



David M. Christian
Vice President
Regulatory Affairs Florida

106 E. College Ave
Tallahassee, Florida 32301
Telephone 850-224-3963
Fax 850-222-2912
david.christian@verizon.com

February 20, 2006

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

Re: Docket No. 060077-TL - Proposal to Require Local Exchange Companies to
Provide Annual Reports of Wood Pole Inspections.

Dear Ms. Bayo:

Verizon's proposed alternative is to maintain its existing pole inspection process, which complies with the NESC, and which experience has shown is more than sufficient to maintain Verizon's network and protect the safety of the public and Verizon employees. Verizon, as a telephone company, is not similarly situated with respect to public safety as electric utilities and thus a "one-size-fits-all" approach is inappropriate. Moreover, the evidence does not support a cause and effect relationship between mandated scheduled pole inspections and lower incidents of hurricane damage to outside plant facilities. The expected benefits (which are highly speculative) do not warrant the additional costs of mandated inspections (which are unrecoverable by telephone companies).

At the very least, the Commission *must* consider alternative technologies, which are faster, less expensive, and safer for Verizon employees and the environment than the type of invasive inspection techniques recommended by Staff for sound, bore, and excavation. As Verizon will describe in more detail in the workshop on February 21, these techniques cause damage to poles and require the use of toxic chemicals and should NOT be mandated by the Commission.

Furthermore, even if the Commission believes that some scheduled inspections are necessary, it is *not* appropriate to mandate invasive inspections for all poles. For example, poles that are below a certain height, that do not have electric facilities attached, and that are younger than a certain age (10-15 years) should not be part of a

mandatory inspection program. The BellSouth proposal, which Verizon understands will be filed today, is a good example of prioritization among poles that gives rationality to an otherwise overbroad and wasteful regulatory mandate. This compromise alternative, however, should only be adopted by the Commission if the Commission finds, based on credible evidence specific to telecommunications facilities, that mandated scheduled inspections are warranted (which they are not) and the benefits not speculative (which they are).

In sum, Verizon's current inspection program has served Verizon well for many years and is the product of Verizon's expertise and experience with its own outside plant. There is no evidence of a problem that needs to be "fixed" through a scheduled inspection program. At the very least, this Commission must consider alternative technologies (which Verizon will describe at the workshop) and limitations on inspections based on the specific characteristics of the poles, such as the BellSouth proposed alternative.

Sincerely,

s/David M. Christian
Vice President
Regulatory Affairs Florida

c. Adam J. Teitzman, Senior Attorney, Office of the General Counsel