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David M. ChristianVice President
Regulatory Affairs Florida

November 21, 2005

Ms. Blanca S. Bayo, Director Division of Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 106 E. College Ave Tallahassee, Florida 32301 Telephone 850-224-3963 Fax 850-222-2912 david.christian@verizon.com.

vertzon.com.OV 21 PH 2:

FPSC-COMMISSION CLERK

Re:

Focused Utility Pole & Vegetation Management Review

November 2005 - February 2006

Dear Ms. Bayo:

Attached are Verizon Florida Inc.'s (Verizon) responses to the above-referenced audit. Verizon considers certain attachments to the responses to be proprietary and requests appropriate treatment thereof pursuant to Section 364.183(1), Florida Statutes and Rule 25-22.006(5). A sealed envelope containing the confidential documents is attached. Due to the nature and volume of the documents, no redacted copies have been provided. Verizon understands the information must be kept confidential until returned to the Company.

undockeded

Verizon is committed to providing quality, dependable service to our customers and proactively addresses any network infrastructure issues, including poles, that may become service affecting. Responses to this data request demonstrate that Verizon's approach of integrating pole inspection and maintenance into the daily work activities of its employees has proven to be effective and successful. All Verizon employees are committed to maintaining high service standards

| | effective and successful. All Verizon employees are committed to maintaining high service standards. |
|--------------------------------------|---|
| CMP | Frank App has been designated as Verizon's liaison to your audit staff and can be reached at 813-483-2521. If you require additional information, please do not hesitate to contact me. |
| com ₋ ctr ₋ | ——Sincerely, |
| ECR . | |
| GCL OPC | David M. Christian Vice President-Regulatory Affairs Florida |
| RCA | Attachments |
| SCR SGA | c: Tripp Coston (w/attachments) |
| SEC | DOCUMENT NUMBER-DATE |
| отн | 11152 NOV 21 8 |

Verizon Florida Inc.'s Responses to Bureau of Performance Analysis Focused Utility Pole & Vegetation Management Review November 2005 - February 2006

DOCUMENT REQUEST 1

Instruction:

- ◆ Please provide the name and relevant contact information of one employee responsible for each document request item so that, if necessary, that person can be contacted to elaborate, clarify or provide additional information.
- ◆ If any responses involve information previously provided to Commission staff, please cite the information or document, which staff member it was provided to, and the date the data was previously provided.
- Please label each response with corresponding request and item number.
- ◆ Please number all pages of responses if possible. (e.g. Page 1 of 26)

A. <u>General</u>

a. Provide a current organizational box chart of the Verizon Florida work units responsible for utility pole inspection and maintenance efforts.

Response:

Attachment No. 1 provides a high level view of the Verizon Outside Plant Engineering, Construction, and Customer Operations groups responsible for engineering, inspection, and maintenance of poles. All of the employees in these three groups ensure that Verizon's network, including poles, meets or exceeds applicable operational and safety standards.

Employees in the Construction and Operations groups are required to inspect poles as part of their normal daily work activity. Any employee performing work that involves climbing a pole or leaning a ladder against a strand must first inspect the pole for soundness and report it if defective. There are a total of 1,642 employees in the Construction and Customer Operations groups in Florida; 559 are in the Construction group and 1,083 are in Customer Operations. Outside Plant Engineering has a total of 97 employees involved in the pole inspection, design, and management and support activity in Florida. Outside Plant Engineers conduct visual pole inspections during the preparation of proposed aerial construction projects. There are 59 Outside Plant Engineers in the Florida Region.

b. Provide a current organizational box chart of the work units responsible for Verizon Florida's vegetation inspection and management efforts.

Response:

See response to question No. 1.a.

Vegetation encroachment issues are reported in a business-as-usual manner and trimming or removal is done on an as needed basis.

c. Please describe any reorganization or other major organizational changes in these Verizon Florida work units during the period 2002-2005.

Response:

There have not been any reorganization or other organizational changes in Verizon Florida work units during the period 2002-2005 that impact the effectiveness of inspection and maintenance issues for poles and vegetation.

2. Provide the number of employees involved in Verizon Florida's utility pole maintenance program for each year 2002-2005, separating management and non-management employees for each organization. Please provide this information, to the extent available, broken down by job title or function (e.g. construction specialist, repair lineman).

Response:

See the organizational charts in Attachment No. 1. Although organizational charts are not available for previous years, the total number of employees involved in business-as-usual outside work has not changed significantly. Of the 1,642 total employees in Construction and Customer Operations, 163 are management and 1,479 are non-management. Non-management employees can be broken down further into 984 repairmen, 448 splicers, and 47 linemen. Verizon maintains a flexible workforce and workers from any of the three non-management classifications can be pulled to help out one of the other classifications. Of the 97 employees in Outside Plant Engineering, 66 are management and 31 are non-management.

a. Please provide a list of any internal audits, external audits, or external studies conducted by or for the company during the period 2002-2005 regarding utility pole inspection, management, and maintenance. Please include the audit report or study date, title of the audit, a brief audit topic description and name of the performing auditor(s).

Response:

In 2002, Verizon contracted with ATCO Communications to perform an audit of Verizon owned poles in five exchanges. Auditors physically visited each pole identified in Verizon's records and conducted a field survey that included a visual inspection for obvious physical, clearance, or safety issues. Verizon's pole records were updated to reflect information obtained during the 2002 pole survey. A small percentage (0.3%) of the 17,910 poles audited was determined to be defective and the poles were replaced. Confidential Attachment No. 2 contains a summary of the audit results and the items that the vendor was contracted to survey.

b. Please provide a list of any internal audits, external audits, or external studies conducted by or for the company during the period 2002-2005 regarding service reliability and service quality. Please include the audit report or study date, title of the audit, brief audit topic description and name of the performing auditor(s).

Response:

Verizon Florida has conducted at least 36 internal audits related to service reliability and service quality and they are listed in Attachment No. 3. Administrative audits include schedules, time sheets, attendance records, safety documentation, productivity reports, trouble clearing, home dispatch records, major tool records, customer signature forms, documented soft wraps and customer call back logs. Technician audits include customer communication, station protection/terminals, bonding and grounding, buried service, aerial drop wire, station wire and jacks, transmission measurements, cross connects billing, time reporting, and records accuracy. Outside plant construction and FTTP (Fiber to the Premises) reviews include inspecting the applicable aerial/buried/underground cable placement, pole placement, pole attachments, associated hardware, strand, anchors and guys, tension and sag, cross connect boxes fiber distribution hubs, cable depth, pedestal placement, manhole racking, manhole sealing, manhole placement, handhold placement, bonding and grounding, splicing, and acceptance testing for compliance with Verizon practices.

In addition to Verizon initiated audits, the Florida Public Service Commission (FPSC) conducts annual service quality audits or evaluations. FPSC evaluations performed from 2002 to 2005 include:

2002: September 9 - October 4 2003: January 20 - November 21

2004: No routine audit performed in 2004

2005: February 21 – March 18

c. Please provide any risk analysis studies or evaluations performed by management over the period 2002-2005 for purposes of identifying internal audit coverage needs and adequacy of internal controls.

Response:

Verizon's management team analyzes risk on a day-to-day basis, and thus it is impossible to list all such analyses or evaluations. Therefore, Verizon interprets this request to be limited to risk analysis studies relating to hurricane damage to network facilities (including poles), since this is Staff's stated concern and the issue that prompted this management audit. Verizon has developed and maintains a comprehensive emergency preparedness and restoration plan that addresses all aspects of business operations during an emergency situation. The plan is designed to provide a centralized point of control and direction prior to, during, and after an emergency condition. Verizon's plan has been activated multiple times over the last several hurricane seasons and has proven to be an effective and efficient "command and control" approach to restoring service. Confidential Attachment No. 4 is a copy of Verizon's 2005 Emergency Preparedness Plan.

4. a. Please list and provide the number of joint use agreements with other utilities allowing Verizon Florida to attach its equipment to the other company's utility poles.

Response:

Joint Use Agreements (7 Companies):

Power Companies:

- 1. City of Bartow
- 2. City of Lakeland
- 3. Florida Power and Light
- 4. Progress Energy (Florida Power Corp)
- 5. Tampa Electric Company (TECO)
- 6. Peace River
- 7. Withlacoochee River Electric Cooperative
- b. Please provide a copy of each of the agreements.

Response:

See Confidential Attachment Nos. 5a through 5g.

5. a. Please list and provide the number of joint use agreements where Verizon Florida has agreed to allow another company to attach its equipment on Verizon's utility poles.

Response:

Joint Use Agreements (16 Companies):

Power Companies (7 Companies):

- 1. City of Bartow
- 2. City of Lakeland
- 3. Florida Power and Light
- 4. Progress Energy (Florida Power Corp)
- 5. Tampa Electric Company (TECO)
- 6. Peace River
- 7. Withlacoochee River Electric Cooperative

CATV (3 Companies):

- 8. Bright House (Same Language in Time Warner and TCI contracts)
- 9. Comcast
- 10. Knology

CLEC (6 Companies):

- 11. Adelphia Business Solutions
- 12. Bell South
- 13. AT&T Local
- 14. FPL Fibernet
- 15. Tapco
- 16. KMC
- b. Please provide a copy of each of the agreements.

Response:

See Confidential Attachment Nos. 5a through 5p.

6. Please provide the number of poles which Verizon Florida owns, separated by class and type.

Response:

Verizon owns 107,863 poles in Florida. See Confidential Attachment No. 6 for class and type.

7. Please provide the number of poles on which Verizon Florida leases usage.

Response:

Verizon leases space on 381,928 poles in Florida under joint use agreements.

8. a. Please provide the average age of poles which Verizon Florida owns.

Response:

Verizon is working to obtain this data and will provide it when available. It is important to note that the age of a pole is not the sole determining factor Verizon uses to determine whether a pole needs to be replaced. Environmental conditions can impact the rate at which a pole will deteriorate over time. Poles that Verizon determines to be defective are replaced regardless of age.

b. Please provide the average [age] of the poles on which Verizon Florida leases space from other utility providers.

Response:

Verizon does not have this data since the poles are not Verizon-owned.

- B. Pole Inspection Programs
- 9. List and describe company inspection activities, efforts and programs for inspecting poles during the period 2002-2005.

Response:

See responses to question Nos. 1 through 3.

10. Provide current copies of the company's policies and procedures that relate to inspection efforts and activities. These inspection activities may include any or all of the following: routine scheduled inspection to determine condition and/or maintenance needs, targeted inspections required under specific triggering circumstances, inspections conducted on an as-needed basis or as part of other work activities.

Response:

Confidential Attachment No. 7 covers safeguards to be taken before climbing poles or placing ladders on poles. This practice covers pole failure, pole strength, visual examination of a pole, methods of pole testing, and procedures for reporting unsafe poles.

11. Provide a description of pole inspection objectives, measurements and results, by year and operating district, for the period 2002-2005.

Response:

See response to question No. 1. Verizon does not set specific pole inspection objectives because pole inspection and maintenance are addressed through normal daily work activities.

12. Provide budgeted and actual expenditures for poles inspection activities, efforts and programs, by year and by district, during the period 2002-2005.

Response:

See Confidential Attachment No. 8 for expenditures for 2005 year-to-date. Verizon is working to obtain data for prior years and will provide the information when it is available.

13. Describe any portions of the pole inspection efforts and activities outsourced or completed by contractors during the period 2002-2005. Please provide copies of any current contracts for outsourcing.

Response:

See response to question 3a for a description of the audit outsourced to ATCO Communications in 2002. Also, Confidential Attachment No. 9 is a

current contract for outsourcing that is representative of the contracts Verizon signs with its vendors.

14. Describe any changes in the company's approach to pole inspection activities, efforts or funding during the period 2002-2005.

Response:

Verizon issued a companywide position statement on 6/13/05 addressing remedial pole work. Since 2000, Verizon has opposed and restricted remedial pole work on Verizon owned poles on the ground that there is no conclusive evidence that such work prolongs the life of the poles. This policy applies to all current and future joint-use or shared pole agreements. Poles not meeting minimum structural standards are replaced rather than repaired.

15. Please describe how the company evaluates and monitors any pole inspections and maintenance work outsourced to contractors.

Response:

Verizon's agreements with its contractors provide performance expectations, audits and reports, plant rules, service quality measurements, and many other items that hold a contractor to high standards. Please see Confidential Attachment 9 for contract language.

Verizon Florida Inc.'s Responses to Bureau of Performance Analysis Focused Utility Pole & Vegetation Management Review November 2005 - February 2006

DOCUMENT REQUEST 1

ATTACHMENT 1 ORGANIZATIONAL CHARTS

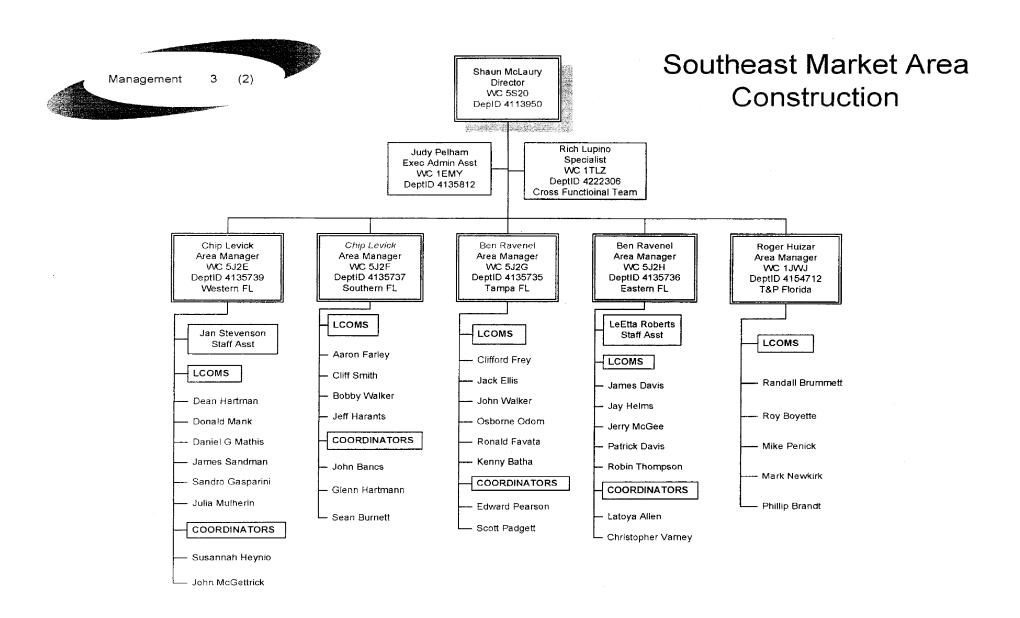
Southeast Market Area Construction Organization Chart

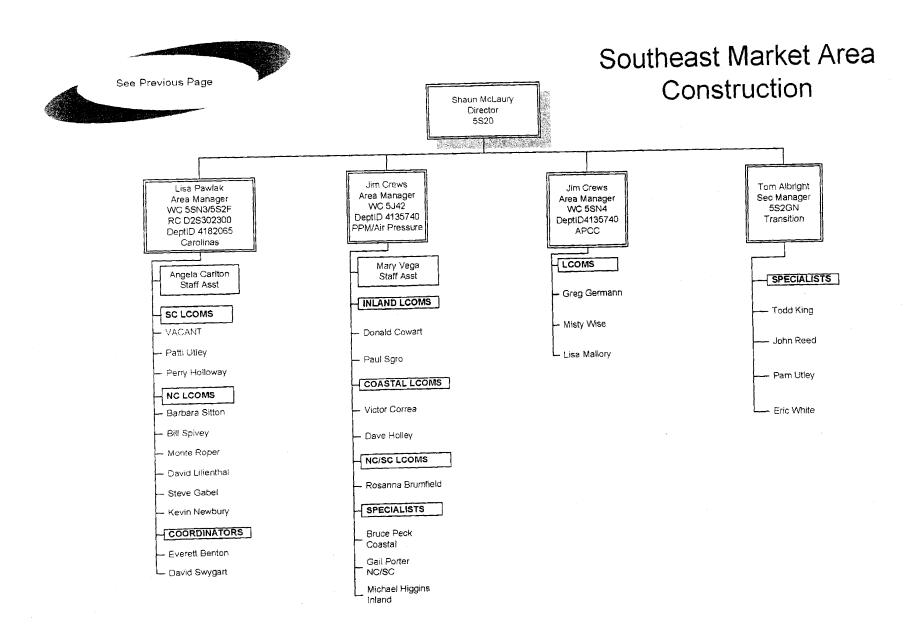
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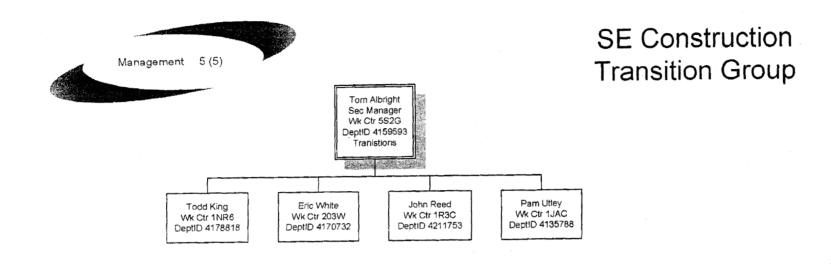
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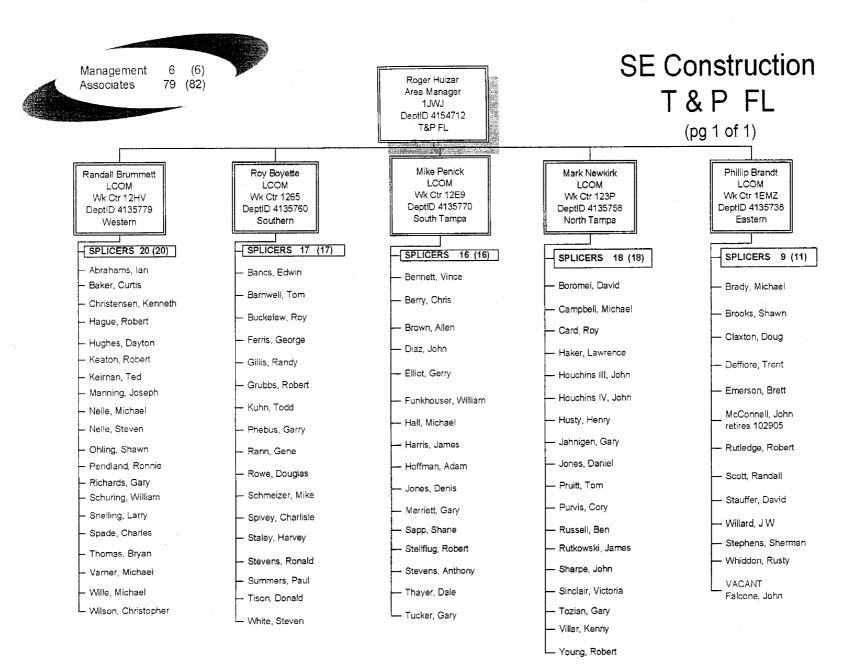
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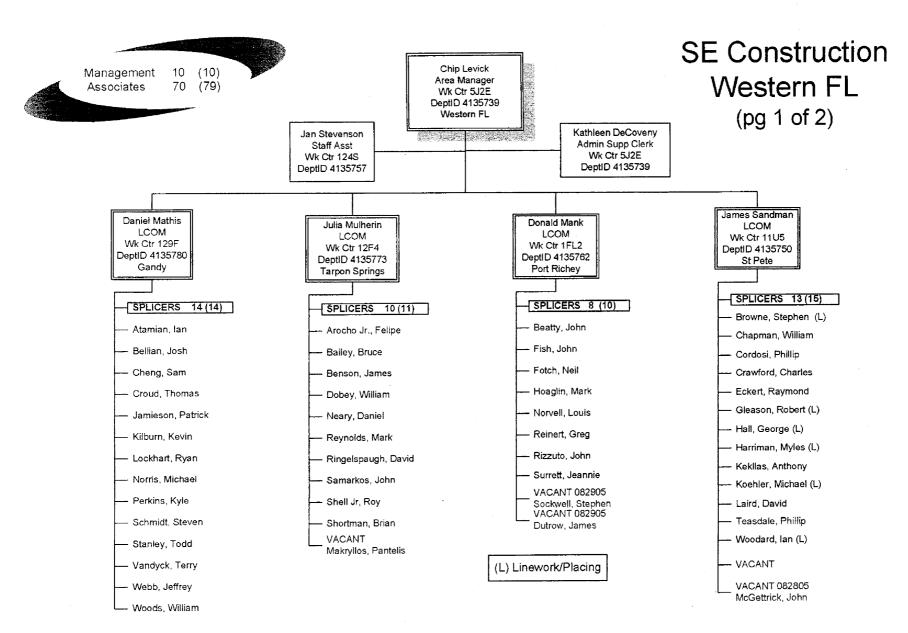
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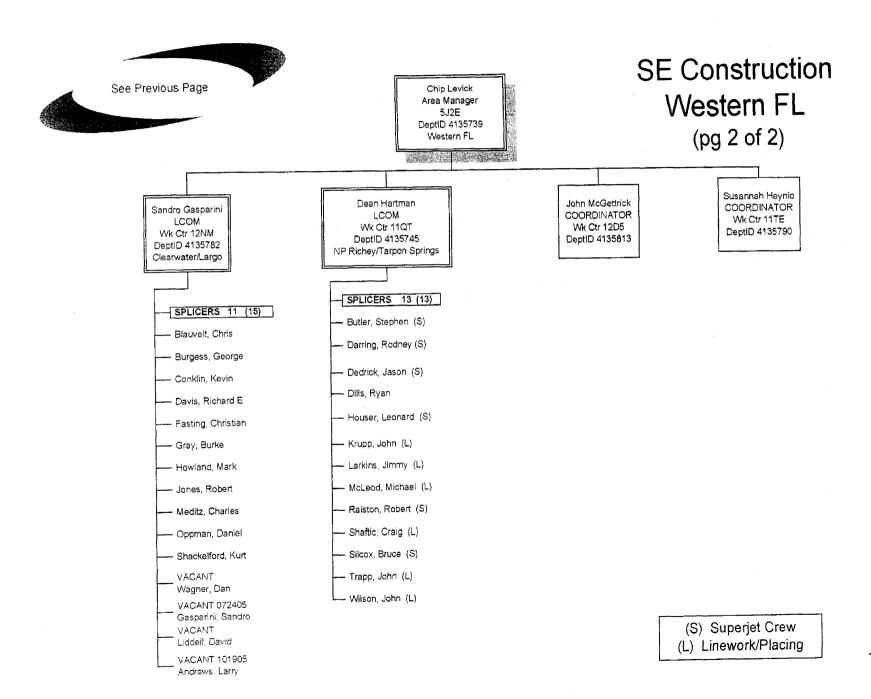


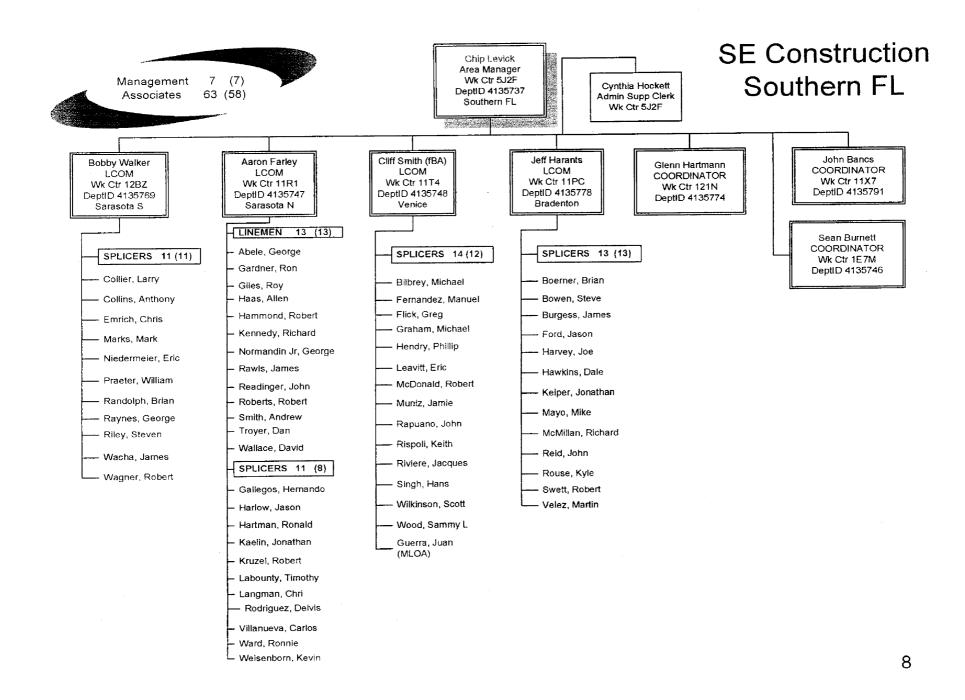


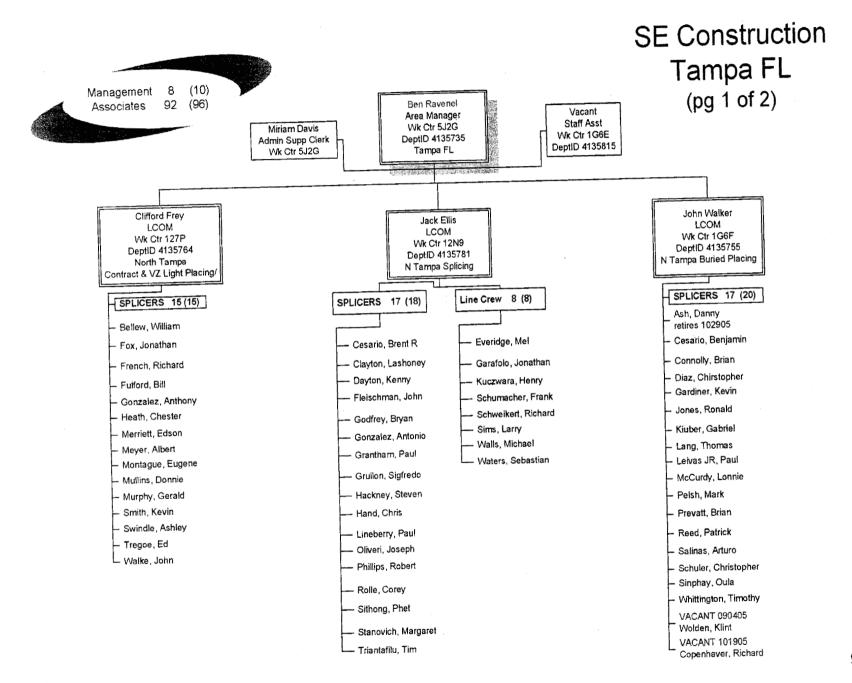


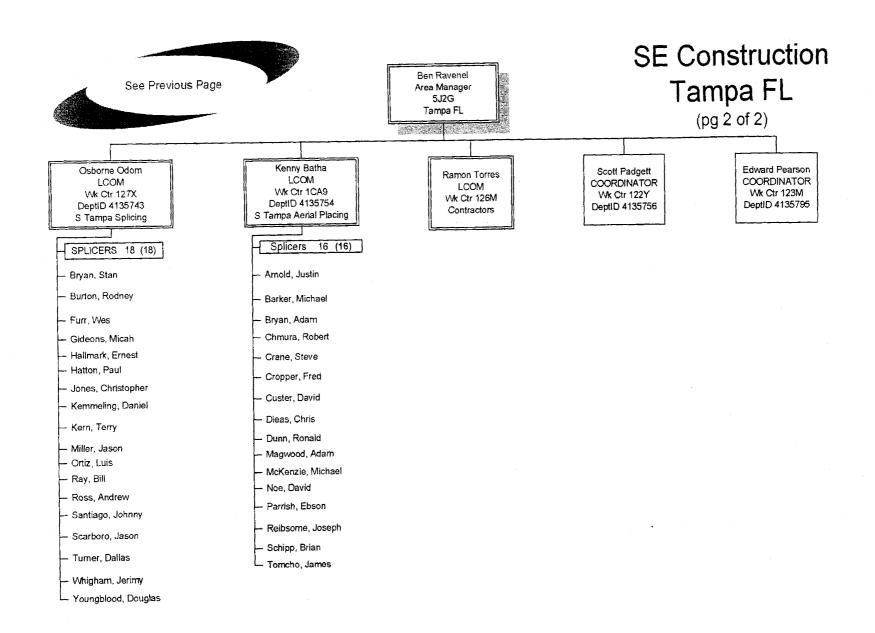


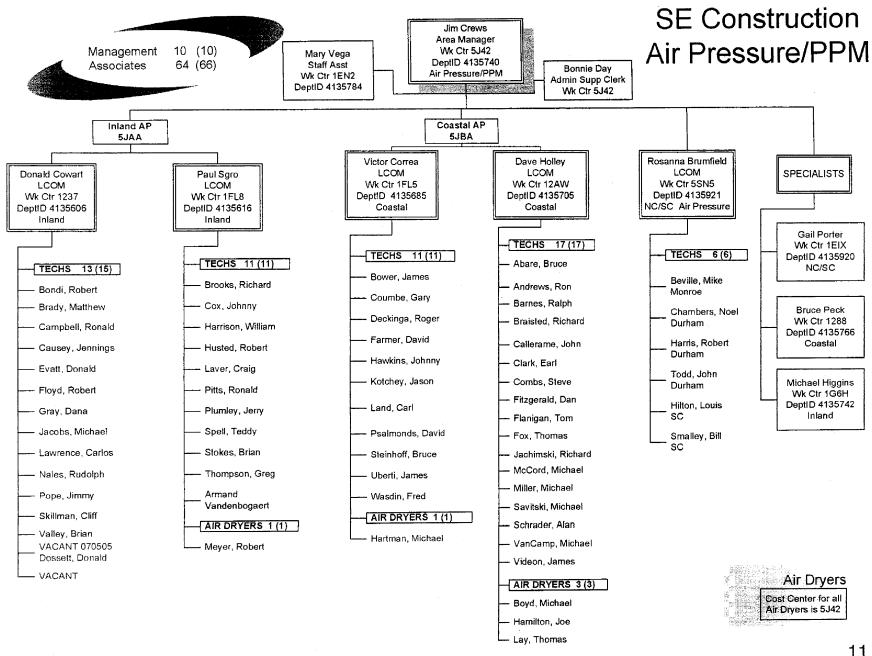


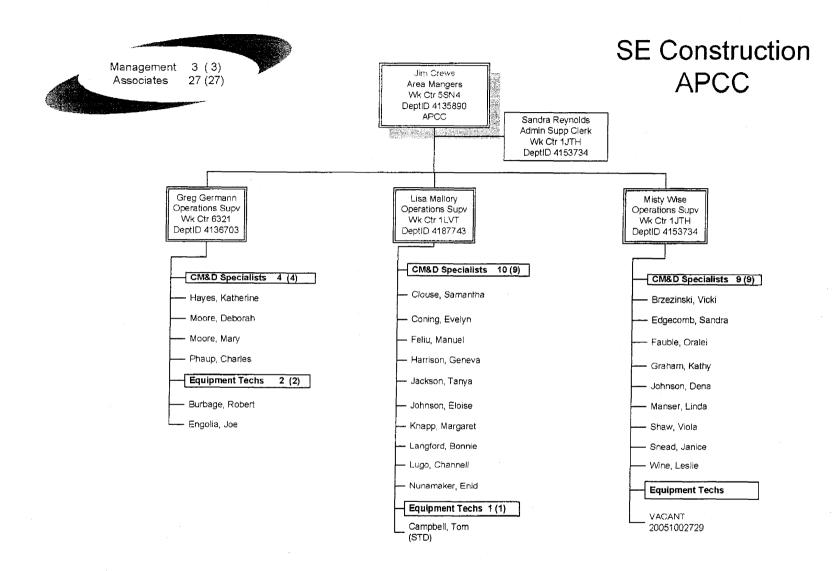




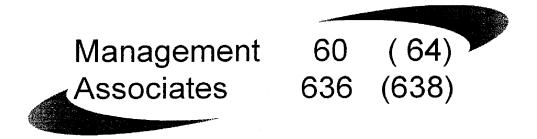








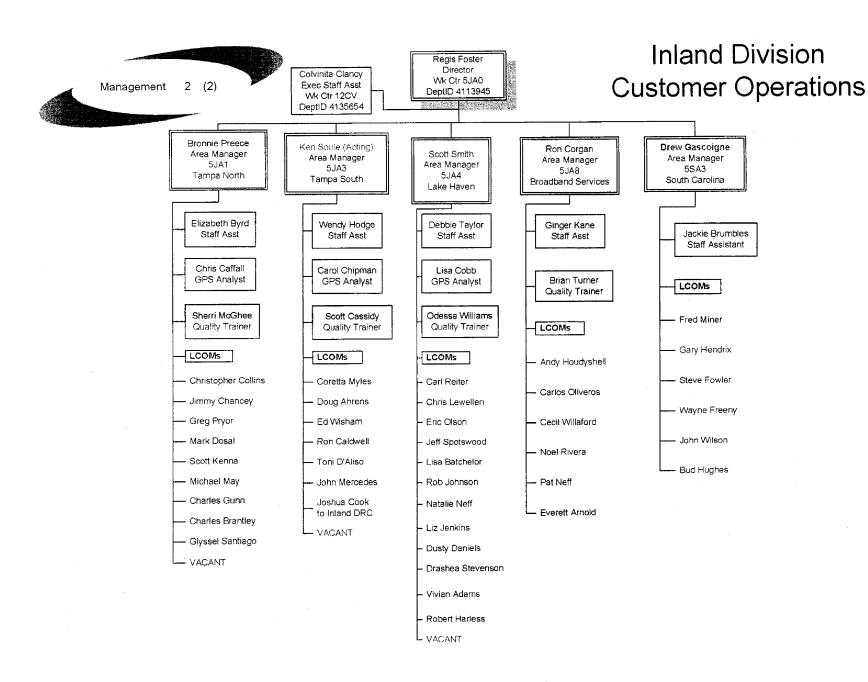
Inland Division Customer Operations Organization Chart

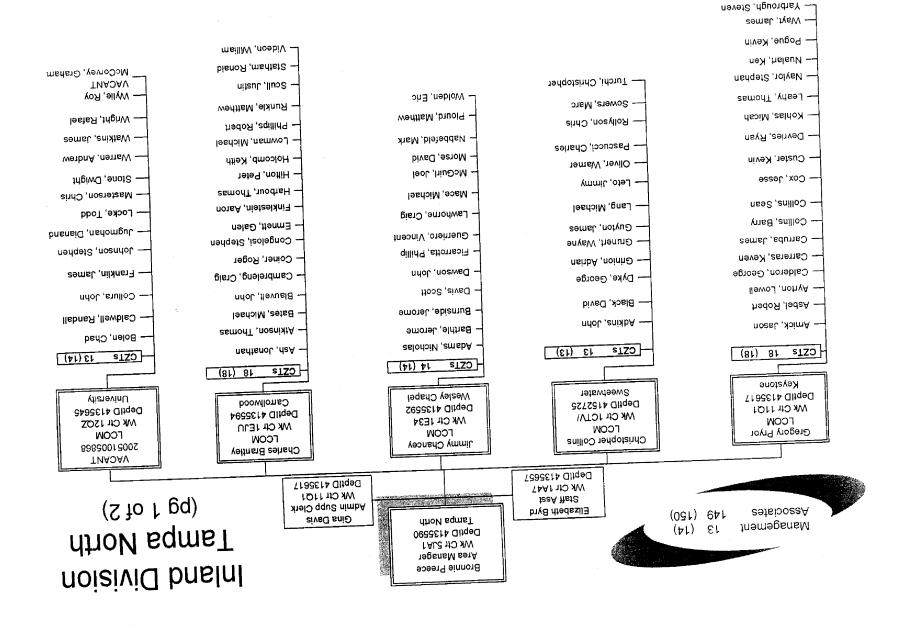


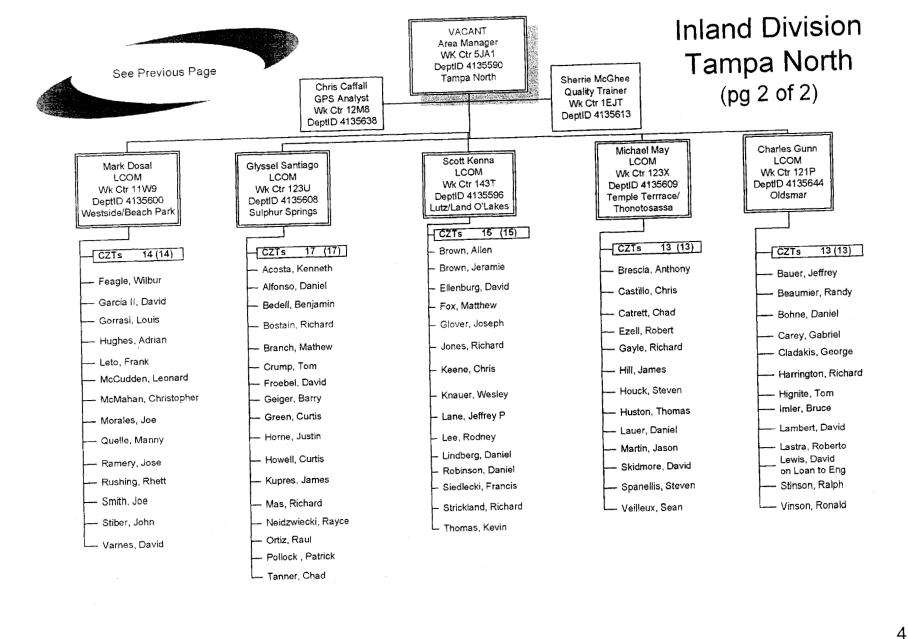
As of October 22, 2005

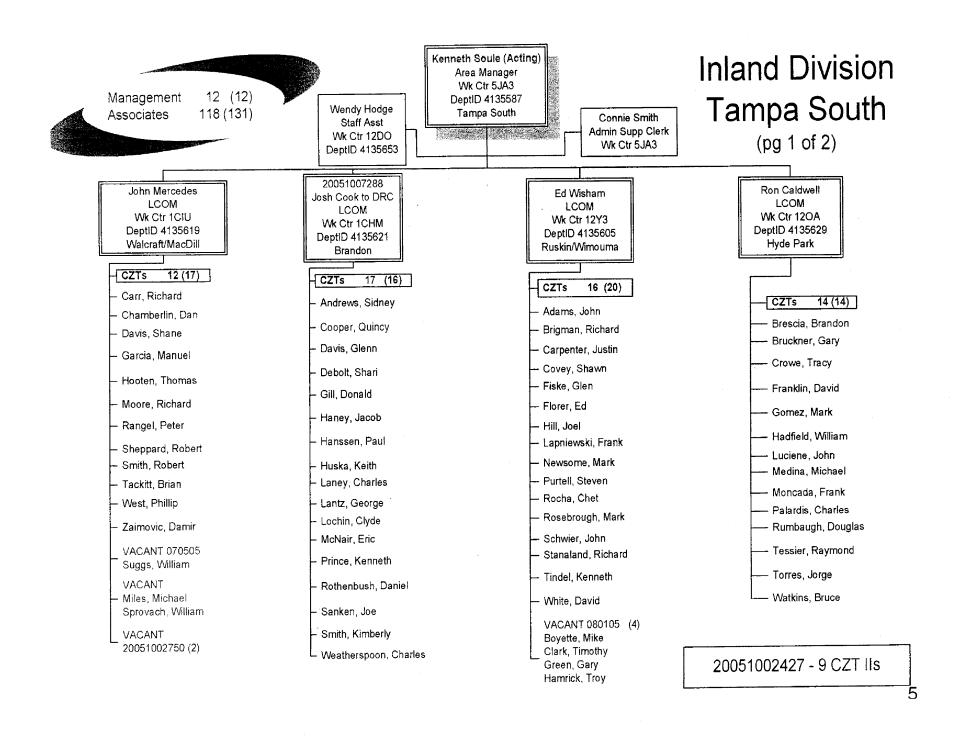
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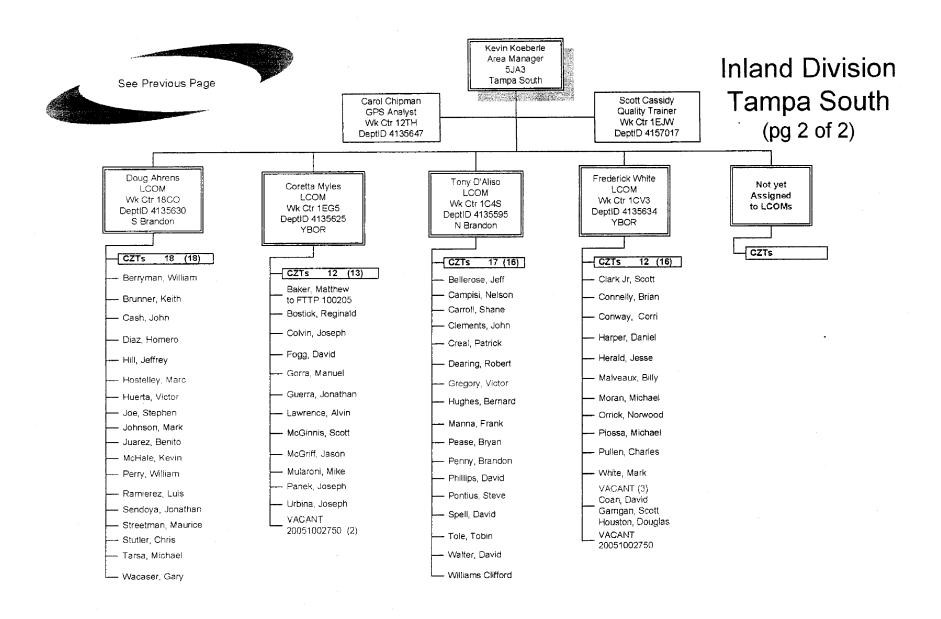
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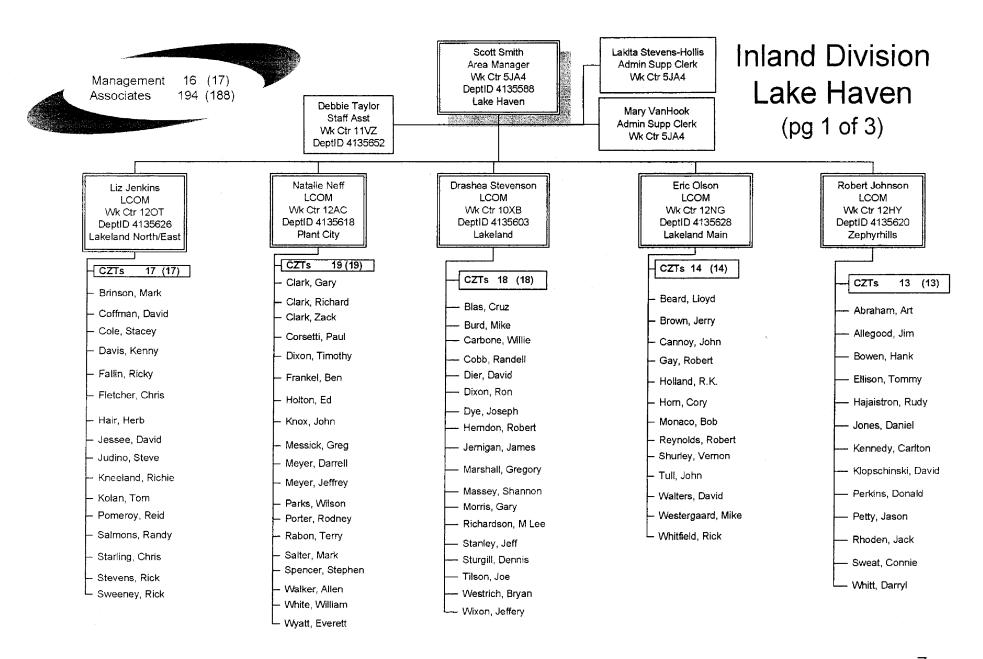


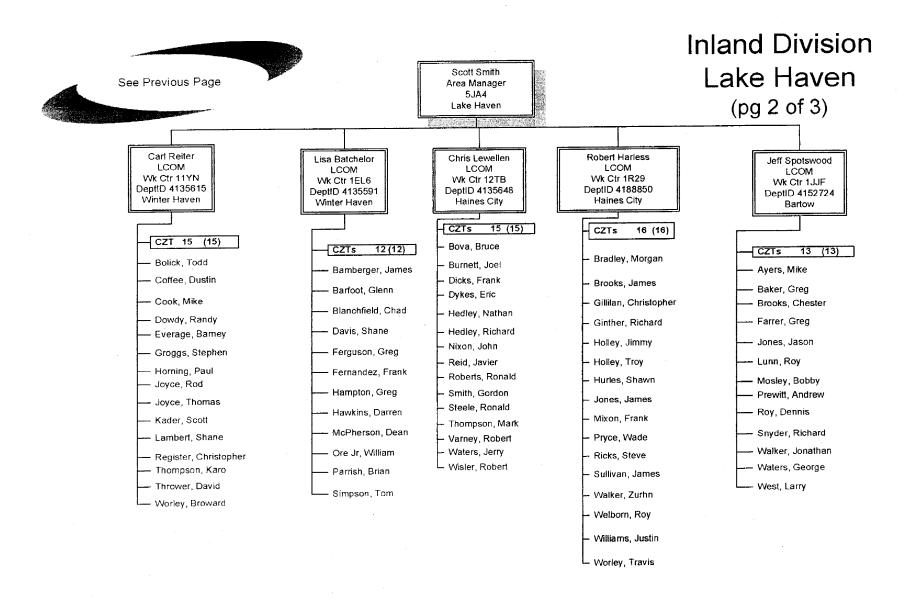


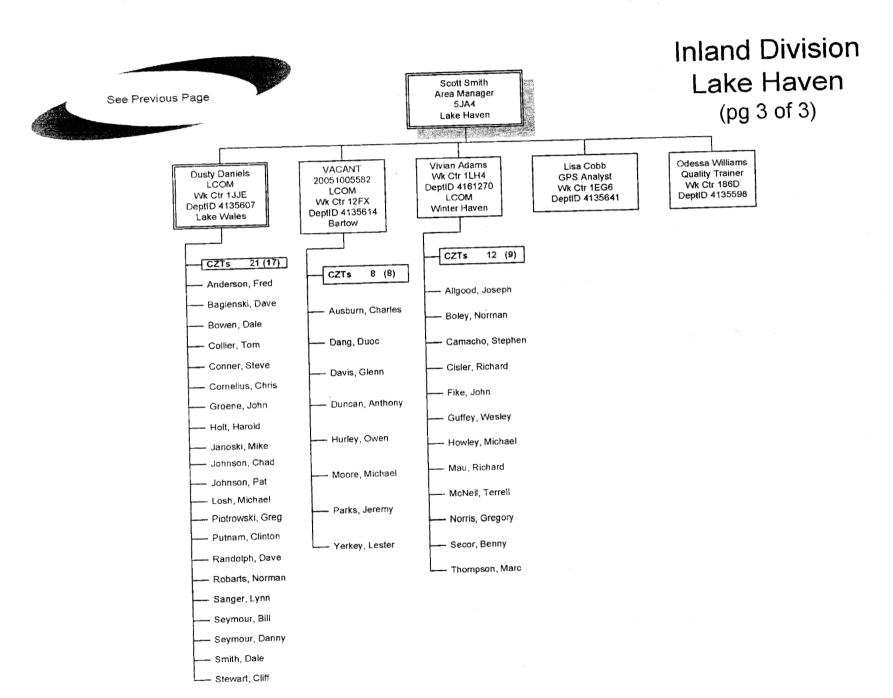


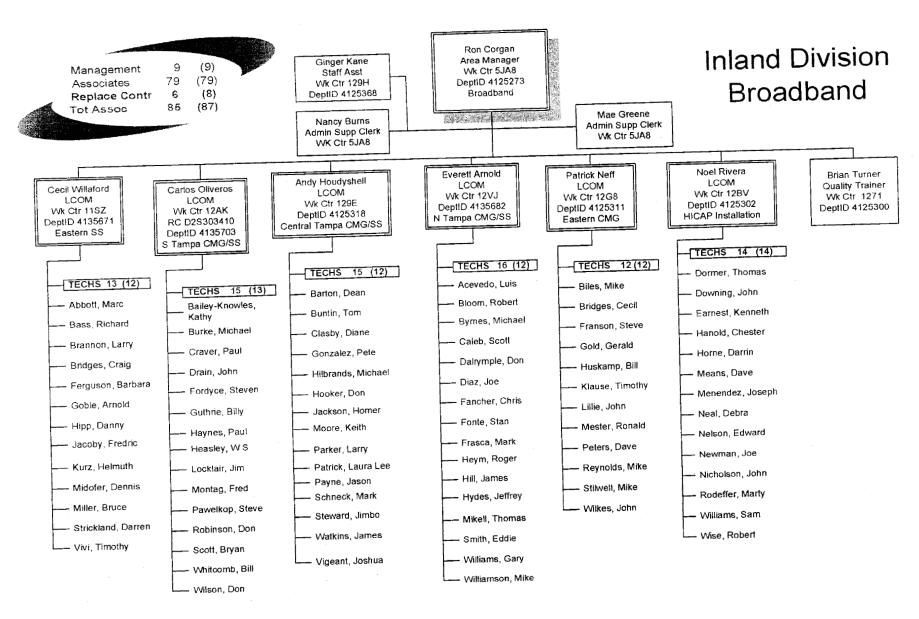












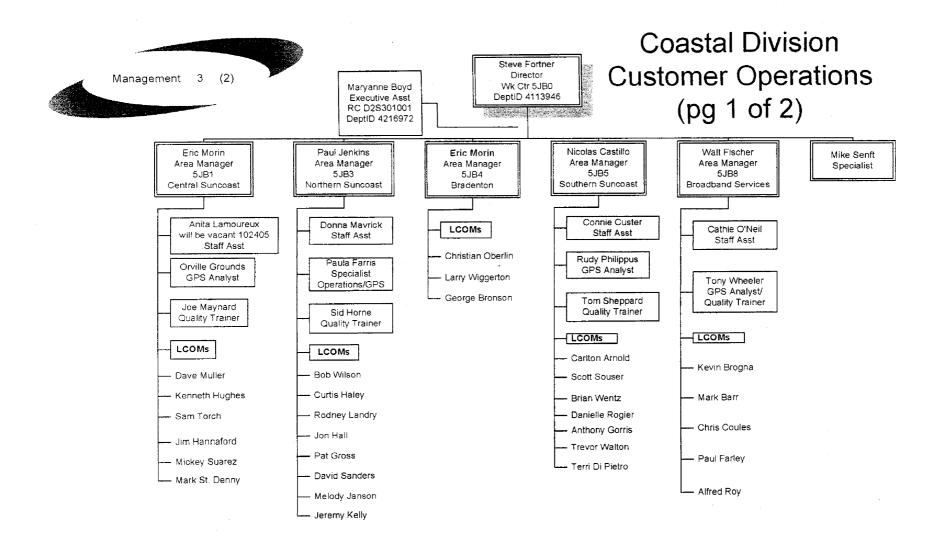


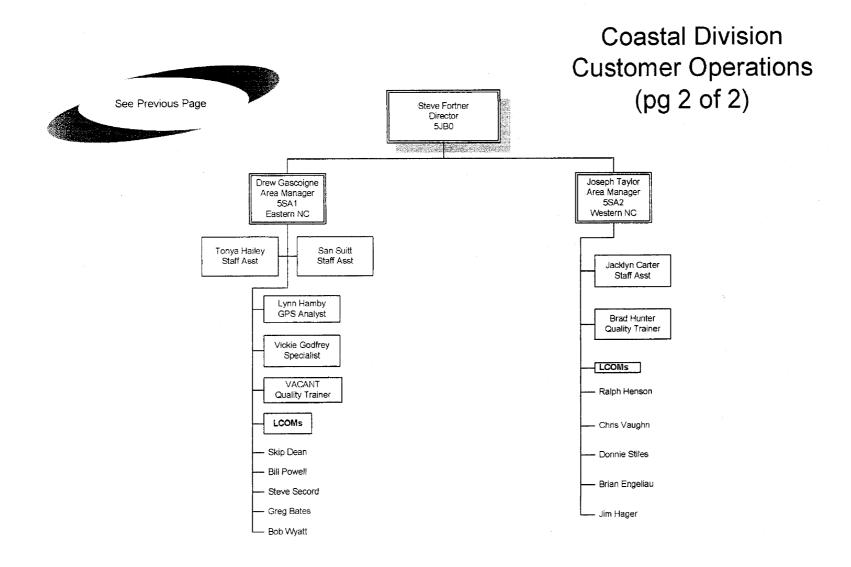
Coastal Division Customer Operations Organization Chart

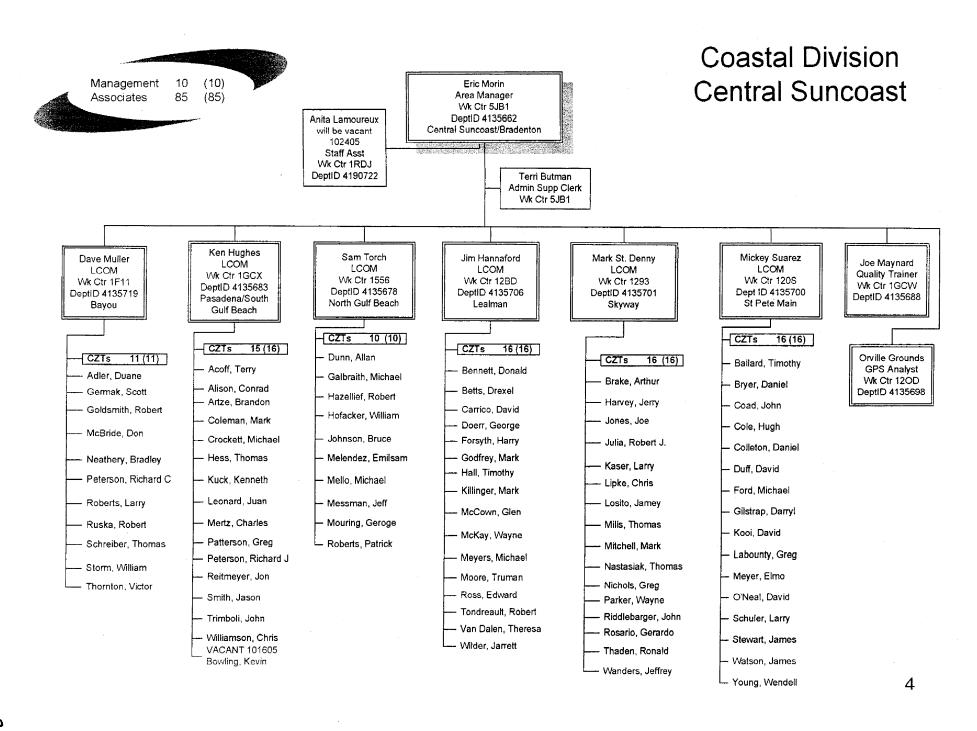


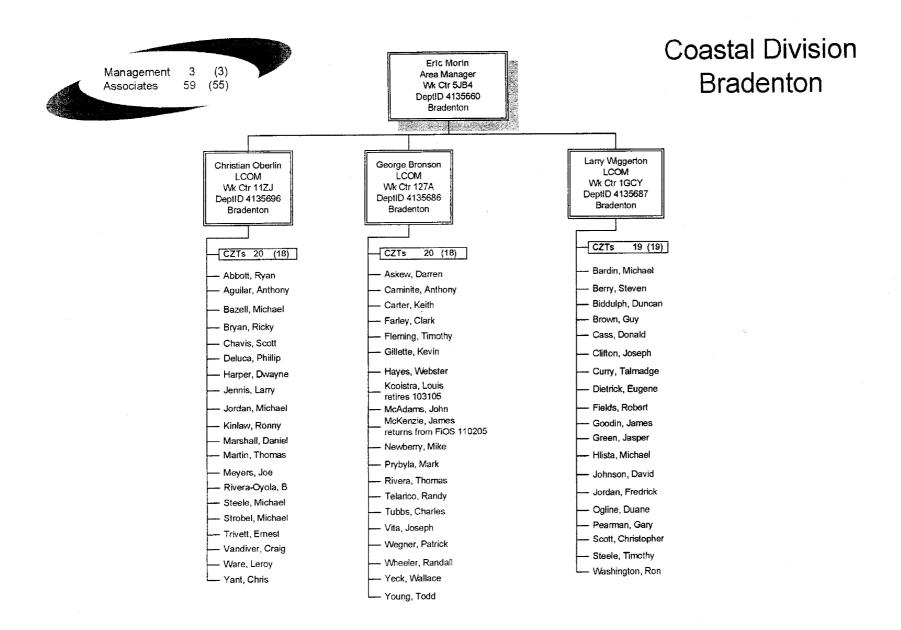
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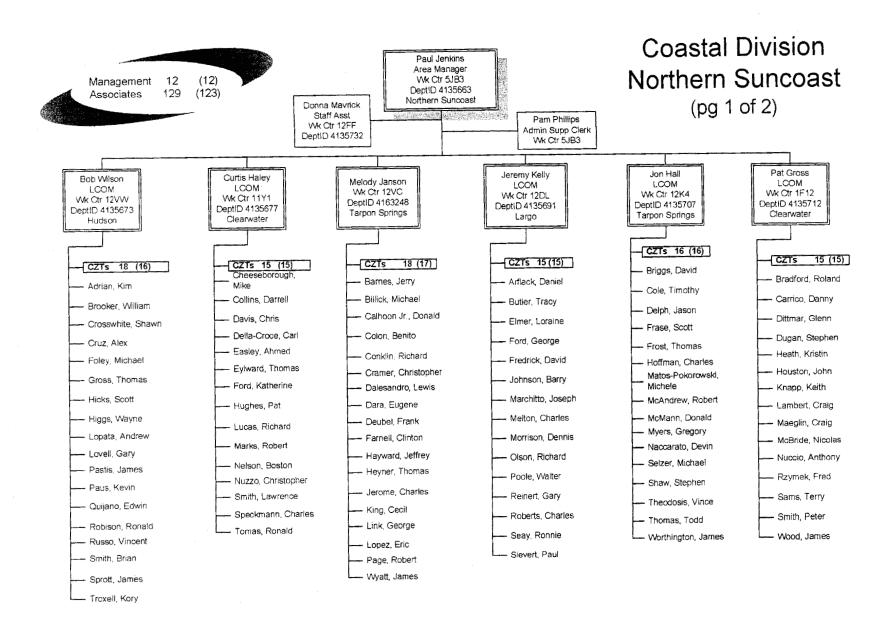
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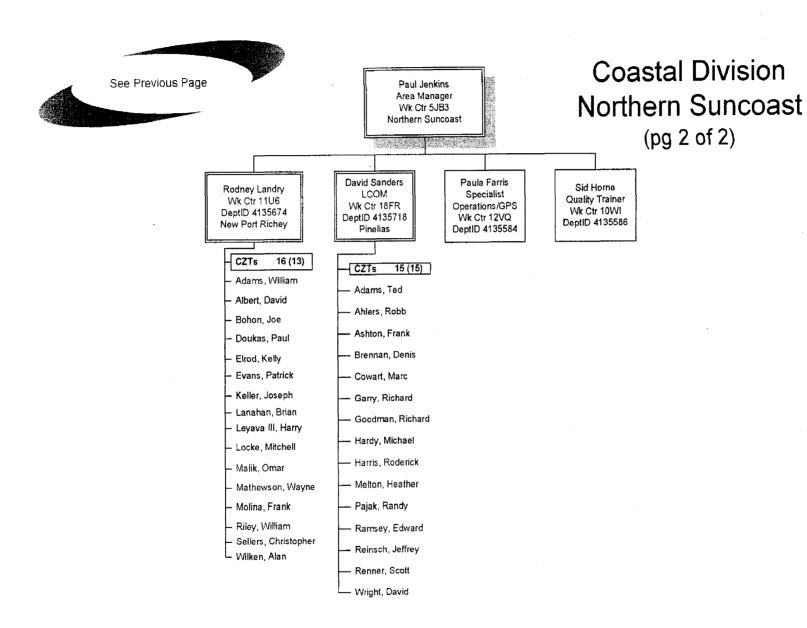


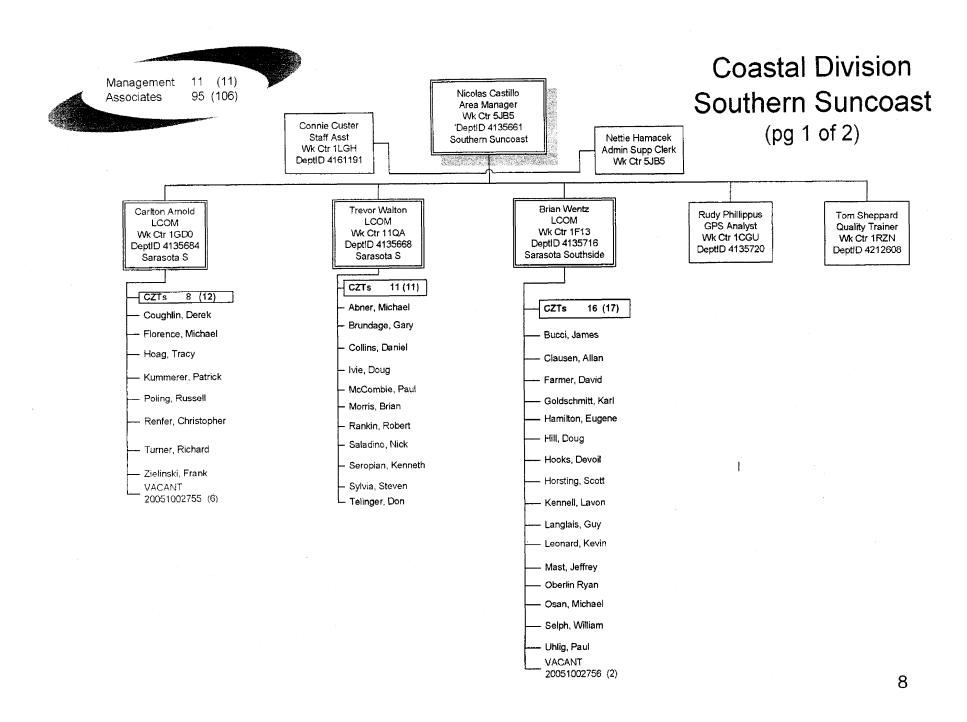


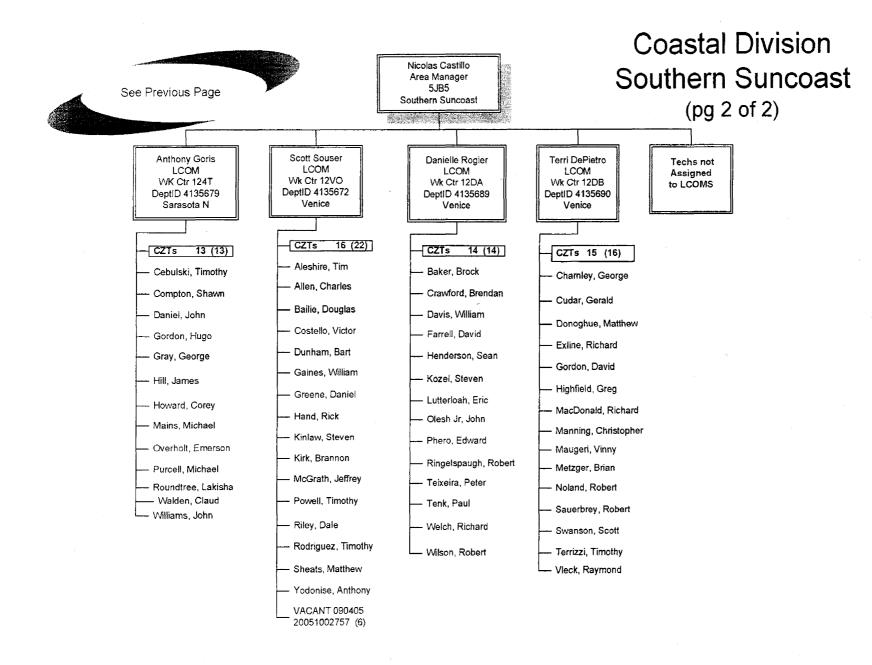


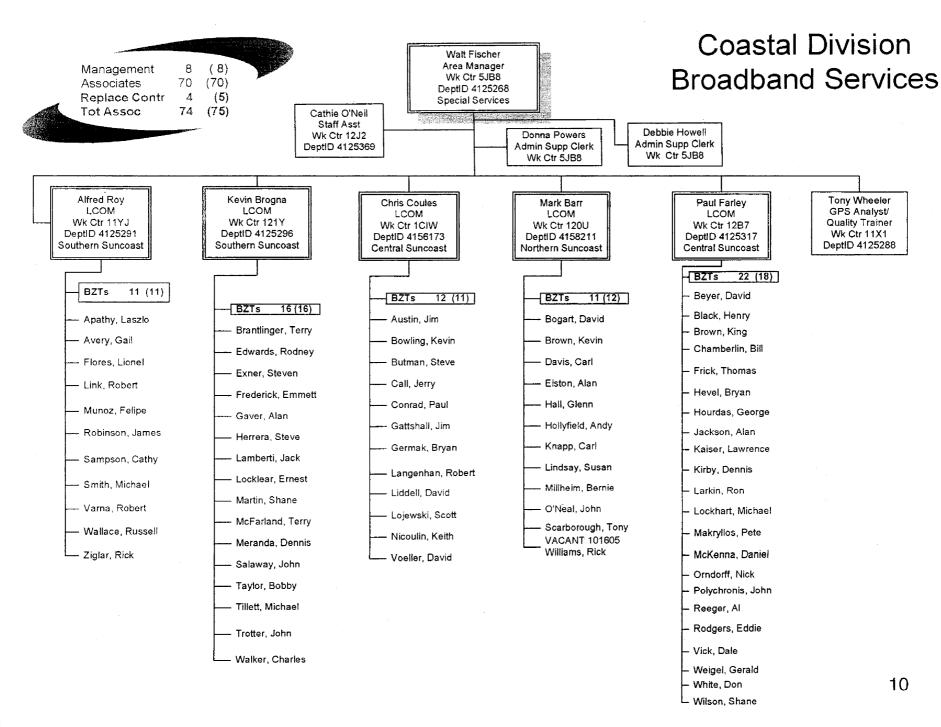


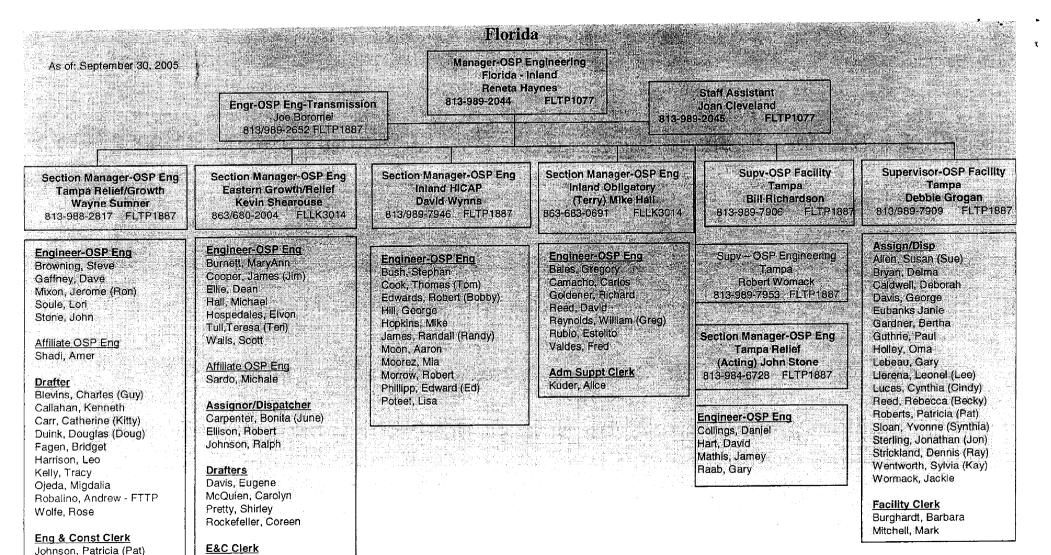








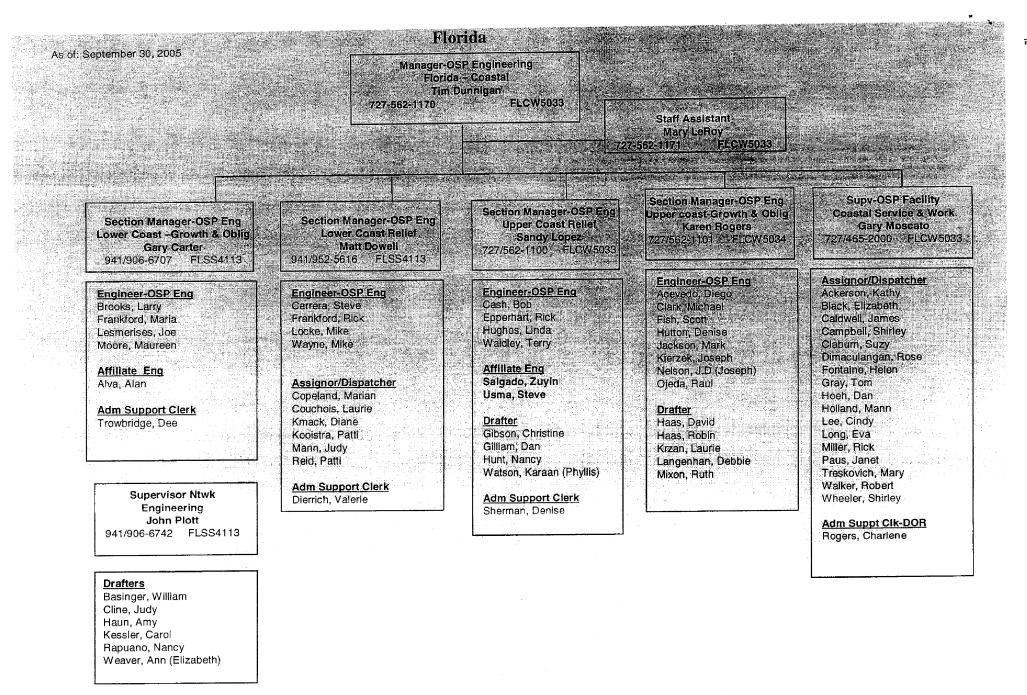




Adm Suppt Clerk
Patterson, Mary

Basel, Rainy Williams, Carolyn

Adm Suppt Clerk
Jolicoeur, Ruthie



DOCUMENT REQUEST 1

CONFIDENTIAL ATTACHMENT NO. 2 TAMPA POLE SURVEY SUMMARY

DOCUMENT REQUEST 1

ATTACHMENT 3

QUALITY ASSURANCE OPERATIONAL REVIEW SUMMARY 2002 THROUGH 2005

Quality Assurance Operational Review Summary for 2002 through 2005

| Audit Date | Audit Title | Audit Topic Description | Name of the performing auditor(s) |
|---------------|--|---|---------------------------------------|
| Aug-02 | Administrative and Technical QAOR (*) (**) | Review local manager's performance of admin functions and field inspection of technician's work | Bret Reelfs |
| , iug 02 | | installing pedagon of townshours of work | Alex Hunter |
| | | | |
| N1 00 | Administrative and Technical | Review local manager's performance of admin functions and | , , , , , , , , , , , , , , , , , , , |
| Nov-02 | QAOR | field inspection of technician's work | Bret Reelfs |
| | | | Alex Hunter Bruce Weeks |
| | | | |
| | | | Bob Arrison |
| Apr-03 | Administrative QAOR | Review local manager's performance of admin functions | Alex Hunter |
| | | | Linda Huskamp |
| May-03 | Administrative QAOR | Review local manager's performance of admin functions | Bob Arrison |
| IVIAY-00 | Administrative GAOTI | The view local manager's performance of admin functions | Alex Hunter |
| | | | Linda Huskamp |
| | | | Bret Reelfs |
| | | | Diet neells |
| Sep-03 | Technical QAOR | Field inspection of technician's work | Alex Hunter |
| Oct-03 | Technical QAOR | Field inspection of technician's work | Alex Hunter |
| 001-00 | reciliada GAOTT | Tield inspection of technician's work | Alex Hunter |
| Nov-03 | Technical QAOR | Field inspection of technician's work | Alex Hunter |
| Dec-03 | Technical QAOR | Field inspection of technician's work | Alex Hunter |
| Jan-04 | Technical QAOR | Field inspection of technician's work | Alex Hunter |
| | | | |
| Feb-04 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| | | · · · · · · · · · · · · · · · · · · · | Matt Dickins |
| | | | Adolfo Torres-Gonzalez |
| | | | Drashea Stevenson |
| | | | Bob Wilson |
| | | | Debbie Sutherland |
| | | | Mark St Denny |
| Apr-04 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| 7,5,0, | Teominal artone | Total Washington of teerminetra Work | Sherri McGhee |
| ļ | | | Tony D'Aliso |
| | | | Norman Moore |
| | | | Curtis Haley |
| | | | Mickey Suarez |
| | | | Gerard Wuenschel |
| | 1 | | |
| May-04 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| | | | Sherri McGhee |
| | _ | | Scott Cassidy |
| <u> </u> | | | Jon Hall |
| | | | Chris Lewellen |
| | | | Jim Hannaford |
| | | | Gerard Wuenschel |
| Jun-04 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| | | | John Pobzeznik |
| | | | Ron Caldwell |
| | | | Rob Johnson |
| | | | Toby Sanders |

| | | | Larry Wiggerton |
|----------|----------------------------|--|--|
| | | | Gerard Wuenschel |
| | | | |
| Jul-04 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| | | | Adolfo Torres-Gonzalez |
| | | | Chris Oberlin |
| | | | Matt Dickins |
| | | | Mickey Suarez |
| | | | Dusty Daniels |
| | | | Rod Landry |
| | | | |
| Nov-04 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| | | | John Pobzeznik |
| | | | Chris D'Aliso |
| | | | Eric Olsen |
| | | | Curtis Haley |
| | | | Mickey Suarez |
| | | | Scott Souser |
| | | | |
| Nov-04 | Administrative QAOR | Review local manager's performance of admin functions | Bret Reelfs |
| | | | Alex Hunter |
| | | | |
| Dec-04 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| | | | Jim Chancey |
| | | | Doug Ahrens |
| | | | Lisa Batchelor |
| | | | Sid Horne |
| | | | Jim Hannaford |
| | | | Brian Wentz |
| | | | |
| Dec-04 | Administrative QAOR | Review local manager's performance of admin functions | Bret Reelfs |
| | | | Alex Hunter |
| | | | |
| Jul-05 | FiOS Technical QAOR Blitz | Field inspection of technician's work | Bret Reelfs |
| | | · | Alex Hunter |
| | | | Orlando Plaza |
| <u> </u> | | | Mike Dassatti |
| | | | Darrell Wilson |
| | | | |
| Aug-05 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| | | | Josh Cook |
| | | | Sherri McGhee |
| <u></u> | | | Sid Horne |
| | | | Liz Jenkins |
| | | | Tom Sheppard |
| | | | Jim Hannaford |
| | | Television of the second of th | |
| Oct-05 | Technical QAOR Blitz | Field inspection of technician's work | Alex Hunter |
| <u> </u> | | | Charles Gunn |
| | | | Doug Ahrens |
| | | | Natalie Neff |
| | | | Curtis Haley |
| | | | Jim Hannaford |
| | | | Tom Sheppard |
| | | | |
| | | | |
| | Administrative & Technical | | |
| | QAOR (*) | | |
| | GAOTI() | | |
| | | | |
| | | | |
| | | ** District level Administrative audit includes: Schedules, Time | э |
| | | Sheets, Attendance records, Safety documentation, | |
| | Administrative V Lechnical | | T. Control of the Con |
| | Administrative & Technical | Productivity reports, Trouble Clearing, Home Dispatch | |
| | QAOR (**) | Productivity reports, Trouble Clearing, Home Dispatch records, Major Tool records, Customer Signature forms, | |

| pr-03 | OSP Construction*** | OSP construction field review | Tom Albright |
|--------|-----------------------------|---|--------------------|
| vpr-03 | OSP Construction | OSP construction field review | Tom Albright |
| 1ay-03 | OSP Construction | OSP construction field review | Tom Albright |
| May-03 | OSP Construction | OSP construction field review | Tom Albright |
| 1ay-04 | FTTP Review**** | FTTP field review | Tom Albright |
| May-04 | OSP Construction | OSP construction field review | Tom Albright |
| lun-04 | OSP Construction | OSP construction field review | Tom Albright |
| Jun-04 | OSP Construction | OSP construction field review | Tom Albright |
| Jul-04 | FTTP Review | FTTP field review | Tom Albright |
| Feb-05 | FTTP Review | FTTP field review | Nat'l Support Team |
| Apr-05 | OSP Construction | OSP construction field review | Tom Albright |
| Jul-05 | OSP Construction | OSP construction field review | Tom Albright |
| Jul-05 | FTTP Review | FTTP field review | David Nall |
| Aug-05 | OSP Construction | OSP construction field review | Tom Albright |
| Oct-05 | FTTP Review | FTTP field review | David Nall |
| | OSP Construction QAOR (***) | ***All OSP construction reviews consist of, but are not limited to, inspecting the applicable aerial/buried/underground cable placement, pole placement, pole attachments, associated hardware, strand, anchors and guys, tension and sag, cross connect boxes, cable depth, pedestal placement, manhole racking, manhole sealing, manhole placement, bonding and grounding, splicing, and acceptance testing for compliance to Verizon packages. | |
| | FTTP Review QAOR (****) | *****All FTTP reviews consist of, but are not limited to, inspecting the applicable aerial/buried/underground cable placement, pole placement, pole attachments, associated hardware, strand, anchors and guys, tension and sag, fiber distribution hubs, cable depth, pedestal placement, manhole racking, manhole sealing, manhole placement, handhold placement, bonding and grounding, splicing, and acceptance testing for compliance to Verizon packages. | |

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DOCUMENT REQUEST 1

CONFIDENTIAL ATTACHMENT NO. 4

VERIZON 2005 SOUTHEAST MARKET AREA DCC EMERGENCY PREPAREDNESS PLAN

ENTIRE DOCUMENT CONSISTING OF 115 PAGES IS CONFIDENTIAL

DOCUMENT REQUEST 1

CONFIDENTIAL ATTACHMENT NOS. 5a-5p

VERIZON JOINT USE AGREEMENTS WITH CITY OF BARTOW CITY OF LAKELAND **FLORIDA POWER & LIGHT** PROGRESS ENERGY (FLORIDA POWER CORP.) **TAMPA ELECTRIC** PEACE RIVER ELECTRIC COOPERATIVE WITHLACOOCHEE RIVER ELECTRIC COOPERATIVE **BRIGHT HOUSE** COMCAST **KNOLOGY ADELPHIA BUSINESS SOLUTIONS BELLSOUTH** AT&T LOCAL **FPL FIBERNET TAPCO KMS**

ALL DOCUMENTS ARE CONFIDENTIAL

DOCUMENT REQUEST 1

CONFIDENTIAL ATTACHMENT NO. 6 VERIZON OWNED POLES

ENTIRE DOCUMENT CONSISTING OF 2 PAGES IS CONFIDENTIAL

DOCUMENT REQUEST 1

CONFIDENTIAL ATTACHMENT NO. 7

VERIZON PRACTICE NO. 603-060-010 SAFEGUARDS TO BE TAKEN BEFORE CLIMBING POLES OR PLACING LADDERS ON POLES

ENTIRE DOCUMENT CONSISTING OF 9 PAGES IS CONFIDENTIAL

| | 2005 Budget | 2005 Actuals |
|--|----------------|-------------------|
| Total Expense Spent on Network Total Expense Pole Lines Exp/Towers Exp | \$XXXXX | \$XXXXX \$XXXX |

Pole Lines Expense/Towers Expense

This account includes the cost of relocating guys, crossarms, cable or wire in connection with such work. These accounts include costs of repairs, moves and changes, rent, training, and minor purchases not included in retirement unit list. Moves and changes are defined as the rearranging and changing the type or location of plant in service. The retention of the plant in an in-service status assumes an uninterrupted move. If the move is interrupted, capitalization accounting applies. The cost of topping poles and cutting off and pulling butts shall be charged to the reserve.

This account includes the cost of receiving training on this type of plant. It also includes operating leases, rents and other non-repair items.

Repairs are defined as the physical maintenance of plant to prevent or overcome deterioration and malfunctioning. It may involve servicing or replacement. Repair replacement applies to items less than a retirement unit. If a complete retirement unit is replaced, the activity requires capitalization accounting.

This account also includes repairing material for reuse and restoration of plant from casualty events, except for the replacement of retirement units which are accounted for as capitalization activity.

This account includes the cost of tree trimming when performed to maintain existing pole line routes. Tree trimming, when initially clearing pole line route for placement of poles, is to be included in cost of construction.

DOCUMENT REQUEST 1

CONFIDENTIAL ATTACHMENT NO. 9 VERIZON/VENDOR OUTSOURCING AGREEMENT

ENTIRE DOCUMENT CONSISTING OF 96 PAGES IS CONFIDENTIAL