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March 1, 2007

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

070000

In Re: AT&T Florida Pole Inspection June 2006 through December 2006

Dear Mrs. Bayo:

Attached is AT&T Florida's pole inspection report for June 2006 through December 2006 pursuant to PSC Order No. Order No. PSC-06-0168-PAA-TL.

BellSouth, pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby makes a claim of confidentiality for its pole inspection report. The responses contain proprietary confidential business information.

Sincerely,

James Meza/RN

James Meza

Annual Pole Inspection Report of BellSouth Telecommunications, Inc. d/b/a
AT&T Florida
June 2006 – December 2006

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Order NO. PSC-06-0168-PAA-TL, DOCKET NO. 060077-TL ("Pole Inspection Order"), submits the following information regarding its pole inspection process for the initial reporting period of June, 2006 – December, 2006.

1) A review of the methods the company used to determine NESC compliance for strength and structural integrity of the wood poles included in the previous year's annual inspections, taking into account pole loadings where required:

AT&T Florida partnered with Florida Power & Light Company and Keys Energy in South Florida to perform joint pole inspections during this reporting period. In connection with this process, AT&T Florida contracted with OSMOSE to inspect AT&T Florida's wood poles. OSMOSE forwarded inspection data to AT&T Florida at regular intervals, and AT&T Florida performed quality control checks to validate the inspection data. As information, AT&T Florida has also held preliminary meetings with Gulf Power Company to begin joint pole inspections in 2007.

Using National Electric Safety Code ("NESC") Grade C Construction Standards as the guideline to determine NESC compliance for strength and structural integrity, and taking into account pole loadings where required, AT&T Florida used the following inspection process for its wood poles:

- **Visual Inspection**

  If OSMOSE found an obvious defect that justified pole replacement, no additional inspection was performed. OSMOSE designated the pole as "Non-restorable" and identified it to AT&T Florida Engineering and Construction forces as a pole to be replaced.

  When replacing a pole, AT&T Florida notifies the power company and third party attachers that they need to transfer their facilities to the new pole. Once all facilities are removed or transferred, AT&T Florida removes the old pole.

- **Sound and Bore**

  If no obvious defect was found on the initial visual inspection, OSMOSE conducted a sound and bore test on the pole to determine the soundness of the interior and exterior of the pole.

➢ **Ground Line Excavation**

OSMOSE performed ground line excavation on every pole, except where the pole base was surrounded by concrete and/or asphalt, or other factors existed that would make excavation hazardous, such as the presence of buried power facilities.

➢ **Load Calculation**

Using a software application (OCALC) that it developed, and which is used throughout the industry to analyze pole loading data, OSMOSE performed a load calculation on each pole inspected. The load calculation is based on NESC Grade C Construction standards. It identifies potential loading defects based on remaining pole strength and the profile of all attachments, whether owned by AT&T Florida, the power company, or a third party.

OSMOSE also considered other factors to determine the strength and structural integrity of the poles, including:

- Year Pole Manufactured
- Height and Class of Pole
- Species or Material of Pole
- Original Groundline Circumference
- Current Effective Groundline Circumference
- Category of Decay Type, if Present
- Measurements of Decay Width and Depth

2) An explanation of the inspected poles selection criteria, including, among other things, geographic location and the rationale for including each such selection criterion:

AT&T Florida met with its power company partners to determine which areas would be inspected first. The key factors they used to define the geographical area for the first inspection were coastal exposure, population density, and critical infrastructure customers, such as hospitals, 911 centers, etc.

The areas chosen crossed 46 AT&T Florida Wire Centers. Thirty three (33) of these wire centers have coastal exposure. Of the 13 wire centers remaining, 11 were in the Metro Miami and Metro Fort Lauderdale areas.

3) Summary data and results of the company's previous year's wood pole inspections, addressing the strength, structural integrity, and loading requirements of the NESC (See Attachment B to this Order):

AT&T Florida's completed Attachment B is attached hereto.

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4) The cause(s) of each pole failure for poles failing inspection, to the extent that such cause(s) can be discerned in the inspection. Also, the specific actions the company has taken or will take to correct each pole failure.

AT&T Florida adopted a very aggressive definition of a pole "failing inspection." Specifically, AT&T Florida instructed OSMOSE to identify not only poles that warranted replacement, but also poles that had minimal defects. Thus, the fact that a pole is classified here as "failing inspection" does not mean that the pole was in danger of falling. In determining whether to replace a pole, AT&T Florida considered the following factors:

- Whether the pole had a defect (e.g., shell rot, damage from insect infestation);
- The extent of the defect (i.e., minimal or significant);
- Whether remediation would effectively extend the life of the pole; and
- Whether transfer of the existing power and/or telecommunications facilities would be simple or complex. (A complex transfer would include situations where the attachments involved transition from aerial to buried on a pole; where equipment other than cable or conductors would need to be moved; and where "corner" poles with cable/guying arrangements would be involved, as opposed to straight line poles.)

Of the 21,955 poles inspected, AT&T Florida identified [redacted] poles that merit replacement promptly and AT&T Florida plans to do so. The Company identified an additional [redacted] poles that do not merit replacement in the near future but that, based on an analysis of the foregoing factors, it intends to replace in the next 18 months

Table 1 below outlines the primary reasons that poles were classified as "failing inspection," to the extent that such information could be discerned from the inspection. Table 2 outlines the age of those poles. As information, [redacted] of the poles in this universe were 30 years old or greater.

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Table 1

Primary Reason for Failure Classification

	A	B
Primary Reason	Number of Poles	% of Total Poles Failed
Shell Rot	[redacted]	[redacted]
Rotten Butt		
Decayed Top		
Woodpecker Holes		
Split Top		
Heart Rot Above		
Heart Rot		
Shell Rot Above		
Hazardous Conditions		
Excessive Checking / Cracking		
Internal Decay		
Exposed Pocket		
Exposed Pocket Above		
Internal Decay Above		
Previous Reject		
Enclosed Pocket Above		
Excessive Cracking/Checking		
Fire Damage		
Lightning Damage		
Mechanical Damage		
Wood Borers		
Total	[redacted]	

[redacted] of 21,955 Poles Inspected – [redacted] Merit Replacement

Poles "Failing Inspection" By Primary Cause

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Table 2

Age of Poles Classified as "Failing Inspection"

	A	B
Age of Pole	Number of Poles	% of Total Poles Failed
1935	[redacted]	[redacted]
1939		
1950		
1952		
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1954		
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1959		
1960		
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1988		
1989		
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1992		
1993		
Total	[redacted]	[redacted]

% of Poles "Failing Inspection"

POLE INSPECTION REPORT

COMPANY: AT&T Florida

Summary of Pole Inspections
Period: June, 2006 – December, 2006

Type of Inspection:

See Response (1) in AT&T Florida's Annual Pole Inspection Report.

Type of Pole: Class____ Material _____ Vintage_____ Installed Population_____

See Attachment #1 to this Attachment B.

Number of inspections planned and number completed: Include reason for any variance between planned and completed pole inspections. All variances justification should address resultant backlog, if any, and plans to address any backlog.

Planned – 28,707
Completed – 21,955

The most efficient and effective pole inspection process is to perform joint inspections within a defined geography in conjunction with a power company. Within any defined geography, be it power company substation boundaries or AT&T Florida wire center boundaries, the mix of ownership of poles will vary. The "Planned" number of AT&T Florida inspections represents a six month average forecast of inspections, based on AT&T Florida's total pole population within the state of Florida and the requirement that all poles be inspected over an 8 year cycle. The "Completed" number of inspections represents the total number of AT&T Florida poles inspected during the six month period of this report (June, 2006 – December-2006).

The difference between the "Planned" and "Completed" does not represent a backlog of inspections; rather it is indicative of the ownership ratios between AT&T Florida and power companies within the geographical areas selected for the first inspection period. Future inspection periods may therefore result in more completions than the average forecast of planned inspections. AT&T Florida is committed to completing an inspection of all its poles over an 8 year period.

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Number of inspected poles addressing a prior backlog

None

See explanation above.

Number of poles failing the inspection

Of the 21,955 poles inspected, AT&T Florida identified [redacted] poles that merit replacement promptly and AT&T Florida plans to do so. The Company identified an additional [redacted] poles that do not merit replacement in the near future but that, based on an analysis of the factors in Response (4) in AT&T Florida's Annual Inspection Report, it intends to replace in the next 18 months.

Number of poles requiring minor follow-up

[redacted]

'Minor follow-up" is defined by a need to make a subsequent visit to a pole for some type of remediation work. Remediation work would include activities such as straightening a pole that may be leaning or installing a "truss" or brace to a pole to correct a minor defect.

Number of poles requiring a change in inspection cycle

[redacted]

Due to AT&T Florida's aggressive pole replacement criteria and remediation of poles identified as needing minor follow-up, no AT&T Florida-owned poles were identified or are anticipated to require a change in inspection cycle.

Number of poles that required no change in inspection cycle or remediation

[redacted]

Due to AT&T Florida's aggressive pole replacement criteria and remediation of poles identified as needing minor follow-up, 17, 889 AT&T Florida-owned poles require no change in inspection cycle or remediation.

Number of poles that were overloaded

[redacted]

See Response (1) in AT&T Florida's Annual Pole Inspection Report for a more detailed description of the loading calculation process.

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Number of poles with an estimated remaining pole life of less than 8 years

[redacted]

Due to AT&T Florida's aggressive pole replacement criteria and remediation of poles identified as needing minor follow-up, [redacted] AT&T Florida-owned poles in the inspection area will have a remaining pole life of less than 8 years.

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Attachment #1

Type of Pole: Class__ Material__ Vintage__ Installed Population___

The following table represents the Installed Population of poles owned by AT&T Florida, by Class and Vintage.

- AT&T Florida does not keep records as to the type or material of poles owned by AT&T Florida. AT&T Florida is not aware of any pole within the Installed Population that is anything other than Southern Pine. No result of any inspection during this period identified any pole material other than Southern Pine.
- This data is derived from an extract from AT&T Florida Property Records.
- This extract will be provided each year and will reflect any changes recorded to AT&T Florida Property Records made during the previous year.

VINTAGE	CLASS A 1	B 2	C 3	D 4	E 5	F 6	G 7	H 9	I	Grand Total
1901										
1908										
1909										
1910										
1913										
1914										
1916										
1917										
1918										
1919										
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1929										
1930										
1931										
1932										
1933										
1934										
1935										
1936										
1937										

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VINTAGE	CLASS									Grand Total
	A	B	C	D	E	F	G	H	H	
	1	2	3	4	5	6	7	9		
1938										
1939										
1940										
1941										
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VINTAGE	CLASS A 1	B 2	C 3	D 4	E 5	F 6	G 7	H 8	I 9	Grand Total
1989										
1990										
1991										
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1993										
1994										
1995										
1996										
1997										
1998										
1999										
2000										
2001										
2002										
2003										
2004										
2005										
Grand Total										

Type of Pole: Class__ Material__ Vintage__ Installed Population___

The following table represents the percentage of the Installed Population of poles owned by AT&T Florida, based on vintage.

- AT&T Florida does not keep records as to the type, or material of poles owned by AT&T Florida. AT&T Florida is not aware of any pole in within the Installed Population that is anything other than Southern Pine. No result of any inspection during this period identified any pole material other than Southern Pine.
- This data is derived from an extract from AT&T Florida Property Records.
- This extract will be provided each year and will reflect any changes recorded to AT&T Florida Property Records made during the previous year.

Vintage	CLASS A 1	B 2	C 3	D 4	E 5	F 6	G 7	H 9	I	Grand Total
1901										
1908										
1909										
1910										
1913										
1914										
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1930										
1931										
1932										
1933										
1934										
1935										
1936										
1937										
1938										
1939										

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Vintage	CLASS									Grand Total
	A 1	B 2	C 3	D 4	E 5	F 6	G 7	H 8	H	
1940										
1941										
1942										
1943										
1944										
1945										
1946										
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Vintage	CLASS A 1	B 2	C 3	D 4	E 5	F 6	G 7	H 9	H	Grand Total
1991										
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1995										
1996										
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Grand Total										