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May 11, 2007

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

undocketed

Re: Response to FPSC's 2007 Storm Preparedness Data Request

Dear Ms. Cole:

BellSouth Telecommunications, Inc., d/b/a AT&T Florida, pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby makes a claim of confidentiality for its response (including exhibits) to the Florida Public Service Commission's 2007 Storm Preparedness Data Request forwarded to AT&T Florida on April 20, 2007. The response and exhibits contain trade secrets, security measures, systems and procedures, and proprietary confidential business information, including information relating to competitive interests.

Sincerely,

Jennifer S. Kay
Jennifer S. Kay /RN

Enclosure

cc: Ms. Beth Salak (w/o enclosure)

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to the
Florida Public Service Commission's 2007 Storm Preparedness Data Request**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") provides the following responses to the Florida Public Service Commission's (the "Commission") 2007 Storm Preparedness Data Request forwarded to AT&T Florida on April 20, 2007.

1) Please describe what type of preventative facilities inspections your company conducts prior to hurricane season and the status of those inspections for 2007.

AT&T Florida is inspecting its entire Florida pole inventory on an eight (8) year planned cycle in accordance with Commission Order regarding pole inspections, Order No. PSC-06-0168-PAA-TL in Docket No. 060077-TL issued on March 1, 2006. AT&T Florida has partnered with FPL, Keys Energy, Keys Electric Cooperative, Gulf Power, Orlando Utilities and Jacksonville Beach Electric to use the same contractor, Osmose Utility Services, Inc., to perform pole inspections. These planned joint inspections will cover approximately 90% of AT&T Florida's joint use poles. [The remaining 10% of AT&T Florida's joint use poles included in the planned pole inspection cycle are shared with other IOUs and municipalities.] In addition to having the poles checked for deterioration and decay, AT&T Florida has also instructed Osmose to perform wind load calculations on every AT&T Florida pole, not just the poles with third party attachments. The first designated inspection area crossed 46 AT&T Florida wire centers. Thirty-three (33) of these wire centers have coastal exposure. Of the thirteen (13) wire centers remaining, eleven (11) were in Metro Miami and Metro Ft. Lauderdale areas.

Prior to each hurricane season, AT&T Florida inspects all central offices. AT&T Florida takes preventative measures to minimize the possibility of water intrusion (i.e., plugging all duct entrances), tests emergency generators to confirm they are in good working order, and tops fuel tanks that are used to power the central offices. Additionally, AT&T Florida inspects all controlled environmental vaults (CEV) prior to storm season to insure that no leaks are present and that sump pumps are working.

AT&T Florida uses a comprehensive, mechanized process that tracks irregular plant conditions ("IPCs"), from identification of the IPC through repair completion. This process is continuous throughout the year and provides a systematic way for AT&T Florida to prioritize and repair known IPCs. The process helps to minimize storm-related damages, as compromised plant may be more susceptible to the elements of a storm.

2) Please describe any vegetation control activities planned/budgeted for 2007. Please indicate the status of completion of these activities.

Following the 2005 hurricane season, AT&T Florida trimmed areas with heavy vegetation in impacted areas. Since then, AT&T Florida has been performing vegetation management in accordance with normal routine maintenance procedures, trimming trees and plants that pose a threat to communications lines. Additionally, AT&T Florida has

instructed Osmose, when conducting pole inspections, to identify any aerial facilities threatened by encroaching vegetation so that these areas can be addressed promptly. The steps taken by AT&T Florida, coupled with the vegetation management activities being performed by the power companies whose lines can be more severely impacted by trees and debris, will help to minimize damage to utility facilities in future storms resulting from surrounding plants and trees.

3) Please describe any changes in policies, procedures, or practices implemented in the past year to assist in hurricane or storm preparation efforts.

Preceding each hurricane season, AT&T Florida evaluates its hurricane preparedness. Following storms, the Company reviews its performance to insure that lessons learned can be transformed into improved processes for the future. Since the last major hurricanes, AT&T Florida has implemented a number of new policies, procedures and practices, or enhanced existing ones, to better prepare for future storms. These include:

- E911 Strike Team. This team of qualified digital technicians can be deployed to affected areas to assist with E911 restoration. (*See Exhibit 1 - E911 PSAP Emergency Strike Team Guidelines.*)
- Cell Site Strike Team. This team of qualified technicians can be dispatched to affected areas to restore facilities feeding cell sites. (*See Exhibit 2 - Cell Site Strike Team Methods & Procedures.*)
- Severe Weather Central Office Checklist. This checklist provides a systematic approach to securing central offices prior to a storm. (*See Exhibit 3.*)
- Advanced Geographic Information Systems (GIS) technology. AT&T Florida uses advanced mapping technology such as HURRTRAK/RM PRO Storm Tracking Maps, HURRTRAK PRO Slosh Maps for Central Office Impact Forecasting and HURRTRAK PRO Slosh Maps for Remote Terminal (RT) Impact Forecasting to evaluate potential areas in a storm's path and the impact the storm will have. This allows the Company to begin making certain logistical decisions before the storm hits. The Company also uses GIS technology and GPS (Global Positioning System) technology to identify facilities that have been damaged in a storm. For example, using advanced mapping technology, AT&T Florida can monitor alarms that would be triggered if power is lost to critical sites like central offices and E911 facilities. (*See Exhibit 4 – a print-out of the NRC Storm Reporter website used to track network alarms, showing “pull down” links for various alarm reports.*)
- An improved system for tracking portable generators. In 2006, the Company re-wrote the Generator Tracking System (GTS) software. The enhanced software provides an improved method for tracking portable generator assets when dispatched to RT sites, as well as setting up fueling routes to help maintain service during extended outages.
- The Company has purchased 158 additional portable generators that can be deployed to impacted areas in the Company's nine-state southeast region. Additionally, individual Network Districts in Florida have purchased additional

portable generators to enhance their local inventories. For example, the Indian River District, Palm District and the South Florida District (Miami-Dade & Monroe Counties) each purchased an additional 8 portable generators and the Broward District purchased 10.

- The Company has installed more than 175 permanent generators at large strategic RT sites since the 2004-2005 hurricane seasons.
- AT&T Florida has built specially designed elevated platforms for certain RT sites and other critical network equipment along the Florida coastline that are vulnerable to flooding. (See Exhibit 5 – “before and after” pictures of RT sites elevated in the Florida Keys.) For example, AT&T Florida has built 13 of these elevated sites along the Florida west coast and 18 in the South Florida District.
- The Network Department will reinforce doors on vulnerable RT locations to prevent doors from being blown open, thus exposing the facility to wind and water damage.
- Acquired new software called Mobile Mapping Tool II that survey teams can use to assess damages immediately following a storm. The software allows the technicians to access facility maps and then input information on damages. That information can be then be downloaded from the technician’s portable computer and sent electronically to the department responsible for repairing the damages. This replaces the traditional method of using paper forms, and can be expected to facilitate the restoration process. (See Exhibit 6 – PowerPoint on Mobile Mapping Tool II.)
- Improved “sweep” team procedures providing for separate teams of linemen to check and reattach, if necessary, aerial fiber routes following a storm.
- Improved fuel provisioning contingency plans for unleaded and diesel fuel needed to run vehicles and certain generators.
- Purchasing 3 days worth of MREs (Meals Ready to Eat) for all employees in certain areas.
- Improved coordination with local power companies on assessment and restoration processes to enhance efficiencies.

Additionally, AT&T continues to work with power companies and cable TV companies to incorporate the use of the NJUNS (National Joint Utilities Notification System) database into daily joint use operations to log and track pole transfers, pole replacements and other activities that impact the provisioning of telecommunications and electric service.

4) Please describe all storm hardening preventative measures taken in preparation for the 2007 storm season.

AT&T Florida continues to replace and repair poles in connection with the pole inspection process outlined in response 1 above. AT&T Florida is also coordinating with FPL, Keys Energy, Gulf Power and Progress Energy on their network hardening activities, including reviewing and providing input on the power companies’ proposed storm hardening plans required to be filed with the Commission.

On June 7, 2007, a Florida-specific "table top drill" will be held in Atlanta, where employees with emergency preparedness/restoration responsibilities from the global, Southeast region, and Florida state corporate levels will walk through a scenario of a hurricane hitting South Florida.

On June 6 and 7, 2007, the AT&T Florida Network Department will host a joint training session in Jacksonville on RT power restoration efforts and the use of the new Generator Tracking System (GTS 4.1) for the AT&T Southeast Region RT Power Emergency Strike Team, the District Digital Electronic Support Specialist ("DESS"), and North Florida DESS responsible for the local Digital Loop Carrier Restoration Centers.

In addition to the items above and those mentioned in response 3, the following preventive measures are representative of the actions taken by AT&T Florida in preparation for the 2007 storm season:

- Ordered covers to protect RT sites that are subject to potential increased wind and water exposure (i.e., facilities in coastal areas). AT&T Florida anticipates that these covers will help to minimize damage and allow for faster restoration. (See Exhibit 7 – Photograph of a covered cabinet and the *BellSouth Hurricane Cabinet Covers Product Announcement*.)
- Established a regional propane provider contract with toll-free, 24 hour contact numbers to provide for a more reliable supply after storms.
- Worked (and continues to work) diligently with FPL to transfer AT&T facilities to new poles.

AT&T Florida's level of preparedness is once again very high. The Company has responded well in the past and will continue to do so through improved storm preparedness and restoration processes.

5) Please describe your hurricane or storm damage assessment and restoration steps in general terms. Then describe any changes in policies, procedures, or practices implemented in 2007 to assist in expediting these efforts.

Once the local power company and relevant external Emergency Operations Centers ("EOC") indicate that it is safe to enter an area impacted by a storm, AT&T Florida deploys survey teams made up of Engineering, Construction and Maintenance managers to assess and evaluate impacted areas. The Company then dispatches teams of service technicians and facility technicians to begin restoration efforts. Additional teams are deployed to assist with debris removal.

AT&T Florida is working with its electric partners and local EOC organizations to better improve communication during and following a storm. For example, AT&T Florida and FPL have both designated employees to serve in each other's EOC. This not only facilitates restoration efforts, but it helps reduce cable cuts and additional damage to telecommunications facilities.

The recent merger of BellSouth and AT&T will also lead to improved storm damage assessment and restoration. Unified managerial control over the local exchange operations will facilitate the deployment of equipment and personnel required to restore service following a disaster. Everything will flow faster and more efficiently because management of the combined company will have to deal only with its own network, its own equipment, and its own employees. The combined company will be able to assess quickly the characteristics of equipment that was destroyed, whether its warehoused substitute equipment is compatible, and the workloads of its technicians, and it will have greater latitude under collective bargaining agreements to redeploy them. Crucial time will be saved in deploying the right personnel and equipment where they are needed most. As indicated in response 4 above, personnel with emergency preparedness/restoration responsibilities at the various corporate levels throughout AT&T are meeting on June 7 in Atlanta to walk through a Florida storm scenario.

Moreover, AT&T has unique disaster recovery capabilities and assets that the merger will allow to be more readily used for the benefit of AT&T Florida and its customers. Before its recent merger with SBC, AT&T Corp.'s primary focus was on service to large government and enterprise customers, both of which demand service of extraordinary reliability. In response to that demand, AT&T Corp. had invested hundreds of millions of dollars to develop disaster recovery capabilities that will now be used to benefit all classes of wireless and wireline customers in Florida.

For instance, AT&T has a fleet of custom-built emergency communications vehicles with satellite uplink facilities that can be immediately deployed to establish command centers and communications capabilities, which are the critical first steps in providing emergency relief and restoring service following a disaster. These fully-equipped, completely self-sufficient centers can be set up and operating within two hours of arrival. They are equipped with generators, a satellite dish for constant communications, LAN connectivity and a PBX phone system, and provide room for more than thirty (30) technicians. The larger 53-foot tractor-trailer expands on each side to reveal 1,000 square feet of workspace. The smaller 38-foot gooseneck trailer can be transported to more remote locations. (See Exhibit 8.) AT&T also has a fleet of "mobile" central offices that can be deployed whenever a central office has been taken out of service. These facilities accelerated service restoration following the attacks on the World Trade Center, and they will now be available in Florida. AT&T is currently developing mobile units with fixed wireless capacity and has about 350 infrastructure trailers that can be used to provide essential power and cooling to central offices in an emergency.

Finally, because the merger placed AT&T Mobility (formerly Cingular) under unified ownership and managerial control, AT&T Mobility's facilities and capabilities will be more readily available for deployment to supplement AT&T Florida's landline network, and facilities in the landline network can be used by AT&T Mobility to restore wireless services in many areas. The combination of AT&T Mobility's network, AT&T's long-distance network, and AT&T Florida's facilities will significantly enhance

the opportunity to reroute traffic over the other companies' backbone facilities, switches, and nodes, thereby restoring services quickly after a disaster strikes.

6) Please provide any measures used by your company to assess the quality, timeliness, or efficiency of hurricane or storm restoration efforts.

Every year, AT&T Florida improves its processes and procedures based on lessons learned from the previous storm season. Meetings are held at the local, state and corporate level to review the Company's past performance and determine where improvements can be made. Additionally, AT&T Florida's Network Department holds Emergency Preparedness Meetings throughout the state prior to hurricane season. These meetings include interdepartmental representatives that either directly or indirectly support Florida's Network organization. Topics addressed include employee safety, public safety, and advanced preparation/positioning of facilities and equipment. AT&T Florida also coordinates with local power companies regarding assessment and restoration processes to facilitate the most efficient use of both companies' resources.

7) Please indicate what methods are used to keep your customers informed of restoration efforts in their area, i.e. phone, radio, internet, or TV.

The method for communicating with customers concerning restoration efforts is guided by the location and severity of the storm. In an effort to keep our customers well informed, all forms of communication, electronic media, internet and print, are utilized as appropriate. Additionally, AT&T Florida's Corporate and External Affairs Department provides briefings and media handouts each day as necessary for broadcast purposes. The Company also provides updates on its restoration efforts twice a day to the State EOC that, in turn, briefs the Governor on restoration activities. These same updates are provided to the Commission so that it can respond to public inquiries regarding service.

8) Please provide the 2007 indicators used by your company to measure overall network reliability and the Florida aggregate monthly results for those indicators for 2007.

AT&T Florida analyzes a variety of measures to evaluate telecommunications network reliability. A spreadsheet itemizing these measures, and the Florida aggregate monthly results for the majority of these measures for 2007, is attached as Exhibit 9. [AT&T Florida is still compiling state specific data for the last four measures listed on the spreadsheet, and will supplement this response with that data in the near future.] The spreadsheet also includes the 2007 results for the ARMIS outages and other reportable outages that AT&T Florida files with the Federal Communications Commission.

9) Please provide at least 10 examples of best practices employed by your company to enhance the reliability and survivability of your network.

- Creating the E911 Strike Team to facilitate restoration of E911 facilities. (See Exhibit 1 - *E911 PSAP Emergency Strike Team Guidelines*.)

- Creating the Cell Site Strike Team to facilitate restoration of facilities feeding cell sites. (See Exhibit 2 - *Cell Site Strike Team Methods & Procedures.*)
- Distributing a Severe Weather Central Office Checklist that employees can refer to when securing central offices prior to a storm. (See Exhibit 3.)
- Using the advanced mapping and tracking technology referenced in response 3 to evaluate potential areas in a storm's path and the impact the storm will have, and to identify facilities that have been damaged in a storm. (See Exhibit 4.)
- Improving Generator Tracking System (GTS) software so that the Company can better track portable generator assets that have been dispatched following a storm and establish fueling routes to help maintain service during extended outages.
- Increasing back-up power capabilities by purchasing additional portable generators that can be deployed to impacted areas in the Company's nine-state southeast region, and to bolster local portable generator inventories.
- Installing permanent generators at large strategic RT sites.
- Building specially designed elevated platforms for certain RT sites and other critical network equipment at locations along the Florida coastline that are vulnerable to flooding.
- Reinforcing doors on vulnerable RT locations to prevent doors from being blown open, thus exposing the facility to wind and water damage.
- Ordering covers to protect RT sites that are subject to potential increased wind and water exposure (i.e., facilities in coastal areas). (See Exhibit 7.)
- Establishing a new propane provider contract that will enable the Company to fulfill propane requirements more efficiently following a storm.

10) For your last major storm or hurricane outage reported to the PSC, please identify the:

- 1. Best practices that if employed, would have reduced the impact of the outage; or avoided the outage all together.**
- 2. Steps you are taking or have taken to implement these best practices. Please include the implementation date or expected implementation date.**

AT&T Florida's Network performed well during the last hurricane season, with approximately 80% of its service and over 97% its utility poles remaining intact following Hurricane Wilma. There is, however, always room for improvement, and as previously mentioned, AT&T Florida strives to incorporate lessons learned into better practices for the future. AT&T Florida believes that the new or improved practices and procedures outlined in the above responses will minimize damages and outages resulting from future storms.

Specifically, elevating certain RT sites along the coast that are prone to flooding is anticipated to significantly reduce, and hopefully eliminate, outages that would result from flooding. AT&T Florida has already elevated 31 RT sites in critical coastal areas such as the Florida Keys and the Panhandle and will continue to assess sites that might benefit from this treatment.

During the last hurricane season, AT&T Florida also noted damages caused by breached doors on RT sites, allowing exposure to wind and rain. The Company plans to reinforce RT doors in future hurricanes with straps, and has ordered protective covers the Network Department can use to cover RT sites before a storm hits. AT&T Florida expects that these preventative measures will reduce outages resulting from wind and water damage to RT sites.

Since the last hurricane season, AT&T Florida has purchased 158 additional portable generators for regional deployment, added more than 30 portable generators to local portable generator inventories, and has installed permanent generators at more than 175 strategic RT sites. The Company anticipates that increased availability of back-up power will minimize outage times.

AT&T Florida remains committed to providing high quality service to its customers before and after storms. AT&T Florida's long-standing dedication to comprehensive storm preparation and prompt restoration, coupled with the increased resources available to AT&T Florida following the merger, place AT&T Florida in a position to better protect its network from storms, and to repair and restore facilities efficiently following severe weather events.

EXHIBIT 1
E-911 PSAP Emergency Strike Team Guidelines
May 22, 2006
Revised August 24, 2006
(10 pages)

(ENTIRE DOCUMENT IS CONFIDENTIAL)

EXHIBIT 2
Special Services
Installation and Maintenance
Cell Site Strike Team
Methods and Procedures
Network Operations Support
February, 2006
(8 pages)

(ENTIRE DOCUMENT IS CONFIDENTIAL)

EXHIBIT 3
Severe Weather Central Office Checklist
Updated June 2006
(4 pages)

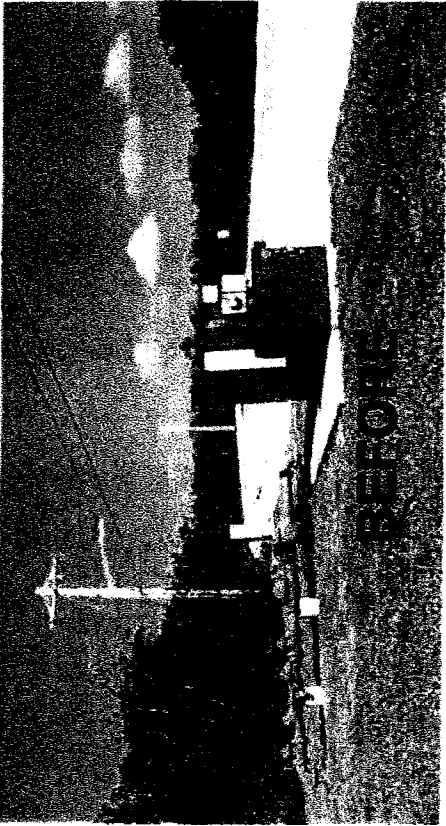
(ENTIRE DOCUMENT IS CONFIDENTIAL)

EXHIBIT 4
NRC Storm Reporter
(1 page)

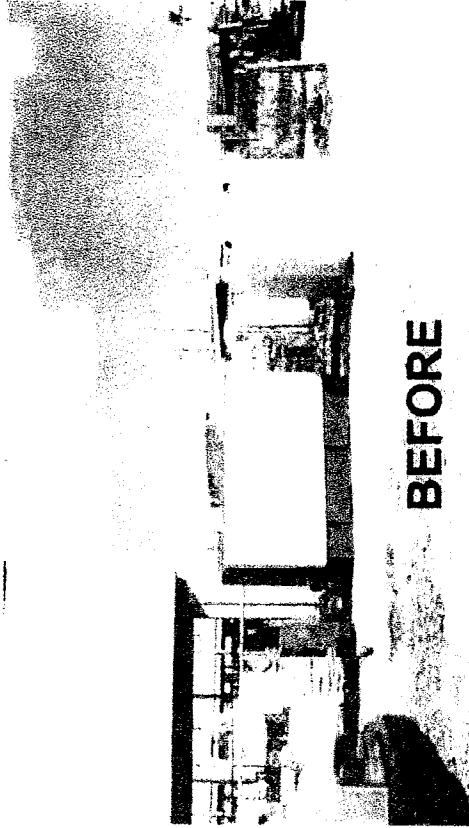
(ENTIRE DOCUMENT IS CONFIDENTIAL)

EXHIBIT 5

College Road KW 2419A



Key West Airport KW 2231B



Key Haven KW 2419(A) B & C



BEFORE



AFTER

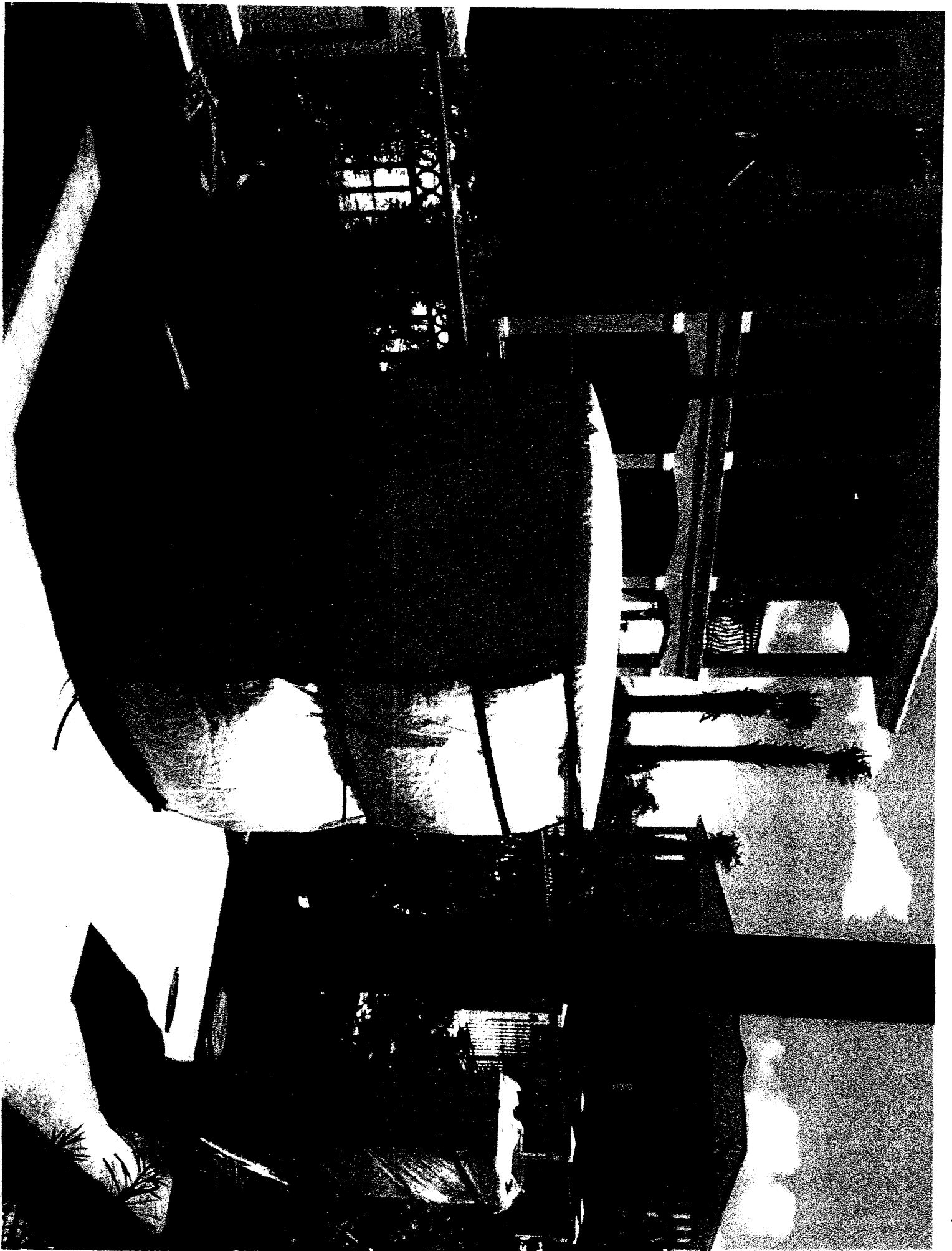


AFTER

EXHIBIT 6
Mobile Mapping Toll II
(27 pages)

(ENTIRE DOCUMENT IS CONFIDENTIAL)

EXHIBIT 7



(EXHIBIT 7)
RL 05-08-005BT Hurricane Cabinet Covers
Product Announcement
(12 pages)

(PORTIONS OF EXHIBIT IS CONFIDENTIAL)

EXHIBIT 8



2007_0227_q1s_282_overview.jpg
◀ AT&T NDR disaster recovery exercise site overview on Tuesday afternoon, February 27, 2007, Anaheim, CA. AT&T Network Disaster Recovery Team. ▶

EXHIBIT 9

REDACTED

State of Florida

1
2
3
4
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12

[REDACTED]

ARMIS outages

FCC Reportable outages

[REDACTED]

	A	B	C	D	E
	Jan-07	Feb-07	Mar-07	Apr-07	2007 YTD
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	0	0	0	0	0
	0	3	1	1	5
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]