

ORIGINAL

Legal Department

June 16, 2006

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

COMMISSION  
CLERK

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*undocketed*

**In Re: June 6, 2006 Letter Regarding Telco Storm Preparation**

Dear Ms. Bayo:

Enclosed is BellSouth Telecommunications, Inc.'s response to the captioned letter dated June 6, 2006. Pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, BellSouth hereby makes a claim of confidentiality for the attached letter. The information contains proprietary data relating to confidential business information utilized by BellSouth to conduct business.

Sincerely,

*James Meza III / RN*  
James Meza, III

CC: Beth Salak  
Jerry Hendrix

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05262 JUN 16 06  
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**REQUEST:** Please indicate status of completion of all facilities inspections and repairs resulting from 2005 storm season. List and describe any remaining backlog of work and provide timetable for clearing.

**RESPONSE:** All of Florida's major storm restoration work from the 2005 hurricane season has been completed. There is on-going restoration work that requires coordination from joint use utilities. This is a continuing process as BellSouth receives additional requests from customers that require further investigation.

BellSouth Telecommunications, Inc  
Undocketed Matter  
2006 Hurricane Preparedness  
FL PSC's Data Request  
June 06, 2006  
Item No. 2  
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**REQUEST:** Please indicate status of completion of all vegetation control activities either resulting from the 2005 storm season or in preparation for 2006 season. Include percentage of planned/budgeted 2006 trimming accomplished to date.

**RESPONSE:** All emergency vegetation management has been completed in Florida. Areas with heavy vegetation and aerial facilities were swept and trimmed as needed as a result of the 2005 storms. 2006 vegetation control will be performed under normal routine maintenance.

REQUEST: Please indicate any changes in practices and procedures implemented as lessons learned from 2004-2005 storm seasons.

RESPONSE: Every year BellSouth improves its processes and procedures based on lessons learned from the previous seasons. Meetings are held at the local, state and corporate level to review the previous year's performance, improve and critique every aspect of the emergency plan, and look for improvements. As a company BellSouth is more prepared for the 2006 storm season than any previous season.

On May 22-23 and May 30-31, BellSouth conducted its Regional 2006 Turf Emergency Preparedness Workshop in Atlanta. The meeting agenda and Workshop Book are provided. Additionally, Emergency Preparedness Meetings were held by BellSouth's Florida Network divisions. These meetings include all interdepartmental representatives that either directly or indirectly support Florida's Network organization. Materials from these meetings are provided. All of these documents are proprietary and are being provided pursuant to BellSouth's letter of confidentiality filed with this Commission.

Lessons learned from the past two seasons have been incorporated into the EOC process. These include topics of employee safety, public safety, and advanced preparation of facilities and positioning equipment.

Furthermore, following is representative of the changes BellSouth's Florida Network organization has/will implement(ed) in preparation for the 2006 storm season:

- Contingency plans for providing backup power to essential services for internal use and for critical emergency response customers supporting the public.
- Coordination meetings have been held with the local Power Company to firm up assessment and restoration processes, enhancing the efficiency of the resources of both companies.
- Power generator requirements for both company uses and to support the network are identified and staged for use.

RESPONSE (CONT):

Specifically, BellSouth purchased more generators for South Florida and response time will be improved.

- Mapping tools and utilization of GPS is also being incorporated into the process to identify facility locations for assessing damage levels for expedited restoration.
- Improved sweep team procedures by providing separate teams of linemen to sweep aerial fiber routes. Crews will protect or reattach as situations require insuring the integrity of BellSouth's major aerial fiber facilities.
- Fuel provisioning contingency plans are in place in the event BellSouth loses Port Everglades.
- South Florida purchased MREs (food) for 3 days for all its employees in case there is another catastrophic storm and food is not available.

After Hurricane Ivan, numerous remote electronic devices were damaged or destroyed. Following that storm the Northwest Florida district pioneered methods to elevate the placement of critical network equipment on platforms. These proved very effective during the storms of 2005. Tropical Storm Arlene and Hurricane Dennis washed over the barrier islands in Santa Rosa and Escambia Counties. All of the equipment placed on the elevated structures survived the storms and were returned to service with generator power immediately after access was gained.

The level of preparedness for the Florida Network organization is once again very high. This group has responded extremely well over the past two storms and has incorporated all identified process improvement into the 2006 plan.

REQUEST: Please describe any other storm hardening preventive measures taken in preparation for the 2006 storm season.

RESPONSE: The following preventive measures are representative of the actions taken by BellSouth's Florida Network forces in preparation for the 2006 storm season:

- Strap doors closed on vulnerable remote terminal locations to prevent doors from being blown open or water damage.
- New propane provider contracts and emergency procedures were established to provide for a more reliable supply after storms.
- Additional permanent generators were installed at critical sites where easements were available.
- Several permanent generators have been installed at large strategic remote terminal (RT) electronic sites in South Florida.
- Specially designed elevated platforms are being installed for remote terminal (RT) sites that were damaged last year by flooding.
- Worked diligently with FPL transferring BellSouth cables and services to new poles.
- The placement of all future cabinets must go through an approval process, which takes into account flood plains, generator placement, and other storm hazards.
- BellSouth is in the process of purchasing cabinet covers, which successfully helped protect BellSouth sites in the panhandle from wind driven sand and moisture.