

ORIGINAL

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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COMMISSION
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FLORIDA CABLE
TELECOMMUNICATIONS ASSOCIATION,
INC., COX COMMUNICATIONS GULF
COAST, L.L.C., et. al.

Complainants,

v.

GULF POWER COMPANY,

Respondent.

E.B. Docket No. 04-381

GULF POWER'S SUPPLEMENTAL RESPONSES TO COMPLAINANTS'
FIRST SET OF INTERROGATORIES TO RESPONDENT

Gulf Power Company ("Gulf Power") supplements its responses to complainants' First Set of Interrogatories, in accordance with the Presiding Judge's August 4, 2005 Discovery Order, as follows:

GENERAL RESPONSES AND OBJECTIONS

1. Gulf Power adopts and incorporates its responses and objections to complainants' first set of interrogatories, as if fully set forth herein.
2. The responses and objections herein supplement and/or amend Gulf Power's April 18, 2005 responses and objections.

CMP _____
 COM _____
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 RCA _____
 SCR _____
 SGA _____
 SEC 1
 OTH _____

SPECIFIC RESPONSES AND OBJECTIONS

8. For all of the poles that you identified in response to Interrogatories 4 and 5, identify every attaching entity other than Complainants attached to each such pole; describe how many attachments on each such pole those other attaching entities have had or have, when such attachments commenced, and where those attachments are located on each pole; and state the make-ready and annual per-pole compensation received by Gulf Power from each attaching entity other than Complainants (including any Gulf Power affiliates). Specifically identify the number of attaching entities paying Gulf Power annual compensation under the

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

FCC's telecommunications rate formula (47 U.S.C. § 224(e) and implementing regulations).

ORIGINAL RESPONSE:

Gulf Power will supplement this response upon completion of the Osmose audit.

SUPPLEMENTAL RESPONSE:

The August 4, 2005 Discovery Order requires Gulf Power to "provide information that it currently possess[es] about users, make-ready costs, and per pole compensation." (Discovery Order, p. 5). In its original response to interrogatory number 16, Gulf Power identified every attacher since 1998 and produced attachment agreements for each attacher. The agreement sets forth the annual rental paid by each attacher. Further, Gulf Power already produced its make-ready documents during the May 27-28, 2005 document review. These make-ready documents include work orders with itemized make-ready costs.

11. Identify all persons, whether or not employed by Gulf Power, who have knowledge or information referring to, relating to, or regarding Gulf Power's factual and legal contentions in FCC Docket Numbers: P.A. No. 00-004 or E.B. No. 04-381, including Gulf Power's contentions in its January 2004 "Description of Evidence" and its December 2004 "Preliminary Statement on Alternative Cost Methodology."

ORIGINAL RESPONSE:

Gulf Power objects to this interrogatory on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving these objections, Gulf Power lists the following:

	Name	Employment
1.	Ben Bowen	Gulf Power Co.
2.	Andy McQuagge	Gulf Power Co.
3.	Doug Stuckey	Gulf Power Co.
4.	Terry Davis	Gulf Power Co.
5.	Tom Park	Southern Company
6.	Tommy Forbes	Gulf Power Co.
7.	Representative of Opposing Parties	
8.	Mike Dunn	GPC, Retired
9.	Robert Calhoun	Knology
10.	Bret McCants	Knology
11.	Wayne Singleton	Knology
12.	Rex Brooks	Gulf Power Co., Retired
13.	Mike Dunn	Gulf Power Co., retired

This list excludes counsel for Gulf Power and other parties. This list also excludes Gulf Power's experts and the personnel of its pole audit contractor.

SUPPLEMENTAL RESPONSE:

Gulf Power is unclear as to what it is being ordered to disclose. This interrogatory asks for the identity of *all* persons who have knowledge or information referring or relating to Gulf Power's legal and factual contentions in this case. This interrogatory is similar in scope to complainants' request for production number 1, which the Presiding Judge found to be "a broad request . . . that would not be calculated to lead to 'discovery of relevant facts. . .'" (Discovery Order, p. 18 (quoting 47 C.F.R. § 1.311)). Similarly, interrogatory number 11, if interpreted literally, would require identification of hundreds of employees at other electric utilities, other CATV, Telecom, and unregulated attachers, and lawyers for Gulf Power and other electric utilities. Furthermore, interrogatory number 11 also seems to request identification of experts retained for the purpose of this hearing proceeding. This would be at odds with the Presiding Judge's other rulings regarding the timing and negotiation of expert discovery. (See, e.g., Discovery Order, pp. 14-16 & 19). Subject to the above comments, Gulf Power supplements this response as follows:

	Name	Title	Employment	Business Address
1.	Ben Bowen	Project Services Specialist	Gulf Power Co.	One Energy Pl. Pensacola, Fl 32520
2.	Andy McQuagge	Project Services Manager	Gulf Power Co.	One Energy Pl. Pensacola, Fl 32520
3.	Eddie Dixon	Project Services Specialist	Gulf Power Co.	One Energy Pl. Pensacola, Fl 32520
4.	Doug Stuckey	Power Delivery Planning Supervisor	Gulf Power Co.	One Energy Pl. Pensacola, Fl 32520
5.	Terry Davis	Treasury/Rates & Regulatory Spec.	Gulf Power Co.	One Energy Pl. Pensacola, Fl 32520
6.	Tom Park	External Affairs Coordinator	Southern Company	270 Peach Tree St. Atlanta, GA. 30303
7.	Tommy Forbes	Engineer	Gulf Power Co.	One Energy Pl. Pensacola, Fl 32520
8.	Mike Dunn	Retired (Project Services manager)	Gulf Power Co. Retired	
9.	Robert Calhoun	Construction Services Manager	Knology	235 W. 15 th Street Panama City, FL. 32501
10.	Bret McCants	Vice-President Operations	Knology	235 W. 15 th Street Panama City, Fl. 32501
11.	Wayne Singleton	No Longer Employed at Knology	Knology	
12.	Rex Brooks	Retired (Project Services Specialist)	Gulf Power Co. Retired	

12. Identify all persons who provided assistance or information used in answering these interrogatories and list the corresponding interrogatory numbers for which they provided the assistance or information.

ORIGINAL RESPONSE:

Gulf Power objects to this interrogatory on the grounds that it is unduly burdensome and vague. Subject to and without waiving these objections, Gulf Power lists the following:

	Name	Employment	Misc.
1.	Ben Bowen	Gulf Power Co.	
2.	Andy McQuagge	Gulf Power Co.	
3.	Doug Stuckey	Gulf Power Co.	
4.	Rex Brooks	Gulf Power Co., Retired	
5.	Keith L. Reese, PE	Georgia Power Co.	NESC expert
6.	Terry Davis	Gulf Power Co.	
7.	Tom Park	Southern Company	

SUPPLEMENTAL RESPONSE:

Gulf Power is unclear as to whether it is being ordered to disclose additional names (which would be legal counsel), further "identity" information for the people identified, or both. The legal counsel involved in preparing the responses were Eric Langley and Ralph Peterson. Ben Bowen and Andy McQuagge (principally Ben Bowen) were involved in responding to virtually all of the interrogatories. Doug Stuckey was involved in responding to interrogatories relating to load studies and distribution planning. Terry Davis was involving in responding to interrogatories relating to accounting issues. Keith Reese was involved in responding to interrogatories relating to NESC requirements. Eddie Dixon was involved in gathering the information for these supplemental responses.

16. Identify and describe all entities (including non-communications attachers) that are, or have been, attached to poles owned or controlled by Gulf Power since 1998.

ORIGINAL RESPONSE:

	Name:	
1.	Americable International, Inc.	
2.	B&L Cable Communications, Inc.	
3.	Knology Inc.	
4.	CableSouth, Inc.	
5.	Cablevision Systems, Inc.	
6.	Comcast Cablevision Corp.	
7.	Comcast Cablevision of Panama City, Inc.	
8.	Comcast JOIN Holding, Inc.	

9.	Community Cable Corp.	
10.	Cox Communications Pensacola, Inc.	
11.	Cox Communications Gulf Coast LLC	
12.	Torrence Cablevision USA	
13.	Jones Intercable, Ltd.	
14.	Springfield Cable Vision	
15.	TCI Cablevision of Florida, Inc.	
16.	TCI TKR of the Gulf Plains, Inc.	
17.	Time Warner Entertainment-Advance/Newhouse Partnership	
18.	Time Warner Entertainment Company, L.P.	
19.	Bright House Networks, LLC	
20.	Emerald Cost Cablevision of Florida, Inc.	
21.	Mediacom Southeast LLC	
22.	Washington Cable TV, Inc.	
23.	City of Valparaiso	
24.	Campbellton Cable TV	
25.	Peoples First Financial S & L	
26.	Frangista Beach Inn	
27.	The Crest Corporation	
28.	R. L. Singletary, Inc.	
29.	Mallard Cablevision, LLC	
30.	DCA, Services Division NAF Contracting	
31.	Walton County	
32.	Adelphia Business Solutions	
33.	KMC Telecom II, Inc.	
34.	Madison River Communications, LLC	
35.	Southern Light, LLC	
36.	BellSouth Telecommunications, Inc.	
37.	Sprint-Florida, Inc.	
38.	GTC, Inc.	
39.	Town of Cinco Bayou	
40.	City of Crestview	
41.	City of DeFuniak Springs	
42.	City of Ponce De Leon	
43.	City of Destin	
44.	City of Fort Walton Beach	
45.	City of Mary Esther	
46.	Town of Shalimar	
47.	City of Valparaiso	
48.	City of Bonifay	
49.	Town of Caryville	
50.	City of Chipley	
51.	City of Graceville	
52.	City of Lynn Haven	

53.	City of Panama City	
54.	City of Panama City Beach	
55.	City of Vernon	
56.	Town of Century	
57.	City of Gulf Breeze	
58.	City of Milton	
59.	Santa Rosa County	
60.	DOT	
61.	MCI Telecommunications	
62.	Bay County Traffic	
63.	Perdue Farms	
64.	Walton County	
65.	City of Pensacola	
66.	School District of Escambia County	
67.	Gulf Coast Building Products, Inc.	

SUPPLEMENTAL RESPONSE:

The Discovery Order requires that Gulf Power provide “identity” information regarding the 67 attachers identified in response to interrogatory number 16. Though Gulf Power is unaware of the CEO of each of the attachers, contact information for each attacher is set forth in the attachment agreements, all of which have been produced. If there is further “identity” information needed by complainants with respect to a particular attacher, Gulf Power will work with complainants to accommodate these needs.

17. Identify and describe any surveys, audits or pole counts conducted by Gulf Power, its agents or any other person from 1996 through the present. Please specify in your answer the dates or time periods of these surveys, audits or pole counts, an explanation of their methodologies and all categories of information collected concerning attaching facilities and their ownership on the poles. In addition, please identify the names, titles and employers of all persons involved in the surveys, audits or pole counts.

ORIGINAL RESPONSE:

Gulf Power has conducted two pole counts from 1996 to the present day; they were done in 1996 and 2001. The 1996 count was done from approximately April 1, 1996 to November 2, 1996. The 2001 pole count was conducted from approximately February 5, 2001 to April 27, 2001.

Both pole counts were conducted with the same methodologies and collected the same information. Gulf Power, with the appropriate telephone company, conducted a total joint use pole count over Gulf Power’s entire service territory. The pole counts were done with teams of one Gulf Power representative accompanied by one telephone company representative, either BellSouth or Sprint (The one exception to this system was

in the 2001 count where BellSouth contracted Gulf Power to count the Bellsouth areas). Teams would count by Gulf Power grid maps in each of the telephone company's respective service areas that overlap Gulf Power's service area. Each team is tasked with the (a) location and ownership of all joint use poles on the map, (b) assigning a sequential number to each pole for identification and counting, (c) and lastly, to identify each CATV or telecom attacher, if any, that is on each joint use pole identified on the grid maps. This process was followed until all the grid maps were counted.

Reports would then be produced that would show (1) the number of Gulf Power attachments on telephone poles, (2) the number of telephone attachments on Gulf Power poles and, (3) the number and company name of all CATV and telecommunication attachments made to both Gulf Power poles and each telephone company.

Below is a list of names of persons that worked for Gulf Power on each of the two pole counts.

1996 Pole Count			
	Name:		
1.	Alan Barton		
2.	Ben Bowen		
3.	Mark Serafin		
4.	R. Payne		
5.	Robert T. Sanders Sr.		
6.	David Lee		
7.	Rex Brooks		

2001 Pole Count			
	Name:		
1.	Ben Bowen		
2.	Rex Brooks		
3.	Carolyn Sirmon		
4.	Keith Johnson		
5.	Dave Hill		
6.	Pat Bolster		
7.	Jason Poe		
8.	Larry Arant		
9.	Larry Little		
10.	Steve Rhodes		
11.	Curtis Brown		
12.	Joe Marshall		
13.	Stephanie Cobb		
14.	Donnie Bell		
15.	Brian Evans		
16.	Raquel Morgan		
17.	Kenny Barron		

18.	Bill Weintritt		
19.	Ernest Robinson		
20.	Glenn Crutchfield		
21.	Bruce Guernsey		
22.	Bill Stinson		
23.	Bill Cassenti		
24.	Louis Dodd		

SUPPLEMENTAL RESPONSE:

The Discovery Order requires further “identity” information of the Gulf Power employees listed, as well as “identity” information for corresponding ILEC employees “to the extent that it is known and readily available.” (Discovery Order, p. 9). Gulf Power does not have similar identity information for the ILEC personnel who worked on the pole counts, though some of this information likely exists within the many boxes of pole county information produced during the May 27-28, 2005 document review. Gulf Power further supplements its response as follows:

1996 Pole Count			
	Name	Company	Business Address
1.	Alan Barton	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
2.	Ben Bowen	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
3.	Mark Serafin	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
4.	R. Payne	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
5.	Robert T. Sanders Sr.	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
6.	David Lee	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
7.	Rex Brooks - Retired	Gulf Power Company	

2001 Pole Count			
	Name	Company	Business Address
1.	Ben Bowen	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
2.	Rex Brooks	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
3.	Carolyn Sirmon	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
4.	Keith Johnson	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
5.	Dave Hill	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
6.	Pat Bolster	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
7.	Jason Poe	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
8.	Larry Arant Retired	Gulf Power Company	
9.	Larry Little	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
10.	Steve Rhodes	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
11.	Curtis Brown	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
12.	Joe Marshall – Military Leave	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
13.	Stephanie Cobb	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
14.	Donnie Bell	Gulf Power Company	One Energy Place, Pensacola, FL. 32520

15.	Brian Evans	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
16.	Raquel Morgan – Trans. to APC	Gulf Power Company	
17.	Kenny Barron	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
18.	Bill Weintritt	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
19.	Ernest Robinson	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
20.	Glenn Crutchfield	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
21.	Bruce Guernsey	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
22.	Bill Stinson - Retired	Gulf Power Company	
23.	Bill Cassenti	Gulf Power Company	One Energy Place, Pensacola, FL. 32520
24.	Louis Dodd	Gulf Power Company	One Energy Place, Pensacola, FL. 32520

20. Identify and describe, for each cable operator Complainants, the number of Gulf Power poles that have been changed out from 1998 to the present in order to accommodate attachments of Complainants, the location of any such change-outs, the reasons for each change-out, and identify any and each instance in which Gulf Power was not reimbursed by Complainants for the costs of such change-outs.

ORIGINAL RESPONSE:

Gulf Power objects to this interrogatory on the grounds that it overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information which is not relevant to the hearing issues. To the extent the information sought is discoverable, it is the subject of other interrogatory responses and Gulf Power's responses to complainants' request for production.

SUPPLEMENTAL RESPONSE:

The information requested is contained within the make-ready documents produced during the May 27-28, 2005 document review. Further, to the extent this interrogatory seeks information regarding change-outs at the request of complainants, complainants themselves should have this information.

24. Identify and describe the occasions on which Gulf Power has refused to change-out a pole. Your response should include, but not be limited to, a description of the circumstances surrounding the refusal, the identification of the entity requesting the pole replacement, and an explanation of the reasons for Gulf Power's refusal and any alternate arrangement employed.

ORIGINAL RESPONSE:

Gulf Power objects to this interrogatory on the grounds that it overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information which is not relevant to the hearing issues.

SUPPLEMENTAL RESPONSE:

Gulf Power does not maintain records of when it has refused to change-out a pole at the request of complainants. Though Gulf Power has made such refusals, the normal practice (historically) is for Gulf Power to accommodate the make-ready requests of complainants, unless there are unusual circumstances.

25. Describe and explain the steps and procedures involved in changing-out a pole, from a prospective attacher's request (or Gulf Power's own core electricity need) to completion (i.e., including processing, procurement, placement and transfer of existing facilities and equipment, including estimated time periods).

ORIGINAL RESPONSE:

Gulf Power objects to this interrogatory on the grounds that it overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information which is not relevant to the hearing issues.

SUPPLEMENTAL RESPONSE:

See Bates labeled documents Gulf Power 02421 - 02425, enclosed herewith.

34. Does Gulf Power routinely inform prospective and existing attachers when it reserves pole space for future use for its core electricity operations, and if so, identify and describe all such reservations and notifications to attachers, including Complainants, since 1998.

ORIGINAL RESPONSE:

Yes. Prospective attachers are shown and/or given a copy of Gulf Power's "spec plate" prior to attaching.

SUPPLEMENTAL RESPONSE:

The "spec plate" identified in Gulf Power's original response is the only written reservation/notification routinely given to prospective attachers regarding reserved space. Gulf Power field employees will, from time to time, advise attacher field employees of potential/impending future uses.

35. Does Gulf Power contend that it requires the use of reserved pole space currently occupied by Complainants, and if so, identify all such pole space, the specific poles at issue by number and location, and describe Gulf Power's and the electric

industry's practice concerning whether attachers, including Complainants, are given the opportunity to pay for the cost of any modifications needed to rearrange or change-out the poles and to continue to maintain their attachments.

ORIGINAL RESPONSE:

Original response omitted in error.

SUPPLEMENTAL RESPONSE:

Yes. Gulf Power does not track its future space needs on a pole by pole basis, but instead plans its future space needs as set forth in the Distribution Planning Studies produced as Bates labeled documents Gulf Power 00005 - 00809. When Gulf Power reclaims space on its poles, attachers typically are given the opportunity to pay the cost of modifications necessary to maintain their attachments.

36. Does Gulf Power contend that it may charge Complainants that are already attached to its poles the rearrangement or change-out costs of modifications required as a result of an additional attachment or the modification of an existing attachment sought by any other attachers, including Gulf Power? Explain the basis for your answer.

ORIGINAL RESPONSE:

Gulf Power Company's contention and position on charges to complainants for "rearrangement or change-out costs of modifications" is the same as, based upon, and as required by 47 U.S.C. § 224(h)-(i), which provides as follows:

(h) Modification or alteration of pole, duct, conduit, or right-of-way

Whenever the owner of a pole, duct, conduit, or right-of-way intends to modify or alter such pole, duct, conduit, or right-of-way, the owner shall provide written notification of such action to any entity that has obtained an attachment to such conduit or right-of-way so that such entity may have a reasonable opportunity to add to or modify its existing attachment. Any entity that adds to or modifies its existing attachment after receiving such notification shall bear a proportionate share of the costs incurred by the owner in making such pole, duct, conduit, or right-of-way accessible.

(i) Costs of rearranging or replacing attachment

An entity that obtains an attachment to a pole, conduit, or right-of-way shall not be required to bear any of the costs of rearranging or replacing its attachment, if such rearrangement or replacement is required as a result of an additional attachment or the modification of an existing attachment sought by any other entity (including the owner of such pole, duct, conduit, or right-of-way).

SUPPLEMENTAL RESPONSE:

Yes, but it depends on the circumstances. If one of the complainants was already attached to the pole and a telecom sought to make an attachment, but the pole required make-ready to accommodate the telecom attachment, complainant would not bear any cost unless complainants sought to modify their existing attachment in which case such complainants would bear a proportionate share of the costs. This is the very reason Gulf Power cited 47 U.S.C. § 224(h) - (i) in its original response. Gulf Power’s policy is to comply with the statute. As set forth in the supplemental response to interrogatory number 35 above, if Gulf Power reclaims space for its core business of electric service, attachers are given the opportunity to pay the cost of modifications necessary to maintain their attachments.

- 45. Identify the pole attachment rental rates paid to Gulf Power by joint users, the specific amount of pole space leased by such joint users, and explain the methodologies, if any, used to calculate these rates.

ORIGINAL RESPONSE:

ILEC Rate Information						
Company:	2000	2001	2002	2003	2004	2005
BellSouth Telecommunications Inc.	\$58.84	\$60.72	\$66.00	\$67.51	\$69.08	\$70.82
Sprint-Florida, Inc.	\$23.96	\$23.96	\$26.50	\$26.50	\$26.50	\$26.50
GTC, Inc.	\$21.97	\$22.68	\$27.04	\$27.04	\$27.04	\$27.04

ILEC Space Leased from Gulf Power Company			
Company:	30' Poles	35' Poles	40' poles
BellSouth Telecommunications Inc.	2'-0"	2'-6"	3'-0"
Sprint-Florida, Inc.	Not specified	2'-6"	3'-0"
GTC, Inc.	Not specified	2'-6"	3'-0"

BellSouth, Sprint-Florida, Inc. and GTC, Inc.: Rate Calculation

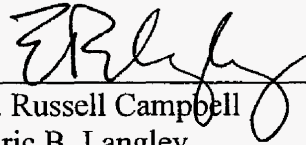
$$\text{Rate} = \text{Investment} \times \text{Annual Charge} \times \text{Space Allocation}$$

SUPPLEMENTAL RESPONSE:

The Discovery Order says, “There is no information provided by Gulf Power regarding its methodologies used to calculate the respective rates.” (Discovery Order, p. 16). The order also says, “Gulf Power must provide responsive information on methodology/formulas used to calculate the ILEC rate information provided.” (Discovery Order, p. 16). But Gulf Power’s original response to interrogatory number 45 specifically included its rate methodology. Moreover, the joint use agreements provided by Gulf Power also contain rate methodology information. (See Bates labeled documents Gulf Power 2089-2148).

Respectfully submitted,

Ben A. Bowen, Gulf Power Co.



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Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supplemental Responses To Complainants' First Set Of Interrogatories has been served upon the following by Electronic Mail and by United States Mail on this the 26th day of August, 2005:

<p>Lisa Griffin Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>	<p>Shiela Parker Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>
<p>Rhonda Lien Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>	<p>Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, D.C. 20554</p>
<p>James Shook Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>	<p>David H. Solomon Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554</p>
<p>Director, Division of Record and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850</p>	<p>Federal Energy Regulatory Commission Docket Room 1A-209 888 First Street, NE Washington, D.C. 20426</p>
<p>John D. Seiver Geoffrey C. Cook Rita Tewari COLE, RAYWID & BRAVERMAN 1919 Pennsylvania Avenue, N.W. Suite 200 Washington, D.C. 20006 Via E-mail</p>	<p>John W. Berresford Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554</p>



 OF COUNSEL

CATV Permitting Procedure

Gulf Power district engineering offices will receive documents called "APPLICATION FOR CATV ATTACHMENT PERMIT" (Permit) from CATV companies, for illustration see example one. These Permits will consist of a one-page form and a drawing of the pole location(s) that the CATV Company wishes to attach. The following is the step by step method of how to handle the Permitting Procedure.

I. Assign the Permit number

Select the next available Permit number on the CATV PERMIT RECORD (CPR). Write the Permit number and the number of poles on the original Permit at the bottom right corner where it says "Permit No." and "Total Poles". Write in the CATV Company name under column 1, number of poles under column 2, and today's date under column 3 on the CPR.

II. Prepare "Jets Job"

Input the "Jets Job" as follows:

- a) Fill in the "headquarters" and "engineer".
- b) "Applicant Name" put in the CATV Company name.
- c) "Job Description" put in the number of poles and the Permit #.
- d) "Address" put in the location of the work given on the Permit.
- e) For "Type" put in C03.
- f) For "Type Customer" put in commercial.
- g) Change Type Service to None.
- h) Give a copy of the "Jets Job" and Permit (with CATV drawing) to the appropriate engineer.

III. Engineer Field Checks the Permit

Gulf engineer will decide if the attachment location described on the Permit has appropriate clearances (meets all NESC and Gulf Specifications etc.) and poles are of sufficient strength (not rotten) to support CATV attachments. Engineer will make one of the following choices:

a) No Make-ready Needed (NWR)

Engineer says it is safe (no NESC or Gulf Specification violations and pole is of sufficient strength) for the CATV to attach. No work required (NWR).

1. CPR (CATV PERMIT RECORD)

- (a) Fill in a NO under column 4 on the CPR.
- (b) Fill in the date that the Permit is mailed back to the CATV Company under column 10 on the CPR.

2. Permit

- (a) Fill in today's date on the Permit



CATV Permitting Procedure

- (b) Fill in a zero for the Estimated cost.
- (c) Fill in N/A for the DSO #.
- (d) Make sure that engineer signed the Permit where it says "Licensor".

3. Copy's

- (a) Send the original Permit to Corporate Accounting, Bin #732.
- (b) Send 1 copy of the Permit to the Cable Company (this is their notification).
- (c) Stamp completed on your copy and file it in the "Completed CATV Permit File".

b) Make-ready Needed (DSO)

If line work on Gulf's poles is needed for CATV Company to safely attach, then the Engineer will promptly prepare a DSO.

1. CPR (CATV PERMIT RECORD)

- (a) Write in YES under column 4.
- (b) Write in the DSO # under column 5.
- (c) Write in the DSO Amount under column 6.
- (d) Write in the Date that *you* notified the CATV Company of the make-ready amount under column 7 (Gulf will fax or mail a copy of the Permit and/or the drawing if requested).
- (e) Place a copy of the Permit with the DSO (which will be put in the suspense file) and hold the original Permit until payment is received.
- (f) **After Payment is Received:**
 - (1). Write in the date that the check is received on the CPR under column 8.
 - (2). Release DSO to the Line Department to work!
- (g) **After the DSO is completed:**
 - (1). Write in the date the DSO is completed on the CPR under column 9.
 - (2). Write in the date that you notify the CATV Company that they can attach to Gulf poles on the CPR under column 10.
 - (3). Now fill out the Permit.

2. Permit

Fill out as described below after columns 8, 9 and 10 of the CPR have been filled in.

- (a) Write in the date where it says, "Permit granted _____". It should be the same date that is in column 10.
- (b) Write in the dollar amount of the DSO for the "Estimated cost".
- (c) Write in the DSO No.



CATV Permitting Procedure

- (d) Make sure the engineer's supervisor signed the Permit where it says "Licensor".
- (e) A copy of the Permit, copy of the check, and a copy of the DSO (face sheet, material sheet and drawing) goes in the "Cable Permit Completed" file.
- (f) The original Permit will go to Corporate Accounting, Bin #732.

3. Copy's

You will need 2 copies of the check, 2 copies of the DSO (2 face sheets, 1 material sheet and 1 drawing) and 2 copies of the Permit.

- (a) A copy of the check and a copy of the Permit go with the suspense DSO.
- (b) The original check and a copy of the DSO (Face sheet only) go to the Treasury Department, Bin #781.

IV. Notes:

CATV Companies are *required* to have written permission from Gulf Power engineering before they attach any main line cable to our poles (per the CATV contract and Gulf's "Management Procedure" 710-009).

CATV Companies can and usually will permit *service drops* after they have attached to Gulf's poles. Gulf engineering should check these permits also, for illustration see example two.

Dates for calculating Interim-Billing should be as follows:

For Exhibit B use the date in the Permit granted field. If this date is missing call the clerk at the office that it originated from for clarification.

For Exhibit D use the date field called "Date of Attachments" (old Form) or "Date Attached" (new form), both are found in the same area on Exhibit D. If this date is missing use the date at the top of the Exhibit D (under County).

If you have any questions, please call Ben Bowen at (850) 444-6726.

CATV Permitting Procedure

Example One

EXHIBIT B APPLICATION AND PERMIT FOR POLE ATTACHMENT

City of _____
 State of _____
 County _____
 Date _____

NAME OF LICENSEE: Knology of Panama City, Inc.

In accordance with the terms of Agreement effective January 1, 2003, application is hereby made for permit to make attachments to the following poles:

No.	TLN Number (if available)	No. of Poles	Service Address or Location
1.	-		
2.	-		
3.	-		
4.	-		
5.	-		
6.	-		
7.	-		
8.	-		
9.	-		
10.	-		
11.	-		
12.	-		
13.	-		
14.	-		
15.	-		
16.	-		

By: _____
 Title: _____
 Licensee

No make ready required. Permit granted on _____.

Make ready required.

- Estimated make-ready costs required to provide space for Licensee's attachments as shown on DSO No. _____ is \$ _____. Licensee accepts these charges by signing below:

By: _____
 Title: _____

Licensee

- Make-ready payment paid by Licensee on _____.
- Make-ready work completed by Gulf Power Company on _____.
- Permit granted on _____.

GULF POWER COMPANY

PERMIT NO. _____
 Total Poles: _____

By: _____
 Title: _____

Licensor



CATV Permitting Procedure

Example Two

EXHIBIT D
APPLICATION AND PERMIT
FOR SERVICE DROP ATTACHMENT EXCEPTIONS

City of _____
 State of _____
 County _____
 Date _____

NAME OF LICENSEE: Knology of Panama City, Inc.

In accordance with the terms of Agreement effective January 1, 2003 application is hereby made for permit to make attachments to the following poles:

No.	TLN Number (if available)	Service Address or Location	No. of Poles	Date Attached
1.	-			
2.	-			
3.	-			
4.	-			
5.	-			
6.	-			
7.	-			
8.	-			
9.	-			
10.	-			
11.	-			
12.	-			
13.	-			
14.	-			
15.	-			
16.	-			

Licensee certifies that the above attachments have been installed on Gulf's poles in strict compliance with the National Electrical Safety Code and any other applicable codes, rules, or regulations of any governing body having jurisdiction.

By: _____
 Title: _____
 Licensee

GULF POWER COMPANY

Permit granted this day of _____
 Month Year

By: _____ Permit No. _____
 Title: _____ Total Poles _____

