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May 26, 2006

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COMMISSION
CLERK

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

Re: Docket No. 060173-EU: Proposed amendments to rules regarding overhead electric facilities to allow more stringent construction standards than required by National Electric Safety Code; and

Docket No. 060172-EU: Proposed rules governing placement of new electric distribution facilities underground and conversion of existing overhead distribution facilities to underground facilities, to address effects of extreme weather events.

Dear Ms. Bayo:

TDS Telecom/Quincy (TDS) files this letter in support of BellSouth's comments in the above referenced docket. TDS supports the Commission's goal to minimize service outages due to extreme weather events. However, the fact that TDS uses and maintains its own distribution poles and has attachments on municipal and rural electric poles; TDS has not had the opportunity to evaluate the potential impacts of the Proposed Rules. Although the Proposed Rules are intended for the electric utilities it appears that the rules may affect any provider that has aerial and underground distribution facilities and/or attaches facilities to poles owned by an investor-owned electric, rural electric, and municipal electric providers.

TDS supports BellSouth's request to postpone any consideration of the Proposed Rules until such time that the Commission can consider the impacts and positions of all affected or potentially affected parties. TDS recommends that the Commission hold a workshop for all affected and potentially affected parties.

Please do not hesitate to contact me at (850) 875-5207 if you have any questions.

Sincerely,

Thomas M. McCabe
Manager - External Relations
TDS TELECOM

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