.

Those needing to attend Pole Rescue Training:

Mike Howard ✓  
John Aragon *No there*  
Toby Wells ✓  
Bryan Cox ✓  
Shaun Dalton ✓  
Henry Ferguson ✓  
Jacob Preece ✓  
Brent Bartley ✓

Jerry Hampton

Rick

Gary Robinson  
Jesse Little  
Allen Gillum  
& Rick Palfrey  
was all so there

INSTRUMENT

BUCKETS RESEUE

JUNE 21 2014

NAME	CO-OP	METHOD	COMPLETED CORRECTLY	SIGNATURE
GARY REBISON	METE	Dump	✓	Gary Rebin
MIKE HARROD	METE	"	✓	Michael Harrod
JACOB PRACK	METE	"	✓	Jacob Prack
JERRY HAMPTON	METE	"	✓	Jerry Hampton
ANDREW GRAHAM	LV	HANDLINE	✓	<del>Andrew Graham</del>
WES MCKINNEY	LV	" S DRUM	✓	Wes McKinney
GRIG CHAVAZ	LV	"	✓	Grig Chavaz
ERIC ADKINS	LV	"	✓	Eric Adkins
MR MATT HARRIS	LV	Dump	✓	Matt Harris
BRIAN LAWSON	LV	"		Brian Lawson
AILEEN LAWSON	LV	"		Aileen Lawson



INSTRUCTOR: DCU

FOUR KESSEL

NAME	CO-OP	METHOD	COMPLETED CORRECTLY	SIGNATURE
KIRBY CASTLE	B.S.	Scrub Driver	Yes	<i>[Signature]</i>
<sup>PH</sup> CHRIS MOSIER	GRAYSON	"	"	<i>Chris Mosier</i>
HARRIS STEWART	GRAYSON	"	"	<i>Mark Spoor</i>
JAMIE WILSON	GRAYSON	"	"	<i>Jamie Wilton</i>
JEFF PRATER	B.S.	"	"	
DOUG HOLBROOK	B.S.	"	"	<i>Doug Holbrook</i>
<del>PH</del> JOSH WELLS	NEW, RUMBLE T. PHONE	"	"	<i>Josh Wells</i>
J. <sup>PH</sup> HUTCHINSON	GRAYSON	"	"	<i>[Signature]</i>
BRYAN COX	NEW BUNK T. ALON	"	"	<i>Bryan Cox</i>
BRYAN ROGERS	GRAYSON	"	"	<i>Bryan Rogers</i>



Inspector: FDW

FOLIO RESULTS

NAME	Co. OP	METHOD	COMPLETED CORRECTLY	SIGNATURE
<del>MINE</del> REYNOLDS	GRAM MOM. ROOM T. PHONE	Screwdriver	YES	Mike Reynolds
HENRY FERGUSON	NEW ROOM T. PHONE	"	"	Ray Reynolds
BRENT BARTLEY	T. PHONE	"	"	Brent Bartley
STEVEN BOSTON	GRAYSON	"	"	Steve Boston
MINE BLEWINS	GRAYSON	"	"	Mike Bles
LEOY PITKINS	LV MOM ROOM T. PHONE	"	"	Ray Pitkins
MINE HARVARD	MOM T. PHONE	"	"	Mike Harvard
TERRY HANNTON	T. PHONE	"	"	Paul Hanton
CHUCK REMINGTON	B. SANDY MOM	"	"	Paul Reynolds
JACOB PREECE	T. PHONE	"	NEW - NEEDS JUDGE	Paul Prece







Telephone: (606)743-3121  
Facsimile: (606)743-3635  
Post Office Box 399  
West Liberty, Ky. 41472-0399

November 05,2012

W. A. Gillum  
Mountain Telephone  
405 Main Street  
West Liberty, KY 41472

***RE: Legal Obligations Governing Work for Mountain Rural Telephone***

To Whom It May Concern:

First, please allow me to thank you for continuing to be a trusted independent contractor of Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain Rural Telephone"). It is through your outstanding support that we are able to provide continuous service to Mountain Rural Telephone's customers.

This letter is being sent as a reminder of the obligations imposed upon you, both contractually and by law, when you are performing work for Mountain Rural Telephone.

Mountain Rural Telephone is regulated by the Kentucky Public Service Commission, which has adopted, and requires Mountain Rural Telephone to abide by, the 1990 Edition of the National Electrical Safety Code (the "NESC"). The Kentucky Public Service Commission has the authority to investigate any acts or practices of Mountain Rural Telephone and, if it concludes that Mountain Rural Telephone has violated any provision of the NESC, to fine Mountain Rural Telephone for such violations.

Every independent contractor of Mountain Rural Telephone should be familiar with the obligations imposed by the NESC and should ensure that they are meeting those obligations. In particular, every independent contractor must make certain that they are abiding by the following NESC requirements:

1. Posting warning signs or traffic control devices when engaging in work that may endanger employees or the public in areas accessible by pedestrians or vehicles;
2. Reporting any accident resulting in personal injury or death, property damage, or the loss of service for four or more hours to Mountain Rural Telephone immediately;



4. Instructing all of your employees about the character of equipment and methods to be used to complete a job before the employee begins work;
5. Ensuring that supervisors are adopting appropriate safety precautions in order to prevent accidents, monitoring and ensuring that all safety rules and operating procedures are being followed by your employees, and making all necessary records and reports; and
6. Ensuring that all conditions are safe to the greatest extent possible before your employees begin work.

As a reminder, pursuant to Section 9 of the Services Agreement governing your relationship with Mountain Rural Telephone, you are also contractually required to comply with all applicable statutes, ordinances, rules, and regulations that may pertain to any particular project.

In order to ensure that you are complying with the 1990 Edition of the National Electrical Safety Code, the Occupational Safety and Health Administration's regulations, and other applicable laws and regulations, we ask that you forward us copies of your internal safety policies for our review.

Finally, we have included copies of Mountain Rural Telephone's incident notification business cards for you to distribute to your employees. If an incident occurs while your employees are working on a project for Mountain Rural Telephone, these cards provide a direct number for your employees to notify Mountain Rural Telephone immediately. This will allow us to promptly notify the Kentucky Public Service Commission or other government agency of the incident if necessary.

Again, thank you for your continued service, and if you have any questions, please do not hesitate to call.

Very Truly Yours,

Allen Gillum, General Manager  
Mountain Rural Telephone Cooperative Corporation, Inc.



On 9/15/2011, I went to Campton, KY to the field office of R & L Contracting, Inc to conduct Labor Standards Interviews. Upon completion of interviews I examine the field office for correct posters and posting of wages, at the time I asked R & L foremen, Larry Slap if they conducted monthly safety meetings? He quickly responded that they did.

 10-25-17  
Teresa Litteral

HR & Safety Director





INCIDENT REPORT

FORM INITIATOR Michael Howard

PERSON INVOLVED IN INCIDENT Richard Dalton

Date of incident 4-4-12 Time of incident 9:30 (a.m.) p.m.

Location where occurred Bays Bend

Describe incident fully: (use back page if necessary or sketch on back if needed to clarify).

some of us had stored work digging ~~with~~  
went to the other track got there we just for got to put line out  
pulled strand out I put strand in ditch I dont no wath  
happng the car hook the strand pulled Richard feet out of under him  
and he failed and hit is head and black top

List all equipment, machinery, materials or chemicals that were being used when event occurred.

Bucket truck Line truck Flat Bed truck strand truck

Identify factors that you believe contributed to or caused the incident no one ~~at~~

Were proper procedures being followed when incident occurred? yes  no

Explain For got to put line out

Was injured employee wearing proper personal protective equipment? NA  yes  no

List PE used Hard Hat Boots

Were you wearing proper personal protective equipment? na  yes  no

List PE used Hard Hat Boots

What changes are necessary to prevent reoccurrence? I think we were safe

But to be more safe It was a ctived

Employee signature Michael Howard Date 4-5-12

INCIDENT REPORT

FORM INITIATOR Toby Wells

PERSON INVOLVED IN INCIDENT Richard Shaun Dalton

Date of incident 4-4-12 Time of incident 9:30 a.m./p.m.

Location where occurred Bays Bend Rd.

Describe incident fully: (use back page if necessary or sketch on back if needed to clarify).

Strand was attached to dead end pole and still attached on flat bed. Shaun was sending material to me on next pole across road. Strand was lying on road and Shaun was standing between pole and strand. Slack was pulled from strand lying on road and allowed strand to rise approx. 2' high

List all equipment, machinery, materials or chemicals that were being used when event occurred.

bucket truck, line truck, Flat bed, strand, drill, framing

Identify factors that you believe contributed to or caused the incident no one was watching to see that strand was flat on road, no road signs, or flagger, lack of leadership.

Were proper procedures being followed when incident occurred? yes / no

Explain Too many people had moved away from critical area (road crossing) should have had all personnel @ road crossing

Was injured employee wearing proper personal protective equipment? NA / yes / no

List PE used hard hat and boots

Were you wearing proper personal protective equipment? na / yes / no

List PE used hard hat and boots

What changes are necessary to prevent reoccurrence? Make sure proper PE is in place before beginning.

Employee signature Toby Wells Date 4-5-12

in road. When the car came through no one was there to slow/stop the vehicle allowing him to hook the strand with his car which pulled strand towards Shaun and pole causing him to be turned upside down and land on his head. 3 phase power poles were nearly broken which caused my gaffs to come out of the pole and caught myself by 3/4" bolt in pole. When I looked down and seen Shaun he was not conscious. The car traveled approx - 100 to 150 feet after he hooked strand. Mike (supervisor) is always very cautious and is very consistent with making sure road signs and flaggers are present when needed. I have no complaints with Mike or his role as supervisor and I know he is genuinely concerned with our well being. I would hope to have a flow up with others about ~~my~~ my opinion on the situation

Toby

INCIDENT REPORT

FORM INITIATOR Henry Ferguson

PERSON INVOLVED IN INCIDENT Shaun Dalton

Date of incident 4-4-12 Time of incident 9:30 a.m (a.m./p.m.)

Location where occurred Bayes Bend Road (Woods bend)

Describe incident fully: (use back page if necessary or sketch on back if needed to clarify).

Working on Bayes Bend, there was strand plugged into a dead end pole and run across the road and pulled out up through 4 strands. I was heading to dig an anchor with John Haggan, when a car came up the road and caught the strand and knocked Shaun to the ground on the black top. Every one was working and didn't really get to see what all happened. It all happened so fast. Toby was working the pole that the strand was coming.

List all equipment, machinery, materials or chemicals that were being used when event occurred. Bucket truck, line truck, flatbed, drills, framing, strand

Identify factors that you believe contributed to or caused the incident driver of car was watching work and not the road, no flaggers or signs were posted

Were proper procedures being followed when incident occurred? yes  no

Explain there was no flaggers or signs out

Was injured employee wearing proper personal protective equipment? NA  yes  no  
List PE used Hard hat, line man boots

Were you wearing proper personal protective equipment? na  yes  no  
List PE used Hard hat, line man boot

What changes are necessary to prevent reoccurrence? always have signs and flaggers to let people know that there is road work ahead, and make sure drivers can be aware of strand or cable across road ways

Employee signature Henry Ferguson Date 4-5-12

Bryon was at the next point with the bucket truck and Mike was on up the road was  
Perry lacy pulled in as I was putting the cable tracker in the truck. When I started  
walking toward John and the live truck, I saw Shawn laying on his back and  
Perry told me to hurry to him, shortly there after everyone there. The strand is what  
caught Shawn behind the legs and knocked him on his back.

HENRY

INCIDENT REPORT

FORM INITIATOR Blum Box

PERSON INVOLVED IN INCIDENT Shawn Dalton

Date of incident 4-4-12 Time of incident 9:30 (a.m./p.m.)

Location where occurred Bay 5 Bend Road

Describe incident fully: (use back page if necessary or sketch on back if needed to clarify).

Shawn was standing at the bottom of the pole helping tony  
hooking & unhooking stuff when the car past and caught the strand  
he went about 60 to 70 feet when the strand pulled tight it  
jenked his foot out from under him and his head hit  
the black top

List all equipment, machinery, materials or chemicals that were being used when event occurred.

Flat Bed, Bucket truck, linetruck & pickup

Identify factors that you believe contributed to or caused the incident

The strand caught the front end of the car

Were proper procedures being followed when incident occurred?  yes  no

Explain we all were working and framing pole to get the strand up  
and fell to pay more attention to the strand

Was injured employee wearing proper personal protective equipment?  NA  yes  no

List PE used Hard Hat & Boots

Were you wearing proper personal protective equipment?  na  yes  no

List PE used Hard Hat & Boots

What changes are necessary to prevent reoccurrence? Always

Everybody need to watch out for <sup>each other</sup> ~~one another~~ around road crossing?

Employee signature Blum Box Date 4-5-12

INCIDENT REPORT

FORM INITIATOR John E. Aragon

PERSON INVOLVED IN INCIDENT Shawn Dalton

Date of incident 4 April 2012 Time of incident ~9:30 (a.m.) p.m.

Location where occurred Bays Bend Road

Describe incident fully: (use back page if necessary or sketch on back if needed to clarify).

Crew hanging strand on power poles. After first attachment the <sup>strand</sup> crossed the road where personnel prepared to attach it. All other crew members were working other sections of the job, only 2 members of crew were left at road crossing. One was working on pole. At some point the strand came in contact with a passing car and was dragged into the last man there. I DID NOT WITNESS THE ACCIDENT.

List all equipment, machinery, materials or chemicals that were being used when event occurred.

Bucket truck, line truck, flat bed cable truck, 10M strand

Identify factors that you believe contributed to or caused the incident Shortage of personnel, False sense of security on a isolated rural road. Rushing to complete job.

Were proper procedures being followed when incident occurred?  yes  no

Explain No road signs or flaggers.

Was injured employee wearing proper personal protective equipment?  NA  yes  no

List PE used Hard Hat

Were you wearing proper personal protective equipment?  na  yes  no

List PE used Hard Hat

What changes are necessary to prevent reoccurrence? Return to a full crew of 8 men. Put more emphasis on safety and less on completing jobs quickly.

Employee signature John E. Aragon Date 5 April 2012



INCIDENT REPORT

FORM INITIATOR

*Perry Lacy*

PERSON INVOLVED IN INCIDENT

*Shawn Dalton*

Date of incident

*4-4-12*

Time of incident

*Approx 9:30 a.m./p.m.*

Location where occurred

*Bay Bend Rd - Woodland*

Describe incident fully: (use back page if necessary or sketch on back if needed to clarify).

*Had just pulled up to job site & had gotten out of truck. Walking towards men working when I heard vehicle coming. Looked to my right and seen vehicle hitting Coble and glanced back at pole and seen Ghacore going backwards and landing on his back in road.*

List all equipment, machinery, materials or chemicals that were being used when event occurred.

*Line truck*

Identify factors that you believe contributed to or caused the incident

*No signs, NO body flagging Rd.*

Were proper procedures being followed when incident occurred?  yes  no

Explain *Same as above*

Was injured employee wearing proper personal protective equipment?  NA  yes  no

List PE used *Hard Hat*

Were you wearing proper personal protective equipment?  na  yes  no

List PE used

What changes are necessary to prevent reoccurrence?

*Someone to flag Rd. and signs, water call*

Employee signature

*Perry Lacy*

Date

*4-19-12*



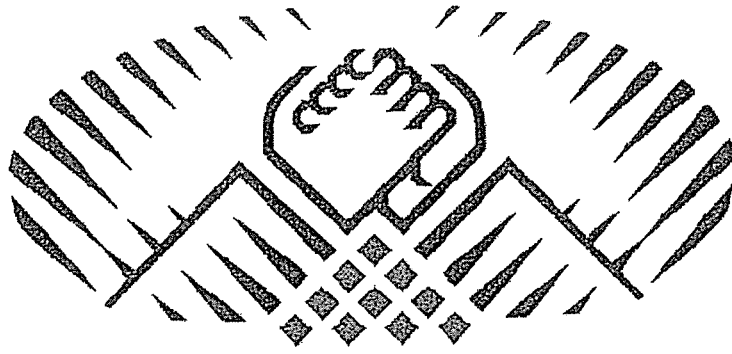
We were workin on hwy 1812 behind the greyhound bus station, Placing strand. The incident took place at approximately 3:45 p.m. The said person mr Ryan Rose climbed a power service pole to raise a copper telephone drop, as soon as said person started to raise drop, the pole fell, The foreman standing close by and run to him. He was ~~was~~ not alert ~~and he was out of breath~~. He was approximately un alert for 2 minutes, his breath was knocked out of him. Responisve started com.in back, + was talkin to every one around him. The ambulance arrived approximately 30 minutes later, then said person walked to ambulance. He was then transported to Jackson, Ky hospital

April 17<sup>th</sup> 2012



Superintendt  
R & L contracting





# Mountain Telephone

## Employee Handbook

**MOUNTAIN TELEPHONE**

**POLICY BULLETINS**

**PERTAINING**

**TO**

**EMPLOYEES**

Welcome to Mountain Telephone. We are pleased that you have become a member of our Team. We value your skills and abilities, and look forward to sharing our goals and successes with you.

Mountain Telephone serves one of the largest areas in Kentucky, which includes Menifee, Elliott, Morgan, and Wolfe counties and a section in Bath County. We are a member-owned Company that is supported by our Board of Directors and Bylaws.

This handbook is designed to acquaint you with Mountain Telephone and provide you with information about working conditions, employee benefits, and policies affecting your employment. It is intended to be a general source of information. It is not a contract.

For the purposes of this handbook, Mountain Rural Telephone Cooperative Corporation, Inc. doing business as Mountain Telephone herein will also be referred to as the "Company".

You should read, understand, and comply with all provisions of this handbook. It describes many of your responsibilities as an employee and outlines the programs developed by Mountain Telephone to benefit employees. One of our objectives is to provide a work environment that is conducive to both personal and professional growth.

No employee handbook can anticipate every circumstance or question about policy. As Mountain Telephone grows, the need may arise to make changes. Mountain Telephone reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, at its sole and absolute discretion. The only exception is a change in our employment-at-will policy permitting you or Mountain Telephone to end our relationship for any reason at any time. This handbook in no way affects the "employment at will" policy. It is the intent of Mountain Telephone to maintain an employment at will policy. Employees will, of course, be notified of any other changes to the handbook as they occur.

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# INTRODUCTION

## BOARD OF DIRECTORS

Jimmie Jones, West Liberty  
President  
[chance@mrtc.com](mailto:chance@mrtc.com)  
743-4469

Katie Ison, Sandy Hook  
Vice-President  
[pison@mrtc.com](mailto:pison@mrtc.com)  
738-4176

Jodi Lawson, Frenchburg  
Secretary  
[jolawson19@hotmail.com](mailto:jolawson19@hotmail.com)  
768-3758

Susan Cable, Campton  
Treasurer  
[susan\\_cable@kyfbins.com](mailto:susan_cable@kyfbins.com)  
668-3695

Betty Nickell, Hazel Green  
662-4671

Casey Helton, Ezel  
725-5320

Chris Dickerson, Sandy Hook  
[jmac\\_leasing@yahoo.com](mailto:jmac_leasing@yahoo.com)  
738-5020

Mark Birchfield, Frenchburg  
[mark\\_birchfield@yahoo.com](mailto:mark_birchfield@yahoo.com)  
768-2969

Randy Halsey, West Liberty  
743-3151

Robert Bradley, Jeptha  
522-4520

Joleen Frederick, Attorney  
743-2550

## **EQUAL EMPLOYMENT OPPORTUNITY**

Mountain Telephone is an Equal Opportunity Employer. We offer employment opportunity based on job qualifications, regardless of race, color, national origin, sex, age, veteran's status, religion or disability.

---

Adopted 5/1/09

## **AT-WILL POLICY**

This handbook is not a contract of employment with MOUNTAIN TELEPHONE. Employment with Mountain Telephone is “at will.” Under Kentucky law, in absence of an express contract to the contrary, a person’s employment is for no specific term and may be ended at-will. This means that the employee is free to terminate his or her relationship with the Company at any time, for any reason, with or without notice. Similarly, the Company retains the right to terminate an employee at any time, for any reason, with or without notice.

---

Adopted 5/1/09

## **OPEN-DOOR POLICY**

One of our goals is for all employees to be satisfied in their jobs. We encourage all employees to make suggestions or present ideas on how our Company can enhance customer services and relations, improve internal processes, and further develop our work environment. Your supervisors and/or management are always available to listen to any questions, concerns, ideas or suggestions that you or any other employee may have. Employees are encouraged to contact the Director of Human Resources if they believe that a particular issue cannot be otherwise resolved, or if their concerns relate to a supervisor's conduct. We can only help you address such issues if you bring them to our attention. Our doors are open to you at all times, for any reason.

---

Adopted 5/1/09

## **POLICY CHANGES**

Mountain Telephone reserves the right to change any policies, procedures, benefits, and terms of employment without notice, consultation, or publication, except as may be required by law. This handbook is intended to be a general source of information and is not a contract. The Company reserves the right to modify or change any portion of the handbook at any time.

---

Adopted 5/1/09



## **DISABILITY ACCOMMODATION**

Mountain Telephone is committed to complying with all applicable provisions of the Americans with Disabilities Act (ADA). It is the Company's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, the Company will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company or pose a direct threat to the safety of the employee or any other individual that cannot be eliminated or reduced to an acceptable level with reasonable accommodation.

### **Scope of Policy**

The Company's policy of reasonable accommodation extends to all reasonable accommodations necessary to allow an individual with disabilities to enjoy equal employment opportunities. This includes the obligation to make reasonable accommodation to allow individuals with disabilities to participate in the application and hiring process and to enjoy equal benefits and privileges of employment as are enjoyed by employees without disabilities. (Supervisors/ employees) who receive requests for such accommodations should consult with the Human Resource Director before rejecting an accommodation request.

Employees or applicants with disabilities, who believe they need a reasonable accommodation to perform the essential functions of their job, participate in the application and hiring process, or enjoy equal benefits and privileges of employment, should contact the Human Resource Director. Mountain Telephone encourages individuals with disabilities to come forward and request reasonable accommodation.

### **Procedure for Requesting an Accommodation**

Employees and applicants requiring accommodation are encouraged to submit a written request outlining the need for accommodation as soon as the need for accommodation becomes apparent to them. Upon receipt of an accommodation request from an employee, the Human Resource Director and the employee's direct supervisor should meet with the employee to discuss and identify the precise limitations resulting from the disability and the potential accommodation that Mountain Telephone might make to help overcome those limitations. Applicants requiring accommodation should inform the Human Resource Director of the need for accommodation as early in the application process as is possible.

The Company may ask for additional medical information from the employee or applicant (post-offer) to verify the need for accommodation. In such instances, the Company may seek authorization from the employee or applicant to contact the individual's health care providers, may ask the individual to provide the requested information from the health care provider or, infrequently, may ask the individual to

undergo a medical examination at the Company's expense to verify the need for accommodation or identify the appropriate accommodation.

Mountain Telephone will determine the feasibility of the requested accommodation considering various factors, including, but not limited to the nature and cost of the accommodation, the availability of tax credits and deductions, outside funding, Mountain Telephone's overall financial resources and organization, and the accommodation's impact on the operation of the Company, including its impact on the ability of other employees to perform their duties and on Mountain Telephone's ability to conduct business.

Mountain Telephone will inform the employee of its decision on the accommodation request or on how to make the accommodation. If the accommodation request is denied, employees will be advised of their right to appeal the decision by submitting a written statement explaining the reasons for the request. If the request on appeal is denied, that decision is final.

The Company will attempt to provide the accommodation requested. The ADA does not, however, require Mountain Telephone to make the best possible accommodation, to reallocate essential job functions, or to provide personal use items (e.g., eyeglasses, hearing aids, wheelchairs, etc.).

An employee or job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify the Human Resources Director. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

---

Adopted 5/1/09

## **EMPLOYMENT INFORMATION**

## EMPLOYEE STATUS

### **Newly Hired Employee**

All newly hired employees shall be employed on a trial basis for the first six (6) months of employment and shall be referred to as “newly hired employees” during that period. This trial period is intended to provide the newly hired employee with an opportunity to demonstrate his or her job skills and ability to work with others.

Since this trial period is a learning and orientation experience for both the newly hired employee and the Company, the employee is expected to work closely with his or her supervisor and is encouraged to seek answers to any question that he or she may have concerning his or her work for the Company or any related matters.

During the trial period, the newly hired employee is not a regular employee of the Company.

Upon satisfactory completion of the trial period, the newly hired employee shall become a regular full-time employee of the Company.

### **Temporary Employee**

A Temporary, seasonal, occasional employee (not qualified for benefits or holiday pay) is one who is hired for an assignment, specific projects that are temporary in nature and is not a newly hired employee or a regular full-time employee.

### **Regular Full-Time Employees**

Any employee who is not a newly hired employee, temporary employee or a part-time employee shall be a regular full-time employee of the Company. Unless he or she is hired pursuant to a written employment contract signed by the employee. A regular full-time employee is a person that has been hired for an indefinite period of time. Regular full-time employees qualify for holiday pay; sick and annual leave determined by the hire date. Eligibility for insurance and retirement plans is outlined in the benefits section. Nothing in this handbook is intended to create or reflect a promise on the part of the Company to employ a regular full-time employee for any particular period of time. Regular full-time employees shall be employed on an at-will basis and are subject to termination with or without cause or prior notice.

**Part-Time Employee** is an employee (not qualified for benefits or holiday) that their usual assignment is less than 30 hours per week.

---

Adopted 5/1/09, Revised 8/5/11

## **HOURS OF WORK**

### **Workday**

Unless otherwise determined by management, the normal workday for all full-time employees shall be 8 hours of work, from 8:00 a.m. to 5:00 p.m., with an unpaid lunch period of one hour. Your supervisor is responsible for scheduling your rest and meal periods.

### **Workweek**

Unless otherwise designated by management, the normal workweek for employees shall be Monday through Friday.

### **Reporting To Work**

Employees are expected to be at their workstations, ready to work, at the beginning of the assigned shift or workday. This is particularly important for positions that involve security or direct contact with customers, visitors or vendors. Except in emergencies, employees are expected to report absences or tardiness to their supervisor at least 30 minutes before the start of the scheduled work period, or, in the case of an unforeseen absence or tardiness, no later than 30 minutes after the start of the work period.

### **Rest Periods**

Employees will receive a 15-minute rest break during each four-hour work period. The scheduling of rest periods is the responsibility of the employee and his or her supervisor.

### **Meal Breaks**

All employees shall receive an unpaid lunch period of one hour scheduled approximately in the middle of the work period. The scheduling of meal breaks is the responsibility of the employee and his or her supervisor.

### **Overtime Work**

At such time when it is necessary for an employee to work overtime, the company will make every effort to give reasonable notice of this possibility well in advance. The supervisors of the Company shall distribute such overtime as evenly as possible so that no single employee is overburdened. All non-exempt employees shall receive time and one-half for hours worked in excess of forty in one week. Holiday, sick and annual leave time will be counted as "hours of work" for overtime purposes.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-131 Hours of Duty, reviewed, revised and adopted March 11, 1988 and MR-121 Hours of Work, reviewed and adopted May 14, 1982.

## **WORKER'S COMPENSATION AND REPORTING OF INJURIES**

All employees of Mountain Telephone are subject to, and protected by, Kentucky laws relating to workers' compensation. Workers' compensation benefits provide medical benefits for work-related injuries or illness, and also provide weekly disability payments to replace lost income. These benefits are provided through a workers' compensation insurance policy purchased by the Company.

**Employees are required to immediately report any work-related accident, illness or injury.**

The Company pays insurance premiums for workers' compensation coverage. No employee contribution is required.

The insurance carrier determines all questions relating to eligibility for workers' compensation benefits, the computation of benefits or the amount of benefits. Employees may contest any determination of the insurance carrier by filing an application for adjustment of claim under the Kentucky Workers' Compensation Act.

No employee will be harassed, coerced, intimidated, retaliated against, discharged or otherwise subjected to any adverse employment action by the Company for reporting an on-the-job accident or injury or a work-related illness or for filing and pursuing a lawful claim under the Kentucky Workers' Compensation Act.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-135 Reporting Injuries.

## **GRIEVANCES AND METHODS OF HANDLING PERSONNEL PROBLEMS**

Employees may present grievances, questions, or problems in a step-like progression to their immediate supervisor, their department manager, HR director and ultimately to the General Manager. A grievance is any problem of an employee or group of employees resulting from work requirements or the conditions under which work is performed. Should the grievance be with any manager or immediate supervisor, then skip that level and take the issue up at the next level.

Employees shall follow the grievance procedure below:

### **Step 1**

If an employee or group of employees has a grievance, their first step is to meet with their direct supervisor to discuss the issue(s) at hand. The employee(s) must come forward regarding the grievance within 7 days of the first occurrence of the issue. Both parties should be dedicated to resolving the grievance at this lowest level of the grievance process. The immediate supervisor should respond to the grievance either verbally or in writing within 7 working days of the step 1 grievance meeting.

### **Step 2**

If the grievance is not resolved in Step 1, within 7 working days of the supervisor's response, the grievance shall be reduced in writing and presented to the department Manager and Human Resource Director. The written grievance must be signed by the employee and contain the following information:

1. The name of the employee(s);
2. The nature of the grievance and circumstances;
3. The date and details of the step 1 grievance meeting;
4. The remedy sought.

The department Manager and/or HR Director shall respond to the grievance in writing within 7 working days from the date the grievance was received.

### **Step 3**

If the grievance is not resolved in step 2, then the employee may submit the grievance to the General Manager. This must be done within 7 working days from the date of the step 2 response. The written grievance must be signed by the employee and contain the following information:

1. The name(s) of the employee(s);
2. The nature of the grievance and circumstances;
3. The date and details of the step 1 grievance meeting;
4. The step 2 written response;
5. The remedy sought.

The General Manager or his/her designee shall respond to the grievance in writing within 7 working days from the date the grievance was received. The General Manager's response is final and subject to review of the Board of Directors.

Employees who are discharged or otherwise end their employment with the Company may skip step 1 of the grievance process and proceed to step 2. This must be done within 7 working days of the discharge/last day of employment.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-133 Employee Relations reviewed and adopted May 14, 1982.



## EDUCATIONAL ACTIVITIES

### At Company's Request

- (1) It shall be the policy of this Company for the General Manager in his discretion to select schools and/or courses which are available in fields relating to the telephone industry for employees of the Company to attend. He is hereby authorized to request any employee of the Company to attend any and all such schools and/or courses that he feels will increase the efficiency of such employee to the Company; and
- (2) The General Manager should advise the Board and request its approval for any employee to attend any school and/or courses that will be in effect for an extended length of time and/or will alter regular work schedules.

### At Employee's Request

- (1) Employees may request the approval of educational activities to be reimbursed by and have time allowed by the Company upon showing that said activity directly benefits the Company. In order to continue in said activity, a passing level of academic achievement shall be demonstrated and,
- (2) The requesting employee, in order to receive this benefit, must be willing to enter into an agreement to dedicate a specific amount of time under the employment of the Company.
- (3) The General Manager should advise the Board and request its approval for any employee to attend any school and/or courses that will be in effect for an extended length of time and/or will alter regular work schedules.
- (4) Upon completion of the course with verification of a passing grade, the employee shall be reimbursed for the cost of tuition and book(s).

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-134 Educational Activities reviewed and adopted May 14, 1982.

## **EMPLOYMENT OF MEMBERS OF THE SAME FAMILY**

It shall be the policy of the Mountain Telephone that in as much as the Company does not follow the policy of employing two members of the same family or "closely related" means a person who is related to the employee to the second degree or less- that is a person who is either a spouse, child, parent, brother, sister- by blood of the employee, however no employee shall lose eligibility to remain employed if they become a close relative of another employee because of a marriage to a close relative of a employee who does not live in the household of the employee. It follows that, when two employees marry, then one must resign from the Company.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-131 Employment of the Members of the Same Family reviewed and adopted May 14, 1982.

# COMPENSATION

## **PAY & PAYROLL**

The Company pays wages and salaries that are competitive with those currently paid for similar jobs by other employers in our industry. Salary increases, when given, are based on factors such as job performance and corporate earnings and are not necessarily given on the basis of length of service alone. Normally, pay rates are reviewed annually.

For payroll purposes, employees are classified as “exempt” or “non-exempt”. This classification is required by law, and is based on the type of work performed by the employee.

“Exempt” employees are those who hold managerial, supervisory, administrative, or executive positions with the Company, and who are paid on a salary basis, this classification is required by law.

“Non-exempt” employees are compensated on an hourly basis.

### **Paychecks**

All employees shall be paid by check or direct deposit of their preference on a biweekly basis.

The paychecks shall represent pay for work performed during the prior pay period.

The Company is required by law to make deductions from an employee’s paycheck for such items as federal and state income taxes and Social Security taxes. Also, the Company offers group plans such as long term disability, and payments for such plans will be deducted from an employee’s paycheck if the employee chooses to participate in the plans. Your pay stub will reflect all deductions.

### **Confidentiality**

Your pay rate and the rates of your co-workers are confidential. Please do not discuss your pay rate with other employees of the Company or with persons outside the Company.

### **Overtime Pay**

Due to the nature of their work, exempt employees are not subject to the overtime pay provisions of the law. A non-exempt employee shall be paid overtime pay based on his or her hourly wages or salary at the time the overtime is worked.

Unless otherwise required by applicable law, overtime pay shall be one and one-half times the employee’s normal hourly rate of pay for time worked in excess of 40 hours of work in any one workweek. Vacation, holiday, and sick time will be counted as “hours of work” for overtime purposes.

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Adopted 5/1/09

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## **STAND-BY/CALL OUT POLICY NON-EXEMPT EMPLOYEES**

To ensure Mountain Telephone operations are run smoothly, it is necessary to have some employees available after normal business hours and on weekends. If you work in a position requiring you to be available for after-hours emergency outages and are scheduled for this duty on a rotating basis, you are eligible for "On-Call" pay.

When scheduled to be on-call, you may engage in your normal non-work activities. However, you must be able to respond to a call within thirty (30) minutes and work ready according to Mountain Telephone policies. (for example, policies on drugs and alcohol abuse). Therefore, you will be given a pager or wireless phone so that you may be reached if conditions warrant.

As an on-call employee, you will be compensated in the following manner.

### **Availability Pay**

You will be paid a minimum base of two (2) hours per day per weekend duty or per day holiday period at one and a half (1.5) times your regular hourly rate on Saturdays, Sundays, and holidays for being available to respond to calls.

### **Premium Pay**

If you are called to respond and you are able to resolve the issue without traveling to Mountain Telephone premises, you will be paid actual time worked or the minimum of thirty minutes at the rate of time and a half (1.5) your regular hourly rate.

If you are called out to respond and must travel to the job or Mountain Telephone premises, you will be paid travel time per call-out and time worked. The rate is one and a half (1.5) times of your regular hourly rate. You will be paid a minimum of thirty (30) minutes work per call-out concurrently.

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Reviewed, Revised & Adopted 7/10/09

Reissued 7/10/09

## **COMPENSATION TO EMPLOYEES WHEN LEAVING EMPLOYMENT OF THE COMPANY**

It shall be the policy of this Company that Regular employees leaving the Company be it voluntary or involuntary are entitled to all accrued vacation time. Those employees giving at least two weeks notice shall be entitled to an additional 80 hours of severance pay.

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Reviewed & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-136 reviewed, revised and adopted May 14, 1982.

# EMPLOYEE PERFORMANCE

## **ANTI-HARASSMENT**

Mountain Telephone will neither tolerate nor condone the harassment of any employee based on the individual's race, color, national origin, sex, age, veteran's status, religion, or disability. Any employee who believes that he or she, or any other employee, is being subjected to such harassment, should bring the matter to the attention of the General Manager of the Company, the Company's Director of Human Resources, or any department head. Mountain Telephone will investigate any such concerns promptly and confidentially. No employee will be subject to any form of reprisal or retaliation for having made a good-faith complaint under this policy.

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Adopted 5/1/09



## SEXUAL HARASSMENT

It is the policy of the Mountain Telephone to strive to maintain a working environment for its employees that is free from sexual harassment by supervisors, co-workers, or third parties. The Company will not tolerate any act of sexual harassment by any person in violation of this policy.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of any such conduct by an individual is used as a basis for employment decisions; or
3. Such conduct has the result of unreasonably interfering with an individual's work performance or creating an intimidating or offensive working environment.

Examples of specific conduct that would violate this policy include, but are not limited to, the following activities on company premises or during work hours:

1. Visual displays of sexually suggestive or sexually explicit materials, such as posters, postcards, catalogs, drawings, cartoons, magazines, or photographs.
2. Sexually suggestive or explicit comments, jokes, epithets, name-calling, etc.
3. Sexually suggestive or explicit gestures.
4. Sending or receiving sexually suggestive or sexually explicit e-mail.
5. Logging onto, viewing, or downloading sexually suggestive or sexually explicit material from the Internet.
6. Viewing or showing sexually suggestive or sexually explicit films or videotapes.
7. Touching any co-worker or other person in a sexually suggestive or sexually explicit manner.

Any act of "hazing" that involves the removal of any item of clothing from a co-worker, that involves actual or threatened physical contact of any sort, or that involves any sexually suggestive or sexually explicit element.

Please note that men as well as women can be victims of sexual harassment, and that sexual harassment may involve persons of the same sex. In addition, conversations or activities that are purely voluntary and consensual may make third persons feel uncomfortable, and thus, may be a violation of this policy.

It is the responsibility of every supervisor employed by the Company to ensure that this anti-harassment policy is strictly enforced. Every supervisor is responsible for ensuring that each employee under his or her supervision is aware of this policy. It is the further responsibility of all supervisors to ensure that any work sections under his or her

responsibility are free from sexual conduct that causes, or reasonably can be considered to cause, an intimidating or offensive working environment. In addition, supervisors are required to comply with all reporting requirements in this policy, including the obligation to promptly report to senior management any complaint made under this policy or any possible violation of this policy.

It is the responsibility of all employees to conduct themselves in ways that ensure that others are able to work in an atmosphere free from sexual harassment. It is the responsibility of all employees to comply with this policy in all respects and at all times.

It is the further responsibility of all employees, including in particular all supervisors, to bring to the Company's attention any evidence of sexual harassment, and to promptly report any act or event that is believed to be a violation of this policy (or that may be a violation of this policy) so that the matter can be investigated as soon as practicable and appropriate action taken. Further, all employees are required to cooperate fully, honestly, completely, and truthfully in any such investigation.

If you believe that you or any other employee has been subjected to sexual harassment in the workplace in violation of this policy, we ask that you immediately report your concerns to the Company. You may report your concerns to your supervisor, any other supervisor with whom you feel comfortable in making such a report, or to the Human Resource Director, General Manager, or Manager. Any supervisor who receives a report of sexual harassment is required to inform the Human Resource Director, General Manager or Manager immediately. All such reports shall be treated confidentially, and will be investigated by the Company in a prompt and responsible manner.

No employee shall be subject to any form of reprisal or retaliation for having made a good faith complaint under this policy.

Any employee who is determined to have violated this policy by engaging in or condoning the sexual harassment of a fellow employee will be subject to immediate discipline up to and including termination of employment

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-188 Sexual Harassment reviewed and adopted November 8, 1991.

## **DRESS**

It shall be the policy of this Company that all employees work in clothing appropriate for their jobs. Managers and Supervisors are responsible for ensuring employees comply with the following standards and will discuss issues individually with affected employees. This is not an all-inclusive list of attire, and management reserves the right to determine appropriateness. Each supervisor is responsible for evaluating the dress and appearance of his/her employees. Corrective action for inappropriate attire can be in the form of sending the employee home—with or without pay, verbal or written warning, or suspension or termination.

Your management at Mountain Telephone is responsible for establishing a reasonable dress code appropriate for the job you perform. Mountain Telephone reserves the right, at any time; to make changes to these guidelines as necessary based on business needs related to safety and customer service.

**All clothing and jewelry must be appropriate for the job being performed and not present a safety hazard nor restrict your performance.**

All clothing must be clean and in good condition.

Uniforms provided for outside employees by the Company should be worn and cared for in a proper way.

Establishing a reasonable standard for personal grooming and jewelry, promotes a positive image of the Company to customers and visitors. These guidelines are not intended to infringe on the personal rights of our employees, but rather to uphold an image of professionalism and respect in our community. The following are minimum acceptable standards for male and female employees:

### **Hair**

Neat, clean, and well groomed. No extreme styles, i.e. punk, Mohawk, etc. No extreme dyed colors other than normal rinses. Beards/Mustaches/Sideburns should be kept neatly trimmed and groomed.

### **Grooming**

Employees shall adhere to good personal hygiene and are expected to come to work neat and well groomed.

### **Jewelry**

Male employees- Wearing of rings should be minimized and not constitute a safety hazard. Earrings and other body piercing is a personal choice, however while performing company business or at a company event, these forms of jewelry should not be visible.

Female employees- Wearing of rings should be minimized and not constitute a safety hazard. Earrings should be tasteful and appropriate for all business and professional

attire. Body piercing is a personal choice, however while performing company business or at a company event, these forms of jewelry should not be visible.

**Body Art**

The form of tattoos and other skin pigment alterations is a personal choice, however the company does request that these forms of body art be covered while performing company business or at company events. Tattoos that are on parts of the body that can not be covered are inappropriate, examples face, hands.

**Make-Up**

Application and use of make-up will be conservative, professional and natural. Application of dramatic colored eye shadows, rouges, blushes and lipsticks is unacceptable.

**Inappropriate Attire**

The following items are considered inappropriate for an employee to wear at work: Spandex or other form fitting pants, leggings, shorts, tank tops, halter tops, crop tops, strapless dresses or tops, sleeveless dresses or tops, revealing necklines, muscle shirts, cut-off shirts, sweat suits, warm-up suits, sweat pants, garments with inappropriate slogans or advertising, casual sandals, loose footwear such as flip-flops.

No part of an individual's torso shall be showing and excessively tight and revealing clothing is inappropriate. Pants should not hang to low on the waist in that undergarments can be seen. In addition, any item of clothing that is damaged has holes, stained or in poor repair is unacceptable work attire.

Employees who have questions as to what constitutes proper attire should consult their immediate supervisor, manager or human resources.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as Policy Bulletin NO MR-129 Dress reviewed and adopted February 12, 1993.

## **DRUG-FREE WORKPLACE SUBSTANCE ABUSE**

It is the policy of Mountain Telephone (herein referred to as "Company") that employees be free of substance abuse and alcohol abuse. The abuse of alcohol and use of illegal drugs increases absenteeism and reduces productivity. Further, such use increases the risk of injury to fellow employees, customers and other persons, and also increases the risk of damage to company property or the property of other persons for which the Company may be held liable.

It is the policy of the Company that the use or possession of alcoholic beverages or illegal drugs by employees while on duty or on company property is prohibited. Employees must not report to duty under the influence of alcoholic beverages or with sufficient amounts of illegal drugs in their-system so as to give rise to a positive drug test. For purposes of this policy, the term "illegal drug" means intoxicants and narcotics, marijuana or any other controlled substance. The term "illegal drugs" does not include medication which has been lawfully prescribed for an employee by his or her physician, presuming such use is consistent with the prescription. The use or possession of alcoholic beverages or illegal drugs is in violation of the policy shall be grounds for disciplinary action up to and including TERMINATION.

### **Pre-employment/Post Offer Testing**

All applicants to whom offers of employment are made must submit to a drug test. Pre-employment tests will be administered only after an offer of employment has been extended. Any offer of employment is contingent upon the applicant achieving a negative test result. A post offer test is performed after an applicant is hired, but before he or she starts working.

### **Post-accident Testing**

When an employee is involved in an accident that results in a fatality, or requires medical attention, the employee shall be subjected to a drug and alcohol test. When an employee is involved in an accident where any property damage occurs, the employee will also be subjected to drug and alcohol tests. In the event that an employee is so seriously injured that he or she cannot provide a urine/breath specimen at the time of the accident, then immediately after medical attention has been provided, a specimen will be collected and tested.

### **Reasonable Suspicion/ "For Cause" Testing**

Reasonable suspicion for requiring an employee to submit to a drug or alcohol test shall be deemed to exist when an employee manifests physical or psychological symptoms or reactions commonly attributed to the use of controlled substances or alcohol. Company supervisors will be trained in identifying characteristics of drug and alcohol abuse. The "reasonable suspicion" for requiring an employee to take a test shall be observed by at least a single supervisor and preferably two, and shall be recorded in a written form. The supervisor is responsible for securing all material and providing all documentation related to the incident. The supervisor, other company official, or person designated by company officials shall accompany the employee to the collection facility.

### **Random Testing**

The Company also conducts random drug and alcohol testing. All employees subject to testing will be included in a random selection system. The random selection system provides an equal chance for each employee to be selected each time a random selection occurs. Random selections will be reasonably spread throughout the year. The Company will drug test at a minimum of 10% percent and alcohol test at a minimum 10% percent of their work force annually. Random selection, by its very nature, may result in employees being selected in successive selections or more than once in a calendar year. Conversely, other employees may never be selected for random testing. Once an employee is notified of selection for random testing, the employee will be directed to the collection site so the testing can be conducted as soon after notification as possible.

### **Return-to-Duty Testing**

It shall be at the sole discretion of the Company whether an employee who has tested positive on a drug or alcohol test shall remain eligible for continued employment. If the employee returns to work after completing necessary education and/or treatment for drug and/or alcohol, the employee will be subject to return-to-duty testing before returning to work. Failure to pass this test will subject the employee to immediate termination.

### **Follow-Up Testing**

It shall be at the sole discretion of the Company whether an employee who has tested positive on a drug or alcohol test shall remain eligible for continued employment. If the employee returns to work, the employee will be subject to unannounced follow-up testing for a period of up to one (1) year as a condition of employment. Failure to pass any further drug or alcohol test will subject the employee to immediate termination.

### **Refusal to Test**

Refusal to submit to the types of drug and alcohol tests employed by the Company will be grounds for refusal to hire an applicant and to terminate employment of existing employees. A refusal to test would include behavior which is intended to obstruct the proper administration of a test. Unreasonable delay in providing a urine or breath specimen could be considered a refusal. In the event that an employee cannot provide a sufficient urine (within three (3) hours) or breath (within fifteen (15) minutes) specimen, the Company may direct the individual to a physician for purposes of evaluation. If the physician cannot find a legitimate medical explanation for the employee's inability to provide a specimen, either urine or breath, it will be considered a refusal to test.

### **Laboratory Procedures**

All urine specimens collected under this policy will be submitted to a laboratory certified by the Substance Abuse and Mental Health Services Administration (SAMHSA). [All specimens initially testing positive will be subjected to a subsequent confirmation test before reported by the laboratory as positive. All positive laboratory test results will be reported by the laboratory to the Company's Medical Review Officer (MRO). In the event the employee wishes to contest the drug test results, the test result and the employee will be referred to the MRO.]

In the event the Medical Review Officer determines there is no legitimate basis for the employee objection, the test will stand as reported. In the event the Medical Review Officer determines there is an explanation for the positive test result other than the use or abuse of illegal drugs or alcohol, the test result will be reported back as negative.

**Retest**

If an employee wishes to challenge the laboratory's test result, the employee can request a retest of the original sample. The retest can be run by the same or another SAMHSA certified lab. Request for a retest must be made within seventy-two hours after the employee is initially advised of the test result. The employee will be required to pay the cost of the retest. In the event the retest demonstrates a result different from the original test, the employee will be reimbursed for the cost of the retest.

**Confidentially**

Individual test results for applicants as well as existing employees will be kept strictly confidential. The only time test result information would be released would be in response to any administrative or judicial action initiated against the Company by the employee. The release of any drug test results other than in the circumstances previously described would only be made following written consent from the tested employee. Any individual who has submitted to drug testing in compliance with this policy is entitled to receive the results of such testing upon timely written request.

**Drugs Tested**

Any applicant who tests positive for the presence of any of the following substances is considered unsuitable for work and will not be hired. Additionally, existing employees who test positive for any of the following substances shall be deemed unsuitable for continued employment. Any employee who tests positive shall be immediately removed from their position pending disciplinary action up to and including termination. The Company reserves the right to expand at any time the substances for which it will test. Those substances for which the Company will test presently include:

- |                                   |                    |
|-----------------------------------|--------------------|
| 1) Marijuana (THC)                | 6) Barbiturates    |
| 2) Cocaine                        | 7) Methaqualone    |
| 3) Opiates                        | 8) Methadone       |
| 4) Amphetamines/methamphetarnines | 9) Propoxyphene    |
| 5) Phencyclidine (PCP)            | 10)Benzodiazepines |

**Alcohol Testing**

Any applicant who tests above 0.02 for the presence of alcohol is considered to have tested positive for alcohol and is unsuitable for work and will not be hired. Additionally, existing employees who test positive for any of the above substances may be deemed unsuitable for continued employment. Any employee who tests positive shall be removed immediately from their position pending disciplinary action up to and including termination.

### **Prohibited Conduct**

The following list of drug- and alcohol-related conduct is illustrative of the offenses which subject an employee to discipline up to and including termination. It is not considered to be an all-inclusive list. Offences of a similar nature will also result in disciplinary action up to and including termination.

- The unlawful manufacture, distribution, dispensation, possession, or use of alcohol or a controlled or illicit substance is prohibited in the workplace.
- Abuse of legal (prescription or over-the counter) drugs or alcohol
- Coming to work under the influence or with sufficient amounts of illegal drugs in the employee's system so as to give rise to a positive drug test.
- Substandard job performance due to an underlying drug or alcohol dependency
- Consumption or possession of open containers of alcohol on Company property, in a Company vehicle or in vehicles rented by the Company.

Disciplinary action following a positive post-accident or reasonable cause test, a five (5) day suspension imposed without pay. If an employee has been suspended while awaiting the drug test results following a post-accident or reasonable cause test and the test results are negative. Then that employee will be reimbursed for the duration of the suspension at their regular rate of pay. Following the suspension period, the Company will identify for the employee who tests positive the various resources available to address substance abuse problems. The Company will, at its discretion, make a case-by-case determination whether the employee who tests positive will be eligible for continued employment. If an employee elects to participate in a program which requires in-patient residential care and the Company has determined the employee is eligible for continued employment, the Company will work closely with both parties to develop a return to work plan. After successful completion of a drug and/or alcohol rehabilitation program, an employee who has been with the Company for one (1) year or more (and not used more than 12 weeks of medical or family leave, including the drug/alcohol rehabilitation time) may at the Company's discretion, be returned to either their original or an equivalent position. An employee who has been with the Company for less than one (1) year may be eligible to return to active employment if a position remains open.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO.-141 Drug-Free Workplace substance abuse policy.



**EMPLOYEE'S DRUG POLICY RECEIPT &  
ACKNOWLEDGEMENT**

I have received a copy of the drug policy issued by my employer, Mountain Telephone, and understand and agree that I am to review this policy in detail and to consult with my supervisor, or Teresa Litteral, Human Resource & Safety Director if I have any questions concerning its contents.

I understand that as an employee of Mountain Telephone I am required to review and follow the drug policy set forth, and I agree to do so.

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Date

## **CORPORATE D.O.T. (DEPARTMENT OF TRANSPORTATION) POLICY AND PROCEDURES MANUAL**

### **SECTION (1)**

#### **POLICY GOVERNING DRUG AND ALCOHOL USE AND TESTING**

##### **1.0 INTRODUCTION AND OVERVIEW**

1.1 The U.S. Department of Transportation (DOT) has issued regulations which govern the use of drugs and alcohol by motor vehicle drivers, and which also require Mountain Telephone to conduct mandatory drug and alcohol testing of drivers at the times and under the conditions described in this policy.

1.2 It is the intention of Mountain Telephone to comply fully with the DOT's Regulations governing drug and alcohol use and testing, and the requirements of DOT's regulations have been incorporated into this policy. In the event the DOT's regulations are amended, this Policy and the applicable term(s), condition(s) and /or requirement(s) of this Policy, shall be deemed to have been amended automatically at the time, without the need for redrafting, in order to reflect and be consistent with the DOT's regulations. In such cases the Company reserves the right to apply the amended requirements immediately, and without giving prior notice to drivers and/or applicants, unless such notice is required by the DOT or another applicable law. It is also the Company's intention to comply with any applicable state requirements governing drug and/or alcohol testing which are not preempted by DOT regulations. The Company also intends to comply with the applicable requirements of the Drug-Free Work Place Act of 1988, the Americans with Disabilities Act, and the Family and Medical Leave Act.

1.3 Under the Company's Policy, drug and alcohol testing will be conducted on any current and/or prospective driver who may be required to operate a motor vehicle with a gross vehicle weight rating in excess of 26,000 pounds. In interstate or intrastate commerce, and on any driver of a motor vehicle that is used to transport hazardous materials in a quantity which requires the vehicle to be placarded regardless of the vehicle's size.

1.4 All applicants for positions with the Company as driver will be notified of the Company's drug and alcohol use and testing policy at the time they apply for a driver position with the Company.

1.5 The Company has spent a great deal of time and effort in developing and implementing the terms, conditions and requirements of this Policy, whose terms, conditions, requirements and implementation comply with the DOT's Regulations.

## **2.0 DEFINITIONS OF TERMS USED IN THIS POLICY**

2.1 For purposes of this Policy and the Company's drug and alcohol testing program, "safety-sensitive function" means any of the following (i) driving; (ii) the time spent waiting to be dispatched at a carrier's or shipper's terminal, plant, facility or other property, unless the driver has been relieved from duty; (iii) inspecting, servicing or conditioning equipment; (iv) being in or on a commercial motor vehicle (except resting in the sleeper berth); (v) loading or unloading, including supervision or assisting in loading or unloading or unloading, attending a vehicle being loaded or unloaded remaining in readiness to operate the vehicle; giving or receiving receipts for a shipment being loaded or unloaded; (vi) securing the vehicle and taking all of the other precautionary measures required by the DOT's regulations following an accident (49 C.F.R. 392.40 and 392.41); (vii) repairing, obtaining assistance, or attending a disabled vehicle.

2.2 For purposes of this Policy and the Company's drug and alcohol testing program, "Company business" includes, but is not limited to, work performed on or in company property including a company vehicle, and work performed on or in a non-company vehicle being used for conducting company business; the term also includes meal and break times.

2.3 For purposes of this Policy and the Company's drug and alcohol testing program, "refusing to be tested" means any of the following (i) failing to provide an adequate urine specimen for a drug test without a valid medical explanation; (ii) failing to provide adequate breath for an alcohol test without a valid medical explanation; (iii) failing to submit to a test as directed; or (iv) engaging in any conduct which clearly obstructs the testing process.

2.4 For purposes of this Policy and the Company's alcohol testing program, an alcohol test will be considered "Positive" when the alcohol concentration level registers 0.02 or greater.

## **3.0 PROHIBITED DRUG AND ALCOHOL USE AND ACTIVITIES**

3.1 The goals of the Company's policy and the testing of the drivers are to insure a drug and alcohol-free transportation and work environment and to reduce and help eliminate drug and alcohol related accidents, injuries, fatalities, and damage to property.

3.2 In furtherance of the Company's goals, the conduct specified in section 3.3 of this policy is prohibited whenever a driver is on duty or whenever a driver is performing, or just about to perform, a safety-sensitive function. (As defined in Section 2.1 of this Policy) whenever a non-DOT worker is performing, or just about to perform, safety-related activity; whenever a driver is otherwise engaged in Company business (as defined in Section 2.2 of this Policy); or at the items otherwise specified in this Policy.

3.3 The following conduct is strictly prohibited (i) drivers are prohibited from using, being under the influence of, or possessing illegal drugs; (ii) drivers are prohibited from using or being under the influence of legal drugs that are being used illegally; (iii)

drivers are prohibited from using or being under the influence of legal drugs whose use can adversely affect the ability of the driver to perform his or her job safely; (iv) drivers are prohibited from selling, buying, soliciting to buy or sell, transporting, or possessing illegal drugs while on company time or property; (v) drivers are prohibited from using alcohol within four (4) hours of driving or performing any other safety-sensitive function; (vi) drivers are prohibited from possessing any amount of alcohol (including possession of medications which contain alcohol) while on duty or driving, unless the alcohol is manifested and being transported as part of the shipment; (vii) testing positive for drugs and/or alcohol; (viii) refusing to be tested for drugs and /or alcohol (as defined in section 2.3 of this policy); (ix) failing to submit to a drug and/or alcohol test as directed by the Company; (x) failing to stay in contact with the Company and its medical review officer while awaiting the results of a drug test; (xi) violating any applicable federal and/or state requirements governing the use of drugs and alcohol: (xii) doing anything to obstruct the Company's goals with respect to drugs and alcohol.

#### **4.0 TEST REQUIRED**

4.1 In general the Company is required by the DOT to conduct tests under the following conditions or time (i) before a driver-applicant is hired or an existing non-DOT worker performs DOT driving duties pre-employment/pre-duty testing); (ii) for reasonable suspicion; (iii) following certain accidents (post-accident testing); (iv) on random basis the Company's procedures and requirements for each test are discussed below.

#### **4.2 Pre-employment / pre-testing**

4.2 (a) This test is required before any driver-applicant will be hired. This test is also required before any existing worker in a non-DOT driver position will be assigned, transferred or otherwise permitted to operate a commercial motor vehicle on behalf of the Company for the first time. For purposes of the Company's Policy concerning pre-employment / pre-duty testing procedures requirements and discipline, applicants and existing workers who are applying for a driver position are collectively referred to in section 4.2 as "applicants."

4.2 (b) Prior to taking a pre-employment/pre duty drug test, the applicant will be given forms notifying the Applicant to report for a drug test, which include instructions and an explanation of the collection procedures for each test. The applicant will also be asked to execute a general consent and release to be tested for drugs. Verbal notification may also be given.

4.2 (c) All offers by the Company to hire an applicant for, or to assign or transfer an applicant to, a driver position are conditioned upon the applicant (i) executing the Company's general consent and release to be tested for drugs and alcohol forms; (ii) taking a drug test as directed by the Company and passing the test; (iii) executing the Company's authorization to obtain past drug and alcohol test results form (which authorizes the Company to obtain all of the applicant's past drug and alcohol test results, including any refusals to test, from each company for whom the driver either worked, or took or refused to take a pre-employment/pre-duty test during the previous two years and the results of those test including any refusals); (vi) passing the DOT required physical

exam required for driver positions; (v) complying with any other conditions or requirements of which the Company advises the applicant at the time of the offer.

4.2 (d) Any applicant who refuses or fails to execute the Company's general consent and release to be drug and alcohol tested forms, who refuses or fails to execute the Company's authorization to obtain past drug and alcohol test results form, who refuses or fails to submit to a pre-employment/pre-duty drug test as directed, or whose result is positive for either test, will be not be considered eligible to work for the Company. Existing workers who test positive will not be considered qualified for the position for which they are applying and will also be subject to Company discipline, up to and including discharge.

### **4.3 Post-accident drug testing**

4.3 (a) A driver who is performing a safety-sensitive function must submit to a post-accident drug and a post-accident alcohol test as soon as possible after the occurrence of any accident that meets the description of section 4.3(b) or section 4.3(c) of this policy. For purposes of this policy and the Company's drug and alcohol testing program, an accident which meets the description of section 4.3(b) or section 4.3(c) of this policy is referred to as a "DOT accident."

4.3 (b) A driver must always submit to a post-accident test as soon as possible after an accident which involves the death of a human being.

4.3 (c) A driver must submit to a post-accident test as soon as possible after the accident, whenever the driver receives a citation for a moving violation involving the accident and either; (i) a person is injured because of the accident and the injuries require immediate medical treatment to the person away from the accident scene; or (ii) one or more motor vehicles involved in the accident incur disabling damage and must be transported away from the accident scene by a tow truck or another vehicle.

4.3 (d) It is possible that a driver will be directed to submit to a drug and/or alcohol test at the accident scene by a federal, state or local law enforcement officer. Whenever a test is conducted by a law enforcement officer, the driver is required to contact the driver's supervisor or another Company official immediately to report this and to provide the Company with the name, badge number and telephone number of the law enforcement officer who conducted the test.

4.3 (e) Whenever a driver is involved in a DOT accident and is not tested for drugs and alcohol by law a enforcement official, the driver is required to immediately report for a test, following the procedures detailed on the Drivers Post-Accident Checklist, which every driver is given when he/she is hired.

4.3 (f) A driver who is required to take a post-accident drug and/or alcohol test will, at the Company's discretion, either be assigned to a non safety-sensitive function, or placed on non-disciplinary suspension while awaiting the post-accident test results.

(g) In addition to the penalties imposed by the DOT (discussed in section 6.1(a), 6.2(c) and 6.2(d) of this Policy), a driver who tests positive for drugs and/or alcohol, who refuses or fails to submit to a post-accident drug and alcohol test as required, who unnecessarily delays reporting to the test site following an accident, or who otherwise fails to comply with the Company's post accident testing procedures, will be subject to disciplinary action, up to and including discharge.

#### **4.4 Random Testing**

4.4 (a) The Company is required to test drivers on a random basis, and all such tests will be unannounced ahead of time.

4.4 (b) Under the Company's random selection process, every driver will have an equal chance of being selected each and every time the selection is conducted... Appropriate safeguards are also present to ensure that the identity of individual drivers cannot be determined prior to or at the time of the selection.

4.4 (c) Whenever a driver is randomly selected to be tested, he/she will be notified of this in writing and/ or verbally and instructed to report to the collection site immediately.

4.4 (d) A driver who tests positive or who refuses to submit to a test is medically unqualified to drive and/ or operate or perform any other safety-sensitive function.

4.4 (e) In addition to the penalties imposed by the DOT (discussed in section 6.1I, 6.2I and 6.2(d) of this Policy), a driver who refuses to submit to a random test, who fails to report for the test as directed, or who tests positive will be subject to disciplinary action up to and including discharge.

#### **4.5 Reasonable suspicion testing**

4.5 (a) Each driver is required to submit to drug and/or alcohol testing whenever the Company has reasonable suspicion to believe the driver has used drugs and/or alcohol in violation of DOT regulations and/or this Policy.

4.5 (b) The reasonable suspicions will exist when a driver's appearance, behavior, speech, or body odors indicate drug or alcohol use, or the chronic and withdrawal effects of drugs. Such observations must be personally observed and documented by at least one Company official who has received training covering the physical, behavioral, speech and performance indicators of probable drug and alcohol use.

4.5 (c) Whenever a driver is notified that there is reasonable suspicion to be tested, the driver/operator will be expected to report to the test site immediately to be tested.

4.5 (d) Drivers who are required to submit to a reasonable suspicion test will be escorted by an agent of the Company to the appropriate specimen collection site for a drug and/or alcohol test.

4.5 (e) The Company will also attempt to contact the driver's spouse, another member of the family, or another person designated by the driver, in order to make arrangements for transporting the driver to his/her home after the test is completed. In the event that the Company is unable to contact the driver/operator spouse, family member, or another designated person, the Company will make arrangements for transporting the driver home by cab or other suitable means.

4.5 (f) If the driver rejects the Company's efforts in this regard and instead insists on driving his/her personal vehicle, the Company reserves the right to take whatever means are appropriate to prevent this including contacting appropriate law enforcement personnel and imposing disciplinary action, up to and including discharge.

4.5 (g) A driver who is required to take a reasonable suspicion test will be considered by the Company as unqualified to work and placed on immediate suspension, without pay, pending the results of his/her test. A driver whose test results are negative will be reimbursed for the time of his/her suspension. A driver whose test results are positive will not be reimbursed for the time of the suspension.

4.5 (h) In addition to the penalties imposed by the DOT (discussed in section 6.1I. 6.2I and 6.2(d) of this policy), a driver whose reasonable suspicion test is positive, or who fails or refuses to submit to a reasonable suspicion test when directed to do so by the Company will be subject to disciplinary action up to and including discharge.

## **5.0 TESTING METHODOLOGY AND INTEGRITY**

5.1 To ensure the integrity and accuracy of each test, all specimen collection, analysis and laboratory procedures shall be conducted in accordance with the DOT's procedural protocols and safeguards set forth in Part 40 of Title 49 of the Federal Code of Regulations This Includes, among other things: (i) procedures to ensure the correct identity of each driver/ operator at the time of testing; (ii) strict chain -of-custody procedures to ensure that the driver's/operator's specimen is not tampered with by the Company, (iii) the use of a trained breath alcohol technician (BAT) and the DOT - approved testing devices for conducting an alcohol test; (iv) the use of a laboratory which has been certified by the National Institute for Drug Abuse (NIDA); (v) the confirmation of an initial positive drug screen by a second analysis using gas chromatography/mass spectrometry (GCMS); (vi) the confirmation of an initial positive alcohol screen by a second analysis (vii) the Company's appointment of a qualified Medical Review Officer (MRO) to review drug test results before they are reported to the Company's designated representative.

5.2 To further facilitate the integrity and accuracy of each test the Company will provide drivers/operators with written and/or oral instructions regarding the conduct of the specific test before each testing event. The Company considers all such instructions to be a part of this policy. Drivers/operators who refuse or otherwise fail to comply with all such instructions will be subject to disciplinary action up to and including discharge.

### 5.3 For all drug tests

5.3 (a) All drug tests conducted under this Policy requires that the driver must provide a specimen of his/her urine.

5.3 (b) At minimum, urine specimens will be analyzed for the presence of the following drugs: (1) marijuana (2) cocaine: (3) opiates, (4) amphetamines; and (5) phencyclidine (pcp). Specimens will also be analyzed for such other substances as the DOT may from time-to-time direct, or as may otherwise be permitted by federal or state law. In the event that the DOT expands the list of drugs for which testing is or may be required, the Company reserves the right to begin testing immediately for those drugs without prior notice to drivers/operators or applicants, unless notice is required by the DOT or another applicable law.

5.3 (c) In general drivers will be permitted to give a urine specimen in privacy and without being observed by collection site personnel. However, a driver forfeits this right whenever there is reason to believe that he/she may alter or substitute a specimen.

5.3 (d) All drug tests will be administered using the split sample methodology required by the DOT. Under this methodology, the driver must provide at least 45 milliliters (ml) in a specimen container. The specimen will then be divided into two specimen bottles by the collector. Thirty (30) ml will be poured into one bottle and fifteen (15) ml into a second bottle. Both bottles will be sent to the laboratory. The bottle containing 30 ml will be analyzed as the drivers/operators primary specimen. The second bottle will be held by the laboratory to be sent to another lab at the driver/operator request in the event the primary specimen is verified as positive. In the event the primary specimen is verified as positive the driver/operator will be notified either by the Company's MRO or by the Company of the positive test and given the option to have the second bottle sent to a different laboratory for analysis. To exercise this option, the driver/operator must advise the Company's MRO within 72 hours of being told the primary specimen was positive.

5.3 (e) Except for the use of methadone and medications containing alcohol, nothing in this Policy prohibits a driver's use of medication legally prescribed by a licensed physician. (i) Who is familiar with the driver medical history and specific safety-sensitive duties, and (ii) who has advised the driver that the prescribed medications will not adversely affect the driver's ability to operate a motor vehicle safely, medications prescribed for someone other than the driver, however, will not be considered lawfully used when taken by the driver under any circumstances.

5.3 (f) Before being tested for drugs, drivers will be given an opportunity to list, on their copy of the chain-of custody form any prescription and non-prescription medications being lawfully used by that driver at that time. A "positive" drug test may be declared "negative" by the Company's MRO, if the driver can prove with clear and convincing evidence that the drug which was used was prescribed by a licensed physician who is familiar with the driver's medical history and specific duties. The determination of this will be made by the Company's MRO.



#### **5.4 For alcohol tests**

5.4 (a) All alcohol tests conducted under this policy requires that the driver must provide a breath or saliva specimen for any test conducted by, or on behalf of, the Company. In the case of an alcohol test by a federal, state or local law enforcement officer following an accident, the driver must provide either a breath or blood specimen, as directed by the law enforcement officer.

5.4 (b) Alcohol test will be administered using a breath specimen, taken by a breath alcohol technician (BAT) using an approved breath testing device (EBT), except in case of an on-scene post-accident testing conducted by federal, state or local officials.

5.4 (c) Before being tested by the Company, each driver will be required to (i) present his/her personal identification, and (ii) execute a "Breath Alcohol Test Form" provided by the BAT. A driver who refuses to provide his/her identification, provides a false identification, refuses to execute the DOT "Breath Alcohol Test Form", or who otherwise refuses or fails to cooperate will be treated as though he/she had tested positive and will be subject to disciplinary action, up to and including discharge, in addition to the penalties imposed by the DOT.

5.4 (d) Prior to each alcohol breath tests conducted by the Company, the BAT will instruct the driver on how the test will be performed.

5.4 (e) To protect each driver, the BAT will open and attach to the testing device an individually sealed mouthpiece in the drivers/operators view. The driver will then be directed to blow forcefully into the breath testing device until an adequate amount of breath has been maintained.

#### **6.0 TEST RESULTS**

In the event that the test results of a driver's primary specimen is positive, the driver will be notified by the Company or its MRO and advised that he/she has 72 hours to request that the MRO send his/her secondary specimen to a second, Company – approved laboratory for analysis. Pending the outcome of this additional analysis, the driver will continue being considered physically unqualified to work by DOT.

6.1 (b) Before a driver's test results will be confirmed positive for drugs, the driver will be given the opportunity to speak with the Company's MRO and demonstrate that there was a legitimate medical explanation for the positive test result. If the MRO determines that a legitimate medical reason does exist, the test result will be reported to the Company as "negative". If the MRO determines that a legitimate medical reason does not exist, the test results will be reported to the Company as a "confirmed positive".

6.1 (c) Except as provided in section 4.2(d) of this Policy (concerning pre-employment and pre-duty test), a driver whose test result is confirmed positive for drugs will be considered unqualified to perform or continue performing his/her functions safely and will immediately be discharged. In addition, a driver whose test results is confirmed

positive for drugs will also be subject to civil and criminal penalties imposed by the DOT.

**6.2 For alcohol tests**

6.2 (a) In the event that the driver provided an adequate breath specimen and the initial test registers an alcohol concentration level that is less than 0.02; the results will be reported as a “negative” and no additional test will be required at that time.

6.2 (b) In the event that the driver provides an adequate breath specimen and the initial test registers an alcohol concentration level of 0.02 or greater; a second, confirmatory test will be performed. In the event that the driver provides an adequate breath specimen and the test registers less than 0.02, the test results will be reported to the Company as “negative”.

6.2 (c) The DOT prohibits a driver whose confirmatory test registers 0.02 or more, but less than 0.04, from performing or from continuing to perform any safety-sensitive function until the driver’s next regularly scheduled duty period, but for not less than 24 hours. Except as provided in Section 4.2(d) of this Policy (concerning pre-employment /pre-duty tests), a driver who, after providing an adequate breath specimen, has a confirmatory test that registers 0.02 or more, but less than 0.04, will, at a minimum, be suspended without pay until his/her next regularly-scheduled duty period, but for no less than 24 hours, and may be subject to additional disciplinary action by the Company, up to and including discharge.

6.2 (d) A driver who, after providing an adequate breath specimen, has a confirmatory test which registers 0.04 or greater will, at a minimum, be suspended without pay until his/her next regularly scheduled duty period, but for no less than 24 hours and will be subject to additional disciplinary action by the Company up to and including discharge.

**7.0 MAINTAINING CONTACT WITH THE COMPANY AND M.O. AFTER A DRUG TEST**

7.1 Driver’s who are tested for drugs are required to remain in contact with the Company and the Company’s M.O. while awaiting the results of their tests. Drivers are also required to advise the Company of their whereabouts and the telephone number where they may be reached during this time.

**7.2 The Company’s M.R.O. is DANIEL DREW, MD. NATIONWIDE MEDICAL REVIEW whose telephone number is (317)-547-8620**

**7.2(a) Drug/ alcohol testing is also performed by MOTOR CARRIER SOLUTIONS, INC. whose telephone number is (606) 474-8854 OR (877) 777-4002**

7.3 A driver who refuses or fails to remain in contact with the Company and the Company’s M.R.O. will be considered insubordinate and subject to disciplinary action, up to and including discharge. In addition, a driver/operator who fails to remain in

contact may waive his/ her right, under Section 6.1(b) of this policy, to speak with the Company's M.O. before a test is confirmed positive.

### **8.0 DRUG AND ALCOHOL INFORMATION**

8.1 The company is required to provide educational materials for all drivers, explaining the DOT's requirements and the Company's policies and procedures to meet those requirements. In addition to this Policy, the Company will provide drivers with information concerning: (I) the effects of drugs and alcohol on an individual's health, work and personal life; (ii) the signs and symptoms of a drug or alcohol problem; and (iii) the available methods of intervention when a problem does exist.

8.2 Each driver is required to certify that he/she has been given a copy of this policy and other drug and alcohol information by the Company in accordance with paragraph 8.1 of this policy. In accordance with paragraph 4.2I of this policy, applicants are required to execute the certification as a condition of being hired. An applicant who refuses to do so will not be hired. Existing drivers who refuse to execute this required certification will be subject to the Company's discipline, up to and including discharge.

8.3 Any existing driver who engages in any conduct prohibited under this policy will be provided with information concerning the resource available to evaluate and resolve a drug or alcohol problem, and the names, addresses and telephone numbers of substance abuse professionals, consulting and treatment programs.

8.4 All questions concerning the educational materials provided by the Company, or about this Policy, should be directed to the appropriate person identified on the "Contact List" which accompanies this Policy.

### **9.0 PAYMENT OF TESTS**

9.1 At its discretion, the Company shall pay the costs for all tests which the Company is required to conduct on drivers under the DOT regulations.

9.2 Drivers are responsible for paying the costs for any tests or tests conducted which the Company does not require, unless otherwise prohibited by the applicable state law.

9.3 Drivers are responsible for paying the costs of the analysis of any secondary urine specimen which they request under Section 6.1(a) of this policy, except as otherwise required by applicable state law.

### **10.0 CONFIDENTIALITY**

10.1 The results of all individual drug and alcohol tests will be kept in a secure location with controlled access.

10.2 All individual tests results will be considered confidential, the release of an individual driver/operator results will only be given in accordance with an individual driver/operator written authorization, or as is otherwise required by the DOT's regulations, or by other applicable federal or state law.

**POST ACCIDENT INSTRUCTIONS**

Company policy and the Federal Motor Carrier Safety Regulations require drivers of Commercial Motor Vehicles to submit to drug and alcohol tests as soon as practicable following any accident in which a driver:

1. Was performing safety-sensitive functions with respect to the vehicle and the accident involved the loss of human life; or
2. Received a citation under state or local law for a moving traffic violation arising from the accident.

An "accident" is defined as an occurrence involving a Commercial Motor Vehicle operating on a public road which results in:

1. A fatality
2. Bodily injury to a person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; or
3. One or more motor vehicles incurring disabling damage as a result of the accident, requiring the vehicle to be transported away from the scene by a tow truck or other vehicle.

**DRIVERS ARE STRICTLY PROHIBITED FROM USING ALCOHOL FOR EIGHT HOURS FOLLOWING AN ACCIDENT OR UNTIL THE POST-ACCIDENT TESTING REQUIREMENTS ARE CARRIED OUT, WHICHEVER OCCURS FIRST.**

In order to insure that the above requirements are met, in the event of any accident, all drivers are required to take the following actions:

1. Call dispatch immediately     **PHONE #** \_\_\_\_\_ **(606)743-4040**
2. Corporate Office               **PHONE #** \_\_\_\_\_ **(606)743-3121**
3. EMERGENCY CALL OUT   **PHONE #** \_\_\_\_\_
4. EMERGENCY CALL OUT   **PHONE #** \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

Please note that these procedures do not require a driver to delay any necessary medical attention for injured people following an accident or to remain at the scene of an accident when his/her absence is necessary to obtain assistance in responding to the accident or to obtain necessary emergency medical care.

**FAILURE OR REFUSAL TO FOLLOW THESE INSTRUCTIONS, INCLUDING THE USE OF ALCOHOL PRIOR TO THE REQUIRED POST-ACCIDENT TEST, WILL BE CONSIDERED A REFUSAL TO SUBMIT TO A TEST AND RESULT IN DISCIPLINE.**

## **Mountain Telephone**

**AN EMPLOYEES ASSISTANCE AND SUBSTANCE ABUSE TRAINING PROGRAM IS IN EFFECT TO EDUCATE DRIVERS OF THE CONSEQUENCES OF ILLEGAL SUBSTANCES. ANY TRAINING WILL BE PAID FOR BY THE EMPLOYEE. THIS INCLUDES BUT NOT LIMITED TO, THE POSITIVE DRUG AND/OR ALCOHOL TESTS. PERSON(S) RESPONSIBLE FOR THE COMPLIANCE OF THE DRUG AND ALCOHOL PROGRAM FOR MOUNTAIN TELEPHONE IS TERESA LITTERAL AND MARY PARSONS @ MOTOR CARRIER SOLUTIONS, INC.**

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Reviewed & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO.MR-141 Drug-Free Workplace Substance Abuse & Corporate D.O.T.

**EMPLOYEE'S D.O.T. DRUG POLICY RECEIPT &  
ACKNOWLEDGMENT**

I have received a copy of the D.O.T. drug policy issued by my employer, Mountain Telephone, and understand and agree that I am to review this policy in detail and to consult with my supervisor, or Teresa Litteral, Human Resource & Safety Director if I have any questions concerning its contents.

I understand that as an employee of Mountain Telephone I am required to review and follow the drug policy set forth, and I agree to do so.

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Date

## **BUSINESS ETHICS**

Mountain Telephone's reputation for honesty and integrity is extremely important to its continued success and ability to compete in the marketplace. The Company currently enjoys an excellent reputation with regard to business ethics and intends to preserve that reputation. All employees are required to adhere to the guidelines set forth in this policy. If an employee has any doubts as to the propriety of a particular situation, he or she should discuss the situation with his or her supervisor or with any other member of Company management as soon as possible. The following conduct is prohibited:

- An employee may not act on behalf of the Company in any transaction involving persons or organizations with which he or she, or any member of his or her immediate family, has any significant connection or financial interest.
- No employee may accept personal fees or commissions from any transactions on behalf of, related to, or involving the Company or its property.
- Employees are prohibited from accepting compensation, services, benefits, payment, remuneration, or any other type of consideration from any organization doing business or seeking to do business with the Company.
- Employees are prohibited from knowingly violating any state or federal statute or violating any procedures adopted by the Company relating to contracts, bidding, accounting, financial reporting, and disclosure procedures.

Any employee who has any reason to believe that any officer, director or employee of the Company has violated or intends to violate any provision of this policy is required to report his or her concerns to management as soon as possible. The failure to disclose a violation or possible violation of this policy is in itself a violation of the policy.

Any violation of this policy may be grounds for immediate discipline, up to and including termination of employment.

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Adopted 5/1/09

## **WEAPONS**

All employees of the Company and any other person coming onto the Company's premises are prohibited from carrying any concealed, dangerous weapon of any sort. An employee who has obtained a license to carry a concealed, dangerous weapon may carry his or her weapon while in his or her personal motor vehicle, but may not do so in a motor vehicle owned by the Company.

Any employee with personal safety concerns (e.g., parking in a remote location, working alone after hours, etc.) should discuss those concerns with the Director of Human Resources. The Company reserves the right to grant complete or partial exemptions from this policy if the circumstances warrant an exemption. Any exemptions shall be at the sole discretion of the Company.

Any employee violating this policy shall be subject to immediate disciplinary action, up to and including termination of employment.

Any employee having questions concerning this policy should contact the Human Resource Director.

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Adopted 5/1/09



## **SMOKING**

In consideration of co-workers and visitors, smoking will be permitted outside the company buildings in appropriate areas only. There will be no smoking in shared company vehicles.

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Adopted 5/1/09

## **VIOLENCE**

The Company will not tolerate violence or threats of violence by any employee against any other person on Company premises. Violence or threats of violence should be reported immediately to any available manager or supervisor of the Company. Any employee who engages in on-the-job violent or threatening behavior will be subject to immediate disciplinary action up to and including termination of employment.

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Adopted 5/1/09

## DISCIPLINARY WARNINGS

Whenever an employee's breach of work rules, misconduct, poor performance, or other unacceptable conduct comes to the attention of the Company, the employee may receive a disciplinary warning. Such a warning is intended to make the employee aware of the seriousness of the problem and the need for immediate corrective action. All warnings will be delivered privately in both oral and written form. The employee will be asked to sign the written warning and will be given a copy. In addition, a copy of the written warning will be placed in the employee's personnel file.

The Company reserves the right to take other disciplinary action deemed appropriate under the circumstances, including demotion, suspension, or termination of employment in lieu of a warning.

If an employee believes a warning is not justified, the employee is entitled and encouraged to freely discuss the situation with his or her supervisor. If the matter cannot be resolved through such discussion, or if the employee believes that such a discussion would be unproductive, the employee may make a written report to the Director of Human Resources and request that the Director of Human Resources review the warning and investigate all relevant circumstances. Any such request will be given prompt attention by the Director of Human Resources or the Director's designee.

The Company reserves the right to take other disciplinary action deemed appropriate under the circumstances, up to and including termination of employment.

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Adopted 5/1/09

## TERMINATION

The Company may terminate any employee, with or without prior notice, for any of the following reasons, or for any similar reasons; this list is provided solely for purposes of illustration, is not intended to be comprehensive and does not limit the Company's right to terminate employees for reasons not included on the list or otherwise in any way affect the at-will status of any employee:

- Disregarding the established rules of the Company
- Dishonesty
- Insubordination
- Incompetence—inability to learn or perform the assigned work
- Misconduct
- Uncooperativeness—unwillingness or inability to work with co-workers and supervisors
- Excessive absenteeism or tardiness

Any other reason deemed appropriate by Company

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Adopted 5/1/09

## **ELECTRONIC COMMUNICATION**

All forms of electronic communication, including but not limited to voicemail, electronic mail, copy machines, telephones, facsimile, video conferencing, use of the internet and other computer networks, and the systems on which they are maintained, are provided by Mountain Telephone in support of Mountain Telephone business and, as such, are the property of Mountain Telephone. Therefore, all electronic communication composed, sent, and received also belongs to Mountain Telephone. There is no expectation of privacy and such communications may be reviewed at any time and for any reason without notice.

### **Acceptable Use**

No forms of communication should be created, viewed, sent, or received which may constitute intimidating, hostile, or offensive material on the basis of race, creed, color, sex, age, national origin, religious beliefs, physical or mental disability, or veteran's status. Mountain Telephone policy against sexual and other harassment applies fully to all means of communication. Communication resources may not be used to send or receive material containing profanity, vulgarity, hate speech, or threats of violence; material that is obscene, pornographic or adult in nature; or that is harassing, intimidating, or lacks in the basic respect expected of all employees toward each other. Communication resources may not be used to send or receive copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization. Unacceptable use is prohibited and is grounds for discipline up to and including termination.

### **Access to Mountain Telephone Property**

All messages or documents created, sent, or retrieved are the property of Mountain Telephone. Mountain Telephone reserves and intends to exercise the right to review, audit, intercept, access, and disclose all messages created, received or sent over electronic resources for any purpose. The contents of communication resources obtained for legitimate business purposes may be disclosed within Mountain Telephone without your permission. The confidentiality of any message should not be assumed. Further, the use of pass codes for security does not guarantee confidentiality. All pass codes must be disclosed to Mountain Telephone Management, upon request, or they are invalid and cannot be used. You may be in possession of documents, records, files, or other items of Mountain Telephone property but not always available to produce the property when needed in the ordinary course of business. Therefore, Mountain Telephone reserves the right to conduct a routine search at any time for Mountain Telephone property on Mountain Telephone premises. Such a search may include your work area, desk, computer, file cabinet, locker, or similar place where you may place Mountain Telephone electronic property. Inspections or searches will be conducted whenever Mountain Telephone has reasonable suspicion to believe that a particular employee or group of employees may be violating Mountain Telephone Electronic Communication policy. Reasonable suspicion searches for evidence of unacceptable use of Mountain Telephone's electronic resources should be approved in advance by the Human Resource

Director and the General Manager. In addition, a second member of management should be requested to serve as an observer for such searches whenever practical.

Unless specifically provided by Mountain Telephone management, you may not intercept or disclose, or assist in intercepting or disclosing, electronic communications.

### **Security**

Protection of corporate assets is a basic business principle. All steps will be taken to protect information from accidental or intentional misuse or destruction. All equipment, software, and data are the property of Mountain Telephone and will be treated as such. You share responsibility to ensure that proper security is maintained. Any possible security lapse on any system must be promptly reported to a manager. You may not use a code, access a file, or retrieve any stored information, unless authorized to do so and you should not attempt to gain access to another employee's messages, unless told to do so by a manager. Pass codes are not confidential and you must provide all computer pass codes to supervisors upon request. Knowledge of pass codes or of loopholes in computer security systems shall not be used to damage computing resources, obtain extra resources, take resources from another employee, gain unauthorized access to resources, or otherwise make use of computing resources for which proper authorization has not been given.

Information that is sensitive in nature or critical to Mountain Telephone should generally be stored on network servers to take advantage of the additional level of security and recoverability that method offers. Security of information that is stored on a workstation is the sole responsibility of the workstation user. Information stored on laptop computers is particularly vulnerable to loss or disclosure and laptop users are required to use all available means to protect the company resources given into their care.

Special care must be taken in the disposal of data storage media and workstation equipment. Data storage media must be erased or destroyed to prevent the loss or disclosure of company confidential information or software. This will generally be done by an employee in the IT department.

Notwithstanding Mountain Telephone's right to retrieve and read any electronic mail messages, such messages should be treated as confidential by other employees and accessed only by the intended recipient. You are responsible for the proper use of the account, including proper pass code identification.

You must not disclose the contents, or any part of any communication message addressed to another person without the permission of the sender, or willfully alter the purport, effect, or meaning of any such message. Both parties to a telephone transmission are considered senders. You must not use any information, derived from any private message passing through your hands which is addressed to another person, or in any other manner acquired as an employee of Mountain Telephone.

You must not permit any unauthorized person to listen to any telephone conversation, monitor any connections more than is needed for its proper supervision, or tell anyone the

fact of the nature of any message, except as required for handling it properly. You must not discuss communication arrangements made between Mountain Telephone and its customers, except as in the normal course of business.

You must not give any information, whatsoever, about the location of equipment, trunks, circuits, cables, or about local calls, toll ticket records of calls, electronic mail, data, or facsimile messages, etc. to any unauthorized person.

### **Telephones**

Mountain Telephone provides you with access to telephones to conduct business on behalf of Mountain Telephone. According to business needs, this may also include the use of wireless equipment (telephones or pagers) or personal communication services. The use of both wired and wireless communication tools shall be your responsibility and regulated by you to ensure that such usage shall be conscientiously confined to the conduct of the business of Mountain Telephone within established guidelines.

If it becomes necessary to use the Company telephone for personal calls, it shall be your responsibility to maintain such usage to a minimum and not create any abuse of the privilege.

Long distance calls placed to or from the company's telephones should be confined to the conduct of Mountain Telephone business. If you need to make urgent or emergency long distance calls using a Company telephone, you should first consult with your supervisor before placing any call.

Personal cell phones should only be used on breaks and lunches. Cell phones should be turned off during business hours for employees who work with the public. All employees should keep cell phone use to a minimum, but as long as it does not interfere with department standards may it be permissible and should follow the same guidelines as for internet usage below.

### **Electronic**

Hardware devices, software programs, and network systems purchased and/or provided by Mountain Telephone are Mountain Telephone property and are to be used in support of Mountain Telephone business. As such, information produced or generated using Mountain Telephone electronic resources are considered to be property of Mountain Telephone. Additionally, all messages composed, sent, or received on the electronic mail system are and remain the property of Mountain Telephone. They are not your private property. There is no expectation of privacy and such communications may be reviewed at any time and for any reason without notice.

### **Authorized Usage**

Mountain Telephone provides electronic mail, and internet access for business use, but allows occasional personal use of these items. Mountain Telephone reserves the right to monitor these communications tools at any time to ensure these services are not being

abused. The monitoring equipment is in place at the present time. Employees should be aware that there should be no expectation of privacy.

Mountain Telephone electronic resources generally must be used only in support of business. Incidental personal use is permissible as long as:

- It does not conflict with department standards
- It does not consume more than a trivial amount of resources
- It does not interfere with staff productivity
- It does not preempt any business activity
- It does not contain material that is obscene, pornographic or adult in nature
- It does not contain profanity, vulgarity, hate speech, or threats of violence
- It does not contain material that is harassing, intimidating, or lacks in the basic respect expected of all employees toward each other
- It is not of an illegal nature
- It is not personal information about another individual without permission
- Although we have very good virus prevention programs installed, downloading from the Internet should be done with caution. Memory space is also a potential problem; therefore, downloaded material should be kept under control.

### **Copyrights**

You are responsible for reading, understanding, and following all applicable licenses, notices, contracts, and agreements for software used on Mountain Telephone owned equipment. When at work, or when Mountain Telephone computing or networking resources are employed, copying of software in a manner that is not consistent with the vendor's license, contract, and /or agreement is strictly forbidden. If found violating software copyright laws (i.e., copying Mountain Telephone purchased software for personal or unauthorized business use) or introducing unapproved software or data on Mountain Telephone equipment, you shall be subject to disciplinary action, up to and including termination. All computers purchased and used by Mountain Telephone are being supplied with licensed copies of software programs. The use or copying of any software product in violation of its' applicable license agreement is strictly prohibited by Mountain Telephone.

**It is the responsibility of each of us to protect Mountain Telephone from any exposure as a result of violating software agreements. Therefore, all software purchases and installations must be authorized through and implemented by the IT Department.**

Each purchased software package must be loaded on one machine only. If you move to a different workstation and the job requires the use of some software from the old station, the software must be removed and reloaded on the new computer by the IT Department. Software from your home computer may not be loaded on a Mountain Telephone machine. Likewise, software may not be copied without the written permission of the IT/Office Manager. Software may not be given to any other employee or outside person



without permission from the IT/Office Manager. All software licenses violations-  
perceived or real – must be brought to the attention of the IT/Office Manager  
immediately.

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Adopted 5/1/09

## **SENSITIVE, CONFIDENTIAL, PROPRIETARY AND NON PUBLIC INFORMATION PROTECTION**

Mountain Telephone adopts this policy to help protect employee, customers, contractors and the company from damages related to loss or misuse of sensitive information. Mountain Telephone operates on a “need to know” basis for all sensitive, confidential, or proprietary information.

This policy applies to employees, contractors, consultants, temporaries, and other workers at the company, including all personnel affiliated with third parties.

### **Definition of Sensitive Information**

Sensitive information includes the following items whether stored in electronic or printed format.

Personnel Information: Sensitive information consists of personal information including, but not limited to:

Credit Card Information, including any of the following:

1. Credit Card Number (in part or whole)
2. Credit Card Expiration Date
3. Cardholder Name
4. Cardholder Address

Tax Identification Numbers, including:

1. Social Security Number
2. Business Identification Number
3. Employer Identification Number

Payroll information, including, among other information:

1. Pay checks
2. Pay stubs
3. Pay rates
4. Employee information

Medical information for any employee including but not limited to:

1. Doctor names and claims
2. Insurance claims
3. Prescriptions
4. Any related personal medical information

Other Personal Information belonging to customers examples of which include:

1. Date of Birth
2. Address
3. Phone Numbers- Non Published number should never be shared with the public.
4. Social Security Numbers

5. Names
6. Account Numbers

Customer information should only be shared within the company on a need to know basis. All Mountain Telephone employees are required to follow the Customer Proprietary Network Information plan required by the Federal Communication Commission.

Corporate Information- Sensitive corporate information includes, but is not limited to:

1. Company, employee, customer, vendor, supplier confidential, proprietary information or trade secrets.
2. Proprietary and/or confidential information, among other things, includes: Business methods, customer utilization information, retention information, sales information, marketing and other Company strategy, computer codes, screens, forms, information about, or received from, Company's current, former and prospective customers, sales associates or suppliers or any other non-public information. Proprietary and/or confidential information also includes the name and identity of any customer or vendor and the specifics of any relationship between and among them and the company.
3. Any document marked "Confidential," "Sensitive," "Proprietary or any document similarly labeled.
4. The company personnel are encouraged to use common sense judgment in securing the company confidential information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, he/she should contact their supervisor/manager.

### **Hard Copy Distribution**

Every employee and contractor performing work for the Company will comply with the following policies:

1. File Cabinets, desk drawers, overhead cabinets, and any other storage space containing documents with sensitive information will be locked when not in use.
2. Storage rooms containing documents with sensitive information and record retention areas will be locked at the end of each workday.
3. Desks, workstations, work areas, printers and fax machines, and common shared work areas will be cleared of all documents containing sensitive information when not in use.
4. Whiteboards, dry-erase boards, writing tablets, etc. in common shared work areas will be erased, removed, or shredded when not in use.
5. When documents containing sensitive information are discarded they will be kept in employee's possession under lock until that employee can shred or the appropriate person is available to shred. If you need any assistance in getting sensitive documents shredded, please contact a supervisor/manager.

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Reviewed & adopted 5/1/09

## IDENTITY THEFT PREVENTION

### New Identity Theft Prevention Program for Mountain Telephone

The creation and implementation of an Identity Theft Prevention Program at Mountain Telephone that will identify, detect, mitigate, and update Red Flags that signal the possibility of identity theft in connection with the opening of a covered account or any existing covered account.

#### PART 1

##### DEFINITIONS

1. For purposes of this Policy, the term “*Covered Account*” means an account that Mountain Telephone offers or maintains, primarily for personal, family or household purposes, that involves or is designed to permit multiple payments or transactions **and** any other account that Mountain Telephone offers or maintains for which there is a reasonably foreseeable risk to customers or the safety and soundness of Mountain Telephone from identity theft, including financial, operational, compliance, reputation, or litigation risks.
2. For purposes of this Policy, the term “*Identity Theft*” means a fraud committed or attempted using the identifying information of another person without authority.
3. For purposes of this Policy, the term “*Red Flag*” means a pattern, practice, or specific activity that indicates the possible existence of identity theft. Part 3 provides a specific description of which Red Flags are applicable to this policy.

#### PART 2

##### INCORPORATION OF EXISTING POLICY AND PROCEDURE

The following policies and procedures already in effect at Mountain Telephone are specifically incorporated herein and will continue to operate in conjunction with the Identity Theft Prevention Policy to achieve its stated purpose.

#### PART 3

##### IDENTIFICATION OF RELEVANT RED FLAGS

After careful examination of our accounts, including the methods by which we open access and past experience with identity theft, the following events/occurrences reasonably indicate the potential for identity theft and should be considered “Red Flags” for purposes of this policy:

- A. Alerts, notifications, or other warnings received from consumer reporting agencies or service providers, such as fraud detections services. For the purposes of this policy Mountain Telephone will be utilizing the ONLINE

**Utility Exchange as their service provider to identify the “Red Flags” listed below:**

1. A fraud or active duty alert is included with a consumer report.
2. A consumer reporting agency provides a notice of credit freeze in response to a request for a consumer report.
3. A consumer reporting agency provides a notice of address discrepancy.
4. A consumer report indicates a pattern of activity that is inconsistent with the history and usual pattern of activity of an applicant or customer, such as:
  - a. A recent and significant increase in the volume of inquiries;
  - b. An unusual number of recently established credit relationships;
  - c. A material change in the use of credit, especially with respect to recently established credit relationships; or
  - d. An account that was closed for cause or identified for abuse of account privileges by a financial institution or creditor.

**B. The presentation of suspicious documents, such as:**

5. Documents provided for identification appear to have been altered or forged.
6. The photograph or physical description on the identification is not consistent with the appearance of the applicant or customer presenting the identification.
7. Other information on the identification is not consistent with information provided by the person opening a new covered account or customer presenting the identification.
8. Other information on the identification is not consistent with readily accessible information that is on file with the financial institution or creditor, such as a signature card or a recent check.
9. An application appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled.

**C. The presentation of suspicious personal identifying information, such as a suspicious address change:**

10. Personal identifying information provided is inconsistent when compared against external information sources used by Mountain Telephone. For example:
  - a. The address does not match any address in the consumer report.

b. The Social Security Number (SSN) has not been issued, or is listed on the Social Security Administration's Death Master File.

11. Personal identifying information provided by the customer is not consistent with other personal identifying information provided by the customer. For example, there is a lack of correlation between the SSN range and date of birth.

12. Personal identifying information provided is associated with known fraudulent activity as indicated by internal or third-party sources used by Mountain Telephone. For example:

a. The address on an application is the same as the address provided on a fraudulent application; or

b. The phone number on an application is the same as the number provided on a fraudulent application.

13. Personal identifying information provided is of a type commonly associated with fraudulent activity as indicated by internal or third-party sources used by the financial institution or creditor. For example:

a. The address on an application is fictitious, a mail drop, or a prison; or

b. The previous phone number is invalid, or is associated with a pager or answering service.

14. The SSN provided is the same as that submitted by other persons opening an account or other customers.

15. The person opening the covered account or the customer fails to provide all required personal identifying information on an application or in response to notification that the application is incomplete.

16. Personal identifying information provided is not consistent with personal identifying information that is on file with Mountain Telephone.

17. If Mountain Telephone uses challenge questions, the person opening the covered account or the customer cannot provide authenticating information beyond that which generally would be available from a wallet or consumer report.

**D. The unusual use of, or other suspicious activity related to, a covered account:**

18. Shortly following the notice of a change of address for a covered account, Mountain Telephone receives a request for a new or additional calling card or for the addition of authorized users on the account.

19. A new account is used in a manner commonly associated with known patterns of fraud patterns. For example:

- a. An unusually large number of long distance calls and the customer fails to make the first payment or makes an initial payment but no subsequent payments.
20. A covered account is used in a manner that is not consistent with established patterns of activity on the account. There is, for example:
    - a. Nonpayment when there is no history of late or missed payments;
    - b. A material increase in the use of long distance;
    - c. A material change in calling patterns.
  21. Mail sent to the customer is returned repeatedly as undeliverable although transactions continue to be conducted in connection with the customer's covered account.
  22. Mountain Telephone is notified that the customer is not receiving paper account statements.
  23. Mountain Telephone is notified of unauthorized charges or transactions in connection with a customer's covered account.
- E. Notice from customers, victims of identity theft, law enforcement authorities, or other persons regarding possible identity theft in connection with covered accounts held by Mountain Telephone:**
24. Mountain Telephone is notified by a customer, a victim of identity theft, a law enforcement authority, or any other person that it has opened a fraudulent account for a person engaged in identity theft.

#### **PART 4**

#### **DETECTION, PREVENTION AND MITIGATION**

##### **Detection**

In an effort to ensure proper detection of any Red Flags, all customers (consumers) must provide at least the following information/documentation before any new covered account will be opened:

1. Full Name;
2. Address, (a residential or business street address for an individual; for an individual who does not have a residential or business street address, a Post Office box number, or the residential or business street address of next of kin or of another contact individual; or for a person other than an individual (such as a corporation, partnership, or trust), a principal place of business, local office, or other physical location; and;
3. Identification number, which shall be: (i) For a U.S. person, a taxpayer identification number; or (ii) For a non-U.S. person, one or more of the following:

a taxpayer identification number; passport number and country of issuance; alien identification card number; or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

To assist with detection of Red Flags, Mountain Telephone will implement the appropriate computer programs tailored to Mountain Telephone business needs to help authenticate customers, monitor transactions, and change of address requests. The following programs are being used and Mountain Telephone continued use thereof is incorporated and made part of this policy:

- a. NISC Software
- b. Online Utilities Exchange

**B. Preventing and Mitigating Identity Theft**

In the event a Red Flag is detected, Mountain Telephone is committed to preventing the occurrence of identity theft and taking the appropriate steps to mitigate any harm caused thereby. In order to respond appropriately to the detection of a Red Flag, Mountain Telephone shall consider any aggravating circumstance(s) that may heighten the risk of identity theft. After assessing the degree of risk posed, Mountain Telephone will respond to the Red Flag in an appropriate manner, which may include:

1. Monitoring a covered account for evidence of identity theft;
2. Contacting the customer;
3. Changing any passwords, security codes, or other security devices that permit access to a covered account;
4. Not reopening a covered account with a new account number;
5. Not opening a new covered account;
6. Closing an existing covered account;
7. Not attempting to collect on a covered account or not selling a covered account to a debt collector;
8. Notifying law enforcement; or
9. Determining that no response is warranted under the particular circumstances.

In an effort to mitigate the damage caused by identity theft, the following programs/software are being used, and Mountain Telephone continued use thereof is incorporated and made part of this policy:

- a. NISC Software
- b. Online Utilities Exchange

For the protection of our customers, *all service providers hired by Mountain Rural Telephone Cooperative Inc.* to perform any activity in connection with any covered account must also take appropriate steps to prevent identity theft. To this end, Mountain Telephone will only contract with service providers that have implemented and follow a similar identity theft prevention policy and who have signed a Non-Disclosure Agreement.



**PART 5**  
**PROGRAM UPDATES**

Mountain Telephone is committed to maintaining an Identity Theft Prevention Policy that is current with the ever-changing crime of identity theft. To that end, Mountain Telephone will reassess this policy on an annual basis. In reassessing this policy, Mountain Telephone will add/delete Red Flags in Part 3, as necessary, to reflect changes in risks to customers or to the safety and soundness of Mountain Telephone from identity theft. The determination to make changes to this policy will be within the discretion of the responsible parties, identified in Part 6 of this policy, but after careful consideration of the following:

1. Mountain Telephone's past experience(s) with identity theft;
2. changes in methods of identity theft;
3. changes in methods to detect, prevent, and mitigate identity theft;
4. changes in the types of accounts that Mountain Telephone offers or maintains;  
and
5. changes in the business arrangements of Mountain Telephone, including mergers, acquisitions, alliances, joint ventures, and service provider arrangements.

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Adopted 10/10/08  
Review and Adopted 5/1/09

# ATTENDANCE

## VACATIONS

It shall be the policy of this Company that all employees who have been regularly employed for one year shall be entitled to vacation time based on eight (8) hours per month. All employees employed regularly for five years shall be entitled to ten (10) hours per month. All employees employed regularly for ten years shall be entitled to twelve (12) hours per month. Vacation time shall be based upon five (5) (40 HOURS) working days per week.

Vacation time may be taken anytime in the year, in which it accumulates, subject to notification to and approval of one week in advance, by employee's supervisor. A vacation schedule shall be made each year in order not to reduce the work force or any department too severely. Choice of vacation time will be based on seniority.

Vacation procedures are established to promote employee welfare and efficient operation. For this reason, efforts should be made to encourage the taking of leave each year and work schedules should be so arranged, in so far as it does not impair efficient operation, to permit the taking of vacations at times desired by the employee.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO.MR-124 Vacations reviewed, revised and adopted March 11, 1998.

## ILLNESS PAY

It shall be the policy of this Company that when employees have qualified as a Regular, or a Part-Time Regular, they are entitled to consideration for Illness Pay, with the following restrictions:

1. Illness must be reported to the immediate supervisor as soon as possible after it has been determined that the employee is unable to work.
2. Eligibility for Illness Pay shall be subject to certification by the Supervisor.
3. An employee must have at least six (6) months of service and regularly work thirty (30) or more hours per week in order to accumulate permissible illness leave time at the rate of 8 hours for each month of active employment, starting after six (6) months of service. If an employee works less than thirty hours per week, the accumulation shall be pro-rated
4. There shall be deducted from accumulated illness leave any time actually used for illness leave purposes. There shall be no limit on number of days an employee can accumulate.
5. An employee may certify his own illness leave up to one (1) day, except in cases when, in the opinion of management, the certification is not justified, and a doctor's statement may be required for one (1) day illness leave. Illness leave in excess of one (1) day must be certified by a doctor's statement.
6. When an employee retires from the Company, after qualifying for the regular retirement plan of Mountain Telephone, he will be paid for unused illness leave at his rate of pay at the time of his retirement, up to a maximum of two thousand (2,000) hours, the accumulation of hours for illness leave purposes has no maximum.
7. Illness leave is available only when an employee is bonafidely sick. An employee found abusing illness leave is automatically terminated.
8. Illness leave may be used for an employee's dental or medical appointments and travel to and from this appointment; however, annual leave must be used for any other purpose during this visit.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-125 Illness Pay reviewed, revised and adopted December 7, 1991.

## **BEREAVEMENT LEAVE**

It shall be the policy of this Company that employees are allowed no more than three(3) days off with pay and up to an additional two (2) days excused unpaid or paid with annual leave (if available) in the event of a death in their immediate family once they have qualified as a Regular, or Part-Time Regular. The immediate family (up to and including 3rd generation bloodline) may consist of wife, husband, son, daughter, mother, father, brother, sister, grandfather, grandmother, great grandfather, great grandmother, uncles, great uncles, aunts, great aunts, mother-in-law, father-in-law, grandfather-in-law, grandmother-in-law or any other relative living in the employee's household.

Recognizing that many blended family relationships exist, the General Manager is permitted to extend this benefit, or a portion thereof, to situations deemed appropriate by the General Manager and not specifically identified in this policy.

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Reviewed, Revised & Adopted July 10, 2009

This policy was formerly known as POLICY BULLETIN NO. MR-126 Death in Employees Immediate Family reviewed and adopted May 14, 1982.

Reissued 7/10/09

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## HOLIDAYS

It shall be the policy of this Company to observe the following yearly holidays:

New Year's Day	Labor Day
Good Friday	Thanksgiving Day
Memorial Day	*Christmas Eve ½ day
Independence Day	Christmas Day

The office of the Company will be closed on these days. When the holiday falls on Sunday, the next day, Monday, will be considered the paid holiday unless otherwise specified. When a holiday falls on Saturday, the preceding Friday will be considered the paid holiday. If an employee works on one of the above holidays, he is paid two and one half times, i.e., one and one half time for the time worked plus straight time for the holiday upon having 40 hours or more work accrued and not counting time worked on this holiday. For the purpose of this policy, paid holidays, paid sick time, and paid annual leave time are considered hours worked.

\*Only when Christmas Eve falls on a Monday, Tuesday, Wednesday or Thursday of the week.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-123 Holidays reviewed, revised and adopted May 14, 1982.

## **FAMILY AND MEDICAL LEAVE.....Implementation Procedures**

All employees who have completed one year of continuous employment, and who worked at least 1,250 hours during the 12-month period immediately preceding the commencement of the leave, shall be entitled to family and medical leave. Employees entitled to family or medical leave may take up to a total of 12 weeks of leave.

1. For birth of a child and to care for the newborn;
2. For placement with the employee of a child for adoption or foster care;
3. To care for the employee's spouse, child, or parent with a serious health condition; or
4. Because of a serious health condition that makes the employee unable to perform the functions of his or her job.
5. For qualifying exigencies arising out of the fact that the employee's spouse, son, daughter, or parent is on active duty or call to active duty status as a member of the National Guard or Reserves in support of a contingency operation.
6. Any future additions or revisions to the Department of Labor's FMLA Policy will automatically be incorporated herein and made a part hereof without further action of the Board of Directors.

The right to take family and medical leave applies equally to male and female employees. A father, as well as a mother, can take family leave for the birth, placement, and adoption or foster care of a child. An expectant mother may take family and medical leave before the birth of a child for prenatal care or if her condition makes her unable to work.

The family and medical leave can begin before the actual placement or adoption of a child if an absence from work is required for the placement for adoption or foster care to proceed.

For the purposes of FMLA, child means a biological, adopted, or foster child, a stepchild, a legal ward, or a child or person for whom the employee has day-to-day responsibilities to care for and financially support or for whom the employee is standing in loco parentis. The child must be either under age 18 or age 18 or older and incapable of self-care because of a mental or physical disability.

An eligible employee who is a spouse, son, daughter, parent, or next of kin of a current member of the Armed Forces, including a member of the National Guard or Reserves, with a serious injury or illness can take up to a total of 26 workweeks of unpaid leave during a "single 12-month period" to care for the service member. See fact Sheet 28A for specific information regarding military family leave.

Mountain Telephone requires the following:

- Employees seeking to use FMLA leave are required to provide 30-day advance notice of the need to take FMLA leave when the need is foreseeable and such notice is practicable.

- Employees will be required to provide medical certification of a serious health condition.
- The Company will require the employee to use paid leave as FMLA leave.
- Paid sick leave can only be used in cases where the employee is sick.
- Paid vacation leave will be required for any other reasons, then unpaid leave. When a holiday is preceded or succeeded by unpaid time, then the holiday will also be unpaid time.
- The Company will require the employee taking leave as a result of a workers' compensation injury also as FMLA leave, to run concurrently with workers' comp where the injury results in a serious health condition.
- The Company will pay premiums for health insurance, these payments will continue during the period of FMLA leave.
- The Company will pay premiums for other benefits while the employee is on FMLA. If the company pays premiums for other benefits normally paid by the employee, when the employee returns from leave the employee will be expected to reimburse the company for payments made on their behalf.
- The Company will use the "rolling" method for determining the 12-month period in which the 12 weeks of entitlement occurs. ("Rolling" means the 12-month period measured backward from the date an employee uses any FMLA leave).
- The Company will notify the employee whether they are a key employee as described in 825.218 of the FMLA regulations.
- Employees will be required to furnish the company with period reports every (6) six weeks of their status and intent to return to work.
- Employees may be required to furnish recertification relating to a serious health condition.
- Employees will be required to provide a Fitness-for-duty certificate to be restored to employment.

In certain circumstances, family and medical leave may be taken intermittently or on a reduced leave schedule.

The company reserves the right to require a physician's statement before approving a request for family or medical leave or before an employee may return to work at the conclusion of a leave.

An employee who returns from family or medical leave within 12 weeks from the commencement of the leave is entitled to be returned to the same position the employee held when leave commenced, or to a position equivalent to that held by the employee when leave commenced, or to an equivalent position with equivalent benefits, pay, and other terms, and conditions of employment.



For further information concerning family or medical leave, please refer to Fact Sheet # 28A: The Family and Medical Leave Military Family Leave Entitlements or consult the Company's Director of Human Resources.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-142 reviewed and adopted February 9, 2007.

## LACTATION

It is the policy of Mountain Telephone that its employees are covered under the Patient Protection and Affordable Care Act, enacted March 23, 2010.

Under the Patient Protection and Affordable Care Act the company has obligations toward employees who express breast milk for a year after her child's birth.

We at Mountain Telephone want to develop and support a culture in our workplace that allows breastfeeding mothers to feel comfortable continuing to breastfeed by lactating when returning to work.

Employees need to contact Human Resources before the birth of their baby to discuss length of expected maternity leave, need for lactation accommodations, and possible schedule and break adjustments.

1. This Policy will follow the guidelines set forth by the Patient Protection and Affordable Care Act.
2. All Regular/Full time breastfeeding employees shall be entitled to take unpaid reasonable break time (if necessary beyond the usual breaks and lunch periods) to express breast milk for a year after her child's birth.
3. A designated private lactation space will be provided upon request.
  - This space will have a straight-back chair, small table/shelf, and electrical outlet. This space will have clean, running, hot and cold water to wash equipment, or have a source nearby.
  - A lactation-specific refrigerator will be provided.
4. All policy governing the program will be implemented by the General Manager.
5. The Company reserves the right to require certain guidelines within the Patient Protection and Affordable Care Act.
6. Effective immediately.

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Adopted 1-15-11

U.S. Department of Labor  
Employment Standards Administration  
Wage and Hour Division

## **Fact Sheet #28A: The Family and Medical Leave Act Military Family Leave Entitlements**

The National Defense Authorization Act for FY 2008 (NDAA), Public Law 110-181, amended the FMLA to allow eligible employees to take up to 12 weeks of job-protected leave in the applicable 12-month period for any “qualifying exigency” arising out of the active duty or call to active duty status of a spouse, son, daughter or parent. The NDAA also amended the FMLA to allow eligible employees to take up to 26 weeks of job-protected leave in a “single 12-month period” to care for a covered service member with a serious injury or illness. These two new types of FMLA leave are known as military family leave entitlements.

### **EMPLOYER COVERATE**

FMLA applies to all public agencies, including state, local and federal employers, local education agencies (schools), **and** private-sector employers who employed 50 or more employees in 20 or more workweeks in the current or preceding calendar year, including joint employers and successors of covered employers.

### **EMPLOYEE ELIGIBILITY**

To be eligible for FMLA benefits, an employee must:

- work for a covered employer;
- have worked for the employer for a total of 12 months;
- have worked at least 1,250 hours over the previous 12 months; and
- work at a location where at least 50 employees are employed by the employer within 75 miles.

### **MILITARY FAMILY LEAVE ENTITLEMENTS**

**Military Caregiver Leave:** A covered employer must grant an eligible employee who is a spouse, son, daughter, parent, or next of kin of a covered service member with a serious injury or illness up to a total of **26 workweeks** of **unpaid** leave during a “single 12-month period” to care for the service member. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness. A serious injury or

illness is one that was incurred by a service member in the line of duty on active duty that may render the service member medically unfit to perform the duties of his or her office, grade, rank, or rating. The “single 12-month period” for leave to care for a covered service member with a serious injury or illness begins on the first day the employee takes leave for this reason and ends 12 months later, regardless of the 12 month period established by the employer for other types of FMLA leave. An eligible employee is limited to a **combined** total of 26 workweeks of leave for any FMLA-qualifying reason during the “single 12-month period.” (Only 12 of the 26 weeks total may be for a FMLA-qualifying reason other than to care for a covered service member.)

**Qualifying Exigency Leave:** A covered employer must grant an eligible employee up to a total of **12 workweeks** of **unpaid** leave during the normal 12-month period established by the employer for FMLA leave for qualifying exigencies arising out of the fact that the employee’s spouse, son, daughter, or parent is on active duty, or has been notified of an impending call or order to active duty, in support of a contingency operation. Under the terms of the statute, qualifying exigency leave is available to a family member of a military member in the National Guard or Reserves; it does not extend to family members of military members in the Regular Armed Forces.

Qualifying exigencies include:

- Issues arising from a covered military member’s short notice deployment (i.e., deployment on seven or less days of notice) for a period of **seven** days from the date of notification;
- Military events and related activities, such as official ceremonies, programs, or events sponsored by the military or family support or assistance programs and informational briefings sponsored or promoted by the military, military service organizations, or the American Red Cross that are related to the active duty or call to active duty status of a covered military member;
- Certain childcare and related activities arising from the active duty or call to active duty status of a covered military member, such as arranging for alternative childcare, providing childcare on a non-routine, urgent, immediate need basis, enrolling or transferring a child in a new school or day care facility, and attending certain meetings at a school or a day care facility if they are necessary due to circumstances arising from the active duty or call to active duty of the covered military member;
- Making or updating financial and legal arrangements to address a covered military member’s absence;
- Attending counseling provided by someone other than a health care provider for oneself, the covered military member, or the child of the covered military member, the need for which arises from the active duty or call to active duty status of the covered military member;

- Taking up to **five** days of leave to spend time with a covered military member who is on short-term temporary, rest and recuperation leave during deployment;
- Attending to certain post-deployment activities, including attending arrival ceremonies, reintegration briefings and events, and other official ceremonies or programs sponsored by the military for a period of 90 days following the termination of the covered military member's active duty status, and addressing
- issues arising from the death of a covered military member;
- Any other event that the employee and employer agree is a qualifying exigency.

Spouses employed by the same employer are limited to a **combined** total of 26 workweeks in a "single 12-month period" if the leave is to care for a covered service member with a serious injury or illness, and for the birth and care of a newborn child, for placement of a child for adoption or foster care, or to care for a parent who has a serious health condition.

FMLA leave may be taken intermittently whenever **medically necessary** to care for a covered service member with a serious injury or illness. FMLA leave also may be taken intermittently for a qualifying exigency arising out of the active duty status or call to active duty of a covered military member. When leave is needed for planned medical treatment, the employee must make a reasonable effort to schedule treatment so as not to unduly disrupt the employer's operation.

Under certain conditions, employees **or** employers may choose to "substitute" (run concurrently) accrued leave (such as sick or vacation leave) to cover some or all of the FMLA leave. An employee's ability to substitute accrued paid leave is determined by the terms and conditions of the employer's normal leave policy.

#### Employee Notice

Employees seeking to use military caregiver leave must provide 30 days advance notice of the need to take FMLA leave for planned medical treatment for a serious injury or illness of a covered service member. If it is foreseeable but 30 days advance notice is not practicable, the employee must provide notice as soon as practicable – generally, either the same or next business day. An employee must provide notice of the need for foreseeable leave due to a qualifying exigency as soon as practicable. When the need for military family leave is not foreseeable, the employee must provide notice to the employer as soon as practicable under the facts and circumstances of the particular case. Generally, it should be practicable to provide notice for unforeseeable leave within the time prescribed by the employer's usual and customary notice requirements.

An employee does not need to specifically assert his or her rights under FMLA, or even mention FMLA, when providing notice. The employee must provide "sufficient information" to make the employer aware of the need for FMLA leave and the anticipated timing and duration of the leave. Depending on the situation, such information may include, as applicable:

- that the requested leave is for a particular qualifying exigency related to the active duty or call to active duty status of a covered military member and the anticipated duration of the leave;
- that the leave is for a qualifying family member who is a covered service member with a serious injury or illness and the anticipated duration of the leave.

When an employee seeks leave due to a FMLA-qualifying reason for which the employer has previously provided the employee FMLA-protected leave, the employee must specifically reference either the qualifying reason for leave or the need for FMLA leave.

## NOTICE REQUIREMENTS

### Employer Notice

Covered employers must post a notice approved by the Secretary of Labor explaining rights and responsibilities under FMLA. Additionally, employers must either include this general notice in employee handbooks or other written guidance to employees concerning benefits, or must distribute a copy of the notice to each new employee upon hiring.

When an employee requests FMLA leave or the employer acquires knowledge that leave may be for a FMLA purpose, the employer must notify the employee of his or her eligibility to take leave, including a reason for non-eligibility if the employee is determined not to be eligible. Such eligibility notice may be oral or written and should, generally, be given within five business days of the request for FMLA leave. Subsequent eligibility notice in the same 12-month leave period may be required when an employee's eligibility status changes. Employers also must inform employees of their rights and responsibilities under FMLA, including giving specific written information on what is required of the employee.

When the employer has enough information to determine that leave is being taken for an FMLA-qualifying reason, the employer must notify the employee that the leave is designated and will be counted as FMLA leave. The employer must designate leave that qualifies as **both** leave to care for a covered service member with a serious injury or illness **and** leave to care for a qualifying family member with a serious health condition as leave to care for a covered service member in the first instance. The designation notice must be in writing and generally, must be given within five business days of the determination. An employer also must notify an employee of the number of hours, days, or weeks that will be counted against the employee's FMLA entitlement.

## CERTIFICATION REQUIREMENTS

Employers may require that an employee's request for military family leave be supported by an appropriate certification. An employer may require that:

- leave for a qualifying exigency be supported by a copy of the covered military member's active duty orders and certification providing the appropriate facts related to the particular qualifying exigency for which leave is sought, including contact information if the leave involves meeting with a third party;

- leave to care for a covered service member with a serious injury or illness be supported by a certification completed by an authorized health care provider **or** by a copy of an Invitational Travel Order (ITO) or Invitational Travel Authorization (ITA) issued to any member of the covered service member's family.

Second and third opinions and recertification are not permitted for certification of a covered service member's serious injury or illness or of a qualifying exigency. An employer may use a health care provider, a human resource professional, a leave administrator, or a management official – but not the employee's direct supervisor – to authenticate or clarify a medical certification of a serious injury or illness, or an ITO or ITA. Additionally, an employer may contact the individual or entity named in a certification of leave for a qualifying exigency for purposes of verifying the existence and nature of the meeting.

### **UNLAWFUL ACTS**

It is unlawful for any employer to interfere with, restrain, or deny the exercise of any right provided by FMLA. It is also unlawful for an employer to discharge or discriminate against any individual for opposing any practice, or because of involvement in any proceeding, related to FMLA.

### **ENFORCEMENT**

The Wage and Hour Division investigates complaints. If violations cannot be satisfactorily resolved, the U.S. Department of Labor may bring action in court to compel compliance. Individuals may also be able to bring a private civil action against an employer for violations.

**For additional information, visit our Wage and Hour Division Website:**  
**<http://www.wagehour.dol.gov> and/or call our toll-free information and helpline, available 8 a.m. to 5 p.m. in your time zone, 1-866-4USWAGE (1-866-487-9243).**

This publication is for general information and is not to be considered in the same light as official statements of position contained in the regulations.

<b>U.S. Department of Labor</b> Frances Perkins Building 200 Constitution Avenue, NW Washington, DC 20210	<b>1-866-4-USWAGE</b> TTY: 1-866-487-9243 <b><u>Contact Us</u></b>
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## **UNIFORMED SERVICES EMPLOYMENT AND REEMPLOYMENT RIGHTS ACT OF 1994**

It is the policy of Mountain Telephone that its employees are covered under The Uniformed Services Employment and Reemployment Rights Act of 1994.

Under The Uniformed Services Employment and Reemployment Rights Act of 1994, (USERRA) Mountain Telephone has obligations toward employees who temporarily leave employment to fulfill a military commitment.

1. The policy will follow the guidelines set forth by The Uniformed Services Employment and Reemployment Rights Act.
2. Under USERRA all Regular/Full time employees shall be entitled to take an unpaid leave of absence for active military service with any branch of the United States military or for military reserve duty, as per Fact Sheet #3 and subsequent revisions.
3. All policy governing the program will be implemented by the General Manager.
4. The Company reserves the right to require certain guidelines within The Uniformed Services Employment and Reemployment Right Act of 1994.
5. Effective immediately.

For further information concerning USERRA leave, please refer to VETS USERRA Fact Sheet #3 U.S. Department of Labor Program Highlights or consult the Company's Human Resources Director.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-143 Uniformed Services Employment and Reemployment Rights Act of 1994 adopted December 11, 2007.



VETS USERRA Fact Sheet 3



**U.S. Department of Labor  
Program Highlights**

Veterans' Employment and Training Service

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**JOB RIGHTS FOR VETERANS AND RESERVE COMPONENT MEMBERS**

**The Uniformed Services Employment and Reemployment Rights Act of 1994  
(USERRA 38 U.S.C. 4301-4334)**

The Department of Labor, through the Veterans' Employment and Training Service (VETS), provides assistance to all persons having claims under USERRA.

The Uniformed Services Employment and Reemployment Rights Act (USERRA) clarify and strengthen the Veterans' Reemployment Rights (VRR) Statute.

USERRA protects civilian job rights and benefits for veterans and members of Reserve components. USERRA also makes major improvements in protecting service member rights and benefits by clarifying the law, improving enforcement mechanisms, and adding Federal Government employees to those employees already eligible to receive Department of Labor assistance in processing claims.

USERRA establishes the cumulative length of time that an individual may be absent from work for military duty and retain reemployment rights to five years (the previous law provided four years of active duty, plus an additional year if it was for the convenience of the Government). There are important exceptions to the five-year limit, including initial enlistments lasting more than five years, periodic National Guard and Reserve training duty, and involuntary active duty extensions and recalls, especially during a time of national emergency. USERRA clearly establishes that reemployment protection does not depend on the timing, frequency, duration,

or nature of an individual's service as long as the basic eligibility criteria are met.

USERRA provides protection for disabled veterans, requiring employers to make reasonable efforts to accommodate the disability. Service members convalescing from injuries received during service or training may have up to two years from the date of completion of service to return to their jobs or apply for reemployment.

USERRA provides that returning service-members are reemployed in the job that they would have attained had they not been absent for military service (the long-standing "escalator" principle), with the same seniority, status and pay, as well as other rights and benefits determined by seniority. USERRA also requires that reasonable efforts (such as training or retraining) be made to enable returning service members to refresh or upgrade their skills to help them qualify for reemployment. The law clearly provides for alternative reemployment positions if the service member cannot qualify for the "escalator" position. USERRA also provides that while an individual is performing military service, he or she is deemed to be on a furlough or leave of absence and is entitled to the non-seniority rights accorded other individuals on non-military leaves of absence.

Health and pension plan coverage for service members is provided for by USERRA. Individuals performing military duty of more than 30 days may elect to continue employer sponsored health care for up to 24 months; however, they may be required to pay *up to* 102 percent of the full premium. For military service of less than 31 days, health care coverage is provided as if the service member had remained employed. USERRA clarifies pension plan coverage by making explicit that all pension plans are protected.

The period an individual has to make application for reemployment or report back to work after military service is based on time spent on military duty. For service of less than 31 days, the service member must return at the beginning of the next regularly scheduled work period on the first full day after release from service, taking into account safe travel home plus an eight-hour rest period. For service of more than 30 days but less than 181 days, the service member must submit an application for reemployment within 14 days of release from service. For service of more than 180 days, an application for reemployment must be submitted within 90 days of release from service.

USERRA also requires that service members provide advance written or verbal notice to their employers for all military duty unless giving notice is impossible, unreasonable, or precluded by military necessity. An employee should provide notice as far in advance as is reasonable under the circumstances. Additionally, service members are able (but are not required) to use accrued vacation or annual leave while performing military duty.

The Department of Labor, through the Veterans' Employment and Training Service (VETS) provides assistance to all persons having claims under USERRA, including Federal and Postal Service employees.

If resolution is unsuccessful following an investigation, the service member may have his or her claim referred to the Department of Justice for consideration of representation in the appropriate District Court, at no cost to the claimant. Federal and Postal Service employees may have their claims referred to the Office of Special Counsel for consideration of representation before the Merit Systems Protection Board (MSPB). If violations under USERRA are shown to be willful, the court may award liquidated

damages. Individuals who pursue their own claims in court or before the MSPB may be awarded reasonable attorney and expert witness fees if they prevail.

Service member employees of intelligence agencies are provided similar assistance through the agency's Inspector General.

For more information about U.S. Department of Labor employment and training programs for veterans, contact the Veterans' Employment and Training Service office nearest you, listed in the phone book in the United States Government under the Labor Department or visit our site:

<http://www.dol.gov/vets/aboutvets/contacts/main.htm>.

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This is one of a series of fact sheets highlighting U.S. Department of Labor programs.

It is intended as a general description only and does not carry the force of legal opinion.

**U.S. Department of Labor**  
Frances Perkins Building  
200 Constitution Avenue, NW  
Washington, DC 20210

**1-866-4-USA-DOL**  
TTY: 1-877-889-5627  
**Contact Us**

## **JURY DUTY**

It shall be the policy that all Regular/Full time employees shall be entitled to take a leave of absence for jury duty. Employees will receive the difference between their normal pay for a regular eight-hour workday or a regular ten-hour workday (only if scheduled a ten hour workday) and the amount they receive as jury pay for a maximum of six weeks. For any period longer than six weeks it must be authorized in writing by the General Manager of the Company. Employees are expected to report to work for any portion(s) of the work day not necessary to be off for jury duty.

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Reviewed 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-144 Jury Duty adopted December 11, 2007.

## ABSENTEEISM AND TARDINESS

Mountain Telephone encourages and expects the regular and dependable attendance and punctuality of each employee. In order for the Company to operate productively and efficiently, employees must be available for work on a regular basis.

### **Family and Medical Leave Act**

Absences due to illnesses or injuries which qualify under the Family and Medical Leave Act (FMLA) will not be counted against an employee's attendance record. Medical documentation within the guidelines of the FMLA will be required in these instances.

Repeated absences or tardiness over a period of time, regardless of the reason, may jeopardize continued employment of an employee. The Company reserves the right to take disciplinary action, up to, and including termination, for excessive absenteeism or tardiness.

The company awards its employees with sufficient vacation, sick and holiday time throughout the year and employees are able to accrue on an unlimited basis. Vacation and holidays must be scheduled with one's supervisor in advance. No vacations will be approved without paid vacation time available. Any available sick days must be used in the case of emergency or sudden illness without prior scheduling. If the employee has no sick time available, then they must use vacation time for sickness. All available sick or annual must be used before time off without pay for sickness. Employees need to call their supervisor as soon as possible for unavoidable absences, 30 minutes before work, or with in 30 minutes after the report to work time.

**Excessive leave is defined as absenteeism so severe that an employee has used up all vacation and sick time and needs additional time off without pay that is not covered under the FMLA.**

An absence occurs when an employee misses more than a period of five (5) hours of work that is unpaid time.

An absence of multiple days due to the same illness, injury or other incident will be counted as one occurrence for the first 5 working days, and each additional 5 days off for the same illness will count as another occurrence (example 1<sup>st</sup> 5days/ one occurrence, 2<sup>nd</sup> 5days/2 occurrences, 3<sup>rd</sup> 5days/3occurrences, etc) for the purpose of this policy.

Days taken off for vacation without proper prescheduling and approval will be counted as a no call/no show occurrence. Employee absence without available paid vacation, for recreation and for days that don't qualify for sick time, and deemed unnecessary by management will be considered a no call/no show absence and would result in proceeding to the first instance of a no call/no show and will result in a final written warning and will follow the same guidelines under the no call/no show.

A tardy arrival, early departure or other shift interruption is considered a one-half occurrence. On occasion and **with prior approval by the supervisor**, an employee who is tardy or leaves early may adjust that day's schedule to work an equivalent amount of time at the end of the shift, and a one-half occurrence will not be counted.

Arrival and departure times are 8am to 5pm unless you are on a different schedule approved by your supervisor/manager. The employee must be at their work station or work area by 8am ready to work. An employee is considered late if he or she reports to work more than five minutes after the scheduled starting time. An early departure is one in which the employee leaves before the scheduled end of his or her shift.

Newly hired employees will be given exception to this policy until after they have been employed for 1 ½ years (18 months) so as to have accumulated some sick and annual leave.

The General Manager may approve unpaid time or tardiness for extenuating circumstances for newly hires.

#### **STEP DISCIPLINE**

Absences and tardiness or early departure will be counted together, but are assigned different levels of severity. Absences are each considered one occurrence; tardiness/early departures are each considered one-half an occurrence.

Occurrences are counted any time an employee takes time off without pay. The company will use the "rolling" method to determine the 12-month period occurrences are counted. ("Rolling" means the 12-month period measured backward from the date an employee has an occurrence).

#### **STEP ONE (One occurrence)**

One occurrence (one unpaid day or two tardies) will be the basis for a coaching discussion between the employee and direct supervisor. The purpose of the coaching session is to make the employee aware that he/she has been absent or tardy frequently enough to draw attention and to be certain that the employee understands this policy and the consequences of violation. The coaching session will be documented in the employee's personnel file.

#### **STEP TWO (Two occurrences)**

Two occurrences (two unpaid days or four tardies or any combination) is cause for a written warning to be placed in the employee's personnel file.

#### **STEP THREE (Three occurrences)**

Three occurrences (three unpaid days or six tardies or any unpaid days or tardies combined) is cause for final written warning with a one day suspension without pay documented in the employee's personnel file.

**STEP FOUR (Four occurrences)**

Four occurrences (four unpaid days or eight tardies or any unpaid days or tardies combined) is cause for termination of employment.

**NO CALL/NO SHOW**

Not reporting to work and not calling to report the absence is a no call/no show and is a serious matter. The first instance of a no call/no show will result in a final written warning. The second separate offense may result in termination of employment with no additional disciplinary steps. **Any no call/no show lasting three days is considered job abandonment and will result in immediate termination of employment.**

Management may consider extenuating circumstances when determining discipline for a no call/no show (for instance, if the employee is in a serious accident and is hospitalized) and has the right to exercise discretion in such cases.

**PROCEDURES**

No disciplinary action will be taken without the direct involvement of the Human Resources Director as counsel to management. All warnings will be delivered by the direct supervisor/manager, or Human Resources as circumstances require.

Management reserves the right to use its discretion in applying this policy under special or unique circumstances.

Although occurrences will roll off an employee's record after the occurrence is one year old, habitual offenders (those who have established a pattern of absences, such as consistently having two or more occurrences in any given yearly period or routinely calling off on Mondays and/or Fridays) may trigger step discipline even though previous year with old infractions have fallen off, if he or she continues to have occurrences.

Mountain Telephone reserves the right to amend or discontinue this policy at any time without notice.

**STEP DISCIPLINE - UNPAID ABSENCES OR TARDINESS IN A ROLLING BACKWARD 12-MONTH PERIOD**

**1<sup>st</sup> OCCURRENCE**

One unpaid absence or  
Two tardies

Making 1 total occurrence

Coaching session documented in file

**2<sup>nd</sup> OCCURRENCE**

Two unpaid absences and/or  
Four tardies- any combination

Making 2 total occurrences

Written warning documented in file

3<sup>rd</sup> OCCURRENCE

Three unpaid absences and/or

Six tardies- any combination

Making 3 total occurrences

Final written warning with a one-day suspension  
without pay documented in file

4<sup>th</sup> OCCURRENCE

Four unpaid absences and/or

Eight tardies- or any combination

Making 4 total occurrences

Cause for termination of employment

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Adopted 5/1/09



# **BENEFITS**

## **BENEFITS INFORMATION**

### **Medical Insurance**

Mountain Telephone provides the AAA group medical/hospital coverage under the National Telecommunications Cooperative Association (NTCA) Group Health Program to regular full-time employees and their dependents. This coverage also includes benefits for vision services.

### **Dental Insurance**

Mountain Telephone provides the AAA Platinum Dental Health coverage under NTCA for all regular full-time employees and their dependents.

Questions regarding these plans should be directed to the Human Resource Director.

The company pays the full cost of the premium for employees and their dependents for the medical and dental insurance plans. Details regarding both of these plans will be provided at the time of enrollment. Each employee will receive a Summary Plan Description after enrollment forms are submitted to NTCA.

The specific benefits, restrictions and limitations of the medical, vision, and dental plans are detailed in the contract governing them. An employee and his/her dependents are eligible to participate as provided by Mountain Telephone's Adoption Agreement with the provider. The plan documents are the final authority and other explanations of benefit plans are referred to NTCA.

### **Hi-Limit Business Travel Insurance**

Mountain Telephone provides hi-limit business travel insurance to all regular full-time employees that benefits in the event an employee is accidentally injured or killed while on official company business. This coverage is provided at no charge to employees.

### **Long-Term Disability**

Mountain Telephone provides long-term disability insurance coverage for all regular full-time employees. Please refer to the plan's contract and Summary Plan Description for specific requirements, limitations, payment reductions or termination of benefits. The company pays 50% of the premium.

### **Retirement Program**

Mountain Telephone provides a Retirement and Security (R&S) Program for all regular full-time employees. The Company contributes 7 % of an eligible employee's W-2 compensation with the employee paying 4 % to fund his/her accrued retirement benefit.

Eligibility for participation in the R & S Program begins the first day of the next quarter after the newly hired employee has ended his/her six month newly hire period (i.e. January 1<sup>st</sup>, April 1<sup>st</sup>, July 1<sup>st</sup>, or October 1<sup>st</sup>).

Please refer to the Program's Summary Plan Description for details on the Program.

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### **Savings Plan**

Mountain Telephone provides all employees who are eligible a 401(k) Savings Plan. Under this Savings Plan, Mountain Telephone will match at 100% all employee 401(k) contributions up to 3% of compensation. Employee contributions are made on a pre-tax basis.

Roth 401(k) contributions can also be made from eligible compensation on an after-tax basis. The company does not match any Roth 401(k) contributions.

Eligibility for participation in the Savings Plan begins the first day of the next quarter after the hire date of the newly hired employee. Regular employees must make changes or enroll at least 5 working days before the beginning of the next quarter.

In addition to the percentages listed above, employees may make further annual contributions to the Savings Plan, though Internal Revenue Service (IRS) regulations imposed limitations on the maximum annual additions allowed each year. Specific questions regarding these limitations should be directed to NTCA Savings Plan office or Human Resource Director. Please refer to the Saving Plan's Summary Plan Description for details regarding this Plan.

Mountain Telephone reserves the right to make policy changes without board action pertaining to benefits as providers change and/or laws change pertaining to benefits.

## **COMPUTER AND/OR TV SYSTEM PURCHASE FOR PERSONAL USE**

The company will allow interest free loans to employees for the purchase of a new computer and/or TV system for employees. A newly hired employee does not qualify for this loan until he/she has completed at least 12 months with the company. The employee must complete a loan agreement before the purchase of a computer/TV system.

The requirements following must be met for final approval:

- The employee must submit an invoice(s) with the purchase price.
- The limit is \$2500.00.
- The loan will cover any item that will attach to the computer/TV. (Examples, printer, keyboard, monitor, camera, cables, entertainment system, speakers, etc)
- The employee is allowed only one active loan.
- The employee must agree that the company will withhold \$50 from their bi-weekly paycheck. Until the loan balance is re-paid.
- Any equipment purchased with this loan shall remain in the employee's home until paid in full.
- If the employee leaves the employment of Mountain Telephone for any reason, the outstanding balance on the loan will be deducted from any money owed to the employee. If the money owed to the employee does not cover the amount of the loan, then the employee must agree to pay the balance in full at time of termination.

The General Manager has final approval after the invoice and loan agreement has been submitted.

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This Policy was formerly known as Computer System Purchase for Personal Use adopted 5/1/09.

Reviewed, Revised & Adopted 1/15/11

## **FREE TELEPHONE SERVICE FOR RETIRED EMPLOYEES**

The Company will furnish free local telephone service to employees and their living spouses, when the employee retires at retirement age from the Company, subject to the following requirements:

1. Provided the employee has a minimum of twenty (20) years of service with the Company.
2. The employee must be working at retirement age.

They will receive free service on their monthly local exchange service rate, touch tone, subscriber line charge and all features. Internet, saving plans, and voice mail will be 50% discount.

Any other cases that do not meet the above requirements will be considered on their individual merits.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-137 Post Retirement reviewed and adopted June 12, 1992.

## POST RETIREMENT MEDICAL BENEFITS

It shall be the policy of this Company to provide health care insurance to retired employees and their spouses. An active employee may continue his/her existing health care insurance after retirement under the following rules:

1. To be eligible, the retired employee must have retired under the Mountain Telephone standard full retirement plan in effect at the time of his/her retirement.
2. The retired employee will make the same contribution to the cost of the insurance as an active employee, except as listed below.
3. A retired employee will receive fifty percent (50%) of the Mountain Telephone contribution toward the cost of the insurance that an active employee receives if he retires with 10 to 15 years of service to Mountain Telephone: seventy-five percent (75%) with 15 to 20 years of service and one hundred percent (100%) with 20 or more years. No contribution will be received with less than 10 years of service.
4. Once a retired employee or their spouse reaches the eligible age for Medicare, or any other federally sponsored medical care insurance plan, he/she will be moved to the Company's applicable supplemental insurance plan.
5. Upon the death of the retired employee, the spouse will be eligible for continued coverage under the Company's existing health care plan, unless he/she remarries.
6. All of the above rules apply only if they are not in conflict with any Federal or State law or the rules of the Company's health care plan.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-138 Post Retirement Benefits reviewed and adopted November 5, 1993.

## **FREE AND DISCOUNTED LOCAL TELEPHONE SERVICE FOR EMPLOYEES**

The Company shall furnish free or discounted service to employee's residential service only in the following manner:

1. After the employee has been employed with the Company for at least one year they will receive touch tone, subscriber line charge, and caller ID, name & number, call waiting, and call forwarding free. They will receive a 50% discount on their monthly local exchange service rate, internet, savings plans, and all remaining features.
2. Supervisors and employees that are on call for maintenance purposes will receive a 100% discount on their monthly local exchange service rate, touch tone, subscriber line charge, and all features. Internet, saving plans, and voice mail will be 50% discount.
3. From time to time employees may receive free usage of certain features or services for testing purposes or off-site monitoring. The General Manager, can as necessary, award special features to certain employees for off-site monitoring and maintenance purposes.
4. This policy does not apply to any toll service.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-139 reviewed and adopted November 10 1995.

# GENERAL INFORMATION



## **BUSINESS TRAVEL AND EXPENSES**

The Company will reimburse expenses for business travel, including the cost of transportation, meals, and lodging, provided that such travel is approved in advance and is required by Company Business. (Reimbursement to be set at receipted expense per day for food and lodging.) Expenses may be advanced for the number of days and nights an employee expects to be gone. Receipts and advancement are expected within 10 days after returning to work.

In the event an employee uses their own vehicle for company business, and/or reporting to work outside their "reporting area", they shall be reimbursed for the same at the rate allowed by the Internal Revenue Service for income tax deduction purposes. Contact HR or accounting for the current rate.

It shall also be the policy of this Company that when it requests an employee to move his household from one area to another, the Company will assume such costs.

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Reviewed, Revised & Adopted 5/1/09

This policy was formerly known as POLICY BULLETIN NO. MR-127 Expense Money for Employees reviewed, revised and adopted December 7, 1991.

## **OUTSIDE EMPLOYMENT**

The Company recognizes the right of employees to spend non-working hours away from the job without restriction. However, the Company requires that activities away from the job must not compromise the Company's interests, adversely affect the employee's job performance and ability to fulfill all responsibilities to the Company or create liability for the Company. An employee who is in doubt whether outside work would violate this policy should submit a written request for authorization to the Company's Director of Human Resources.

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Adopted 5/1/09

# SAFETY

## **SAFETY PRACTICES**

The Board of Directors recognizing the importance of safe working conditions for the employees of the Company has authorized and directed the General Manager to establish such rules and procedures. For the Company to maintain such tools and equipment as necessary to fully implement and enforce the following safe working practices required by Occupational Safety and Health Administration (OSHA) and/or Public Service Commission or any other established safety and health laws or regulations. Safety practices are to be review and revised if needed and report to the Board of Directors annually.

Mountain Telephone is dedicated to providing a safe and healthy work environment for employees and customers. The Company shall follow operating practices that will safeguard employees, the public and Company operation. We believe all accidents are preventable. Therefore we will make every effort to prevent accidents and comply with all established safety and health laws and regulations.

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Adopted 5/1/09

## **SAFETY AWARENESS PROGRAM**

### **BUSINESS OFFICE**

It has been the ongoing policy of our company to instill “safety awareness” in our entire operations, to ensure personal safety and the overall high quality of our services.

Enclosed you will find a copy of the Operational Safety Rules. Please read this material; then sign the Employee Safety Acknowledgement Sheet.

### **General Information**

This applies to every employee of the Company, whatever his/her job title or description. It is the responsibility of the individual employee to know and follow the safety practices for any job being performed, whether or not the job is a part of the employee’s regular assignment. For that reason, it is critical that all employees familiarize themselves with this handbook. While this handbook contains many of our safety procedures, it is not intended to be all-inclusive.

### **Company Safety Responsibilities**

In as far as possible, the Company is obligated to provide a safe and healthful working environment for the employee. To meet this obligation, the Company strives to provide the proper tools, equipment, and building designs.

The Company also recognizes its obligation to provide safe working procedures, instructions and training, as well as oversight to ensure that such instruments and procedures are utilized.

In addition, the company recognizes its moral obligation to encourage safety off the job.

### **Employee Safety Responsibilities**

Accident prevention is everyone’s business. Employees at all levels share the responsibility of accident prevention. All employees shall:

Follow all of the Company’s safety and health standards and rules. This assures compliance with occupational safety and health standards, as well as all rules, regulations and orders issued under the OSHA Act that apply to his or her own actions and conduct.

Wear or use prescribed protective equipment.

Employee need to report hazardous conditions to their supervisor.

Employees need to report any job-related injury or illness the same day to their immediate supervisor or another manager.

Correct all safety violations regardless of which department or supervisor the employee is assigned.

### **Office Safety**

#### **Lifting and Carrying**

Plan your job so that a minimum of lifting and carrying is necessary. When preparing to lift an object, squat down close to the object by bending your knees and, keeping your back as straight as possible, grasp the object while keeping it close in, and then lift by straightening the knees. Arms are to be inside the knees. If the object is too large or too heavy to lift, get help. When carrying an object, never obstruct your forward vision. Whenever possible, before lifting an item, face the direction you will be going to avoid twisting or turning.

#### **Storerooms**

Good housekeeping is a valuable contribution to safety. Therefore, all sorted materials, boxes, etc., shall be neatly arranged, clear of aisle and passageways. Materials in cabinets will be arranged so that when the doors are opened, the contents will not fall out. Do not store materials on top of cabinets.

Heavy material shall be stored on the bottom of shelves. All storage shelves shall be bolted together or otherwise anchored to the wall.

#### **Furniture**

Desk and tables are not dangerous. They cause injuries only when misused.

Sliding shelves, drawers, and doors should be kept closed when not in use. Through normal wear and tear, the veneer on some office furniture becomes chipped or splintered. As this condition occurs, it should be reported as once. Metal desks, table and typewriter stands should be observed for sharp burrs. The burrs should be removed to avoid injury or damage to clothing.

Never use a desk top as a substitute for a ladder. Desk drawers should be equipped with safety stops. Durable transparent plastic tops should be used instead of glass.

Chairs are provided to sit on. Adjust the chair for correct height and proper tension on the backrest. Always sit way back on the seat of any chair, never on the arm. Do not use a chair as a substitute for a stepladder. Leaning back in a chair with your feet propped on a desk or table shall be avoided at all times. When sitting down or rising from a chair, hold it firmly by the arm or backrest.

#### **Filing Cabinets**

Filing cabinets should be conveniently located in the office but away from aisles or passageways. Filing cabinets with 4 or more drawers should be bolted together or anchored to the wall or floor to prevent tipping over. Open one drawer at a time and

always use the handle to close the door. Never slam or kick the drawer to close it. Heavy material should be confined to the lower drawers.

### **Bookcases**

Bookcases should be located in a convenient location but placed in such a manner as to avoid striking the doors against other items of furniture. Make sure the bookcase is well secured and that all sharp edges and loose or defective parts are immediately repaired.

### **Office Machines**

Power operated office equipment is in wide use throughout our Company. This section outlines the more important precautions to be followed.

All protective guards and covers provided by the manufacturer will be left in place. Only those persons trained to observe all safety procedures common to the particular machine involved would be permitted to operate the machine.

All machines should be equipped with a 3-prong plug for proper grounding, unless it is double insulated. Power cords should be located so as not to obstruct aisles and passageways. Qualified repair personnel will make repairs to all power cords and plugs. When moving a machine, coil and secure the cord to avoid tripping and falling.

Stop the machine before attempting to clear a jam. If you cannot clear the machine, inform your supervisor. Disconnect all the machines from the power source before performing maintenance work. Never distract the attention of an employee operating or repairing a machine.

Loose wearing apparel, dangling jewelry and long hair will be properly contained and kept away from all moving parts of machines. Large rings should be removed when operating machines where there is a possibility of contact with any moving parts.

### **Paper Cutter**

When operating the paper cutter, the operator must not be distracted or engaged in conversation with other employees. Once the cutter has been activated, no attempt should be made to adjust the material in the path of the blade. During use of the cutter, scrap paper should be placed in a waste container and the floor should be kept clear at all times.

### **Accident Reporting**

In the case of occupational injury or illness, adequate treatment will be provided and the supervisor shall accompany the employee whenever possible.

When an employee sustains an injury, the supervisor should render first aid, and if needed, get the employee to a doctor or get a doctor to the employee.

In case of a medical emergency, particularly for severe or life threatening injuries, the local emergency medical services should be called or the employee should be transported to the local hospital emergency room.

When an employee is involved in a motor vehicle accident while driving a company vehicle, the following steps should be taken:

- Keep calm. Make no admissions or any blame for the accident.
- Offer assistance or first aid to the injured. For serious injuries, call an ambulance and or a physician.
- Call your supervisor.
- Call the appropriate law enforcement agency (Highway Patrol, Sheriff, Police, etc.) immediately to report any accident resulting in injury to any person, or motor vehicle damage.
- Get names and license numbers of driver(s) of other vehicle(s).
- Get names of witnesses.
- Get names of injured.
- Get details.
- Draw a sketch.

A department supervisor shall report all motor vehicle accidents involving company vehicles to the office, by telephone, within 24 hours of the accident, whether or not they result in injury to the employee.



## **SAFETY AWARENESS PROGRAM PLANT**

### **To Comply With the Law**

It is our responsibility to comply with local, state and federal regulations in providing a safe environment for our employees; and to achieve efficient, productive performance of our contracts. The safety program requires the support of company management and employees, defines procedures, assigns responsibilities and provides a means for enforcement.

### **To Promote Efficiency**

Unorganized safety efforts have a direct, negative bearing on overall efficiency. They permit the loss of skilled workers, equipment and materials resulting in lost productivity. When the safety program is standardized, the overall effort is positive.

It is in our company's best interest to comply with the above objectives. We have, therefore, compiled this safety manual and expect all levels of organization, as well as individual employees, to follow these procedures. We have every reason to believe that if we work together on the safety program, the employees and the company will both benefit.

Enclosed you will find a copy of the Operational Safety Rules. Please read this material, and then sign the Employee Safety Acknowledgement sheet.

## **SAFETY PRACTICES**

### **Objective**

To provide the maximum in safety and protection for the employee of the Company and to keep them adequately trained and informed of safe working practices, tools and equipment.

### **Content**

The Board of Trustees recognizing the importance of safe working conditions for the employees of the Company has authorized and directed the General Manager to establish such rules and procedures and to maintain such tools and equipment as necessary to fully implement and enforce the following safe working practices.

#### **A. Hard Hats**

Hard hats shall be worn day or night by all employees when doing work in the open requiring them to climb to a work area or while working under another employee on a pole or ladder.

#### **B. Eye Protection**

Goggles, face shields or other suitable protection shall always be worn whenever there is danger of exposing the eyes to flying particles, acids,

caustic substances or any condition hazardous to you or the person in charge.

C. Care and Maintenance of CO Buildings

1. Employee shall wear face protection, apron and gloves when servicing batteries.
2. Smoking is not permitted in any CO.

D. Care and Operation of Motor Vehicle

E. All Company vehicles must be operated in accordance with state and local regulations; and, posted speed limits must be observed at all times.

1. When trailers, poles or loads project beyond the rear of the truck bed, red flags shall be placed at the extreme end of the load or object trailed. All cars and trucks must be equipped with first aid kits, fire extinguishers, and flags in accordance with state and local regulations.
2. Seat belts must be worn at all times by employees operating or riding in Company owned vehicles.

F. Good Housekeeping

Truck beds and compartments shall be kept neat and in a safe condition. Heavy material items should not be stacked so high that placing or removing such items would create a lifting or handling hazard.

G. Poles

Before climbing any pole or structure, an employee shall take every precaution to insure that it is safe to climb and work upon. If the strength of any pole is questioned, it shall be thoroughly tested before being climbed. If the pole is unsafe to climb, it shall be braced or guyed before being climbed.

H. Safety Around Electric Wires

All employees shall wear rubber gloves whenever they see a power line, regardless of voltage, near the working area, which might come in contact with the telephone cable or wires. If a power line has fallen on a telephone line, the power supplier will be notified immediately for removal. All joint use poles should be tested for voltage before climbing the pole.

I. Tools

1. All tools shall be kept in a safe operating condition. Lineman belts and safety strap shall be inspected regularly for wear and replaced when necessary. Climbers shall be maintained according to standard with gaff covers properly installed when not in use.
2. Climbers shall be removed at the foot of the pole.

J. Reporting Accidents and Injuries

Any accident resulting in serious injury or death to an employee or the general public shall be immediately reported to the main office by radio, telephone or in person by the employee who has full knowledge of the incident.

All accidents, regardless of severity, involving employees, should be reported in writing to supervisor as promptly as possible. This report should contain all information pertaining to the accident and shall be the responsibility of the injured or supervisor who is on the job site.

K. Roadway Safety

When performing maintenance or construction work near a roadway or public thruway of any kind, the use of warning flags, signs, cones, lights or flagmen must be used in such a manner as to provide adequate warning to the public that work is being performed in the immediate area.

L. Responsibility

1. The General Manager and Department Heads shall be responsible for carrying out said policy to its fullest extent.
2. Failure of employee to comply with this policy shall be grounds for disciplinary action.

## EMPLOYEE'S SAFETY ACKNOWLEDGEMENT

I have read the Operational Safety Rules and will comply with these rules to the best of my ability.

I understand company policy on vehicle use and will comply.

I understand that I am to use safety equipment as appropriate at all times.

I understand that I am to report any unsafe conditions and any personal injury immediately to my Supervisor.

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Employee's Signature

Date

## VEHICLE FLEET SAFETY & USAGE

The purpose of this policy is to ensure the safety of those individuals who drive company vehicles and to provide guidance on the proper use of company fleet vehicles. Vehicle accidents are costly to our company, but more importantly, they may result in injury to you or others. It is the driver's responsibility to operate the vehicle in a safe manner and to drive defensively to prevent injuries and property damage. As such, the company endorses all applicable state motor vehicle regulations relating to driver responsibility. The employer requires each driver to drive in a safe and courteous manner pursuant to the following safety rules. The attitude you take when behind the wheel is the single most important factor in driving safely.

The Safety Director, your direct Manager, and supervisor are responsible for general administration of this policy and are to report to the General Manager. They are responsible for:

- Reviewing accidents and employer's overall driver safety record to determine if there should be changes in policy or procedure; or if other corrective action (such as training, equipment changes, etc.), should be implemented to enhance the safe operation of company vehicles, and/or personal vehicles on company business.
- Reviewing driving records of individual employees and making recommendations to the General Manager when driving privileges should be suspended or revoked.
- Reviewing all other issues that arise with respect to compliance with this policy.

### Driver Guidelines and Reporting Requirements

1. Company vehicles are to be driven by authorized employees only, except in case of repair testing by a mechanic.
2. Any employee who has a driver's license revoked or suspended shall immediately notify the Human Resource Director or immediate supervisor by 9 a.m. eastern time the next business day, and ***immediately discontinue operation of the company vehicle***. Failure to do so may result in disciplinary action, including termination of employment.
3. All accidents in company vehicles, regardless of severity, must be reported to your direct supervisor and police if necessary. Accidents are to be reported immediately (from the scene, during the same day, or as soon as practicable if immediate or same day reporting is not possible). Refer to Drug-Free Workplace Substance Abuse Policy for Non DOT drivers, and refer to Corporate D.O.T. (Department of Transportation) Policy and Procedures Manual for D.O.T drivers included in this handbook for guidelines for drug testing procedures following accidents.

Reissued 7/1/09

4. Accidents involving the employee's personal injury must be reported to Human Resources for Worker's Compensation purposes immediately whether in company vehicle or personal vehicle when on company business. Failing to stop after an accident and/or failure to report an accident may result in disciplinary action, up to and including termination of employment.
5. Immediately report the accident to your direct supervisor. Provide a copy of the accident report and/or your written description of the accident to your supervisor ASAP.
6. There will be a formal accident review conducted on each accident to determine cause and how the accident could have been prevented.
7. Drivers must report all ticketed violations received during the operation of a company vehicle, immediately, and all fines incurred by the negligence of the driver will be the responsibility of the driver.
8. Motor Vehicle Records will be obtained on all drivers every two years. A driving record that fails to meet the criteria stated in this policy, or is considered to be in violation of the intent of this policy, will result in a loss of the privilege of driving a company vehicle.

*Company business is defined as driving at the direction, or for the benefit, of employer. It does not include normal commuting to and from work.*

#### **Driver Criteria & Administration**

Employees must have a valid and current driver's license to operate a company vehicle.

Employees are expected to drive in a safe and responsible manner and to maintain a good driving record. The Human Resource Director is responsible for reviewing records, including accidents, moving violations, etc., to determine if an employee's driving record indicates a pattern of unsafe or irresponsible driving, and to make a recommendation to the General Manager for suspension or revocation of driving privileges.

Criteria that may indicate an unacceptable record includes, but is not limited to:

- Three or more moving violations\* in a year
- Three or more chargeable accidents within a year. Chargeable means that the driver is determined to be the primary cause of the accident through speeding, inattention, etc. contributing factors, such as weather or mechanical problems, will be taken into consideration.
- Any combination of accidents and/or moving violations.

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*\* Violations include any ticket, charge, or other law enforcement proceeding relating to these, as well as independent evidence of violations deemed satisfactory by management.*

### **Driver Safety Rules**

1. The use of a company vehicle while under the influence of intoxicants and other drugs (which could impair driving ability) is forbidden and is sufficient cause for discipline, up to and including termination of employment.
2. Cell phone use while driving should be kept to a minimum.
3. No driver shall operate a company vehicle when his/her ability to do so safely has been impaired by illness, fatigue, injury, or prescription medication.
4. All drivers and passengers operating or riding in a company vehicle ***must*** wear seat belts, even if air bags are available.
5. No unauthorized personnel are allowed to ride in company vehicles.
6. Drivers are responsible for the security of company vehicles assigned to them. The vehicle engine must be shut off, ignition keys removed, and vehicle doors locked whenever the vehicle is left unattended. In addition, drivers are responsible for making sure that the vehicle they are handling is compliant with all Kentucky and U.S. registration, licensing and safety regulations.
7. All state and local laws must be obeyed.
8. Radar detectors are strictly prohibited in company vehicles. Drivers are to drive at the speed of traffic but never to exceed the posted speed limit.

### **Vehicle Maintenance**

Proper vehicle maintenance is a basic element of any fleet safety program, not only to ensure a safe, road worthy vehicle, but also to avoid costly repair expenses and unexpected breakdowns.

Routine inspections or safety checks of critical items, such as brakes, lights, tires, wipers, etc., must be done every 15,000 miles or sooner if a problem arises.

Oil changes and tire rotations are due every 5,000 miles.

Every 30,000 miles, vehicles should have a tune-up, transmission service, cooling system service, brake service, AC service, etc.

The vehicle must be cleaned (***interior and exterior***) regularly to help maintain its good appearance for you and the company. A clean vehicle makes a good impression on customers.

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Prior approval from your direct supervisor is required on any vehicle maintenance needs.

*All maintenance performed for the month must be listed on the mileage reports.*

#### **Personal Automobiles**

Those employees who occasionally use their personal vehicle for company business will be reimbursed for mileage pursuant to IRS regulations. Reimbursed mileage is defined as mileage driven over and above the employee's normal commuting mileage. Damage to employee owned personal autos, as well as injury to family members, friends, etc., will not be covered by the corporate coverage and therefore, is the sole responsibility of the employee.

#### **Personal Use, Passengers, & Authorized Drivers of Company Vehicles**

Company vehicles are to be driven by authorized employees only, or in case of repair testing, by a mechanic. Spouses, other family members, or other non-employees, are not authorized to drive company vehicles.

Passengers are generally limited to those individuals who need to ride in the vehicle to conduct employer business, such as other employees, vendor representatives, retailers, etc.

- Approval for exceptional use should be in advance unless emergency circumstances prevent advance approval.
- Due to the design of these vehicles and related safety concerns, transport of non-employee family members is not allowed except on a case (per incident) basis due to emergency or exceptional needs. Such use may be approved on a case (per incident) basis by the department manager. Approval for exceptional use should be in advance unless emergency circumstances prevent advance approval. Once approved, the employee **should be aware that such use indicates acceptance of any liability not covered by company insurance.**

Vehicles are not to be used for personal reasons other than for commuting or de minimis personal use (such as a stop for a personal errand on the way between a business delivery and the employee's home), except when it is deemed an emergency situation or the employee has obtained permission from their supervisor, department manager or the general manager. Mileage driven in a company vehicle on personal business must be tracked separately for income tax purposes; the IRS considers personal use of a company vehicle to be a taxable fringe benefit as noted IRS Publication 15-B Commuting Rule.

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Reviewed, Revised & Adopted 7/10/09

Reissued 7/10/09



## **Epidemic/Pandemic or other Contagious Illness in the Workplace**

In the event of an epidemic, pandemic or other contagious illness in our exchanges, telecommunications will play a vital role in protecting the community's health and recovery efforts. Therefore it is imperative to maintain the operation of our business in order to support the day to day operations of not only emergency services, but that of our entire subscriber base as well. An epidemic may be limited to just a portion of our service area, a pandemic would be far more reaching in geographical proportions. This section is intended to be used in conjunction with all other applicable components with this document.

The company encourages each employee to take advantage of vaccinations offered through the Public Health Service, with the concurrence of their physician.

Contagious illness can be transmitted in direct or indirect contact, including sneezes, coughs or touching contaminated surfaces such as door knobs, keyboards, telephones, and desks. Here are some measures to be taken to reduce employees' risk of infection:

1. Sick persons should stay home- The Center for Disease Control recommends that people with flu-like illness should stay home for at least 24 hours after their fever is gone (without the use of fever-reducing medicine). A fever is defined as having a temperature of 100 degrees or more. This guidance does not apply to health care settings where the exclusion period is 7 days from the onset of flu symptoms or until 24 hours after the resolution of symptoms, whichever is longer. In a declared epidemic/pandemic event Human Resource or General Manager will review/waive the need for doctor's excuses on a case by case basis the required doctor's excuse for employees to use sick time. In the event of a declared epidemic/pandemic Human Resource Director or General Manager will review and/or waive the doctor's excuse requirement for employees to use sick time. Human Resources will notify employees when an excuse is no longer required.
2. Sick employee's may be asked to go home- Those employees who become ill with symptoms of the flu during the work day should be separated from other workers and asked to go home promptly.

### Prevention

1. Cover coughs and sneezes- Cover coughs and sneezes with tissue or elbow. Put tissues in no-touch disposal receptacles.
2. Wash hands often- Wash hands with soap and water or use an alcohol-based hand cleaner, especially after coughing or sneezing.
3. Clean surfaces likely to have frequent hand contact-Frequently clean commonly touched surfaces in the workplace, such as workstations, countertops and doorknobs.

4. The company may also consider increasing “social distancing” in the workplace. Public health officials may recommend that employers implement measures to increase the physical distance between people in the workplace or consider telecommuting for some jobs if possible.

#### Epidemic/Pandemic Event Declared

The company will identify a coordinator to provide defined roles and responsibilities for preparedness, planning and response to a significant community health event. If an event is declared Human Resource Director will serve as coordinator, if not available, Executive Assistant if not available, Business Office Manager to serve as the coordinator.

1. The Coordinator will insure that the authorized employee can be provided with the facilities, hardware and software necessary to work from home. (Broadband access to company voice and data systems)
2. The Coordinator will establish and maintain a mode of communication with the Public Health Service that can be used to confirm a quarantined employee or customer without violating HIPPA or other privacy issues.
3. The Coordinator will determine trigger points for office closure and/or reduction of other services based on current staffing and recommendations from the Public Health Department.
4. The Coordinator will consider methods to re-supply the staff with material from the warehouse without face to face contact.
5. The coordinator will forecast and allow for non-essential employee absences due to their or their families illness or quarantine.
6. The Coordinator will determine if there are special PSC reporting requirements under these conditions.
7. The Coordinator will develop a communication plan.

#### Human Resources

1. Maintain a current list of the public health officials for each exchange to contact for consultation.
2. Encourage participation in wellness programs, and encourage immunizations and vaccinations whenever possible.
3. Become the key contact for public health officials to implement a response to a community-wide health issue.
4. Be the key contact for each supervisor and manager to report that an employee is absent due to an illness of a contagious nature.
5. Work with Managers in keeping the staff and public aware of all the company’s actions that affect them.
6. Consider having one or more employees trained and equipped to safely return to work for essential job functions that require them to be in the office.
7. Human Resources trigger events:
  - Notification from a supervisor of an illness in their work group

- Confirmation of/or Notification from Public Health Services (PHS) of an epidemic.
- Confirmation of/or Notification from PHS of an epidemic/pandemic.

#### Customer Service

Due to the critical nature of the Customer Service Department, its size in employees, and close quarters in the normal workday, it is quite susceptible to a serious illness within the community. Also, by its design, it must be kept in operation throughout any work disruption that is encountered.

1. Encourage total participation in wellness programs, and immunizations and vaccinations whenever possible.
2. Continue to encourage customers to pay by mail, credit card, automatic withdrawal and payment drop boxes in lieu of face to face contact. If necessary close offices to drive through access only if an epidemic.
3. Customer Services Department trigger events:
  - An employee reports their illness or that of a dependent.
  - Multiple employees report their illness or that of a dependent.
  - Human Resources confirm an incident.
4. Consider having one or more employees trained and equipped to safely return to work for essential job functions that require them to be in the office.
5. Continue cross training of the staff in multiple tasks to strengthen operations in an emergency reduction of force.

#### Accounting Department

1. Encourage total participation in wellness programs, and immunizations and vaccinations whenever possible.
2. Predetermine if external reports and documents could be re-routed to a second site other than the office.
3. Predetermine method(s) for transfers and deposits of normal banking procedures.
4. Consider having one or more employees cross trained to do the work and equipped to safely return to work for essential job functions that require them to be in the office. (Accounts Payable)
5. Accounting Department trigger events:
  - An employee reports their illness or that of a dependent.
  - Multiple employees report their illness or that of a dependent.
  - Human Resources confirm an incident.

### Government Regulatory Agencies

1. The Assistant General Manager and/or Human Resource Director will determine if the governmental regulatory agencies have any plans for additional or reduced reporting requirements in a serious health emergency.
2. Managers, Administrative Directors will have authority to authorize travel during a disruption of normal business, while directed to consult with the General Manager or Executive Assistant when possible.
3. Determine any additional requirements that governmental agencies will require during an incident of this nature.
4. The General Manager will appoint the Marketing /PR Director as point of contact with the media in a serious health event. If not available the Human Resource Director will be appointed.
5. Government Affairs trigger events:
  - Human Resources confirm an outbreak that is large enough in scope to involve regulatory agencies.

### Engineering Department

1. Encourage total participation in wellness programs, and immunizations and vaccinations whenever possible.
2. Consider having one or more employees trained and equipped to safely return to work for essential job functions that require them to be in the office.
3. Consider having one or more employees trained and equipped to safely return to work for essential job functions that require them to be in the office.
4. Engineering Department trigger events:
  - An employee reports their illness or that of a dependent.
  - Multiple employees report their illness or that of a dependent.
  - Human Resources confirm an incident.

### Outside Plant Department

The Outside Plant Department, due to the number of employees, large geographical area it covers, and close contact with the subscribers is a risk to be exposed to a serious health emergency within the community. The Outside Plant Department, like Customer Services must be kept operational in a crisis, as communications will play an important role in the community recovering from the incident. Unlike several of the other components of the company, plant personnel are assigned in many different areas. Planning a response to an outbreak, keep the response adaptable in scope from one community to encompassing the entire serving area.

1. Encourage total participation in wellness programs, and immunizations and vaccinations whenever possible.
2. Insure that the PPE equipment assigned to each technician is in good condition and well stocked. The existing PPE equipment assigned to each technician is in good condition and well stocked. The existing PPE for Hanta Virus and Blood

Borne Pathogens will provide protection for each individual in an incidental contact with seasonal and novel virus.

3. Continue to install outside protectors at all premises. This practice will allow a technician to insure service to a location without requiring a face to face contact with the subscriber.
4. Work with the Engineering Department to insure that any new or existing Inside Terminals (IT) can be installed in a manner to reduce the extent of face to face contact with the subscriber during maintenance.
5. Maintain stock levels at a minimum of one months supply with a maximum of two months supply. Transportation and distribution of goods may be disrupted.
6. Consider having one or more employees trained and equipped to safely return to work for essential job functions that require them to be on in the office.
7. Maintain all vehicles and emergency generators as required and insure that all fuel tanks are kept full.
8. Outside Plant Department trigger events:
  - An employee reports their illness or that of a dependent.
  - Multiple employees report their illness or that of a dependent.
  - Human Resources confirm an incident.

#### Central Office Plant Department

1. Encourage total participation in wellness programs, and immunizations and vaccinations whenever possible.
2. Insure that the PPE equipment assigned to each technician is in good condition and well stocked. The existing PPE equipment assigned to each technician is in good condition and well stocked. The existing PPE for Hanta Virus and Blood Borne Pathogens will provide protection for each individual in an incidental contact with seasonal and novel virus.
3. Maintain stock levels at a minimum of one month supply with a maximum of two months supply. Transportation and distribution of goods may be disrupted.
4. Consider having one or more employees trained and equipped to safely return to work for essential job functions that require them to be in the office.
5. Maintain a full fuel level for all emergency generators.
6. Continue the height level of required maintenance on all other power systems.
7. Insure that all required CO plant maintenance has been completed.
8. Place all "Off Site" data back up programs for critical infrastructure in a safe, but accessible location. Review current practices that make access to those assets difficult during an epic/pandemic environment.

#### Data Processing

The Information Technology staff will be the catalyst for all the other departments in the planning and implementing of this section for this response plan. Expanding the networks that help manage the company on a daily basis to remote small home offices is vital to a successful result. Listed below is a framework for the technology supporting

this plan, taking into consideration that its normal state is one in constant upgrade and expansion.

1. Encourage total participation in wellness programs, and immunizations and vaccinations whenever possible.
2. Insure that the PPE equipment assigned to each technician is in good condition and well stocked. The existing PPE equipment assigned to each technician is in good condition and well stocked. The existing PPE for Hanta Virus and Blood Borne Pathogens will provide protection for each individual in an incidental contact with seasonal and novel virus.
3. Maintain stock levels at a minimum of one month supply with a maximum of two months supply. Transportation and distribution of goods may be disrupted.
4. Consider having one or more employees trained and equipped to safely return to work for essential job functions that require them to be in the office.
5. Place all "Off Site" data back up programs for critical infrastructure in a safe, but accessible location. Review current practices that make access to those assets difficult during an epic/pandemic environment.
6. Insure that all emergency power requirements are in place and routinely tested.
7. Assist Outside Plant and engineering build a network that can reach to the employees that have been identified as suitable candidates to maintain departmental function from a remote site.
8. Create regular drills or tests of the network to insure its ability and security.
9. Maintain an active redundant network with adequate spares.
10. Create an internal information system to allocate manpower shortages only to those capable of deriving the greatest benefit from it. Share the plan with the Management team to minimize conflict in a manpower shortage.

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Adopted 1-15-11

## Emergency Preparedness Plan

### Purpose

The purpose of the Mountain Telephone Emergency Preparedness plan is to prepare the company's facilities and employees in the event of an emergency situation. Proper planning will help to expedite the restoration of service and return to normal working conditions in the event of a disaster or emergency.

All employees are responsible to be familiar with the overall plan and prepared to perform any specific duties to comply with the plan. We have a plan so that at the time of emergency we can best protect and serve our employees, visitors, customers and community.

An emergency is any unplanned event that can cause death or significant injuries to employees, customers or the public; or that can shut down our business, disrupt operations, cause physical or environmental damage, or threaten the facility's financial standing or public image.

### General Preparedness

1. Listen for updates, warnings and preparedness instructions from Mountain Telephone Management Team and local media newscasts.
2. Fuel your car or company vehicle. Service stations may be closed after a storm, tornadoes, etc. Especially if the electricity is out.
3. Ready a "family safety kit" containing first aide items, special medicines, important papers, flashlights, and a portable radio with extra batteries.
4. Secure several days worth of water, food and clothing for everyone in the family. You will need at least a gallon of water per person per day. You should have at least a 3 day supply.
5. Pack at least one change of clothing and footwear per person, and a blanket or sleeping bag per person.
6. Sanitation supplies
7. Include an extra set of car keys, cash, credit cards or traveler's checks.
8. Remember to turn off the utilities only if you suspect the lines are damaged or if you are instructed to do so.
9. Plan how to take care of your pets.
10. Ask an out of state friend or family member to be your "family contact". After a disaster, other family members should call this person and tell them where they are. Everyone in your family should know your contacts phone number.

### **Tornadoes**

Tornadoes are incredibly violent local storms that extend to the ground with winds that can reach 300 miles per hour. Tornadoes are usually spawned from powerful thunderstorms.

#### **Tornado Watch**

A tornado watch is issued when severe thunderstorms and tornadoes are possible. Employees should stay tuned to local radio or television news reports for additional information.

#### **Tornado Warning**

A tornado warning is issued when a tornado has been sighted or reported on radar or spotted. Persons in the warning area should take shelter immediately.

#### **Tornado Preparedness**

If a tornado warning is issued for your area, these procedures must be followed:

- Before leaving your workstation, IF TIME PERMITS, unplug all electrical equipment, store small articles and loose papers in locked cabinets.
- Stay away from windows, glass doors and outside walls, especially during storms with hail, high winds or possible tornadoes.
- If you see any revolving, funnel shaped clouds, report them immediately by telephone to your local police department or dial 911.
- Go into small interior rooms, rooms with reinforced concrete, brick or block without windows and a heavy concrete floor. Once inside the sheltered area, personnel should protect their heads with their arms.
- Check for fires, fire hazards and other problems after the storm. Use flashlights, do not use matches or turn on electrical switches if you suspect damage.

### **Floods and Flash Floods**

Floods are the most common and widespread of all natural disasters. Most floods develop slowly over a period of days. Flash floods, however, are like walls of water that develop in a matter of minutes. Flood waters only one foot deep can sweep you off your feet.

#### **Flash Flood Watch**

A flash flood watch means heavy rains are occurring or are expected to occur that may cause sudden flash flooding in specified areas. Be alert to the possible emergency, which will require immediate action.

#### **Flash Flood Warning**

A flash flood warning means flash flooding is occurring or imminent along certain streams and designated areas. Immediate action to reach a place of safety must be taken by those threatened.



#### Flood Warning

Flood warnings are announced when the affected river, lake, or tidewaters overflowing its normal levels. Immediate action to reach a place of safety must be taken by those threatened.

#### Flood Watch

A flood watch means that rainfall is heavy enough to cause rivers to overflow their banks or melting snow is mixing with rainfall to produce similar effects.

#### Flood Preparedness

If local authorities release flood warnings, know the proper flood evacuation routes.

Follow emergency procedures set by your local authorities

1. Precautionary- This phase will concentrate on the people who are the most vulnerable to the effects of winds and water. It is directed at persons living in low-lying areas.
2. Recommended- This phase will concentrate on all the people who are at risk that live in trailers or manufactured homes, in low-lying or flood prone areas.
3. Mandatory- This is the final and most serious phase of evacuation. Authorities will put maximum emphasis on encouraging evacuation and limiting entry into the risk area.

#### **Severe Winter Storms (Ice-storms)**

Severe winter storms (ice-storms) bring heavy ice, snow, strong winds and freezing rain. Winter storms can prevent employees and customers from reaching the facilities, leading to a temporary shutdown until roads are cleared. Heavy snow and ice can also cause structural damage and power outages. Severe winter conditions can make driving difficult or dangerous.

#### Winter Weather Preparedness

If a severe winter weather watch is issued the following activities should be completed:

- If time permits, unplug all electrical equipment, except your computer equipment. The IT Department will take care of all computer related equipment.
- All employees should follow the instructions of the management team and should pay attention to the warnings of local officials.

#### Shelter in Place

In the event of an emergency, a shelter in place bulletin may be issued. Employees should tune into the EBS reporting stations, monitor local radio, local weather advisories.

- Make sure ventilation systems have been shut down
- Notify other employees.
- Lock entrance and exit doors to the building until an all clear is issued
- Turn to local radio station to be kept advised of the Shelter in Place Status.

### **Fire**

The first employee to see the fire should call 911 and management. An all call on the intercom system will be our alarm to proceed to the nearest exit, and congregate at your departments meeting place as determined by that department's supervisor. It is the responsibility of all Supervisors to account for their employees.

In the event there is a fire in the building, employees are to follow these procedures.

- IMMEDIATELY NOTIFY A MEMBER OF THE Management Team
- Evacuate the building
- Call 911

Employees in outlying areas are to

- Call 911 or the local fire department
- IMMEDIATELY notify their supervisor

### **Bomb Threats**

Most bomb threats are received over the phone by anonymous callers. However, a threat may be received by other means such as regular mail or e-mail. Regardless of the method of notification, all threats should be taken seriously and the employee who receives the threat should be prepared. Above all, it is very important to remain calm in order to obtain as much information as possible about the bomb and the caller.

A copy of the bomb threat procedures should be kept next to each phone to assist the call recipient. The call recipient should try to keep the caller on the line as long as possible and try making as many notes as possible as to what the caller relays for later reference. If possible have another employee to notify Central Office and try to trace the call.

Any person receiving a telephoned bomb threat should ask the caller:

- When will the bomb explode?
- Where is the bomb located?
- What kind of bomb is it?
- Why did you place the bomb?
- What is your name and address?

Keep talking to the caller as long as possible and record the following.

- Time of call
- Age and sex of caller
- Speech pattern, accent, possible nationality, slang etc.
- Emotional state of the caller
- Background noise such as music, traffic, and bar sounds etc.
- Let the caller hang up first. When the caller hangs up, call 911 and notify the manager/ or Safety Director.

If a suspicious package/envelope is discovered:

- Do not approach or touch the package.
- Call 911. Give as much detail as possible to the dispatcher. Let the dispatcher hang up first to ensure that they have concluded their conversation with you.
- Evacuate the area. If the object is located in a room with a door, close the door so any potential blast may be confined to that space.
- Do NOT use two-way radios, using a two way radio in the area may trigger the device.

### **Terrorist Attacks**

Devastating acts, such as terrorist attacks, leave many concerned about the possibility of future incidents in the United States. There are things you can do to prepare for the unexpected and reduce stress levels.

To prepare for a terrorist attack

- Establish a meeting place
- Assemble a disaster supply kit: include copies of essential documents and keep them in a safety deposit box.

If disaster strikes

- Remain calm
- Follow the advice of local emergency officials
- Listen to the radio or TV for news and instructions
- Keep a first aid kit nearby
- Shut off any damaged utilities

Evacuation

- Wear long-sleeved shirts, pants and sturdy shoes
- Take your disaster kit with you
- Lock your office/building
- Use travel routes specified by local authorities
- Stay away from downed power lines

### **Employee Responsibilities**

All employees are responsible for keeping their current addresses, phone numbers, and emergency contact information up to date with Human Resources.

In preparation of heavy rain and rising water employees located on the first floor of the office building must remove all personal items from their desktops and surrounding floor in order to allow the IT department to efficiently secure computers and other equipment.

In the event of an emergency that requires evacuation, all employees of Mountain Telephone are asked to follow these instructions.

1. All employees are responsible for contacting their supervisor as soon as possible after evacuating. This initial contact should occur no later than thirty-six hours after evacuating. Employees should then keep in touch with their supervisor on a daily basis. Your supervisor should be the first person you contact. If you are unable to contact your supervisor, leave a voicemail message on their work phone. After this you should attempt to contact Teresa Litteral, HR & Safety Director, at (606)743-7722.
2. All employees are responsible for checking the status of the current situation by checking the internet, checking their Mountain Telephone email, or Mountain Telephone home page.
3. All employees are expected to inform the company of their intended destination in the event of an evacuation.
4. It is recommended that all employees enroll in direct deposit to avoid the potential of payroll issues in evacuation situations.

#### Communication Flow Chart

In the event of an emergency, Mountain Telephone has implemented a communications flow chart. The chart is as follows:

Employees are to call their Supervisor

Supervisors are to call their Managers

Managers are to contact Human Resources and/or Assistant General Manager

### **Emergency Preparedness Team**

The General Manager will be in charge to activate The Emergency Preparedness Team which is made up of Assistant Manager, Human Resource Director, and Managers who will be assigned specific duties to direct and supervise. The General Manager will chair the initial meetings to put the plans in motion necessary to deal with the emergency. He will be responsible to communicate to appropriate employees, outside agencies or others what actions Mountain Telephone will take in response. Each Team member will be responsible to prepare detailed plans for their departments and communicating the plan to the employees in their department. Each team member may delegate certain responsibilities and functions, but will be accountable for the overall performance of those employees assigned by him or her.

The most typical emergency to address is the advent of a tornado or winter/ice storm. Some events will require the Team to be more proactive than others, but all will require follow up after the event. That follow up will include all departments and will require them to:

- Assess damages
- Identify requirements for material, parts, etc.
- Prioritize those requirements
- Direct and coordinate service restoration

The priority of restoration of service will be as follows:

- Central Offices
- Public Safety Services such as Federal, State and area emergency response agencies
- Hospital or other medical services
- Business Circuits
- Residential Service

#### Recovery Activities

In addition to the activities listed above, certain actions will be required of the Emergency Preparedness Team following an emergency as listed below. The first Emergency Preparedness Team Member on the scene should perform the following tasks, if possible. Some actions would be dependent upon the type of emergency encountered:

- Take pictures and obtain written statements, descriptions of events and scope of damage prior to clean up.
- Secure property from further loss by erecting temporary fences or employing security guards.
- Notify insurance carriers immediately of damage
- Notify vendors of equipment or supplies needed immediately
- Salvage any equipment and goods that are useable.
- Relocate employees to temporary location (s) if necessary.
- Have structural engineer and architect inspect any damaged buildings prior to reoccupying them for business purposes.
- Insure that all purchases directly related to emergency damages are coded as such.

#### Assistant General Manager

- Oversees the command center which will be established at the Mountain Telephone Commercial building, or another designated central office as the need arises, or as a situation requires.
- Responsible to see that funds are available to meet immediate financial need in the event of an emergency
- Responsible to insure that appropriate measures are in place to prepare and distribute payroll on paydays

- Oversee the warehouse to properly prepare for an emergency and insure that adequate inventories of needed equipment are in place or available from critical suppliers
- Insures that critical financial reports, checks and records are stored in an offsite facility if needed

#### Business Office Manager

- Responsible to direct the activities of the IT, Customer Service, Accounting and work with Sales/Marketing.
- Assists in allocating resources to the affected areas.
- Assist the Assistant General Manager at the command center which will be established at the Mountain Telephone Commercial building, or another designated central office as the need arises, or as a situation requires or in their absence.
- Responsible to see that the Billings and Collections Department is equipped to staff the reception area and carry out their assigned duties as soon as possible following an emergency
- Responsible to implement IT Department Plans as soon as necessary and to insure properly running network as soon as possible after the emergency
- Responsible to see that the IT Department implements activity to protect the integrity of all company records stored on the servers
- Responsible to see that employees are completely informed of their actions needed to protect the company computer equipment located in their office/work areas
- Responsible for determining the feasibility of Customer Service and Customer Support working out of a remote location

#### Central Office Plant Manager

- Oversees the direction of the Network and CO Plant.
- Assists in communicating the needs of those departments to the General Manager or the Assistant General Manager.
- Assists in allocating resources to the most affected areas
- Designates areas where resumption of service is most critical
- Insures that the appropriate vendors are notified in case of critical need of replacement equipment or parts
- Oversees the command center in the absence of the Assistant General Manager or other Managers.

#### Outside Plant Manager

- Oversees the command center in the absence of the Assistant General Manager or other Managers.

- Oversees the direction of outside plant, engineering, construction, and installer/repairmen.
- Assists in determining what outside agencies should be notified and when
- Is responsible for the security of company property
- Direct contact will be established with Emergency Response Personnel, Law enforcement personnel of the County affected
- Designates areas where resumption of service is most critical
- Is responsible for the security of company property
- Is responsible to insure that adequate messages are prepared for employees for call in to designated voice mail boxes directing them on reporting times and dates

#### Supervisor of Outside Plant Operation

- Coordinates scheduling of field personnel to secure plant facilities before an emergency and repair plant facilities after an emergency for all Mountain Telephone properties and buildings.
- Insures that the appropriate vendors are notified in case of critical need of replacement equipment or parts
- Responsible for designating persons to obtain needed supplies
- Responsible for securing company vehicles

#### Supervisor of Central Office

- Designates areas for the first service restoration along with CO Plant Manager.
- Oversees the dispersal of emergency power supplies to outlying remotes
- Responsible for designating persons to obtain needed supplies
- Responsible for test running generators prior to an emergency
- Responsible for securing company vehicles

#### Customer Service Supervisor

- Responsible to insure that adequate staffing is maintained in the Customer Service Department during and immediately following an emergency so that customer questions are answered and needs are met as conditions allow
- Responsible for determining the feasibility of Customer Service and Customer Support working out of a remote location

#### Human Resources and Safety Director

Responsible to insure that Managers have contact numbers for all employees

- Responsible to insure that Personnel Records are accounted for and properly protected
- Responsible for assisting employees to secure day care and living arrangements if possible when returning to work immediately following an emergency.
- Responsible for keeping the Company web page current.
- Assists in communications with employees.
- Organizes the initial response meetings in the event of an emergency
- Represents the company in local emergency response and planning meetings

Director of Marketing and Public Relations

- Works with General Manager and Assistant General Manager in determining what outside agencies should be notified
- Maintain newspaper articles describing the situation of the emergency
- Responsible for coordinating articles with Public Relations to ensure continued communication with public agencies, media and customers regarding the progress of Mountain Telephone and our resumption of services.

Executive Assistant to General Manager

- Establishes immediate contact with insurance carriers
- Is responsible to insure that all employees are accounted for and can be reached when needed with HR assistance.

**Departmental Procedures**

Each Department should establish specific procedures to follow in the event of an emergency. Those procedures should specify actions that are to be followed in the event of an impending emergency (such as weather) as well as guidelines to follow immediately after an emergency.

Those Departmental Procedures should be published for all employees to be able to access them and should be available with a copy of the Emergency Preparedness Plan. Departmental Procedures should be reviewed at least annually by the Departmental Manager to verify their accuracy and usefulness.

The Emergency Preparedness Plan along with Departmental Procedures should be reviewed with all employees at least once per year and at the onset of potentially threatening weather (particularly tornadoes). All employees are expected to be familiar with the Emergency Preparedness Manual, Departmental Procedures and their obligations set forth by those documents.

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Adopted 1/15/11



## RECEIPT OF HANDBOOK ACKNOWLEDGEMENT FORM

I have received a copy of the employee handbook issued by employer, Mountain Telephone, and understand and agree that I am to review this handbook in detail and to consult with my supervisor, manager, or the Human Resource Director if I have any questions concerning its contents.

I understand and agree:

- That this handbook is intended as a general guide to personnel policies at Mountain Telephone and that it is not intended to create any sort of contract between the Company and any one or all of its employees;
- that the Company may modify any or all of these policies, in whole or in part, at any time, with or without prior notice; and
- that in the event the Company modifies any of the policies contained in this handbook, the changes will become binding on me immediately upon issuance of the new policy by the Company.

I further understand and agree that my employment with Mountain Telephone may be terminated by me or by the Company at any time, for any reason permitted by law. I understand that no person other than the Board of Directors and General Manager has any authority to enter into any contract of employment for any specific period of time and further understand and agree that he or she may do so only in a written document signed by him or her.

I understand that as an employee of Mountain Telephone I am required to review and follow the policies set forth in this employee handbook and I agree to do so.

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Date



# Mountain Telephone

## Forklift

### Purpose

**Material handling is a significant safety concern.** During the movement of products and materials there are numerous opportunities for personal injury and property damage if proper procedures and caution are not used. This program applies to all powered industrial trucks, hoists & lifting gear. The information in this program shall be used to train prospective industrial truck operators and provide the basis for refresher and annual retraining. OSHA reference for Powered Industrial Trucks is 1910.178.

### Responsibilities

#### Management

- Provide adequate training in safe operation of all equipment used to move or access materials
- Provide equipment that is safe to operate
- Implement an "Out of Service" program for damaged equipment
- Not allow modification to equipment except those authorized in writing by the equipment manufacturer
- Establish safe operating rules and procedures

#### Supervisors

- Monitor safe operations of material handling equipment
- Ensure all equipment is safety checked daily
- Tag "Out of Service" any damaged equipment

#### Employees

- Operate only that equipment for which they have been specifically trained and authorized
- Conduct required daily pre-use inspections
- Report any equipment damage or missing safety gear
- Follow all safety rules and operating procedures

#### Hazards

- Falling loads
- Overloading of equipment

- Impact with equipment
- Piercing of containers
- Loading dock roll off
- Chemical contact - battery acid
- Fires during refueling

### **Hazard Controls**

- Control of equipment keys
- Authorized fueling & recharge areas
- Proper palletizing of material
- Equipment warning lights
- Seat belts
- Mounted fire extinguishers

### **Pre-Qualification**

All candidates for Powered Industrial Truck (PIT) operators must meet the following basic requirements prior to starting initial or annual refresher training:

- Must have no adverse vision problems that cannot be corrected by glasses or contacts
- No adverse hearing loss that cannot be corrected with hearing aids
- No physical impairments that would impair safe operation of the PIT
- No neurological disorders that affect balance or consciousness
- Not taking any medication that affects perception, vision, or physical abilities

### **Training**

**Training for Powered Industrial Truck (PIT) Operators** shall be conducted by an experienced operator, selected by Management. All operational training shall be conducted under close supervision. All training and evaluation must be completed before an operator is permitted to use a Powered Industrial Truck (forklift, etc) without continual & close supervision. Training consists of:

#### **Trainees may operate a powered industrial truck only:**

- Under the direct supervision of persons, selected by management, who have the knowledge, training, and experience to train operators and evaluate their competence; and

- Where such operation does not endanger the trainee or other employees.

### **Training Content**

Training consists of a combination of formal instruction, practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace.

**Initial Training:** Powered industrial truck operators shall receive initial training in the following topics:

#### **Truck-related training topics:**

1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate
2. Differences between the truck and an automobile
3. Truck controls and instrumentation: where they are located, what they do, and how they work
4. Engine or motor operation
5. Steering and maneuvering
6. Visibility (including restrictions due to loading)
7. Fork and attachment adaptation, operation, and use limitations
8. Vehicle capacity
9. Vehicle stability
10. Any vehicle inspection and maintenance that the operator will be required to perform
11. Refueling and/or charging and recharging of batteries
12. Operating limitations
13. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

#### **Workplace-related topics:**

1. Surface conditions where the vehicle will be operated
2. Composition of loads to be carried and load stability
3. Load manipulation, stacking, and unstacking
4. Pedestrian traffic in areas where the vehicle will be operated
5. Narrow aisles and other restricted places where the vehicle will be operated
6. Hazardous (classified) locations where the vehicle will be operated
7. Ramps and other sloped surfaces that could affect the vehicle's stability
8. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust

9. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation

**Refresher training and evaluation:** Refresher training, including an evaluation of the effectiveness of that training, shall be conducted to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely. Refresher training in relevant topics shall be provided to the operator when:

1. The operator has been observed to operate the vehicle in an unsafe manner
2. The operator has been involved in an accident or near-miss incident
3. The operator has received an evaluation that reveals that the operator is not operating the truck safely
4. The operator is assigned to drive a different type of truck
5. A condition in the workplace changes in a manner that could affect safe operation of the truck
6. Once every 3 years an evaluation will be conducted of each powered industrial truck operator's performance.

### **Safe Operating Procedures (SOP) & Rules**

- Only authorized and trained personnel will operate PITs.
- All PITs will be equipped with an overhead guard, fire extinguisher, rotating beacon, back-up alarm and seat belts. Seat belts will be worn at all times by the Operator.
- The operator will perform daily pre- and post-trip inspections.
- Any safety defects (such as hydraulic fluid leaks; defective brakes, steering, lights, or horn; and/or missing fire extinguisher, lights, seat belt, or back-up alarm) will be reported for immediate repair or have the PIT taken "Out of Service".
- Operators will follow the proper recharging or refueling safety procedures.
- Loads will be tilted back and carried no more than 6 inches from the ground. Loads that restrict the operator's vision will be transported backwards.
- PITs will travel no faster than 5 mph or faster than a normal walk.
- Hard hats will be worn by PIT Operators in high lift areas.
- Operator will sound horn and use extreme caution when meeting pedestrians, making turns and cornering.
- Passengers may not ride on any portion of a PIT. Only the operator will ride PITs. "NO PASSENGERS" decals will be affixed on all PITs.

- If PITs are used as a man lift, an appropriate man lift platform (cage with standard rails and toe-boards) will be used.
- Aisle will be maintained free from obstructions and wide enough (six foot minimum) for vehicle operation.
- Lift capacity will be marked on all PITs. Operator will assure load does not exceed rated weight limits.
- When un-attended, PITs will be turned off, forks lowered to the ground and parking brake applied.
- All PITs (with exception of pallet jacks) will be equipped with a multi-purpose dry chemical fire extinguisher. (Minimum rating; 2A:10B:C)
- Operators are instructed to report all accidents, regardless of fault and severity, to Management. Management will conduct an accident investigation.
- When loading trailers, dock plates will be used. Operators will assure dock plates are in good condition and will store on edge when not in use.
- Trailers will be parked squarely to the loading area and have wheels chocked in place. Operators will follow established Docking/Un-Docking Procedures.

## **Trucks**

The flooring of trucks and trailers shall be checked for breaks and weakness before they are driven onto.

- The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks.
- Fixed jacks may be necessary to support a semi trailer and prevent upending during the loading or unloading when the trailer is not coupled to a tractor.

## **Operations**

- If at any time a powered industrial truck is found to be in need of repair, defective, or in any way unsafe, the truck shall be taken out of service until it has been restored to safe operating condition.
- Trucks shall not be driven up to anyone standing in front of a bench or other fixed object.
- No person shall be allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.
- Unauthorized personnel shall not be permitted to ride on powered industrial trucks.

- Arms or Legs shall not be placed between the uprights of the mast or outside the running lines of the truck.
- When a powered industrial truck is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and brakes set. Wheels shall be blocked if the truck is parked on an incline.
- A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform. Trucks shall not be used for opening or closing freight doors.
- There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- An overhead guard shall be used as protection against falling objects. It should be noted that an overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling capacity load.
- A load backrest extension shall be used whenever necessary to minimize the possibility of the load or part of it from falling rearward.
- Trucks shall not be parked so as to block fire aisles, access to stairways, or fire equipment.

## **Loading**

- Only stable or safely arranged loads shall be handled. Caution shall be exercised when handling off-center loads which cannot be centered.
- Only loads within the rated capacity of the truck shall be handled.
- The long or high (including multiple-tiered) loads which may affect capacity shall be adjusted.
- Trucks equipped with attachments shall be operated as partially loaded trucks when not handling a load.
- A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load.
- Extreme care shall be used when tilting the load forward or backward, particularly when high tiering. Tilting forward with load engaging means elevated shall be prohibited except to pick up a load. An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack. When stacking or tiering, only enough backward tilt to stabilize the load shall be used.

## **Fueling Safety**

- Fuel tanks shall not be filled while the engine is running. Spillage shall be avoided.



- Spillage of oil or fuel shall be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- No truck shall be operated with a leak in the fuel system until the leak has been corrected.
- Open flames shall not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.

## **Maintenance of Powered Industrial Trucks**

- Any power-operated industrial truck not in safe operating condition shall be removed from service. All repairs shall be made by authorized personnel.
- Those repairs to the fuel and ignition systems of industrial trucks which involve fire hazards shall be conducted only in locations designated for such repairs.
- Trucks in need of repairs to the electrical system shall have the battery disconnected prior to such repairs.
- All parts of any such industrial truck requiring replacement shall be replaced only by parts equivalent as to safety with those used in the original design.
- Industrial trucks shall not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer, nor shall they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts. Additional counter-weighting of fork trucks shall not be done unless approved by the truck manufacturer.
- Industrial trucks shall be examined before being placed in service, and shall not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle. Such examination shall be made at least daily. Where industrial trucks are used on a round-the-clock basis, they shall be examined prior to use each shift. Defects when found shall be immediately reported and corrected.
- When the temperature of any part of any truck is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the vehicle shall be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Industrial trucks shall be kept in a clean condition, free of lint, excess oil, and grease. Noncombustible agents should be used for cleaning trucks. Low flash point (below 100 deg. F.) solvents shall not be used. High flash point (at or above 100 deg. F.) solvents may be used.

### ***Powered Industrial Truck Pre-Use Checklist***

***A check of the following items (as applicable) is to be conducted by the operator prior to use each shift.***

Lights

Horn

Brakes

Leaks

Warning Beacon

Backup Warning Alarm

Fire Extinguisher

If any deficiencies are noted, the unit is to be placed OUT OF SERVICE until the problem has been corrected. Additionally, it is the operator's responsibility to notify the immediate supervisor.

TBL 2/7/07

# Mountain Telephone

## Ladder Safety

### **Purpose**

Ladders present unique opportunities for unsafe acts and unsafe conditions. Employees who use ladders must be trained in proper selection, inspection, use and storage. Improper use of ladders has caused a large percentage of accidents in the workplace. Use caution on ladders. OSHA reference: (29 CFR 1910.25, 1910.26, and 1910.27).

### **Ladder Hazards**

Falls from ladders can result in broken bones and death. Ladder safety is a life saving program at our company.

#### *Hazards include:*

- Ladders with missing or broken parts
- Using a ladder with too low a weight rating
- Using a ladder that is too short for purpose
- Using metal ladders near electrical wires
- Using ladders as a working platform
- Objects falling from ladders

### **Ladder Inspection**

Inspect ladders before each use.

- All rungs and steps are free of oil, grease, dirt, etc.
- All fittings are tight.
- Spreaders or other locking devices are in place.
- Non-skid safety feet are in place.
- No structural defects, all support braces intact.

Do not use broken ladders. Most ladders cannot be repaired to manufacturer specifications. Throw away all broken ladders.

### **Ladder Storage**

Store ladders on sturdy hooks in areas where they cannot be damaged. Store to prevent warping or sagging. Do not hang anything on ladders that are in a stored condition.

## Ladder Ratings

### *Ladder weight ratings*

- I-A 300 pounds (heavy duty)
- I 250 pounds (heavy duty)
- II 225 pounds (medium duty)
- III 200 pounds (light duty).

### *Limits on ladder length.*

- A stepladder should be no more than 20 feet high.
- A one-section ladder should be no more than 30 feet.
- An extension ladder can go to 60 feet, but the sections must overlap.

## Ladder Setup

The following procedure must be followed to prevent ladder accidents:

- Place ladder on a clean, slip-free, level surface.
- The top of the ladder should extend at least 3 feet above the top support or work area.
- Anchor the top and bottom of the ladder if possible.
- To set up a ladder at the proper angle, place the base of the ladder a distance of  $\frac{1}{4}$  the height of the ladder, away from the wall when using an extension ladder.
- Never allow more than one person on a ladder.
- Use carriers and tool belts to carry objects up a ladder.
- Do not lean out from the ladder in any direction.
- Do not allow others to work under a ladder in use.

## Ladder Setup on Poles

- Ladder adapter (v-rung) shall be installed on ladder before use on pole.
- V-rung must fit property on the pole.
- A ladder cinch shall be used to anchor ladder to pole before climbing.
- Read and understand all labels on cinch and ladder before use.
- The cinch belt should be placed between the fifth and sixth rung. The ladder-cinch should be at right angles (90 degrees) to the ladder.
- Make sure the ladder and cinch is in good condition for safe climbing.
- Make sure ladder feet is on level surface before climbing.
- Safety off through top rung of ladder and around pole.

- In the event working height exceeds top of ladder rung, then top of ladder must be secured to pole.

You can also use a ladder-cinch at the top and bottom of ladders when necessary.

### **Ladder Setup on Suspension Strand**

- Ladder shall have cable hooks installed prior to use.
- Make sure there are no electrical hazards before attempting to set ladder on suspension strand.
- Extend ladder approximately 2 rungs above suspension strand and lower until hooks are over strand.
- Ensure ladder hooks are secured over suspension strand before climbing.
- Make sure ladder feet are on level surface before climbing.
- Run safety cinch through ladder rung and suspension strand before latching to belt.

### **Ladder Maintenance**

- Keep ladders clean. Rungs should be kept free of grease and oil.
- Never replace broken parts unless provided by the original manufacturer.
- Do not attempt to repair broken side rails.
- Keep all threaded fasteners properly adjusted.
- Replace worn steps with parts from manufacturer.

Prepared by Teresa Litteral 1/17/06

## MOUNTAIN TELEPHONE

### Medical and First Aid Program - 1910.151

It is of the utmost importance that Mountain Telephone maintains the safest workplace possible. However in those cases when medical treatment is necessary emergency or otherwise we must be prepared to address any and all situations. Report any first aid cases no matter how insignificant they may seem so that they may be properly addressed, report injuries to your supervisor, or Human Resource as soon as possible. It is vital to manage all medical cases beginning with good accident investigations at the very onset. Good communication must be maintained between the company, the treating physician and the injured employee about their diagnosis, prognosis, and plan of medical treatment to return them back to work as soon as possible.

#### Purpose

To ensure the ready availability of medical personnel for advice and consultation on matters of employee health.

#### Procedures

- In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid.
- For employees who will be conducting work related duties in geographic locations where medical assistance is not readily available, those employees will be properly trained to provide first aid treatment which could be reasonably expected based on the nature of the work. Adequate first aid supplies will be readily available at each location Malone Warehouse, Plant and Commercial Buildings and in each company service vehicle.
- If the need arises for emergency care while in the field, proceed to the nearest medical facility to your present location or **call 911**.
- For non-emergency care, contact supervisor for instructions. If supervisor is not available, go to the nearest medical facility of your choice. Contacting Supervisor or Human Resource as soon as possible.
- Employee training will be conducted by the local American Red Cross or similar entity.
- Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use. All flushing and drenching equipment shall be kept clean and sanitary. All Mountain Telephone remote CO's have eye washing facilities.

#### 1910.151 Appendix A - (First Aid Kits)

- First Aid supplies are required to be readily available under paragraph 1910.151(b). An example of the minimal contents of a generic first aid kit is described in American National Standard (ANSI) Z308.1-1978 “Minimum Requirements for Industrial Unit-Type First Aid kits.”
- Employers who have unique or changing first aid needs in their workplace may need to enhance the first aid kit contents. Our company will review our first aid needs on an annual basis to ensure the content of our kits is adequate.
- If it is reasonably anticipated that employees will be exposed to blood or other potentially infectious material while using first aid supplies, employers are required to provide appropriate PPE in compliance with the provisions of the Bloodborne Pathogens Standard 1910.1030(d)(3). This standard lists appropriate PPE for this type of exposure, such as gloves, face shields, eye protection, and mouth to mouth barriers.

The contact information, **other than 911**, for the medical facility in our service area is:

Appalachian Regional Healthcare - West Liberty, KY- 743-3186

ARH Morgan Co Clinic- West Liberty, KY - 743-3198

Morgan Co Emergency Medical Service - West Liberty, KY- 743-2700

Mary Chiles Hospital- Mt. Sterling, KY - 859-498-1220

Menifee Medical Clinic- Frenchburg, KY- 768-2191

St. Claire Hospital- Morehead, KY- 606-783-6500 or 800-264-0616

Elliott Co Medical Clinic- Sandy Hook, KY - 738-5155

Kings Daughters- Ashland, KY - 606-327-4000

KY River Medical Center-Jackson, KY - 606-666-6000

St. Luke’s Medical Clinic-Campton, KY- 668-9076

# Mountain Telephone

## Bloodborne Pathogens Program

### Purpose

An infection control plan must be prepared for all persons who have exposure to bodily fluids, including blood, during the course of his or her work (i.e. administering First Aid, etc.) and/or handle, store, use, process, or dispose of infectious medical wastes. This infection control plan complies with OSHA requirement, 29 CFR 1910.1030, Bloodborne Pathogens. The plan includes requirements for personal protective equipment, housekeeping, training, and a procedure for reporting exposures. This plan will be renewed and where appropriate, modified yearly.

### Responsibilities

- The Company Safety Director will conduct the Bloodborne Pathogen Program and maintain records of training and inspections for this program.
- Management will ensure proper conduct of the program through inspections, record keeping and periodic audits.

### Definitions

**Medical Wastes/Infectious Wastes.** All waste emanating from human or animal tissues, blood or blood products or fluids. This includes used first aid bandages, syringes, needles, sharps, material used in spill cleanup and contaminated PPE or clothing.

**Universal Precautions.** Refers to a system of infectious disease control that assumes that every direct contact with body fluids is infectious and requires every employee exposed to be protected as though such body fluids were infected with bloodborne pathogens. All infectious/medical material must be handled according to Universal Precautions (OSHA Instruction CPL 2-2.44A).

### Hazards

Unprotected exposure to body fluids presents the possible risk of infection from a number of bloodborne pathogens, notably Hepatitis and HIV.

### Hazard Control

**Engineering Controls** - prevention of exposure to bloodborne pathogens engineering controls include: Hand washing facilities, proper storage facilities and containers, use of Personal Protective equipment, and trained to use brooms/dust pans to pick up sharps/materials. Infectious waste kits are located in First Aid Station at Outside Plant, Malone Warehouse, and Commercial Building. If situation occurs where hand washing facilities are not available, each service vehicle is equipped with a universal precautions kit, which includes antiseptic towels that employees can use and each employee has access to instant hand sanitizer. Employees utilizing this alternative must see that hands are washed with soap and running water as soon as possible.



**Administrative Controls** - prevention of exposure to bloodborne pathogen administrative controls include: universal precautions, assignment of PPE, employee training, use of spill kits specifically designed for blood and body fluids, restricted access to waste collection points and waste disposal procedures.

## **Reporting and Record Keeping**

Any reports required by OSHA will be maintained by the Human Resource & Safety Director. All reports (Training Certificates, Notice of HBV Vaccinations, exposure reports) will be maintained for 30 years. Occupationally contracted HBV or HIV will be recorded on the OSHA 300 Log of Occupational Injuries and Illnesses as an illness. Exposures to bloodborne pathogens from contact with sharps will be recorded on the OSHA 300 Log of Occupational Injuries and Illnesses if treatment such as gamma globulin, hepatitis B immune globulin or hepatitis B vaccine is prescribed by a Physician.

## **Exposure Determination**

The exposure determination was made without considering the benefits of Personal Protective equipment. This exposure determination is required to list all job classifications in which employees have potential for occupational exposure, regardless of frequency. The following job classifications exist at MTC:

Janitorial/Housekeeping-Emptying of waste cans, restroom cleaning

Installer/Repairmen- *employees that have potential for contact with human body fluids during some activity in their job description at MTC.*

## **Training**

All personnel assigned duties as Installers/Repairmen, Emergency Response Team, and Janitorial/Housekeeping will receive initial and annual training by a qualified safety professional on the Bloodborne Pathogen Program.

All new and current affected Employees will be trained initially and annually thereafter. The content of the training program will include:

14. Company Policy
15. Types and transmission of Bloodborne Pathogens
16. General Safety Rules
17. Universal Precautions
18. Use of Personal Protective Equipment
19. Medical Waste Disposal Procedures
20. Post Exposure Treatment and Procedures
21. HBV Vaccinations

Documentation of training will be by HR.

All Employees not affected by this Program will receive an overview of the program requirements during scheduled department Safety Meetings with documentation by Safety Meeting Minutes Form.

## **Hepatitis-B Virus (HBV) Vaccinations**

All Installer/Repairmen, janitorial/housekeeping and those required to provide first aid or emergency response duties or medical care on a routine basis will be offered Hepatitis-B Virus (HBV) Vaccinations at Company expense. Employees that transfer to a job or their job is reclassified to include exposure to bloodborne pathogens will be offered HBV Vaccinations within 10 working days of the transfer or reclassification.

The choice for HBV vaccination is not mandatory. If an affected Employee chooses not to have the vaccination at the initial offering, they will have the opportunity to be vaccinated when they are ready. The Company will document the offer, acceptance or declination, and vaccination dates with the *Notice of HBV Vaccinations Form on the Bloodborne Pathogen Exposure Control Maintenance Record form*.

## **Post Exposure Treatment and Notification Procedures**

Should an affected Employee or an Employee acting as a "Good Samaritan" be occupationally exposed to HIV/HCV/HBV, the affected Employee will report the exposure to the Human Resource & Safety Director. The Company will provide for the Employee the opportunity to be tested for HIV/HCV/HBV at Company expense. Following the initial blood test at time of exposure, seronegative Employees will be retested at 6 weeks, 12 weeks and 6 months to determine if transmission has occurred. During this period, the Employee will follow the recommendations provided by the Physician or the U. S. Public Health Service.

An "occupational exposure" is defined as blood or body fluid contact from an injured or ill Employee to the affected Employee or injury by a contaminated sharp object.

Following the report of exposure, HR & Safety Director will contact the exposure source and request that person be tested for HIV/HCV/HBV at Company expense. The request is not mandatory and if refused will not effect that Employee's future employment.

The source individual's blood is tested, as soon as possible and after consent is obtained, to determine HBV and HIV infectivity. (Hepatitis B surface Antigen, Hepatitis C Antibody and HIV Screen)

The exposed employee's blood shall be collected as soon as feasible and tested for HBV (Hepatitis Bs Antibody, Hepatitis C Antibody) and HIV serological status, after consent is obtained (Employee Consent for HIV Antibody Testing).

During all phases of Post Exposure, the confidentiality of the affected Employee and exposure source will be maintained on a "need to know basis". The *Bloodborne Pathogens Exposure Control* form is used to document the exposure and offer of medical assistance to the affected Employee and the *Medical Consent for Bloodborne Pathogens Testing must be in writing* from the exposure source. The results of any HIV/HCV/HBV tests conducted will be provided to the exposed and source Employees within 5 business days of receipt.

## **Cuts**

If an employee has a needle stick, cut, or mucous membrane exposure to another persons body fluids he/she must report the incident immediately to HR & Safety Director.

### ***Blood Exposure***

All employees exposed to human blood and blood products must report to the HR & Safety Director for information and possible inclusion in the Hepatitis B Immunization Program.

### ***Infection Control Plan***

The purpose of the Infection Control Plan is to protect the health and safety of the persons directly involved in handling the materials, Company personnel and the general public by ensuring the safe handling, storage, use, processing, and disposal of infectious medical waste. This plan complies with the OSHA requirement for 29 CFR 1910.1030, Bloodborne Pathogens.

**Universal precautions:** Refers to a system of infectious disease control which assumes that every direct contact with body fluids is infectious and requires every employee exposed to be protected as though such body fluids were infected with bloodborne pathogens. All infectious/medical material must be handled according to Universal Precautions (OSHA Instruction CPL 2-2.44A).

The following universal precautions must be taken.

1. Gloves must be made of appropriate disposable material, usually intact latex or vinyl. They must be used:
  - a. when the employee has cuts, abraded skin, chapped hands, dermatitis, or the like.
  - b. when examining abraded or non-intact skin of a patient with active bleeding.
  - c. while handling blood or blood products or other body secretions during routine procedures.
2. Gowns, aprons, or lab coats must be worn when splashes of body fluid on skin or clothing are possible.
3. Mask and eye protection are required when contact of mucosal membranes (eyes, mouth or nose) with body fluids is likely to occur (e.g. splashes or aerosolization).
4. Resuscitation equipment, pocket masks, resuscitation bags, or other ventilation equipment must be provided to eliminate the need for direct mouth to mouth contact.

### ***Waste Disposal Plan***

1. Medical/Infectious waste must be segregated from other waste at the point of origin.
2. Medical/Infectious waste, except for sharps (e.g. razor blades, broken glass, needles, etc.) capable of puncturing or cutting must be contained in double disposable red bags conspicuously labeled with the words, "INFECTIOUS WASTE -- BIOHAZARD."

3. Infectious sharps must be contained for disposal in leak-proof, rigid puncture resistant containers.
4. Infectious waste thus contained as described in procedures 2 and 3 above must be placed in reusable or disposable leak-proof bins or barrels which must be conspicuously labeled with the words, "INFECTIOUS WASTE -- BIOHAZARD." These waste barrels are be picked up regularly by an outside company licensed to handle infectious wastes.
5. Spills/Disinfectants: a solution of sodium hypo chlorite (household bleach) diluted 1:9 with water must be used to disinfect, following initial cleanup of a spill with a chemical germicide approved as a hospital disinfectant. Spills must be cleaned up immediately.
7. After removing gloves, and/or after contact with body fluids, hands and other skin surfaces must be washed thoroughly and immediately with soap or other disinfectant in hot water.
10. Call Human Resource & Safety Director, or Management for disposal of infectious waste.

*Personal Protective Equipment for Worker Protection  
Against HIV and HBV Transmission*

TASK	GLOVES	APRON	MASK	EYEWEAR
Control of Bleeding w/ spurting blood	X	X	X	X
Bleeding control with minimal bleeding	X			
Emergency Child Birth	X	X	X	X
Blood Drawing	X			
Handling & Cleaning Instruments	X			
Cleaning Bio Spills	X			
Taking Temperature				
Giving Injection	X			
Measuring Blood Pressure				

**The examples provided in this table are based on application of universal precautions. Universal precautions are intended to supplement rather than replace recommendation for routine infection control, such as hand washing and using gloves to prevent gross microbial contamination of hands (e.g., contact with urine or feces).**

## RECORD OF HEPATITIS B VACCINE DECLINATION

\_\_\_\_\_  
DATE

**I understand that due to my occupational exposure to blood or to other potentially infectious materials, I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to me. However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.**

**Employee Name:** \_\_\_\_\_

**Employee Signature:** \_\_\_\_\_

**Employer Representative:** \_\_\_\_\_

# Bloodborne Pathogen Post Exposure Form

## Exposed Individual

Name: \_\_\_\_\_

Address: \_\_\_\_\_

SS# \_\_\_\_\_

1. Using the list below, check of the parts of the body that were exposed:

Eye \_\_\_\_\_ Mouth \_\_\_\_\_ Mucous Membrane \_\_\_\_\_

2. What was the employee exposed to:

Blood-Vomit-Urine

Feces-Other

3. Source individual \_\_\_\_\_

4. Describe the exposure incident \_\_\_\_\_

5. What work was being done \_\_\_\_\_

6. What caused the incident \_\_\_\_\_

7. What PPE was being worn \_\_\_\_\_

8. What actions were taken immediately following  
the incident \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

## Bloodborne Pathogen Exposure Control Maintenance Record

Employee Name: \_\_\_\_\_ SS #: \_\_\_\_\_  
 Company Name: \_\_\_\_\_  
 Dept: \_\_\_\_\_ Location: \_\_\_\_\_  
 Signature: \_\_\_\_\_

### Hepatitis B Vaccination Record\*

Date: \_\_\_\_\_ Physician: \_\_\_\_\_  
 Date: \_\_\_\_\_ Physician: \_\_\_\_\_  
 Date: \_\_\_\_\_ Physician: \_\_\_\_\_

### Post-Exposure Evaluation/Follow-up

Date: \_\_\_\_\_ Incident: \_\_\_\_\_  
 Date: \_\_\_\_\_ Incident: \_\_\_\_\_  
 Date: \_\_\_\_\_ Incident: \_\_\_\_\_

### Personal Protective Equipment Record

I have received the following equipment and maintain it in good condition:

	Date of Issue and Reissue		
Disposable Gloves			
Isolation Gown			
Eye/Mouth Protection			
Antiseptic hand wipe			
Bio Hazard waste bag			
Other:			

### Training Record

Type(s) of Certification: \_\_\_\_\_

Initial Training:

Subject: \_\_\_\_\_ Date: \_\_\_\_\_ By Whom: \_\_\_\_\_

Annual Retraining:

Subject: \_\_\_\_\_ Date: \_\_\_\_\_ By Whom: \_\_\_\_\_

Subject: \_\_\_\_\_ Date: \_\_\_\_\_ By Whom: \_\_\_\_\_

Subject: \_\_\_\_\_ Date: \_\_\_\_\_ By Whom: \_\_\_\_\_

### Confirmation of Policy Receipt and Review

I have received a copy of the Bloodborne Pathogen Program at Mountain Telephone. I have reviewed the Program, understand it, and agree to abide by it.

Employee's Signature: \_\_\_\_\_ Date: \_\_\_\_\_



# Mountain Telephone

## Personal Protective Equipment

### Purpose

This standard was developed to provide guidelines concerning the proper use of Personal Protective Equipment and to comply with OSHA standards.

Mountain Telephone feels that the proper selection and use of personal protective equipment is vital in the successful implementation of this safety program. Mountain Telephone reserves the right to select and/or approve all personal protective equipment issued or used by its employees, visitors and/or subcontractors, and only such equipment issued or approved will be allowed on its job sites. Because personal protective equipment can only be effective if chosen and used properly failure to wear assigned personal protective equipment (PPE) or follow procedures will result in disciplinary action up to and including termination.

This standard addresses eye, face, head, foot, and hand protection.

### Definition

PPE includes clothing and other accessories designed to create a barrier between the user and workplace hazards.

### Responsibility

**The Safety Director is responsible for complying with all OSHA requirements.**

1. Create/update the specific written program.
2. Oversee that annual workplace hazard assessments are completed and documented.
3. Conduct periodic workplace reassessments as requested by supervisors and/or as needed.
4. Oversee training is completed and documented.
5. Provide technical assistance to facility personnel on the proper use, care, and cleaning of approved PPE.
6. Conduct hazard assessments before new hazards are introduced or before processes are added or changed that may affect the facilities PPE needs.

### Managers and Supervisors/Foremen

1. Implement and enforce the requirements of the specific written program.
2. Provide appropriate PPE to employees.
3. Ensure employees are trained on the proper use, care, and cleaning of PPE.
4. Seek assistance from Safety Director when questions arise.
5. Notify Safety Director before new hazards are introduced or before processes are added or changed that may affect the facilities PPE needs.

6. Ensure defective or damaged equipment is immediately replaced.

### **Employees**

1. Wear PPE as required.
2. Attend required training sessions.
3. Store, clean and maintain PPE as required.
4. Inform the supervisor/safety director of the need to replace PPE.

### **Hazard Assessment**

For each department, a documented hazard assessment shall be completed that includes the following:

- a. A survey of each work area shall be conducted to identify sources of hazards, including impact, penetration, compression, chemical, heat, dust, electrical sources, material handling, etc.
- b. Each survey will be documented using the PPE Hazard Assessment Form, or equivalent, that identifies the workplace surveyed, the person conducting the survey, findings of potential hazards, and date of the survey.
- c. The completed hazard assessment forms shall be kept on file for 24 months for record verification.

### **Protective Equipment**

1. All personal protective clothing and equipment will be of safe design and construction for the work to be performed and shall be maintained in a sanitary and reliable condition.
2. Only those items of protective clothing and equipment that meet NIOSH or ANSI (American National Standards Institute) standards will be purchased or accepted for use.
3. Careful consideration should be given to comfort and fit of PPE in order to ensure that it will be used.

### **General Rules**

1. **Hard Hats:** All workers must wear company issued hard hats at all times when working with or under aerial equipment, this includes bucket trucks, ladders, and in areas where there could be an impact or penetration from falling or flying objects or where electric shock may occur. Head protection must meet ANSI 289.2-1991 Class B requirements.
2. **Gloves:** Gloves are recommended but not required for all classes of work where there are possibilities of hand injuries. Workers should wear work gloves in good condition and suited to the type of work involved. Use of special gloves, such as Hot Line, neoprene or rubber, to handle electric or chemicals shall be issued to those workers who have need for them.
3. **Aprons:** Employees changing batteries should wear gloves, apron and face shields.
4. **Shoes & Boots:** If the hazard assessment indicates a need for personnel to wear safety shoes, then employees must wear safety shoes or boots when working in areas where there is a danger of foot injuries from falling or rolling objects, objects piercing the sole, exposure of feet to hot, corrosive, or poisonous substances. Depending on the particular workplace hazards, employees may need impact protection, compression protection, and puncture protection. At a minimum, safety shoes or boots must be made with leather or

approved other material and provide protection for the entire foot. Shoes and boots must be kept in good repair. In addition, the wearing of sneakers, sandals or shoes that have been slit or have holes cut in them will not be permitted.

5. **Eye & Face Protection:** Supervisor, Foremen, and Managers should ensure that approved eye and face protection is worn whenever warranted by the work exposure to flying particles, molten liquids, chemical gases or vapors. ANSI 287.1 approved safety glasses with full side shields must be worn in all circumstances. Full-face shields must also be used when performing work such as grinding or chipping or handling battery cells and solutions. Face shields shall only be worn over primary eye protection (safety glasses or goggles). Those employees that require prescription eyewear must have the proper prescription safety glasses with side shields or wear goggles approved to wear over prescription glasses or use protective goggles with corrective lenses mounted behind the protective goggles. Wearers of contact lenses shall also wear appropriate eye and/or face protection devices when in hazardous environment.
6. **Body Belts:** It is very important to understand that body belts are not considered personal protective equipment. They are to be used as a positioning device only. They should never be used to provide fall protection but are allowed to be used in conjunction with safety harnesses and lanyards. Body belts should be inspected prior to every use. If any part of the belt is found to be defective the belt should not be used.
7. **Traffic Vests:** Whenever employees are required to work in the immediate vicinity of moving traffic, all personnel are required to wear, at a minimum, a fluorescent orange or red traffic safety vest that will be provided by the company. Work areas should be clearly marked by barricade, tape or cones. Anytime practical and especially where work is conducted near a curve, signage should be erected to indicate the work ahead on or near the roadway; signage should be in accordance with DOT Guidelines.
8. **Personal Work Clothing:** The minimum work clothing acceptable for all employees in plant or in the field is long denim or twill pants, and a shirt that provides adequate protection against such hazards as abrasions to the skin. Workers should be cautioned against wearing any type of hazardous clothing, such as polyesters, double knits, etc. Clothing that has become torn, ragged or frayed is not acceptable, since it presents a hazard of catching on edges or machine parts which could cause the wearer to trip or fall and does not present an appropriate appearance.
9. **Hearing Protection:** When employees are subject to high noise levels, hearing protection will be provided and used to reduce exposure.
10. **Voltage Detector:** When employees need to climb poles, bucket trucks are used, or their may be electric current, need to use voltage detector to check for electric current on the ground, pole and check strand supporting telephone cable.

When employees are required to climb poles where high voltage is present the employee shall take all safety precautions and utilize all safety equipment available.

Employees need to dress in such a way to satisfy both Mountain Telephone and Personal Protective Equipment dress codes at all times.

## **Training**

Any worker required to wear PPE shall receive training in the proper use and care of PPE. The training shall include, but not necessarily be limited to, the following subjects:

- a. When PPE is necessary to be worn.
- b. What PPE is necessary
- c. How to properly on, off, adjust, and wear PPE.
- d. The limitations of the PPE
- e. The proper care, maintenance, useful life and disposal of the PPE.

Written records shall be kept of the names of person trained, the type of training provided, and the dates when training occurred.

Situations must always be constantly re-evaluated to be certain that the level of PPE that originally dictated is still sufficient for the work activity that is taking place. If an employee has any question regarding the proper PPE for any work activity or the proper use of that PPE they should see their supervisor or the Safety Director.

You must always be responsible and wear PPE as instructed. However, it is also essential for you to recognize the limits of PPE. No Personal Protective Equipment is perfect or incapable of failure, especially if improperly used or maintained. **PPE will not make you “bulletproof” or invincible.** Simply put, you should exercise the same level of care while using PPE as without it.

**Remember PPE is Only Effective If It Is Properly Used!!!!!!!**

OSHA Standards acknowledgement

I acknowledge that I have received a copy of Mountain Telephone's OSHA Standards and understand that it is my responsibility to read the standards and understand its contents and abide by its contents.

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Employee

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Date