

James Meza III  
General Counsel – Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

April 4, 2006

Mrs. Blanco S. Bayo  
Director, Division of the Commission Clerk  
& Administrative Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**RE: Docket 060077-TP Proposal to require local exchange telecommunications companies to implement ten-year wood pole inspection program.**

Dear Mrs. Bayo,

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc Response to the request for additional information in regards to the Proposal to Require Local Exchange Companies to Implement Ten-Year Wood Inspection Program which we ask you to file in the above docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,

  
James Meza III

Cc: Jerry Hendrix  
James Meza  
Robert Culpepper  
Beth Salak

# ***BellSouth Telecommunications, Inc.***

## ***Wood Pole Inspection Program***

### **General Synopsis**

BellSouth will inspect wood poles, owned by BellSouth, over an eight-year period. The inspection process will comply with Order No. PSC-06-0168-PAA-TL, issued March 1, 2006 (the "Pole Inspection Order"). Annual inspection results will be reported to the Florida Public Service Commission by March 1 of each year, the first report made available no later than March 1, 2007. The information contained in the annual report will comply with the Pole Inspection Order. Due to the timeframe involved with setting up the inspection program and finalizing contracts with various entities, the first report will not be a full 12 months report.

### **Pole Inspection Methodology**

BellSouth will use the sound and bore technique on each pole inspected, including excavation for all Southern Pine poles, except in situations where obvious visual indicators warrant pole replacement. The inspection will also include a strength assessment of the pole to determine if the pole size and strength are appropriate for all attachments to the pole.

### **Pole Specific Data Gathering**

BellSouth will use a variety of methods to ensure that all BellSouth-owned poles are inspected in an eight-year period. BellSouth will:

- Inspect poles in conjunction with scheduled pole inventory audits, dependent upon business arrangements with power companies and where feasible to do so
- Inspect poles jointly with power companies, outside of scheduled pole inventories, dependent upon business arrangements with power companies and where feasible to do so
- Inspect poles through the use of its own or contracted work forces where joint inspections are not applicable or feasible

BellSouth will record data for each pole inspected. BellSouth will maintain the data in such a manner that summary reports can be generated to monitor and track the progress of the program. Pole specific data will include:

- Number of poles failing 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 pole life of less than eight years

## **Collocated Pole Inspections**

In instances where a BellSouth-owned pole contains attachments of two or more companies, BellSouth will attempt to negotiate agreements with those companies to perform joint pole inspections. Should another company have a pole inspection program in place that supports the requirements of the Pole Inspection Order, BellSouth will consider joint participation in the program. BellSouth will also attempt to integrate pole inspections into pole inventories, conducted periodically pursuant to the terms and conditions of joint use agreements and pole attachment licensee agreements. Any joint pole inspection program will have, as a baseline, the inspection criteria outlined in the Pole Inspection Order. To the extent BellSouth is unable to reach agreements with other companies regarding joint pole inspections, BellSouth will inspect its poles through the use of its own or contracted work forces.

Should inspection results indicate defects in pole conditions or strength assessments, BellSouth will address those defects in accordance with the terms and conditions of the applicable joint use agreements or license agreements.

## **Internal Enforcement of BellSouth's Pole Inspection Program**

BellSouth will use several measures to ensure that its pole inspection program complies with the Pole Inspection Order:

- Periodic quality assurance of any external resources used to implement the pole inspection program
- Semi-annual progress reports submitted to Florida Network Operations management team
- Monitoring and adjusting, as necessary, inspections to ensure all BellSouth-owned poles are inspected in an eight year cycle
- Internal management procedures to be developed by Regional BellSouth Network Operations Support Staff
- Periodic audits conducted by BellSouth Regional Network Operations Support Staff to ensure compliance with internal BellSouth procedures, terms and conditions of agreements with external resources and data gathering and reporting requirements

## **Other Details**

BellSouth intends to inspect poles in multiple geographic locations simultaneously, as opposed to inspecting poles on a region-specific basis (i.e. South Florida one year; Central Florida the following year). BellSouth believes that operating a pole inspection program in multiple areas will:

- Offset the potential of a large scale weather event interrupting the entire process;
- Minimize the potential of relocating personnel on a regular basis, thus making the process more cost effective and efficient, and;
- Allow BellSouth more flexibility in developing joint pole inspection arrangements with other pole owners or attaching entities.