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EMBARQ™

Embarq Corporation
Mailstop: FLTLHO0102
1313 Blair Stone Rd.
Tallahassee, FL 32301
EMBARQ.com

September 21, 2006

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

RE: Docket No. 060077-TL, Embarq's Wood Pole Inspection and Reporting Plan (Rev. 09-21-06)

Dear Ms. Bayó:

Enclosed for filing on behalf of Embarq Florida, Inc. is Embarq's Revised Wood Pole Inspection and Reporting Plan, which was provided via e-mail to Beth Salak on September 21, 2006. One minor revision was made to the plan on page number 3, paragraph 2.7.

Copies have been served as per the attached Certificate of Service.

If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S Masterton

Susan S. Masterton

ab

Enclosure

Susan S. Masterton
COUNSEL
LAW AND EXTERNAL AFFAIRS- REGULATORY
Voice: (850) 599-1560
Fax: (850) 878-0777

CERTIFICATE OF SERVICE
DOCKET NO. 060077-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. mail this 21st day of September, 2006 to the following:

Florida Public Service Commission
Adam Teitzman
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Florida Public Service Commission
Carl Vinson/Lisa Harvey/Rick Moses
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Office of Public Counsel
Harold McLean
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Verizon
Leigh A. Hyer
P.O. Box 110, FLTC0717
Tampa, FL 33601-0110

Verizon Florida, Inc.
Mr. David Christian
106 East College Avenue, Suite 710
Tallahassee, FL 32301-7721

Susan S. Masterton

Susan S. Masterton

WOOD POLE INSPECTION AND REPORTING PLAN

Embarq Florida, Inc. (f/k/a Sprint-Florida, Incorporated)

Revised September 21, 2006

Docket No. 060077-TL

1.0 Inspection Methodology

1. Abstract

Embarq Florida, Inc., f/k/a Sprint-Florida, Incorporated (hereinafter "Embarq") maintains approximately 38,800 wood poles within its service area. Within this population of poles, 9,673 are considered to be higher risk. These poles are 35' or taller and carry electrical circuits greater than 750 volts to ground. The remaining 29,127 poles are less than 35' in height, and carry telecommunication circuits. Both groups combined accounted for a placement (new and replacement for all purposes) rate of less than one-half of one percent during the unprecedented hurricane seasons of 2004 and 2005. Thus, these lower risk poles accounted for a failure rate of significantly less than one-half of one percent during the hurricane seasons. This data clearly illustrates that Embarq is in a distinctly different situation than that of the power industry for the majority of its poles

Embarq will inspect and document all of its poles in an 8-year cycle. Corrective action will be taken on any poles found to be defective or not of sufficient strength to carry the imposed load using an established process, i.e. the Irregular Plant Condition process.

If Embarq's analysis of the inspection results indicate that a geographic area experiences more decay due to environmental influences or bug infestation, Embarq will implement a cost-effective remediation plan, which may include the utilization of industry approved bracing or trussing.

1.2 Pole Selection Criteria

Class 5 poles of 30 and 35 feet are the standard for telecommunications poles. These poles are stronger than required for attachment loads imposed by communications and lower voltage electric attachments. Poles that carry only communication facilities and poles with communications and electric circuits less than or equal to 750 volts to ground have less potential to fall or break. A class 5 pole has a breaking load of 1900 lbs 2' from the top of the pole. A 30-foot class 5 pole has a more consistent circumference from the base to the top of the pole than a taller pole. With the added strength of support strands, the chances of these poles failing and creating a hazard are greatly reduced.

Taller poles with higher voltage power lines have more potential to fall or break due to the weight and size of the attachments and higher wind resistance at the weaker (narrower) top of the taller poles. Poles 35 feet or higher lose their consistency in circumference as a normal physics plant equation. The greater the height, the more reduced the circumference and greater potential for failure at heights exceeding 30 feet, i.e., poles that carry electrical attachments such as cross-arms and transformers.

Based on the years of experience in maintaining aerial plant and the guidelines in the NESC standards, Embarq believes that only poles over 30 feet with and without the specified electrical attachments reaching the age of 10 years need to be placed into the inspection program. Poles over 30 feet without electrical attachments and poles 30 feet and less are not considered higher risk, even in the NESC standards. However, in order to collect data which can be used as a basis for future decisions, Embarq will include all its poles in the proposed inspection plan.

Poles will be listed in order of priority with poles carrying electric distribution circuits greater than 750 volts being priority 1 and telephone poles 30 feet and shorter and carrying only telephone cable, cable television and possibly an electric company drop as priority 2. During inspections of Embarq priority 1 poles load calculations will be performed to determine whether

the poles are structurally sound and capable of maintaining the current imposed loads. Poles failing acceptable load calculation parameters as defined by ANSI 05.1 and NESC standards will be corrected within 90 days unless an immediate safety hazard exists

Going forward Embarq will enhance its load calculation program based on the data provided by the attaching entities to illustrate cumulative load and ensure that higher risk "priority 1" poles, i.e., 35 feet and taller, carrying electric distribution facilities exceeding 750 volts, are not overstressed. Embarq is analyzing several load calculation software programs including the Osmose O-Calc and Linesoft pole load calculation software in order to choose one to use as its standard product.

2.0 Pole Inspection Methodology

Embarq Florida owns and maintains approximately 38,800 poles within the boundaries of its Florida service areas. Embarq will inspect all poles as stated in section 1.2 and will collect data essential for reporting and remediation consistent with Order No PSC-06-0168-PAA-TL. The following are the specifics of Embarq's pole inspection plan.

Business as Usual Inspections by technicians;

2.1 During business as usual (BAU) activity the EMBARQ technicians when accessing poles will conduct visual inspections in conjunction with sound and prod technique to determine if decay or bug infestation is present or a visual inspection indicates that the pole strength/stability is suspect. A pole that as a result of a prod test reflects surface decay, bug infestation or rot at any point on the pole will be tagged as unsafe and reported to engineering for corrective action

2.2 Visual inspections will consist of checking for excessive rake, leaning, pole movement in wind, location of the birthmark on the pole relative to ground line to determine the depth of the pole in the ground, vehicle damage, fungus, bugs, and cracks that go several inches into the pole. Cracks are common due to the compression of the preservative treatment process however deep cracks could be a sign of a problem.

2.3 Report defective poles to engineering for structural bracing or replacement following established procedures.

Inspection Program:

Inspectors on behalf of Embarq will perform the following tasks;

2.4 Review and create maps of pole records for each exchange/area to be inspected

2.5 Perform inspections of Priority 1 poles which will include load calculation, excavation and drilling to determine strength and structural integrity

2.6 Perform Sound and Prod test on all Grade N poles to determine if additional testing is required

2.7 If visual inspection and/or sound and prod test reveals suspected damage or decay the inspector will excavate around the pole to a depth of 18 inches and drill the pole to determine the strength and structural integrity. Embarq may utilize the Resistograph device as an alternative to typical industry boring with large drill bit or another technology if such technology is approved by the Commission and

proves to be more reliable, is less insidious and is more cost effective than the standard industry bore methodology.

2.8 Record results, and update Embarq's engineering work order (EWO) and facility systems

2.9 Report defective poles to engineering for structural bracing or replacement following established engineering standards

2.10 Place an inspection tag on each pole delineating the date of inspection and or placement

2.11 Provide a summary of the pole inspection results to the FPSC on an annual basis with the first report to be filed on March 1, 2007.

3.0 Pole Inspection Requirements per the NESC

Embarq will fully comply with Rule 25-4.036, Florida Administrative Code (F.A.C.), Design and Construction of Plant and the 2007 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. Embarq agrees that compliance with these codes and accepted good practice is necessary to ensure, as far as reasonably possible, continuity of service, uniformity in the quality of service furnished and the safety of persons and property.

3.1. The NESC rules regarding pole strength and loadings, including deterioration, only apply to grades B and C construction. In addition, specific rules apply to poles exceeding 35 feet in height.

3.1.1 Sections 25 and 26 provide rules that apply to wind loading requirements and speak specifically to grades B and C construction. Rule 250 – 2 (c), (d), and (e) are coastal hurricane maps that indicate the winds are calculated at a 10 meter/33 foot height. Since the majority of the Embarq poles are 30 feet or shorter, those poles are excluded from NESC load requirements; however, Embarq will include those poles in the inspection schedule so that data on the performance of all classes and sizes of poles in the Embarq network can be accumulated and analyzed.

4. Specific Pole Data Accumulation

Embarq will utilize the following methods to ensure that 100% of Embarq poles are inspected over an 8-year cycle:

4.1 Implement a schedule of pole inventories by exchange/service area

4.2 Conduct mutual inspections with electric companies as the agreements between the parties require

4.3 Utilize a contracted work force to perform pole inspections to complement Embarq trained technicians

4.4 Record data for each inspected pole.

4.5 Pole specific data will include:

4.5.1 Type of inspections performed

4.5.2 Type of pole (material e.g. wood/species)

4.5.3 Age of poles inspected

4.5.4 Number of poles inspected by size and class

4.5.5 Number of poles failing inspection

4.5.6 Number of poles requiring a change in inspection cycle

4.5.7 Number of poles requiring minor follow up

4.5.8 Number of poles that were overloaded

4.5.9 Number of poles with an estimated pole life less than 8 years

4.5.10 Number of inspected poles addressing a prior backlog

Embarq inspectors will record the data associated with each pole inspected and will maintain a database from which an annual summary report can be generated to monitor and track the progress, effectiveness and cost of the inspection program.

5. Compliance

Embarq will ensure compliance through internal processes as follows:

5.1 Periodic quality assurance of the contractor or company employees performing the pole inspections and the quality of the data captured

5.2 Quarterly progress reports to Network Services operation Director Engineering

5.3 Ensure resources are maintained to meet annual pole inspection requirements

Annual report to FPSC

Embarq will submit an annual pole inspection report to the FPSC Division of Competitive Markets and Enforcement by March 1 of each calendar year. The report will contain data points as defined in section 4 above.

6. Poles Inspected During Normal Course of Business

Poles and attachments found to be unsafe by technicians during normal course of business in compliance with Embarq Practice 010-100-009 Climbing Equipment, Climbing Safety, Testing Poles and Working On Poles will be tagged per Embarq Irregular Plant Conditions Practice 010-100-024 Tagging and reporting Unsafe Equipment and Conditions, will be reported to the local supervisor and engineering manager for immediate remediation.

Pole failures occur as a result of various causes. Before climbing a pole or testing it for safe climbing conditions, the technician will make a visual check for excessive rake or unexplained leaning of a pole; bent, loose, or missing pole steps; the presence and distribution of large knots; climber gaff splinters; unauthorized signs, aerials, clotheslines; nearby interfering tree growth; and excessively tight or excessively slack drop or line wires on one side of pole.

Before climbing, technicians must test poles using the following methods in a manner that will provide the greatest structural results.

1) Prod Test: (exploring the pole for rot at the ground level or below.) A long shank screwdriver (5 in. minimum) or test prod must be used. Apply pressure at ground level to pole by pushing prod into pole. For further determination, remove 6 inches or more dirt at base of poles and reapply inward pressure to pole by prod below ground level.

2) Hammer Test: Rap the pole sharply with a hammer weighing about 3 pounds, starting near the ground line and continuing upwards circumferentially around the pole to a height of approximately 6 feet. The hammer will produce a clear sound and rebound sharply when striking sound wood. Decay pockets will be indicated by a dull sound and/or a less pronounced hammer rebound. When decay pockets are indicated, the pole shall be considered unsafe.

Poles found to be in an unsafe condition will be given immediate remedial action, e.g. trussing, bracing or replacement, within 10 business days.

7. Strength Assessments and Load Calculations

The strength and loading requirements specified in National Electrical Safety Code (NESC) Sections 25 and 26, only apply to Grade B and C construction, not Grade N construction. The NESC does not provide specific loading requirements for Grade N Construction. NESC pole strength requirements for communication poles are based on the grades of construction specified in Section 24 of the NESC. Sections 224 and 242 state the only time the communication facilities become a Grade B construction is when the communication facilities are higher than the electric circuits or the communications facilities are placed in the supply space on the pole. Embarq owned poles that carry electric supply cables or components that exceed 750 volts (Priority 1) are subject to NESC rules for Grade B and C construction. Therefore, strength assessments will be conducted utilizing strength assessment software of all attachments on the pole. Embarq will partner with the appropriate electric utility to determine imposed load of electric facilities.

EMABRQ will use a program specifically designed to accurately assess loads on existing and newly installed poles. Outputs will include:

- Individual attachment load
- Total load of all attachments
- Results indicating overload or reserve capacity
- Stress on the pole from wind at the base of the pole

New poles placed in service will be put into one of the two categories, either a Priority 1 or Priority 2 depending on the grade of construction. Poles that are added or replaced or changed due to the addition or removal of power distribution attachments exceeding 750 volts will be assigned either a Priority 1 or a Priority 2 status based on the new characteristics and inspected accordingly.