

BellSouth Telecommunications, Inc.
Regulatory & External Affairs
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

Nancy.Sims@Bellsouth.com

Nancy H. Sims
Director

850 577 5555
Fax 850 222 8640

February 20, 2006

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**Re: Docket 060077-TL Proposal to Require Local Exchange
Companies to Provide Annual Reports of Wood Pole Inspections**

Dear Mrs. Bayó:

Attached is the filing of BellSouth and Sprint's joint response to the Commission's approved proposed agency action regarding wood pole inspections. Copies of this response will be provided to the parties electronically and at the Commission Staff workshop scheduled to be held on Tuesday, February 21, 2006.

Yours truly,



Nancy H. Sims
Director – Regulatory Relations

Copy to: Parties of Record (Electronically)
Nancy B. White
Charles Rehwinkle

Wood Pole Inspection Program – BellSouth and Sprint Joint Proposal

Inspection cycle and annual reports: BellSouth and Sprint propose to implement an 8 year pole inspection cycle and report to the Commission on an annual basis the results of the inspections of wood poles. BellSouth and Sprint will use a variety of methods to insure that all specified poles are inspected over the 8 year cycle. These may include the following:

- BellSouth and Sprint propose to prioritize pole inspection activities based on logical geographies, such as wire center boundaries, and other parameters. Higher priorities would be given to those wire centers that are considered as having direct coastal exposure.
- BellSouth and Sprint, dependent upon each company's business arrangement with the power company, will inspect certain poles in conjunction with pole inventory audits, performed on a scheduled basis with the power companies in connection with joint use agreements to reconcile pole ownership and payments for pole attachments.
- BellSouth and Sprint will pursue jointly inspecting some of its inventory with the power companies with costs shared by BellSouth, Sprint and the power companies, dependent upon each company's business arrangement with the power companies.
- BellSouth and Sprint will independently inspect some portion or all of its inventory. Independent inspections may be used to insure that the specified pole population is inspected over the 8 year cycle.

Given the preceding, BellSouth and Sprint propose that the percentages of poles sampled within a given year may vary from the 12.5% percentage associated with equal samples over an 8 year period. The methods described above may dictate that a higher percentage is appropriate in some years and a lower percentage in others. However, BellSouth and Sprint will insure that 100% of the specified pole inventory is inspected over the 8 year cycle.

Finally, BellSouth and Sprint propose that inventory requirements should include allowances for newly placed poles (10 years from date of initial placement) and poles that are less than 35 feet in length and are without power attachments.

Method of Inspection: BellSouth and Sprint propose to use the sound and bore technique or other inspection alternatives, , as the basis for the inspection of its wood poles. Additionally, the sound and bore technique will include excavation, or other PSC approved alternatives for all Southern Pine poles as appropriate for joint use poles with electric attachments that are older than 10 years.

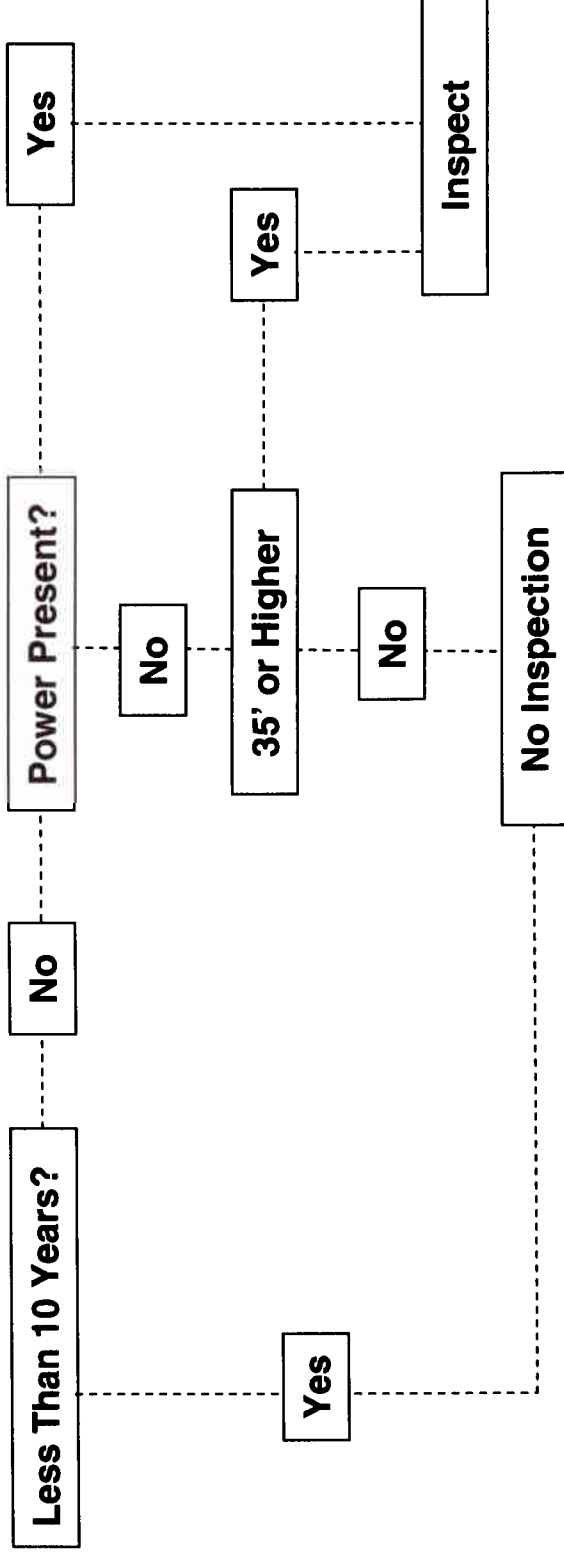
Summary Florida Inspection Decision Tree: See Attachment 1

Filing Requirements: BellSouth and Sprint propose that the submission date for comprehensive wood pole inspection plans shall be July 1, 2006. This proposal is based on the need to complete various activities prior to the submission of the comprehensive inspection plan. These include the following:

- Seeking opportunities for efficiencies with other LECs and potentially developing a consistent report, thereby reducing PSC workload
- Working with power companies on addressing inspections for joint use poles
- Completion of force analysis associated with inspection program
- Finalization of contracts with outside contractors who will perform inspections
 - Securing internal funding for pole inspection program
- Time required for contractors to find and train qualified pole inspectors
- Development of mechanized system for monitoring/tracking of pole inspection results
 - Securing internal funding for mechanized system

Also, consistent with the foregoing BellSouth and Sprint propose that the first annual report, due on March 1, 2007, shall contain inspection data for August 2006 through December 2006 rather than a full twelve month period.

Wood Pole Inspection Decision Tree



Inspection Method –

Excavate (Southern Pine Only), Sound and Bore or other approved inspection alternatives per RUS Guidelines, Prod and Probe may be used where no power attachments exist.