ORIGINAL

ATTACHMENT B
undocketed
BellSouth Telecommunications, Inc.
Pole Inspection Audit
Request for Specified Confidential Classification

02/23/06

BELLSOUTH'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION IN THE *REVIEW OF POLE INSPECTION AND MAINTENANCE PRACTICES*

TWO REDACTED COPIES

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

(Note: Part 5 of 5 is conf. CD only)

BELLSOUTH'S RESPONSE TO DR-1

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: Mr. Jerry Hendrix
UTILITY: BellSouth Telecommunications, Inc
FROM: Jerry Hallenstein — Tripp Coston (Audit Manager)
REQUEST NUMBER: DR-1 — DATE OF REQUEST: 11/08/05
AUDIT PURPOSE: Review of Telephone Pole Maintenance Operations
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 11/21/2005

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:

___ INCIDENT TO AN INQUIRY
_X_ OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

Data Request 1

Bellsouth is providing response to DR 1, except for I3 which will be provided by 12/3/05.

Bellsouth has provided written response and 3 disks in this response. (1 disk-3 copies)

TO: AUDIT MANAGER Tripp Coston — DATE: 11/22/05

THE REQUESTED RECORD OR DOCUMENTATION:

[X] (1) HAS BEEN PROVIDED TODAY

[ ] (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY

[✓] (3) AND IN MY OPINION, ITEM(S) All IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.

[ ] (4) THE ITEM WILL NOT BE PROVIDED (SEE ATTACHED MEMORANDUM)

Stan Warren, Manager
(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst — PSC/RGO-6 (Rev.6/00)

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(A1 of 5)

Florida Public Service Commission Pole Attachment Audit Request 1

1. a. Provide a current organizational box chart of the BellSouth Work units responsible for utility pole inspection and maintenance efforts.

Answer: See Attachment 1

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

Answer: See Attachment 1

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

Answer:

2002 – Florida was divided into two Network Vice President areas, North Florida and South Florida

–In both areas, there were a total of 10 Network Operations 'turf' entities and 7 Operations Centers Support entities

2005 – Florida are managed by one Senior Network Vice President

–There are 6 Network Operations 'turf' entities and 4 Operations Centers Support entities

Any organization shown as 'General Manager' with or without a subordinate shown as 'Director – Design and Construction' would have been involved with some level of pole inspection activity and vegetation management from 2002 - 2005.

See Attachment 1 for the diagram.

2. Provide the number of employees involved in BellSouth'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)

Answer: See Attachment 2

(2)

3. 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 (e.g. construction specialist, repair lineman)

Answer: BellSouth will provide a response to this request by December 2, 2005.

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 performing auditor(s).

Answer: BellSouth will provide a response to this request by December 2, 2005.

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.

Answer: BellSouth will provide a response to this request by December 2, 2005.

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

Answer: See Attachment 3

b. Please provide a copy of each of the agreements.

Answer: See Disk

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

Answer: See Attachment 4

b. Please provide a copy of each of the agreements.

Answer: See Disk (Note: BellSouth has only provided examples of CLEC agreements since these agreements are on file with the Commission.)

6. Please provide the number of poles, which BellSouth owns, separated by Class and Type.

Answer: See Attachment 5

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

Answer: BellSouth does not have available the total number of poles on which space is leased to other companies. Multiple companies may be attached to a single BellSouth owned pole. The following numbers are by type of company, and the total number of BellSouth owned poles to which they are attached.

- **Power Companies –**
- **Cable Television Companies –**
- **Competitive Local Exchange Carriers –**

8. a. Please provide the average age of poles, which BellSouth owns.

Answer: The average age of BellSouth owned poles is 28 years and 4 months.

b. Please provide the average age of the poles on which BellSouth leases space from other utility providers.

Answer: BellSouth does not have any information to determine the average age of poles on which BellSouth leases space from other utility providers.

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

Answer:

1. BellSouth utilizes its work force and some contract resources to inspect and report on the condition of its poles.

2. New employees are trained on pole safety with the use of practice 460-300-100BT.

3. Emphasis is placed on all outside plant technicians to inspect poles before climbing or working on the pole.

4. BellSouth practices, which describe various work operations that may be performed on poles, include the requirement to inspect a pole prior

to working aloft and include the methods of inspecting a pole. An example is practice 620-131-010BT.

5. **The following methods are used to inspect poles:**

   –Pike Pole Test
   –Prod and Sounding Test
   –Boring Test
   –Hand Line Test
   –Visual Inspection

6. **These methods are detailed in practice – 460-300-100BT.**

7. **These methods are reinforced yearly under the Accident Prevention Plan practice MA-BSAP-001BT.**

8. **Poles identified as defective are reported under the guidelines in practice 620-095-902BT.**

9. **During the planning phase for new construction or reinforcement of existing facilities, poles are inspected under the requirements of engineering practice 928-411-510BT and checklist requirements described in practice JA-QIC-001BT. Appropriate action is taken to replace defective poles when identified.**

10. **BellSouth has contracted with OSMOSE Utilities Services, Inc. to provide some targeted pole line maintenance and inspection.**

10. Provide current copies of the company's policies and procedures that relate to inspection efforts and activities. These inspections activities may include any or all of the following: routine scheduled inspections 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.

Answer: See Disk

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

Answer: Item 10 contains BellSouth's Methods and Procedures for pole inspection. There are no specific measurements established for pole inspections. As discussed above, BellSouth network forces inspect poles as a normal course of their day-to-day operations.

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

Answer: See Attachment 6.

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.

Answer: The following information would be applicable to any agreement BellSouth has with contractors or suppliers of services:

– All outside plant contracts have stipulations regarding the acceptable levels of performance required by the contractor. They also include language which requires the contractor to correct all defects which are found.

– All contracts have an inspection process in place depending upon the contract type. Some types of work within those contracts also require full time, on-site inspection. Individual contracts for specific job authorizations require full inspection of the entire work that is performed.

– Procedures are in place that requires BellSouth personnel to hold regular meetings with the contractor to discuss performance issues. They also require that all defects are corrected and are documented as to the corrective measures.

See Attachment 7 for our contract for pole inspection.

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

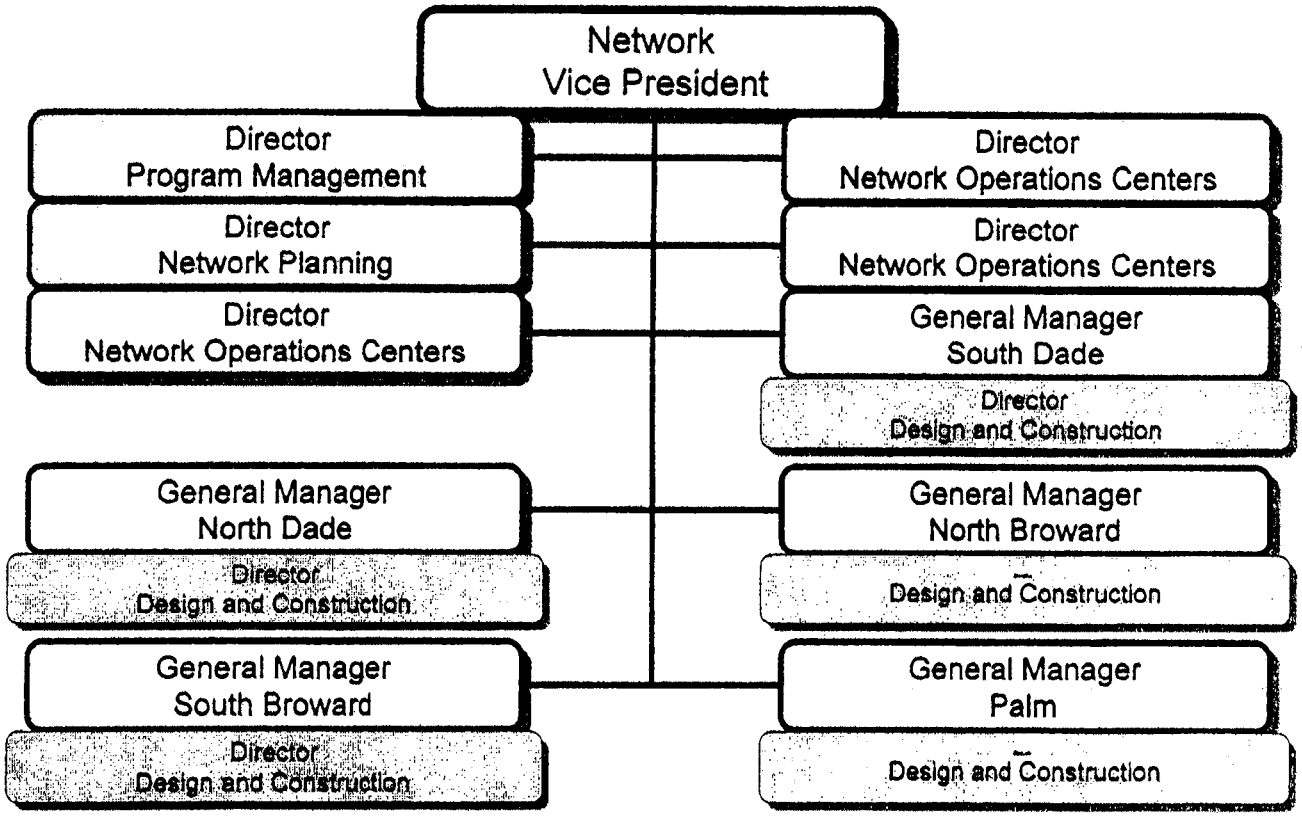
Answer: There have been no significant changes to BellSouth's approach to pole inspection activities, efforts or funding during the period 2002 – 2005.

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

Answer: See Response to Items 9 and 13.

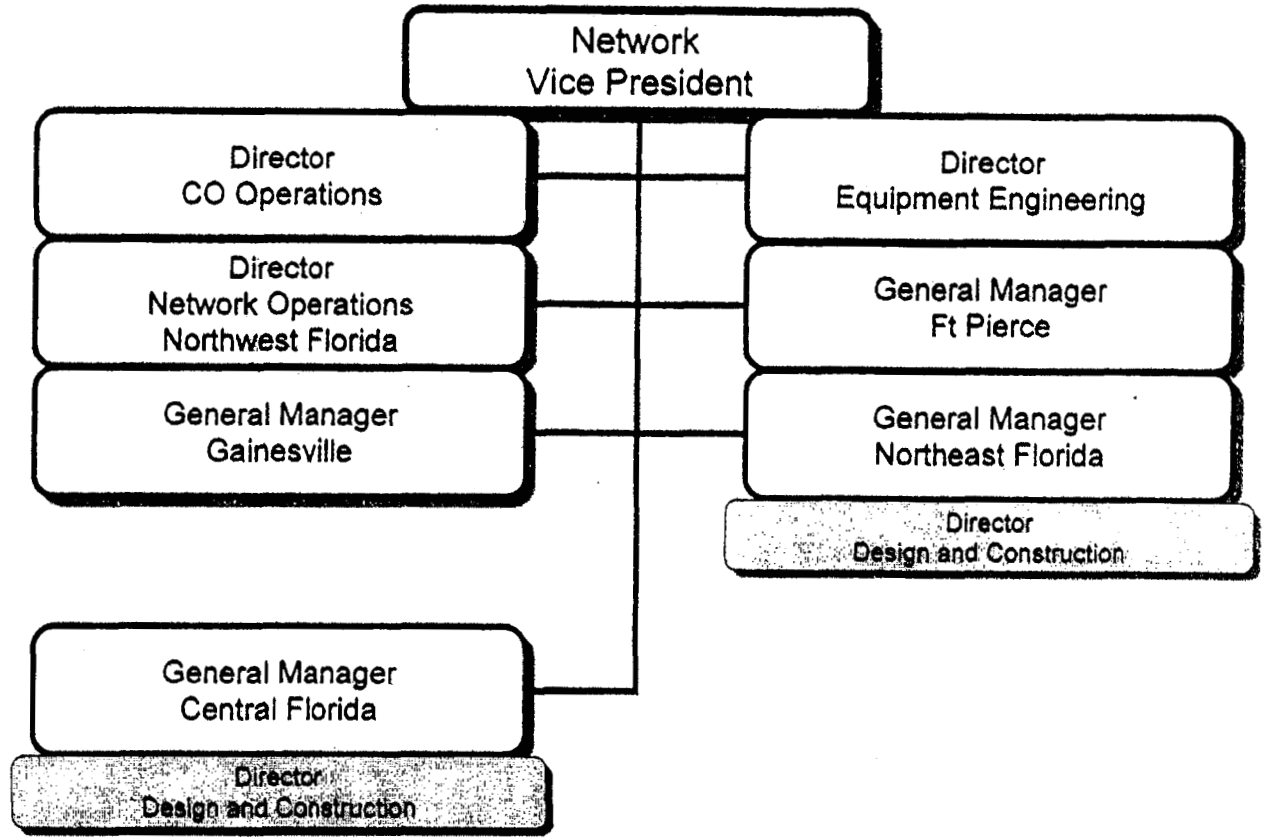
Florida Network Operations 2002

South Florida

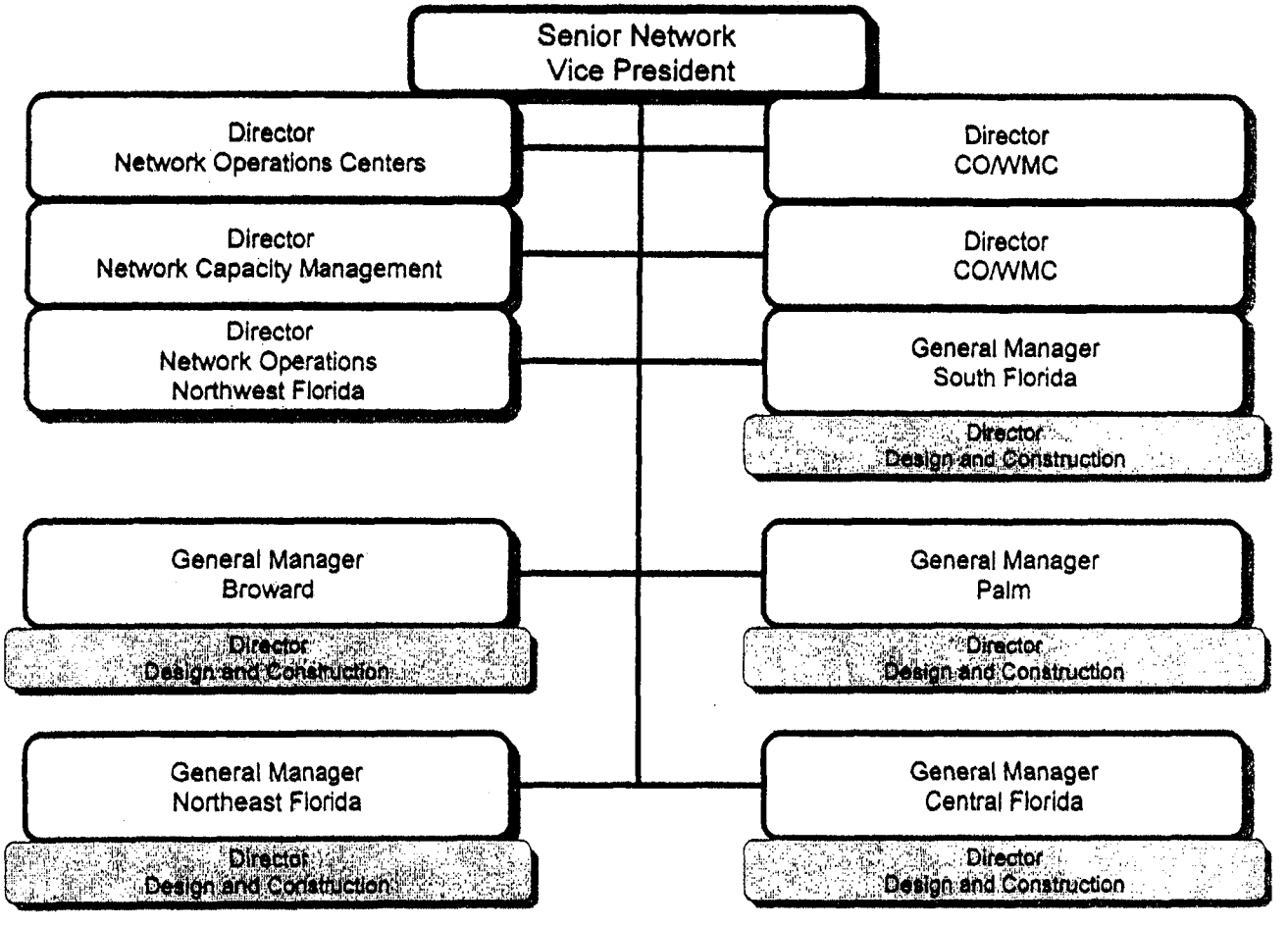


Attachment 1

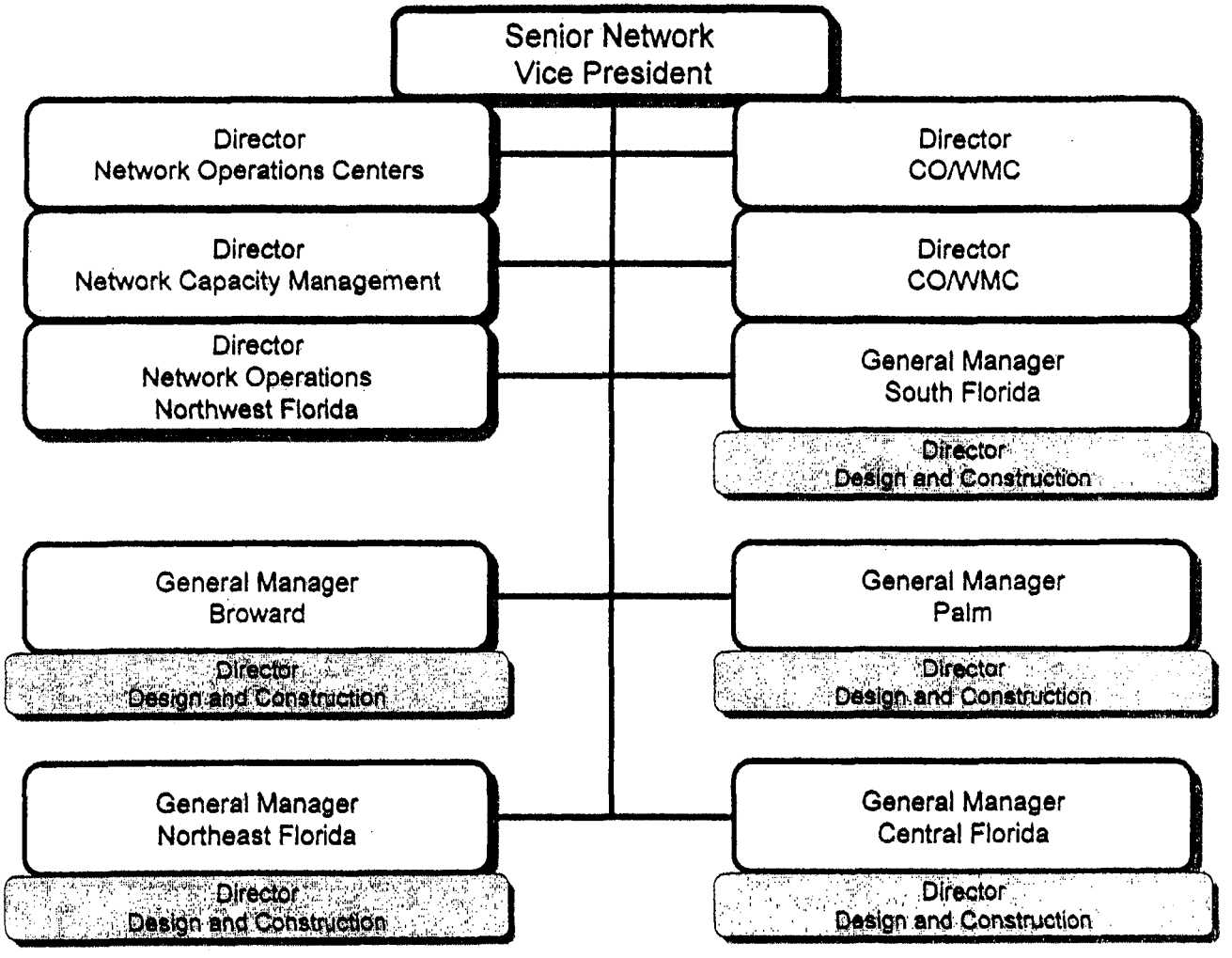
Florida Network Operations 2002
North Florida



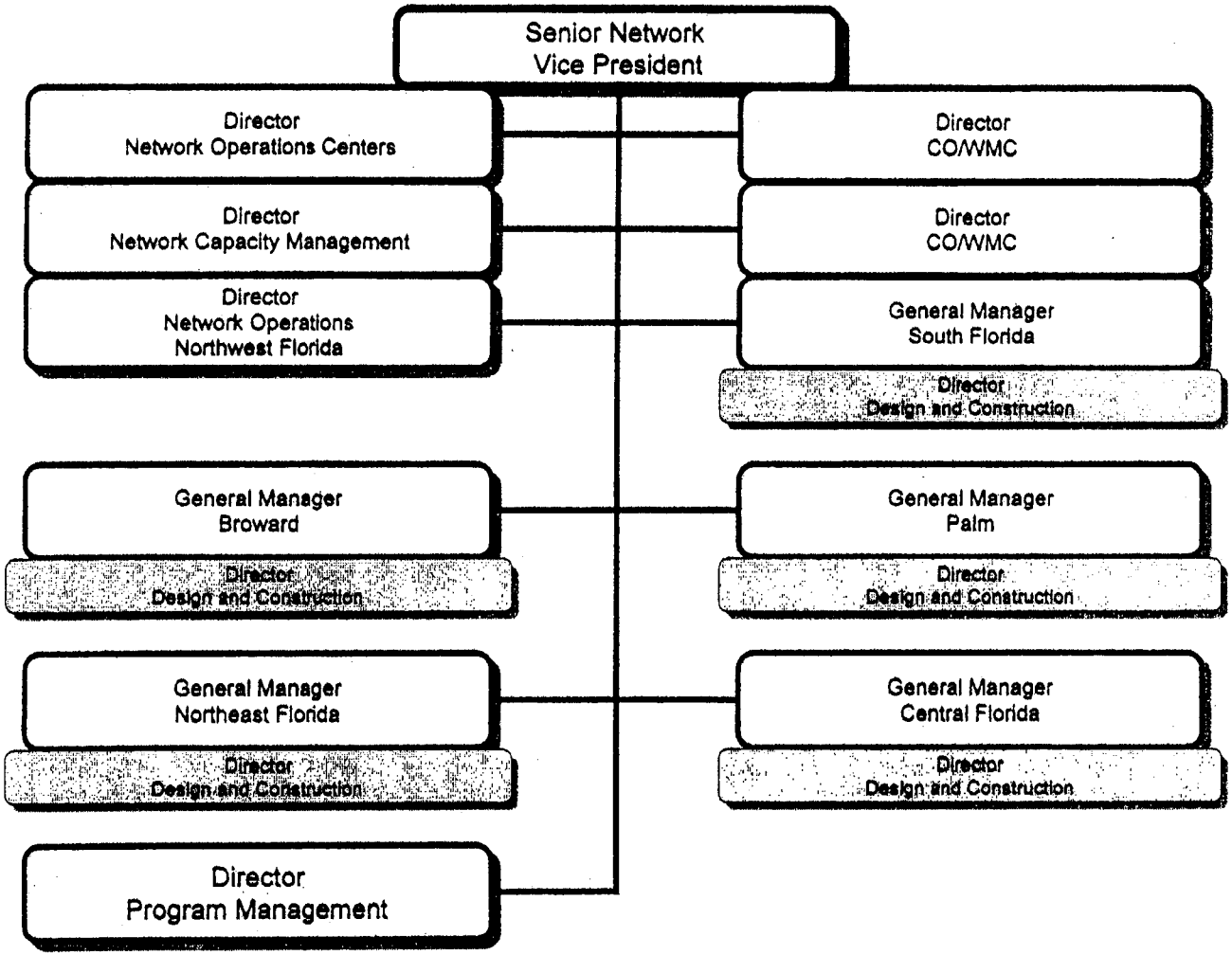
Florida Network Operations 2003



Florida Network Operations 2004



Florida Network Operations 2005



Florida Network Operations

Field Operations Personnel

2002 - 2005

	Facility Technician	Service Technician	Outside Plant Technician	Network Manager (Management)	Outside Plant Engineer (Management)	Total by Year
2002	1319	2736	325	315	417	7114
2003	1153	2459	256	293	400	6564
2004	1124	2359	258	286	409	6440
2005	1120	2236	276	283	399	6319

Attachment 2

Attachment 3

4a. BellSouth has joint use agreements in place with 38 companies/govt agencies that allows BellSouth to attach equipment to other utility owned poles. Included in the listed is the particular agreement format BellSouth has with each firm.

4b. Attached is a copy of each agreement format.

Campany	Agreement Format
	75agmt.pdf
	1969agmt_amend
	gpc02.pdf
	agmt88.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	feca93.pdf
	1993agmt.pdf
	feca93.pdf
	feca93.pdf
	agmt1944-amend.pdf
	1947agmt-amend.pdf
	1949agmt_amend.pdf
	1981agmt_amend.pdf
	83agmt.pdf
	1964agmt.pdf
	2001agmt.pdf
	1995agmt.pdf
	44agmt_amendmt
	1948agmt_amend.pdf
	1982agmt.pdf
	77agmt.pdf
	OUC_agmt.pdf
	1996agmt.pdf
	1952agmt.pdf
	1961agmt.pdf
	1973agmt.pdf
	1991agmt.pdf
	ch1991agmt.pdf
	OUC_agmt.pdf
	1997agmt.pdf

Attachment 4

a. BellSouth has agreements in place with 62 companies/govt agencies that llows these companies to attach equipment to BellSouth owned poles. Included in ıe listed is the particular agreement format each firm has entered into with ellSouth.

b. Attached is a copy of each agreement format.

OMPANY NAME	Agreement Format
	0870agmt_exh.pdf
	0870agmt_exh.pdf
	0870agmt_exh.pdf
	0977agmt_appdx.pdf
	0977agmt_appdx.pdf
	0977agmt_appdx.pdf
	0977agmt_appdx.pdf
	0977agmt_appdx.pdf
	0977agmt_appdx.pdf
	0184agmt_appdx.pdf
	0184agmt_appdx.pdf
	0383agmt_appdc.pdf
	0383agmt_appdc.pdf
	0383agmt_appdc.pdf
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	0383agmt_appdc.pdf	
	0490agmt_appdx.pdf	
	1191agmt_appdx.pdf	
	1191agmt_appdx.pdf	
	1092agmt_appdx.pdf	
	0795agmt_app-exh.pdf	
	383-184agmt_appdx.pdf	
	383-184agmt_appdx.pdf	
	383-184agmt_appdx.pdf	
	383-683agmt_appdx.pdf	
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	383-683agmt_appdx.pdf	
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	SEA-1278agmt_appdx.pdf	
	SEA-1278agmt_appdx.pdf	
	floh001013.pdf	

	floh021015.pdf fdotagrmt.pdf	

CLEC Right of Way Agreements

CLEC	Agreement Name	Date Effective	Note
AT&T Communications of the Southern State, Inc. - FL	AT&T Communications of the Southern States, Inc. - FL	October 2001 to November 13, 2005	Entire Agreement includes ROW
MCI WorldCom Communications, Inc.- Florida	MCI WorldCom Communications, Inc.- Florida	September 9, 2001 to December 26,200	Entire Agreement includes ROW
Knology Holdings, Inc.	MCI Metro Access Transmission Services, Inc. (Follow on in Florida)	September 21, 2001 to December 26, 2004	Knology adoption. However, only the ROW Attachment 6 applies now.
KMC Telecom, Inc.	MCI Metro Access Transmission Services, Inc. (Follow on in Florida)	September 21, 2001 to December 26, 2004	KMC adoption. However, only the ROW Attachment 6 applies now.

Summary of BellSouth Owned Poles

By Class and Type

HEIGHT	CLASS 1	2	3	4	5	6	7	9	TOTALS
10									
12									
13									
15									
16									
17									
20									
22									
25									
26									
27									
28									
30									
33									
35									
37									
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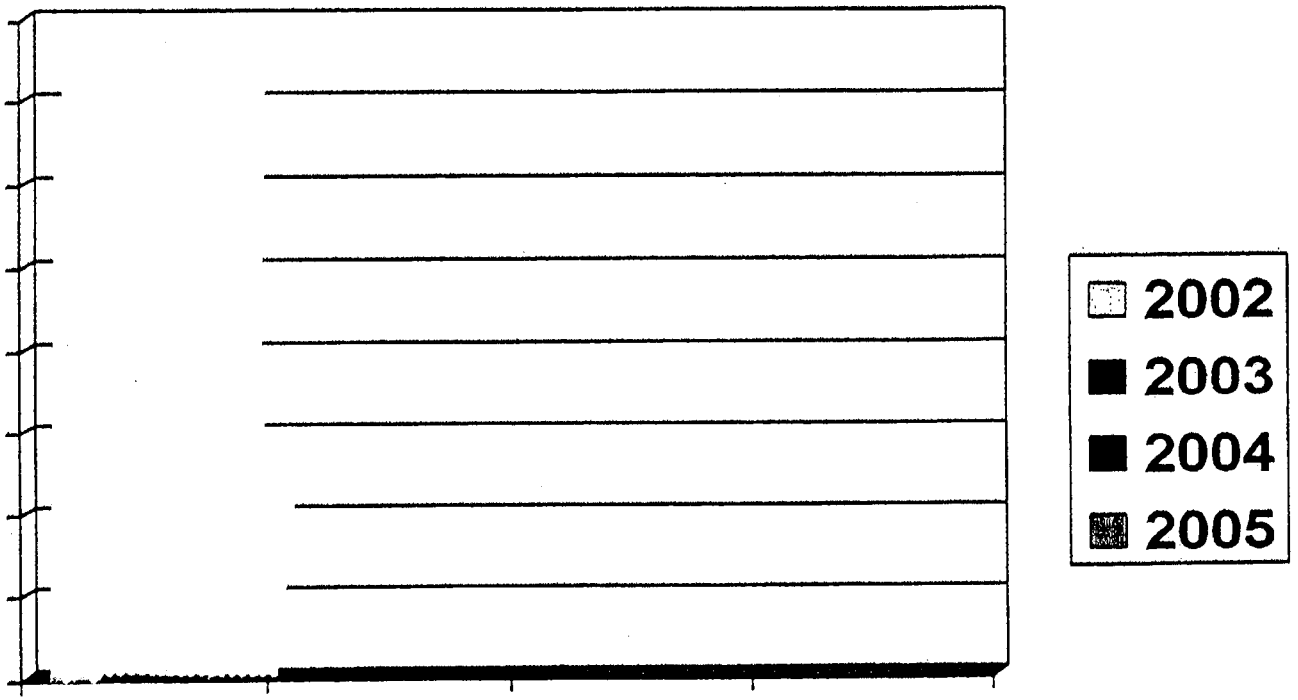
45									
50									
55									
60									
65									
70									
75									
80									
85									
90									
Grand Tota									459312

Attachment 5

Pole Inspection

Actual Contract Expense

2002 - 2005



Contract Expense

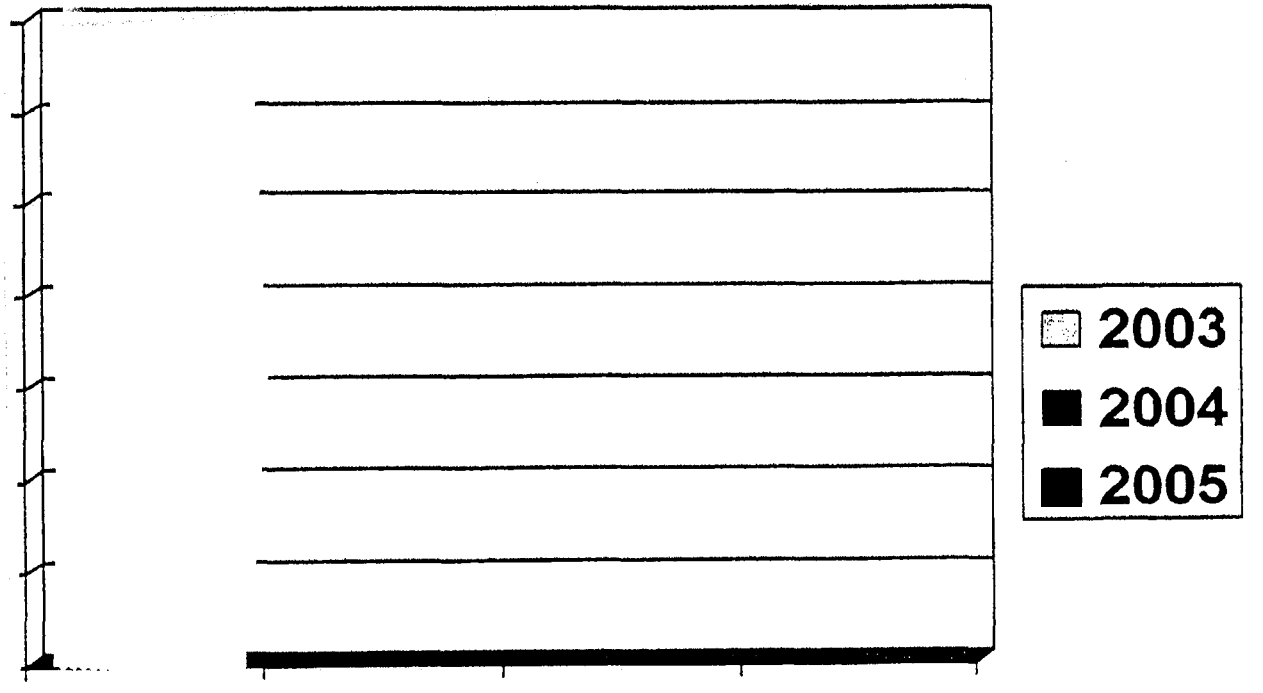
2005 data reflects end-of-month October, 2005

Attachment 6

Line Clearance

Actual Contract Expense

2003 - 2005



Contract Expense

2005 data reflects end-of-month October, 2005

ATTACHMENT 7

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BELLSOUTH'S SUPPLEMENTAL RESPONSE TO DR-1

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: Mr. Jerry Hendrix
UTILITY: BellSouth Telecommunications, Inc
FROM: Jerry Hallenstein — Tripp Coston (Audit Manager)
REQUEST NUMBER: DR-1 — DATE OF REQUEST: 11/08/05
AUDIT PURPOSE: Review of Telephone Pole Maintenance Operations
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 11/21/2005

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:

___ INCIDENT TO AN INQUIRY
_X_ OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

Data Request 1

Attached is Bellsouth's Supplemental Response to DR1 - Item 3.

TO: AUDIT MANAGER Tripp Coston DATE: 12/2/05

THE REQUESTED RECORD OR DOCUMENTATION:

[X] (1) HAS BEEN PROVIDED TODAY

[ ] (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY

[✓] (3) AND IN MY OPINION, ITEM(S) 3 IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.

[ ] (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Stan Green - Manager
SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst — PSC/RGO-6 (Rev.6/00)

(Pt 265)

REDACTED

FLORIDA PUBLIC SERVICE COMMISSION POLE & VEGETATION MANAGEMENT REVIEW—DATA REQUEST 1

3. 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).

Answer: BellSouth has no documents responsive to this request.

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).

Answer:

2002

2003

2004

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.

Answer: Please see attached documents.

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BELLSOUTH'S RESPONSE TO DR-2

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: Mr. Wayne Tubaugh
UTILITY: BellSouth Telecommunications, Inc
FROM: Jerry Hallenstein Tripp Coston
(Audit Manager)

REQUEST NUMBER: DR-2 DATE OF REQUEST: 12/08/05
AUDIT PURPOSE: Review of Telephone Pole Maintenance Operations
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 12/16/2005

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:

___ INCIDENT TO AN INQUIRY
_X_ OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

Data Request 2

attached are BellSouth responses to Data Request 2 except for Items 1 & 2. BellSouth will provide responses to these items by January 6, 2006.

TO: AUDIT MANAGER Tripp Coston DATE: 12/16/05

THE REQUESTED RECORD OR DOCUMENTATION:

(1) HAS BEEN PROVIDED TODAY

(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY

(3) AND IN MY OPINION, ITEM(S) 1-20 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.

(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Stan Greer Manager Regulatory Relations
(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst PSC/RGO-6 (Rev.6/00)

(P+3065)

REDACTED

Telephone Pole Maintenance Review
BellSouth Document Request 2

1. Please provide the total number of BellSouth-owned poles treated, braced and replaced for each year during 2002 through 2005.

Answer: BellSouth is still gathering data to respond to this request. BellSouth will provide a response to this request by January 6, 2006.

2. Please provide the total number of BellSouth-owned poles treated, braced and replaced as a direct result of hurricanes occurring in each year 2002 through 2005.

Answer: BellSouth is still gathering data to respond to this request. BellSouth will provide a response to this request by January 6, 2006.

3. a. Does a company that BellSouth leases poles to ever perform maintenance (treating, bracing, replacing) on BellSouth poles? If so, please explain in detail the situations the lessee would perform this maintenance on BellSouth-owned poles.

Answer: As a general policy and practice, licensees do not perform maintenance on BellSouth poles. Many joint use agreements, however, allow licensees, such as power companies, to replace BellSouth poles in emergency situations to protect the public and enable service restoration.

b. If applicable, for each year 2002 through 2005, please indicate the number of BellSouth-owned poles treated, braced, and replaced by a company that leases poles from BellSouth.

Answer: BellSouth does not have a mechanized system to track poles treated, braced, and replaced by a company that leases poles form BellSouth.

c. Please provide applicable BellSouth policies and procedures for maintenance and repair performed by companies on poles BellSouth leases to another company.

Answer: As previously stated, provisions for emergency replacement of BellSouth owned poles are generally incorporated into joint use agreements with other companies.

4. a. Does BellSouth ever perform maintenance (treating, bracing, replacing) on poles BellSouth leases from another company?

(2)

Answer: As a general policy and practice, BellSouth does not perform maintenance on poles owned by others. However, during emergency situations, a pole owned by another company may be replaced by BellSouth to protect the public and enable service restoration.

b. If applicable, for each year 2002 through 2005, please indicate the number of poles treated, braced, and replaced by BellSouth, where BellSouth leases the pole from another company.

Answer: BellSouth does not have a mechanized system to track poles treated, braced, and replaced by BellSouth where BellSouth leases the pole from another company.

c. Please provide applicable policies and procedures for maintenance performed by BellSouth on poles BellSouth leases from another company.

Answer: As previously stated, provisions for emergency replacement are generally incorporated into joint use agreements with other companies.

5. a. Please describe the company's ongoing efforts or programs to identify the root cause of pole failures during 2002 through 2005.

Answer: Work orders that are prepared would, in most cases, designate the cause of a damaged or broken pole. Examples could include vehicle-related damage, weather-related damage, vegetation, etc. However, no root cause analysis has been performed, overall, for the years 2002 through 2005 related to pole failures.

b. Please describe any changes to the company's policies and procedures in identifying the comprehensive root cause of pole failures as a result of hurricanes during 2002 through 2005.

Answer: See 5a.

6. Please explain in detail how BellSouth monitors the structural integrity of poles to ensure against overloading:

a. When the company is the lessor (i.e., BellSouth-owned poles)

Answer: BellSouth utilizes its workforce to monitor the integrity of poles. Technicians inspect all poles before working aloft. Engineers inspect poles when an engineering work order is issued to add or rearrange outside plant facilities. In some instances, contractors are used to inspect poles to determine whether it is appropriate to reinforce, rather than replace poles.

b. When the company is the lessee (i.e., poles owned by another company)

Answer: BellSouth utilizes its workforce to monitor the integrity of poles. Technicians inspect all poles before working aloft.

7. Are all BellSouth poles covered under the National Electric Safety Code (NESC) standards? If not, please provide the number of poles covered under the NESC standards and explain what factors are used in determining when a pole is not covered by the NESC standards.

Answer: All BellSouth owned poles are covered under the National Electric Safety Code (NESC) standards.

8. For poles for which BellSouth leases from another company, how does BellSouth ensure that the lessor (i.e., pole is owned by another company) is meeting NESC criteria?

Answer: BellSouth practices, which describe various work operations that may be performed on poles, include the requirement to inspect a pole prior to working aloft and include the methods of inspecting a pole. An example is practice 620-131-010BT.

The following methods are used to inspect poles:

- Pike Pole Test
- Prod and Sounding Test
- Boring Test
- Hand Line Test
- Visual Inspection

9. Does BellSouth employ a computerized mapping system of its poles (both owned and leased)? If so, please describe the system features and how BellSouth uses the system to monitor the condition of its poles in service.

Answer: BellSouth does employ a computerized mapping system, but does not use it to monitor the condition of its poles.

10. What individual, specific training do BellSouth employees receive on pole maintenance and inspection?

Answer: Technicians are trained on inspection procedures outlined in practice 460-300-110 BT. The inspection training is reinforced through BellSouth's accident prevention program with the use of MA-BSAP-001BT. (See Attachment A.)

a. Please provide copies of training materials and a detailed course description for any formal, classroom-type training program(s) of instruction.

Answer: See attachment 460-300-100BT. (See Attachment B.)

b. Please provide a detailed description and any training materials, schematics, drawings or photographs used for informal, on-the-job type instruction.

Answer: See attachments 620-131-010BT (Attachment C) and MA-BSAP-001BT.

11. Please provide any written policies and procedures that relate to pole identification and classification, pole condition assessment, pole testing, and pole repair (i.e., treatment, bracing, replacing).

Answer: See 10 above.

12. Please provide a flowchart or other visual representation for the routing of a request for pole maintenance and or replacement from inception to conclusion.

Answer: See Attachment D.

13. Does BellSouth receive inspection results for poles it leases from other companies?

Answer: BellSouth does not receive inspection results for poles it leases from other companies.

a. Please provide a list of companies from which BellSouth does, and does not, receive such reports.

Answer: See 13.

b. Please provide a recent, representative copy of such a report.

Answer: See 13.

14. Does BellSouth provide inspection results to other companies?

Answer: BellSouth does not provide inspection results to other companies.

a. Please provide a list of companies to which BellSouth does, and does not, provide such reports.

Answer: See 14.

b. Please provide a recent, representative copy of such a report.

Answer: See 14.

15. a. Does BellSouth track the average total minutes of customer interruptions per year? If so, please provide results from 2002 through 2005.

Answer: BellSouth does not track the average total minutes of customer interruptions per year.

b. Did BellSouth track the average total minutes of customer interruptions for specific outage events? If so, please provide specific results for all hurricanes during period 2002 through 2005?

Answer: BellSouth does not track the average total minutes of customer interruptions for specific events. However, BellSouth does track central office downtime and some circuit availability such as private line due to performance measures for those services.

16. Does BellSouth track the number of outages caused by pole failures per year? If so, please provide the number outages for each year 2002 through 2005?

Answer: BellSouth does not track the number of outages caused by pole failures.

17. Please provide an explanation of each pole classification, types 1-9, as shown in Attachment 5 to BellSouth's response to staff's Document Request number 6.

Answer: The column 'HEIGHT" is the length of a pole, in linear feet. The "CLASS" of a pole is indicated by a number 1-9, the lower number indicating a higher loading capacity.

18. a. Please provide the number of poles for which BellSouth is the lessee.

Answer: 738,737

b. Please breakdown the number of poles provided in (a) by type of company BellSouth leases from.

Answer: All companies that BellSouth leases pole space from are providers of commercial power.

19. Please provide an explanation for the increase in expenses for pole inspections in 2003, as shown in Attachment 6 to Staff's Document Request Number 12.

Answer: In 2003, BellSouth increased its rehabilitation efforts in the Broward County area. In connection with the rehabilitation work, BellSouth's contractor performed pole inspection activities.

20. Please describe and provide copies of all relevant customer outreach material used by BellSouth to educate customers on how to report a defective or compromised pole.

Answer: There is information about repair and inside wire published in the local telephone directories but there is no "outreach" material provide to the public about "defective or compromised" poles.

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REQUEST FOR POLE MAINTENANCE OR REPLACEMENT FLOW CHART

THE TECHNICIAN INSPECTS THE POLE PRIOR TO BEGINNING WORK, FOLLOWING BSP 621-020-015 AND BSP 620-131-010

THE TECHNICIAN IDENTIFIES A DEFECTIVE POLE AND SUBMITS THRU HIS NETWORK MANAGER AN RF658 FORM (SAFETY AND SERVICE/ PLANT WORK ORDER), WHICH IS ASSIGNED TO THE ENGINEERING DEPARTMENT

UPON RECEIPT OF THE RF658 FORM IN ENGINEERING, AN OSP DESIGN SPECIALIST IS ASSIGNED THE TASK OF VERIFYING THE DEFECT, CHECKING POLE OWNERSHIP, AND PREPARING ENGINEERING DRAWINGS WHEN NECESSARY. IF THE POLE BELONGS TO ANOTHER UTILITY, THAT COMPANY IS NOTIFIED THRU EITHER A PHONE CALL, EMAIL, OR NJUNS (NATIONAL JOINT UTILITIES NOTIFICATION SYSTEM) OF THE DEFECT.

AFTER FIELD INSPECTING THE POLE AND VERIFYING OWNERSHIP AND DEFECT, THE SPECIALIST WILL PREPARE AN ENGINEERING WORK ORDER TO PLACE A NEW POLE, FOLLOWING BSP 621-215-011, BSP 621-020-111, BSP 919-120-700, AND BSP 919-120-200SV.

THE ENGINEERING WORK ORDER IS ISSUED TO THE OUTSIDE PLANT CONSTRUCTION ORGANIZATION, WHERE IT IS SCHEDULED FOR PLACEMENT. IF OTHER UTILITIES ARE ATTACHED, THEY ARE NOTIFIED THRU EITHER A PHONE CALL, EMAIL, OR NJUNS (NATIONAL JOINT UTILITIES NOTIFICATION SYSTEM).

WHEN ALL UTILITIES HAVE COMPLETED THEIR TRANSFER WORK, THE POLE IS SCHEDULED FOR REMOVAL AND DISPOSAL.

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3.0 BellSouth Telecommunications Florida

3.1 Company Operations

BellSouth Telecommunications Florida operations serve 5,301,496 access lines connecting customers along the entire east coast of the state and in parts of central and north Florida. BellSouth owns 459,312 poles, with an average age of more than 28 years. Almost one-half of BellSouth's poles are class 4 wood poles and are 45 feet in height.

BellSouth employees under the General Managers of BellSouth's Florida Network Operations are responsible for inspecting and reporting the condition of BellSouth's poles. BellSouth does not have a specific program to proactively perform pole inspections. No scheduled sounding and bore inspections are preformed to detect deterioration as a separate maintenance activity. Instead, BellSouth's network forces inspect poles in the normal course of their responsibilities when it is necessary for an employee to climb a pole.

BellSouth does use the services of Osmose Utilities Services, Inc. to perform a limited number of specific pole inspection activities in selected geographic areas. Osmose determines whether it is appropriate to treat, reinforce, or to replace poles. The physical inspections are performed in accordance with BellSouth's practices and procedures. BellSouth's contract with Osmose expired on May 15, 2005; however, according to BellSouth, Osmose is still available to BellSouth and efforts to renew the contract are underway.

BellSouth's contract with Osmose specifies a maximum spending cap of However, over the study period 2002 through 2005 examined by staff, BellSouth's annual expenses for pole inspections and treatment conducted by Osmose were respectively. Osmose's fees to remedy poles ranges from reinforce a pole. According to BellSouth, Osmose services are not requested unless BellSouth has identified more than ten poles in a specific area that are in need of inspection. Though BellSouth could not specify the number of poles inspected by Osmose for each year, based upon these per-pole charges, staff concluded that at most 862 to 2,483 poles were examined annually for the period.

There have been no significant changes to BellSouth's approach to pole inspection activities, efforts, or funding during the study period 2002-2005. However, BellSouth did note that the company is in the process of developing a graphical interface that would show a geographical location and inspection results of poles owned by BellSouth as a means to improve documentation and track results of pole inspections.

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3.2 Inspection Activities

As previously mentioned, BellSouth does not have a planned program for inspecting or maintaining each pole in its system within a prescribed timeline or cycle. As a result, BellSouth does not have procedures and practices in place that are specific to a pole inspection program. BellSouth's existing policies and procedures describe various work operations and safety precautions to be performed prior to working aloft, including the requirement to inspect poles and the methods of inspecting a pole.

3.2.1 Policies, Procedures, and Training

All of BellSouth's poles are subject to NESC standards. BellSouth's network forces are trained on pole safety and precautions to be taken before climbing poles or working on pole- supported equipment. BellSouth's practices include the requirement to inspect a pole prior to working aloft. The following methods are used by BellSouth to inspect poles to determine if they are capable of withstanding loads they are subjected to during climbing and working aloft:

- Visual Inspection
- Pike Pole Test
- Prod Test
- Sounding Test
- Boring Test
- Hand Line Test

BellSouth's practices describe various work operations that may be performed on poles. Poles found to be unsafe for climbing are marked with a B or C pole tag. Poles marked with a B pole tag do not require immediate replacement. These are defective poles that are not yet considered dangerous, but are in need of repairs. The B pole tag serves as a warning that poles should be temporarily supported before climbing or working on them. Poles marked with a C tag require immediate replacement. The C tag serves as a warning that the pole is in dangerous condition and that it should not be climbed or worked on before replacing.

Upon detection of a defective pole by a BellSouth employee, an Irregular Plant Condition form is completed and submitted to the Network Manager. In turn, the Network Manager assigns the Irregular Plant Condition report to BellSouth's Engineering Department to verify the defect. Responsibilities of the Engineering Department include checking the pole for ownership, notifying the joint-user if the pole is not owned by BellSouth, preparing engineering drawings when necessary, and preparing a work order to repair or replace with a new pole.

The work order is issued to BellSouth's outside plant construction organization, where it is scheduled for placement. The work order authorizes the addition, retirement, or transfer of poles and contain estimates of materials used. Records for work orders of BellSouth poles treated, braced, and replaced are maintained within BellSouth's

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Continuing Property Records (CPR) system. The CPR system serves as a perpetual inventory of property owned by BellSouth and it maintains information on capital expenditures for these property units. The objectives of the CPR system are:

- To provide for the verification of property record units by physical examination.
- To provide for accurate accounting for retirements.
- To provide data for use in connection with depreciation studies.

BellSouth employs a computerized system to maintain its property records, but it is not used to proactively monitor the condition of its poles. As previously mentioned, the company is developing an interface to formalize and track pole inspection results. All related pole inspection activities, such as pole replacements, are currently captured in BellSouth's CPR system.

3.2.2 Inspection Results

Exhibit *A*, extracted from BellSouth's CPR system, depicts the number of BellSouth-owned poles treated, braced, and replaced by BellSouth for each year during 2002 through 2005. For the year 2004, 53 percent of the total poles replaced resulted from hurricane damage. In 2005, 80 percent of the total poles replaced resulted from hurricanes.

BellSouth Telecommunications Florida Poles Treated, Braced, and Replaced 2002-2005				
Year	**Treated**	**Braced**	**Replaced**	**Total**
2002	0	0	1853	1853
2003	330	115	1750	2195
2004	56	37	2081[1]	2174
2005	30	66	2276[2]	2372

EXHIBIT *A*

In addition to the poles replaced by BellSouth due to hurricane damage, the company reports to have had approximately 2,300 BellSouth poles replaced by Florida Power & Light during 2004 recovery efforts. Although 2005 figures are still being compiled, BellSouth estimates that at least the same number (2,300) of BellSouth's poles were replaced by Florida Power & Light during 2005 recovery efforts.

3.2.3 Audits

With the exception of contracted inspection activities performed by Osmose, BellSouth does not have a specific pole inspection program to audit. However, at a minimum, a root cause analysis of pole failures could identify the cause of failure.

[1]BellSouth replaced 1151 poles in 2004 due to hurricanes.
[2]BellSouth replaced 1887 poles in 2005 due to hurricanes.

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Additionally, specific outage data pertaining to pole failures could be captured, which would provide some indication of the effectiveness of company maintenance efforts. The root cause analysis would help BellSouth in establishing appropriate controls to limit exposure to the company.

3.3. Joint-Use Agreements

The facilities of multiple companies may be attached to a single BellSouth-owned pole. The following is a breakdown of the types of companies whose equipment is attached to BellSouth poles and the total number of BellSouth-owned poles to which each are attached.

- Power Companies
- Cable Television
- Competitive Local Exchange Carriers

BellSouth occupies and leases space from electric utilities on 738,737 poles. BellSouth does not track information regarding pole inspection activities performed by the owners of the poles that BellSouth leases.

BellSouth has established joint-use agreements with other utilities within its service territory. BellSouth has joint-use agreements in place with 62 companies and municipalities that allow these companies to attach equipment to BellSouth-owned poles. Similarly, BellSouth has joint-use agreements in place with 38 companies and municipalities that allow BellSouth to attach equipment to other utility-owned poles.

For those companies contracted to attach to BellSouth-owned poles, the terms of the agreement require the joint users to notify each other whenever a pole is relocated or a new pole is erected within the territory covered by the agreement. As a general policy and practice, joint users do not perform maintenance on BellSouth-owned poles. If a joint user identifies a BellSouth pole in need of repair or replacement, the joint-user notifies BellSouth. BellSouth, in turn, creates a work order for pole repair or replacement.

Many joint-use agreements allow joint users, such as power companies, to replace BellSouth's poles in emergency situations in order to protect the public and enable quicker service restoration. In this situation, the ownership of the new pole is transferred between companies. Similarly, as a general policy and practice, BellSouth does not perform maintenance on poles owned by others. However, during emergency situations, a pole owned by another company may be replaced by BellSouth and the ownership of the new pole is transferred to BellSouth.

BellSouth's CPR system is used to inventory BellSouth poles replaced by a joint user; however, BellSouth does not have a mechanized system to keep records of any emergency pole replacement that may have been conducted on its poles by joint users.

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The rising number of multiple joint users on each pole carries with it increased risk of creating more stress than a pole can sustain. Multiple attachments can increase the potential for failures due to unbalanced or overweight conditions. This potential risk makes it prudent and necessary for companies to concurrently increase the number and type of inspections so that all wood poles can be accurately assessed for overloading.

3.4 Conclusions

Given that hurricanes drastically impacted the state of Florida over the past two years and the number of electric utility pole attachment, staff contends that BellSouth's pole inspection process should be escalated beyond conducting pre-climbing inspections whenever a repair or addition of facilities is necessitated.

The following findings were made based on staff's evaluation of BellSouth's current pole inspection practices:

Finding 1

BellSouth does not conduct scheduled inspections of its entire wood pole inventory for deterioration and overloading as prescribed by the National Electric Safety Code.

The National Electric Safety Code (NESC) establishes standards and acceptable practices for utilities to ensure the safety of employees and the general public. These standards include safety rules for overhead electrical lines. BellSouth states that all of its 459,312 poles are installed and maintained in accordance with the NESC standards. While BellSouth provides telecommunication services to its customers, the company allows electric utilities to attach overhead electric distribution conductor cable and their components to its poles. Approximately BellSouth-owned poles carry electric conductor cable and other distribution components.

The Florida Public Service Commission has adopted the NESC requirements to govern telephone plant construction, safety, and maintenance. Rule 25-4.036, Florida Administrative Code (Design and Construction of Plant), states facilities "shall be designed, constructed, installed, maintained, and operated in accordance with provisions of the 2002 Edition of the National Electric Safety Code (IEEE C2-2002) and the National Electrical Code (NFPA 70-2005), pertaining to the construction of telecommunications facilities." In Section 26 of the NESC (Strength Requirements), the standards state that all poles equal to or less than 18 meters (60 feet) must be maintained to a strength standard of two-thirds its original strength at installation. If the pole's strength falls below this standard, the pole should be strengthen or replaced. Also, in Section 21, Subsection 214a, the code states that all "lines and equipment shall be inspected at such intervals as experience has shown to be necessary."

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BellSouth does not conduct routine or scheduled inspections of its entire inventory of installed poles. Instead, the company states that Bellsouth's employees are responsible for verifying the condition of any pole where work is being performed. However, when an employee verifies the condition of a pole, a complete sounding and boring test is not required.

Through the use of a contractor, BellSouth performs a limited number of targeted pole inspections. The contractor is responsible for treatment, bracing and replacing when multiple pole deterioration cases are detected in an area. Staff notes that the number of poles inspected in this manner appears to be very small.

Under BellSouth's current approach to pole inspection, only poles whose components require servicing receive a limited inspection. This allows the vast majority of the poles to go unmonitored for extended periods of time. Without a scheduled, cyclical inspection program, BellSouth cannot assume that all poles are in good and safe condition and it cannot know whether it is complying with NESC requirements.

Given the lack of scheduled, cyclical inspections, the condition of the overall plant cannot be known with any specificity. It is critical for a company to monitor and inspect its plant facilities. In light of the recent weather phenomenon in Florida which is expected to continue in future years, not placing the necessary focus on pole infrastructure exposes the company to potential service interruptions and possible public safety concerns. If BellSouth does not inspect and maintain poles to industry standards, the services of joint users could be compromised. Failure to establish a scheduled, cyclical pole inspection program may result in preventable and prolonged out-of-service conditions and may constitute less than full compliance with NESC standards.

NESC requirements can only be met if Sprint is conducting pole inspections of a sufficiently detailed nature to detect the specific degree of pole impairment. Inspections must be conducted on a number of poles such that the results are statistically reliable. Neither visual nor sounding inspections provide the level of data necessary to determine a percentage of strength loss.

Company Response:

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Finding 2

BellSouth does not evaluate or document the root causes of its pole failures or assess the risks associated with potential pole failures.

Assessing the risk of potential failure and conducting root cause analysis are valuable management practices. Currently, BellSouth does not monitor or document the cause of any pole failure. When an in-service pole fails, the company replaces the pole under its normal pole replacement process. The company does not document or track the reasons for each failure. Collecting this data and conducting root cause analysis would allow the company to identify the cause of failure, to collect applicable outage data resulting from failures (i.e., total customer interruptions by cause), and to assess the risks associated with failure or potential failures.

The root cause analysis pertaining to pole failures provides some indication of the effectiveness of company maintenance efforts. This analysis would assist the company in establishing appropriate controls to limit its exposure, such as planned inspections of its entire pole inventory on a specific cycle.

Risk assessment, if coupled with a parallel maintenance program, could prolong the service lifetime of BellSouth-owned poles in Florida and improve the overall storm resistance of its plant. Lack of risk assessment and a proactive approach to maintenance can lead to increased pole failures in a storm and to a corresponding increase in customer disruptions. The company may experience pole failures that could have been prevented if a program existed to identify risk and to correct recurring issues which compromise its poles. In the case of joint-use poles, such service disruptions are magnified by a factor of at least two.

Company Response:

Finding 3

BellSouth does not use a central monitoring system to track the condition of poles currently in service.

BellSouth uses a computerized system to maintain its property records, but does not employ it to proactively record or track results of inspections and the condition of poles. A limited number of outsourced pole inspection and repair activities are currently captured in BellSouth's Continuing Property Records (CPR) system. However, the CPR system primarily serves as a perpetual inventory of property owned by BellSouth and to maintain information on capital expenditures for these property units. A centralized system to monitor poles' locations and conditions would allow the company to adequately maintain records and to accurately schedule and prioritize the inspection process.

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Without a centralized monitoring system, BellSouth cannot ensure its system's condition complies with NESC guidelines. The company cannot verify that each pole has been inspected within a reasonable, regular, and recurring time frame and meets strength standards. A monitoring system coupled with a comprehensive inspection process could enable the company to better maintain oversight records on each pole and to more accurately predict its life cycle.

Company Response:

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