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May 26, 2006 – VIA ELECTRONIC MAIL

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

Re: Docket No. 060173-EU
Proposed amendments to rules regarding overhead electric facilities to allow more stringent construction standards than required by National Electric Safety Code

Docket No. 060172-EU
Proposed rules governing placement of new electric distribution facilities underground, and conversion of existing overhead distribution facilities to underground facilities, to address effects of extreme weather events

Dear Ms. Bayo:

Enclosed are Verizon Florida Inc.'s Comments for filing in the above matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 770-284-5498.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing were sent via U.S. mail on May 26, 2006 to:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

s/ Dulaney L. O'Roark III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed amendments to rules regarding overhead electric facilities to allow more stringent construction standards than required by National Electric Safety Code) Docket No. 060173-EU
) Filed: May 26, 2006
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and)
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In re: Proposed rules governing placement of new electric distribution facilities underground, and conversion of existing overhead distribution facilities to underground facilities, to address effects of extreme weather events) Docket No. 060172-EU
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COMMENTS OF VERIZON FLORIDA INC.

Verizon Florida Inc. ("Verizon") supports the comments being filed today in these dockets by BellSouth Telecommunications, Inc. ("BellSouth"). These dockets concern proposed amendments to the Commission's rules addressing overhead electric facilities and proposed Commission rules regarding new underground electric distribution facilities and the conversion of overhead electric distribution facilities to underground facilities. Not surprisingly, the participants in these dockets primarily have been electric utilities, but companies in other industries also will be affected by the proposed rules and amendments. Verizon, for example, owns 107,863 poles in the state, with 29,632 bearing attachments by electric utilities. In addition, Verizon has attachments to approximately 381,000 electric utility poles. As matters now stand, the Commission has not heard from all the relevant players and does not have the information it needs to ensure that the proposed rules take into account all their concerns.

The risk of failing to include all affected parties is borne out by the latest version of the proposed rules and amendments. As outlined in BellSouth's comments, these rules and amendments would favor the participating electric utilities at the expense of telephone carriers and other companies. Rules that are slanted in favor of one industry without taking into account the effects on others would produce poor public policy, result in wasteful practices, and ultimately generate higher prices for consumers. Before adopting rules that affect companies in several industries, the Commission should ensure that the affected companies have fully participated and brought their concerns to the Commission's attention.

Respectfully submitted on May 26, 2006.

By: s/ Dulaney L. O'Roark III
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