BEFORE THE PUBLIC SERVICE COMMISSION

In re: Proposal to require local exchange telecommunications companies to implement ten-year wood pole inspection program.	DOCKET NO. 060077-TL ORDER NO. PSC-06-0168-PAA-TL ISSUED: March 1, 2006

The following Commissioners participated in the disposition of this matter:

LISA POLAK EDGAR, Chairman
J. TERRY DEASON
ISILIO ARRIAGA
MATTHEW M. CARTER II
KATRINA J. TEW

NOTICE OF PROPOSED AGENCY ACTION
ORDER REQUIRING EACH LOCAL EXCHANGE TELECOMMUNICATIONS COMPANY TO IMPLEMENT EIGHT-YEAR POLE INSPECTION CYCLE AND REQUIRING REPORTS

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

BACKGROUND

The hurricanes of 2004 and 2005 that made landfall in Florida severely impacted Florida's local exchange telecommunications companies. According to the reports from the major incumbent local exchange companies, over 725,000 customers experienced telecommunication outages during Hurricane Wilma. Due to its large service footprint and access line count, the impacts were particularly large for BellSouth. After Wilma struck in October 2005, over 610,000 BellSouth customers were left without telephone service. Two months after the storm, the company still had over 19,000 trouble reports to be worked.

Meteorological experts have stated that the last two storms seasons, while extremely severe, are most likely part of a long term cycle of increased hurricane activity. William Gray and Philip Klotzbach of the Department of Atmospheric Science at Colorado State University, in their extended range forecast of Atlantic seasonal hurricane activity published in December, 2005, expect the current active period of increased hurricane activity to last another 15 to 20 years. The forecast states that there is a low probability that the coming 2006 and 2007 hurricane seasons, or the seasons which follow, will have an equivalent number of major hurricane US landfall events seen in 2004 and 2005. Nonetheless, with the forecast of increased hurricane

activity, hurricane conditions are expected to affect Florida's telephone lines much more than was experienced between 1966 and 2003, when US hurricane landfall numbers were substantially below the long term average.

The severe hurricane seasons of 2004 and 2005 have underscored the importance of system maintenance activities of Florida's local exchange companies. These efforts to maintain system components can reduce the impact of hurricanes and tropical storms upon a company's outside plant. An obvious key component in telephone infrastructure is the outside plant. If a pole fails, there is high chance that the equipment on the pole will be damaged, and failure of one pole often causes other poles to fail. Thus, wooden poles must be maintained or replaced over time because they are prone to deterioration. Deteriorated poles have lost some or most of their original strength and are more prone to fail under certain environmental conditions such as high winds or excessive weight loadings. The only way to know for sure which poles are acceptable, which poles must be treated or braced, and which poles must be replaced is through periodic inspections and loading evaluations.

Due to the unforeseeable weather pattern that has emerged and the expectation of continued intense activity for the foreseeable future, this Commission's statutory authority regarding the reliability and safety of the Florida grid strongly suggests that we carefully consider whether the companies are taking all reasonable actions to assure that their outside plant, especially their poles, are properly maintained. Wood pole inspections are critical in order to be able to assess whether strength requirements have been maintained. This Commission should be fully informed of such wood pole inspection results. With such information, we may consider what actions, if any, may be necessary to ensure that wood poles are adequately maintained, including requirements such as more rapid replacement, chemical treatment, or bracing of deteriorated poles.

Section 364.15, Florida Statutes, requires this Commission to direct repairs, improvements, changes, additions, or extensions whenever we find it reasonable to do so to promote the security or convenience of the public or employees or in order to secure adequate service or facilities for telecommunications services. We have also adopted The National Electric Safety Code Requirements for local exchange companies through Rule 25-4.036, Design and Construction of Plant, Florida Administrative Code. Finally, we may require telecommunication companies to file records or reports or other data directly related to matters within our jurisdiction. Section 364.183, Florida Statutes.

INSPECTION PROGRAM

There are five reasons why we find it appropriate to require an eight-year inspection program:

1) The NESC identifies wood pole minimum strength requirements that must be maintained via periodic inspections;

2) In performing inspections, the local exchange companies are required by the NESC to consider the conditions to which the poles can be expected to be exposed;

3) It is probable that Florida is experiencing an extended period of increased hurricane activity, indicating that conditions have changed and punctuating the need for systematic review of local exchange companies' wood poles to assure that they are reasonably robust and that pole loadings are appropriate;

4) Local exchange companies do not practice planned cyclical inspections of their installed wood pole inventory. A uniform wood pole inspection cycle implemented by all local exchange companies is necessary in order for the Commission to be able to assess telephone service reliability and safety, and;

5) An eight-year inspection cycle matches the cycle recommended by the United States Department of Agriculture's Rural Utilities Service for Florida rural electric utilities.

Forecast of Future Storm Activity and FPSC Jurisdictional Authority

Florida local exchange companies were severely impacted by the storms of 2004 and 2005, with hundreds of thousands of service interruptions to customers and millions of dollars of damage incurred. For example, over 725,000 local exchange customers experienced service outages during Hurricane Wilma in October 2005. BellSouth reports to have lost 3,451 poles to storm damage in 2004 and about 4,187 in 2005 according to a preliminary estimate which is subject to revision. Verizon lost 1,690 poles to storms in 2004. Sprint does not separately track pole replacement by event.

As noted above, Section 364.15, Florida Statutes, requires this Commission to make and serve an order directing repairs, improvements, changes, additions, or extensions whenever we find it reasonable to do so to promote the security or convenience of the public or employees or in order to secure adequate service or facilities for telecommunications services. We have also adopted The National Electric Safety Code Requirements for local exchange companies through Rule 25-4.036, Design and Construction of Plant, Florida Administrative Code. This Commission may also require telecommunication companies to file records or reports or other data directly related to matters within our jurisdiction. Section 364.183, Florida Statutes.

Pole Inspection Requirements per the NESC

This Commission has authority to require the incumbent local exchange companies to implement a comprehensive inspection of its telephone poles as a means of complying with NESC. This is similar to our authority with respect to electric IOUs. The authority for such a program is listed below.

> Rule 25-4.036, Florida Administrative Code (F.A.C.), Design and Construction of Plant.
>
> (1) The plan and facilities of the utility shall be designed, constructed, installed, maintained and operated in accordance with provisions of the 2002 Edition of the

> National Electrical Safety Code (IEEE C2-2002) and the National Electrical Code (NFPA 70-2005), pertaining to the construction of telecommunications facilities.
>
> (2) Compliance with these codes and accepted good practice is necessary to insure as far as reasonably possible continuity of service, uniformity in the quality of service furnished and the safety of persons and property.

Rule 25-4.038, F.A.C., Safety, is another applicable rule regarding the safety of telephone poles. The rule is stated below in pertinent part.

> Rule 25-4.038, F.A.C., Safety.
>
> Each utility shall at all times use reasonable efforts to properly warn and protect the public from danger, and shall exercise due care to reduce the hazards to which employees, customers, and the public may be subjected by reason of its equipment and facilities...

In addition, a routine pole inspection program would ensure compliance with the NESC and minimize service disruption.

Section 26 (Strength Requirements) of the NESC prescribes strength factors for poles which must be maintained for the period poles are in service. The NESC requires the company to strengthen or replace poles equal to or less than 18 meters in length (which would include most telephone poles) that have lost one-third of their original strength at installation under no-load conditions. In addition, when new or changed facilities add loads to existing poles, the strength of the pole must exceed the strength required at replacement. If this is not the case, the pole must be replaced with a stronger one. A copy of this portion of the NESC is attached to this Order as Attachment A.

The requirements identified in the NESC can only be met if the company in question is conducting pole inspections of a detailed nature necessary to detect the specific degree of impairment to poles. Further, these inspections must be conducted on a number of poles that is sufficient to be statistically reliable. Neither visual nor sounding inspections of poles alone will provide the data necessary to determine a percentage of strength loss. The code is not specific as to the exact schedule with which inspections must be made, but states the following: "Lines and equipment shall be inspected at such intervals as experience has shown to be necessary." (NESC, Rule 214.A.2) The company is responsible for considering the conditions of service to which the installation reasonably can be expected to be exposed.

USDA Rural Utility Service Guidelines Regarding Pole Inspection Cycles

The United States Department of Agriculture's Rural Utility Service (RUS), formerly the Rural Electrification Administration, suggests pole-by-pole initial inspections over a cycle of ten years. The RUS suggests wood pole reinspections in Florida every eight years. The RUS also suggests reinspections more frequently than eight years in the event that a sampling of poles

reveals advanced decay in greater than 1 percent of the poles inspected. The RUS suggests that sound and bore inspections should include excavations, especially for Southern Pine poles, because it greatly increases the effectiveness of the inspection. We find that the Florida local exchange companies' pole inspection cycles should not exceed the suggested wood pole inspection cycle which applies to the rural utilities of Florida (electric cooperatives), especially during periods when heightened hurricane activity is expected.

Since many local exchange companies and electric IOU facilities are collocated on the same poles, inspection of both electric IOU poles and local exchange company poles provides the benefit of protecting the electric and telephone infrastructure in the event of severe storm conditions.

Local Exchange Company Pole Inspection Cycles: Deterioration and Overloading

Just as local exchange telephone companies attach lines and equipment to electric IOUs' poles, a large part of electric distribution in Florida is accomplished through attachment of electrical conductor cable, transformers and other components to poles owned by local exchange companies. BellSouth owns and maintains 459,312 poles in Florida, with 307,459 of these bearing attachments (lines, transformers, etc.), by electric utilities. Verizon owns and maintains 107,863 Florida poles, with 29,632 bearing attachments by electric utilities. Sprint-Florida owns and maintains 38,731 poles, of which 9,673 bear electric utilities attachments.

Because of this collocation, we find it is as important for local exchange companies to thoroughly inspect poles as it is for electric IOUs.

Our Staff is currently conducting a management audit of major local exchange companies' pole inspection and maintenance programs. The audit report will be published in March 2006. It is our understanding that unlike Florida's electric IOUs, the major incumbent local exchange companies do not conduct planned inspections of their entire wood pole population on a cyclical basis. The three largest local exchange companies do, however, have a policy of inspecting telephone poles when repair or addition of facilities necessitates a telephone company employee or contractor climb or make attachments to telephone poles. However, in these instances, the type of inspection performed does not involve drilling the pole to identify slight to moderate rot or deterioration.

Additionally, BellSouth performs targeted remedial pole inspections, treatment, bracing and replacing when multiple pole deterioration cases are detected in an area. However, the number of poles involved appears to be very small. BellSouth's statewide expenditures for its outsourced inspection activities were minimal over the period 2002 to 2005. The number of poles covered by BellSouth in these years by such efforts is estimated by our staff to have been at most about 2,500 poles. To complete an eight-year cycle, on the other hand, BellSouth would have to average about 57,000 planned pole inspections per year.

Another potential cause of pole failure is overloading of poles. This can result from ineffective communication or exchange of information between the pole owner and non-owner

attachers. Most communication between local exchange companies and electric IOUs regarding increased weight and stress loads to poles is informal, either by telephone or e-mail. There is inherent difficulty and complexity for each party in knowing the current load on poles and in communicating changes to each other. Without accurate tracking and exchange of information, overloads can result which may not become apparent until factors such as storm winds, auto accidents, or wood deterioration ultimately cause failures.

Inspection and Reporting Cost Estimate

The incremental cost of maintaining an eight-year inspection cycle will vary depending on each local exchange company's current level of expenditures and the number of poles owned. Additional costs for inspecting loading, as well as certain professional and administrative costs, will be required to maintain the data and file the reports for each company. These costs are not quantified but are expected to be small in comparison with the costs of the increased inspection activity.

The cost of conducting these inspections, while not insignificant, must be considered in the context of storm restoration costs. For example, Sprint estimated its 2004 storm damages at $148 million in Docket No. 050374-TL. FPL's sound and bore inspection costs per pole averaged $45.20 per pole. Assuming an eight-year inspection cycle, this would require Sprint to inspect about 4,800 poles per year. At an estimated cost of $45.20 each, this would total less than $217,000 annually for the inspections and pole treatment, bracing or replacement. Since the quantity of remedial actions needed will necessarily vary based upon the failure rate encountered, the weighted cost per pole used here to provide a rough estimate may be different from the actual cost incurred. The annual inspection of one-eighth of BellSouth's poles would require about 57,000 sound-and-bore inspections each year. Based upon an average cost of $45.20 per pole, the inspection and remediation costs would be just over $2,590,000. We find an effective pole inspection program can be expected to reduce future storm damage restoration costs.

Concrete Poles

We propose no specific action unique to the inspection of concrete poles because the strength of concrete poles does not diminish over time like wood poles. Any deterioration of a concrete pole is generally observed by cracks and surface blemishes. Therefore, the adequacy and frequency of visual inspections is not a specific concern at this time. More information is necessary before we take any action concerning concrete pole inspections.

Conclusion

The specific standards of the NESC require inspection of local exchange companies' wood poles based upon the conditions reasonably expected to be imposed on them. The last two hurricane seasons and the meteorological forecasts for the 2006 hurricane season and beyond provide clear indications that conditions have changed. Our rules require that local exchange companies must inspect their poles on a periodic basis. However, there exists no systematic

wood pole inspection reporting requirement at this time. We find it appropriate to require each local exchange company to annually report to this Commission the results of its prior calendar year inspections of its wooden poles. Such inspection should be based on the requirements of the National Electric Safety Code and a eight-year pole inspection cycle.

INSPECTION METHODOLOGY

Wood Pole Inspection Methods

Wood pole inspection methods vary, but three basic methods are used, usually in combination, in order to assess the condition of wood poles. These methods include:

1) Visual inspections which may be completed in conjunction with thermo vision (infrared) pole attachment inspections;

2) Employee assessments completed prior to climbing poles in conjunction with field work; and

3) Sound and bore pole inspections, often performed by outsourced contractors, which often include excavation of the pole to a depth of 18 inches.

Visual inspections provide little value for determining the loss in strength caused by internal rot and fungal decay within poles, though some defects such as woodpecker holes or broken cross arms may be detected. The climbing inspections involve sounding the pole with a hammer and probing it with a screwdriver, a method which may be adequate for detecting a severely rotten pole. However, slight or moderate rot could not be detected using this method.

In the electric industry, sound and bore inspections are frequently performed by outside contractors. Sound and bore inspections, including excavation, are by far the most effective form of inspection for determining the internal condition of the wood poles. In these inspections, the pole is sounded (hammered) to determine whether any hollows exist. If so, the pole is drilled in several locations to determine the extent of the hollow cavity. The drilling can be used to determine the thickness of the remaining shell. The soil is excavated around the pole below ground level to determine the extent of exterior pole rot and wood loss. At this point, fungicide treatment of the pole is an option if the pole has sufficient remaining good wood. Detailed records are kept of these inspections, and the poles are marked by the contractor with the date and type(s) of inspection and mitigation performed.

Wood pole inspections conducted using one of the three methods may result in one of three remedial actions: treatment (as specified above), bracing, or replacement.

Pole Inspection for Strength Requirements Related to Pole Attachments

Factors such as incremental pole attachments impose additional strength requirements that are considered at the time the pole is installed. Of course, many pole attachments occur well

after the date of pole installation. We have previously noted that the NESC states that "[w]hen new or changed facilities add loads to existing structures (a) the strength of the structure when new shall have been great enough to support the additional loads and (b) the strength of the deteriorated structure shall exceed the strength required at replacement. If either (a) or (b) cannot be met, the structure must be replaced, augmented, or rehabilitated." See Attachment A. We believe that third parties have completed pole attachments to wood poles that were done without full consideration of the requirements of the NESC requirement. Thus, wood pole strength inspections under such conditions require both remaining strength assessments as well as pole attachment loading assessments.

USDA Rural Utility Service (RUS) Guidelines

Of the three inspections, only sound and bore inspections provide the quantitative data allowing for meaningful evaluations of remaining pole strength. The RUS suggests that sound and bore inspections are the minimum acceptable inspection method. The RUS indicates that visual inspection methods lack the recommended accuracy. According to the RUS, the sound and bore inspections should include excavations, especially for Southern Pine poles, because excavations greatly increase the effectiveness of the inspection.

Conclusion

We find it appropriate to require the wood pole inspections to be based on the sound and bore technique for all poles. This method produces information about remaining pole strength requirements as required by the NESC, whereas the visual and thermovision inspection methods cannot provide such information. The sound and bore technique shall include excavation for all Southern Pine poles and other pole types as appropriate, in accordance with the suggestions of the RUS.

Moreover, if a local exchange company does not maintain records of the strength impact assessments of pole attachments affixed to the pole after the time of original pole installation, poles with additional attachments shall be inspected for strength impacts in order to determine whether the local exchange company has complied with the NESC (i.e., when new or changed facilities add load to existing structures, the strength of the structure when new shall have been great enough to support the additional loads). In those specific cases, this type of assessment shall be completed in addition to the wood pole sound and bore inspections in order to ensure that the pole is not overloaded.

REPORTING REQUIREMENTS

This Commission needs to understand the nature of each local exchange company's pole inspection program on a going-forward basis. By requiring that such programs be provided in advance of the pole inspection data collection period, we can be assured that any issues that may arise out of our staff's review of the pole inspection programs can be brought to our immediate attention. Thus, each local exchange company shall submit a comprehensive wood pole inspection plan to the Director of the Division of Competitive Markets by April 1, 2006. In its

filings, each local exchange company shall include its plan for pole-specific data gathering, pole inspection program enforcement, and collocated poles inspections (how poles shared by two or more companies will be inspected). The plans shall also identify any pole inspection standards utilized by the local exchange company that supersede those of the NESC and any other details necessary to understand its pole inspection program.

The Commission recognizes that each local exchange company may face company-specific circumstances. It is therefore appropriate to afford some flexibility in the manner in which the individual local exchange company's plans implement the requirements of this order. To the extent any local exchange company's plan deviates in any material respect from the requirements of this order, staff is directed to present its recommendation regarding the plan to the Commission for further consideration in light of the utility's specific circumstances.

The annual report of pole inspections, hereafter referred to as the Pole Inspection Report, shall be filed by March 1 of each year with the Division of Competitive Markets and Enforcement. It shall contain the information listed below for the previous calendar year. The first report shall be provided on March 1, 2007, but it shall contain inspection data for May 2006, through December 2006, rather than for a full twelve-month period, given the timing of this Order. All annual inspection reports, including the 2006 Pole Inspection Report, shall contain the following informational sections:

1) A review of the methods the company used to determine NESC compliance for strength and structural integrity of the wood poles included in the previous year's annual inspections, taking into account pole loadings where required;

2) An explanation of the inspected poles selection criteria, including, among other things, geographic location and the rationale for including each such selection criterion;

3) Summary data and results of the company's previous year's wood pole inspections, addressing the strength, structural integrity, and loading requirements of the NESC (See Attachment B to this Order); and

4) The cause(s) of each pole failure for poles failing inspection, to the extent that such cause(s) can be discerned in the inspection. Also, the specific actions the company has taken or will take to correct each pole failure.

We find this reporting requirement to be the appropriate action to take at this time. We note that in the event that in the future, this Commission adopts reliability standards related to pole inspections that supersede the safety requirements reflected in the NESC, we may modify the reporting requirements accordingly to reflect the new standards.

Furthermore, we find that March 1 is the optimal date for the filing of annual Pole Inspection Reports because it coincides with the filing deadline of the Annual Distribution Reliability Report requirement pursuant to Rule 25-6.0455, Florida Administrative Code. A requirement to file by March 1 allows the companies adequate time to prepare the report and also allows this Commission the ability to respond to the information contained in the report in a

timely fashion. Reporting requirements for 2006 shall be abbreviated to include only May 2006 through December 2006. This will allow the local exchange companies time to coordinate their inspection programs and provide this Commission with details about their individual inspection program plans prior to the initiation of the inspection program.

SEVERABILITY

The inspection and reporting requirements established by this order are intended to apply separately to each local exchange company. Accordingly, a protest to this order by (or directed to) one local exchange company shall not prevent this order from becoming final at the end of the protest period as to any local exchange company which is not the subject of the protest.

INFORMAL MEETING

We direct our staff to hold an informal meeting to allow parties an opportunity to discuss with our staff the requirements of this proposed agency action and propose viable alternatives on an expedited basis. If our staff finds that a proposed alternative should be brought before us for our consideration, they shall do so prior to the conclusion of the protest period.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that each local exchange company shall implement an inspection program of its wooden poles based on the requirements of the National Electric Safety Code and an eight-year inspection cycle. It is further

ORDERED that each local exchange company shall annually report to this Commission the results of its prior calendar year inspections of its wooden poles. It is further

ORDERED that all wood pole inspections required herein shall be based on the sound and bore technique for all poles. The sound and bore technique shall include excavation for all Southern Pine poles and other pole types as appropriate, in accordance with the recommendations of the United States Department of Agriculture's Rural Utilities service for Florida's rural electric utilities. It is further

ORDERED that if local exchange company does not maintain records of the strength impact assessments of pole attachments affixed to the pole after the time of original pole installation, poles with additional attachments shall be inspected for strength impacts in order to determine whether the local exchange company has complied with the National Electric Safety Code (i.e., when new or changed facilities add load to existing structures, the strength of the structure when new shall have been great enough to support the additional loads). In those specific cases, this type of assessment shall be completed in addition to the wood pole sound and bore inspections in order to ensure that the pole is not overloaded. It is further

ORDERED that each local exchange company shall submit a comprehensive wood pole inspection plan to the Division of Competitive Markets and Enforcement by April 1, 2006. In its filings, each local exchange company shall include its plan for pole-specific data gathering, pole inspection program enforcement, and collocated poles inspections (how poles shared by two or more companies will be inspected). The plans shall also identify any pole inspection standards utilized by the local exchange company that supersede those of the National Electric Safety Code and any other details necessary to understand its pole inspection program. It is further

ORDERED that because of company-specific circumstances, it is appropriate to afford some flexibility in the manner in which the individual local exchange company plans implement the requirements of this order. To the extent any local exchange company's plan deviates in any material respect from the requirements of this order, staff is directed to present its recommendation regarding the plan to the Commission for further consideration in light of the company's specific circumstances. It is further

ORDERED that the annual Pole Inspection Report shall be filed by March 1 of each year with the Division of Competitive Markets and Enforcement. It shall contain the informational sections detailed in the body of this Order for the previous calendar year. The first report shall be provided on March 1, 2007, and shall contain inspection data for May 2006 through December 2006, rather than for a full twelve-month period. It is further

ORDERED that Attachments A and B, attached to this Order, are incorporated herein by reference. It is further

ORDERED that an informal meeting will be held to allow parties an opportunity to discuss with our staff the requirements of this proposed agency action and propose viable alternatives on an expedited basis. If our staff finds that a proposed alternative should be brought before us for our consideration, they shall do so prior to the conclusion of the protest period. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that a timely protest to this order by (or directed to) one local exchange company shall not affect the other local exchange companies. This order will become final at the end of the protest period as to any local exchange company which is not the subject of a protest. It is further

ORDERED that any protest of this Order shall identify with specificity the item or measure being protested, and any such protest shall not prevent the remainder of the Order from becoming final and effective with respect to the local exchange company that has filed, or is the subject of, the protest. It is further

ORDERED that in the event this Order becomes final, this docket shall be closed.

By ORDER of the Florida Public Service Commission this 1st day of March, 2006.

BLANCA S. BAYÓ, Director
Division of the Commission Clerk
and Administrative Services

By: Kay Flynn
Kay Flynn, Chief
Bureau of Records

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on March 22, 2006.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

ATTACHMENT A

Table 261-1A

Strength Factors for Structures,[1] Crossarms, Support Hardware, Guys, Foundations, and Anchors for Use with Overload Factors of Table 253-1

[It is recognized that structures will experience some level of deterioration after installation, depending upon materials, maintenance, and service conditions. The table values specify strengths required at installation. Footnotes specify deterioration allowed, if any. When new or changed facilities add loads to existing structures (a) the strength of the structure when new shall have been great enough to support the additional loads and (b) the strength of the deteriorated structure shall exceed the strength required at replacement. If either (a) or (b) cannot be met, the structure must be replaced, augmented, or rehabilitated.]

	Grade B	Grade C
Strength factors for use with loads of Rule 250B		
Metal and Prestressed-Concrete Structures[6]	1.0	1.0
Wood and Reinforced-Concrete Structures[2, 4]	0.65	0.85
Support Hardware	1.0	1.0
Guy Wire[5, 6]	0.9	0.9
Guy Anchor and Foundation[6]	1.0	1.0
Strength factors for use with loads of Rule 250C		
Metal and Prestressed-Concrete Structures[6]	1.0	1.0
Wood and Reinforced-Concrete Structures[3, 4]	0.75	0.75
Support Hardware	1.0	1.0
Guy Wire[5, 6]	0.9	0.9
Guy Anchor and Foundation[6]	1.0	1.0

[1] Includes poles.

[2] Wood and reinforced concrete structures shall be replaced or rehabilitated when deterioration reduces the structure strength to 2/3 of that required when installed. If a structure is replaced, it shall meet the strength required by Table 261-1A. Rehabilitated portions of structures shall have strength greater than 2/3 of that required when installed.

[3] Wood and reinforced concrete structures shall be replaced or rehabilitated when deterioration reduces the structure strength to 3/4 of that required when installed. If a structure is replaced, it shall meet the strength required by Table 261-1A. Rehabilitated portions of structures shall have strength greater than 3/4 of that required when installed.

[4] Where a wood or reinforced concrete structure is built for temporary service, the structure strength may be reduced to values as low as those permitted by footnotes (2) and (3) provided the structure strength does not decrease below the minimum required during the planned life of the structure.

[5] For guy insulator requirements, see Rule 279.

[6] Deterioration during service shall not reduce strength capability below the required strength.

ATTACHMENT B

POLE INSPECTION REPORT

Company: _____

Summary of Pole Inspections
Period: _____

Type of Inspection: _____

Type of Pole: Class ____ Material _____ Vintage _____ Installed Population _____

Number of inspections planned and number completed _____/_____. Include reason for any variance between planned and completed pole inspections. All variances justification should address resultant backlog, if any, and plans to address any backlog.

Number of inspected poles addressing a prior backlog _____.

Number of poles failing the inspection _____ .

Number of poles requiring minor follow-up _____.

Number of poles requiring a change in inspection cycle ____.

Number of poles that required no change in inspection cycle or remediation ____.

Number of poles that were overloaded _____.

Number of poles with estimated remaining pole life of less than 8 years _____.