



Florida Cable Telecommunications Association

Steve Wilkerson, President

VIA ELECTRONIC DELIVERY

August 18, 2006

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

RE: Docket Nos. 060172-EU and 060173-EU – Responsive Comments by M.T. (Mickey) Harrelson on behalf of the FCTA

Dear Ms. Bayo:

Attached for filing is the Responsive Comments of M.T. (Mickey) Harrelson, Consultant, submitted on behalf of the Florida Cable Telecommunications Association, Inc., on the Affidavit of Dr. Lawrence M. Slavin and Appendix 1 concerning Rule 25-6.034, Florida Administrative Code, filed on August 11, 2006, as part of the Initial Comments of Verizon Florida Inc., concerning proposed amendments to Rules 25-6.034, 25-6.064, 25-6.078, and 25-6.115.

Copies have been served upon the parties of record by electronic and U.S. Mail delivery.

Thank you for your assistance in this matter. Please contact me with any questions.

Sincerely,

s/ Michael A. Gross

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

Enclosure

cc: All Parties of Record

CERTIFICATE OF SERVICE

HEREBY CERTIFY that a true and correct copy of the foregoing Responsive Comments of Florida Cable Telecommunications Association's expert witness, Mickey Harrelson, has been served upon the following parties electronically and by U.S. Mail this 18th day of August 2006.

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s/ Michael A. Gross

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BEFORE THE PUBLIC SERVICE COMMISSION

In re: Proposed rules governing placement of new electric distribution facilities underground, and conversion of existing overhead distribution facilities to underground facilities, address effects of extreme weather events.

DOCKET NO. 060172-EU

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: August 18, 2006

**RESPONSIVE COMMENTS OF M.T. (MICKEY) HARRELSON,
CONSULTANT, SUBMITTED ON BEHALF OF THE FLORIDA CABLE
TELECOMMUNICATIONS ASSOCIATION, INC., ON THE AFFIDAVIT OF
DR. LAWRENCE M. SLAVIN AND APPENDIX 1 CONCERNING
RULE 25-6.034, FLORIDA ADMINISTRATIVE CODE, FILED ON AUGUST 11,
2006, AS PART OF THE INITIAL COMMENTS OF VERIZON FLORIDA INC.,
CONCERNING PROPOSED AMENDMENTS TO RULES 25-6.034, 25-6.064,
25-6.078, AND 25-6.115**

Dr. Slavin is particularly qualified to render opinions on proposed Rule 25-6.034 because of his education and background and his past and present service as a member of the NESC Subcommittee 5.

Dr. Slavin presented in Appendix 1 a thorough and technically oriented explanation of Grades of Construction, Loading requirements for grades B & C and strength requirements. He explained that direct wind forces on poles and lines increase in proportion to the square of the wind speed. The NESC requires applying extreme wind design to structures greater than 60 feet high, not to distribution poles of less height. Applying an extreme wind calculation, in the 150 mph zone, to a distribution pole will require a pole almost 400% as strong as required by the NESC. Even in the 110 mph zone the distribution pole must be 200 % as strong as presently required.

Figure 2 of Dr. Slavin's report illustrates that extremely strong (large diameter) wood poles will be required to provide the design strength which is now provided by the commonly used 40 foot class 4 pole. The results are a minimum class 1 is required. For 110 mph wind design a class H1, 120 mph and 130 mph requires a class H2, 140 mph requires a class H4, and 150 mph requires an H5.

I have checked with a large manufacturer of wood utility poles. The required class 1 and H 1 thru H 5 wood poles, indicated in Figure 2, are rare to non-existent in today's supply of wood utility distribution poles. Approximately only one in 30 of the 40 foot poles produced is class 1. H 1 thru H 5 – 40 foot poles must be special ordered. A class H 5 – 40 foot pole is equivalent to the bottom 40 feet of an 80 foot class 1 pole. The volume of wood in a pole increases approximately 15% for each increase in pole class for a given pole length. Prices increase about the same amount (15%) per pole class increase for commonly available poles. The compound increase between a class 4 pole and a class 1 pole is 52%. The increase between class 4 and class H 5 is 306%.

The non-availability of large wood poles together with the high cost of utilizing steel or concrete poles for distribution lines are more reasons to go slowly with implementing Rule 25-6.034.

Dr. Slavin also pointed out that much of the damage to lines on less than 60 foot poles is caused by wind-blown debris rather than the direct effect of the wind.

I have observed that another large factor in pole safety failure is leaning poles. The poles did not break but leaned over to an unsafe angle due to storm forces and soil

too soft to hold the pole upright. Stronger (larger diameter) poles will not solve this problem. Storm guys, if practical, will solve the structure strength and soft soil problem.

Nothing is gained by having extremely strong distribution poles broken by flying trees and other debris or pushed over in soil too soft to resist the force of the wind.

I agree with Dr. Slavin's recommendations in paragraph 5 of Appendix 1 to his affidavit. Do not apply extreme wind design requirements to distribution poles or do so only under very limited, well-defined circumstances.

Submitted by:

Michael T. (Mickey) Harrelson, Consultant
Professional Engineer
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On behalf of the Florida Cable Telecommunications Association