

Ruth Nettles

From: McPike, Jessica L [EQ] [Jessica.L.Mcpike@Embarq.com]
Sent: Wednesday, July 11, 2007 4:58 PM
To: Filings@psc.state.fl.us
Cc: Susan Masterton; Sandy Khazraee
Subject: Docket 070297-070301-EI, Embarq's Preliminary Position on the Issues and Areas of Concern
Attachments: 070297-070301 Embarq's Issues and Areas of concern Ann Cole(2).doc

ORIGINAL

Filed on Behalf of: Susan S. Masterton

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Docket No. 070297-070301EI

Title of filing: Embarq's Preliminary Position on the Issues and Areas of Concern

Filed on behalf of: Susan Masterton

No of pages: 21

Description: Embarq's Preliminary Position on the Issues and Areas of Concern

<<070297-070301 Embarq's Issues and Areas of concern Ann Cole(2).doc>>

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FPSC-COMMISSION CLERK

ORIGINAL



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1313 Blair Stone Rd.
Tallahassee, FL 32301
EMBARQ.com

July 11, 2007

Ann Cole
Office of Commission Clerk
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Re: Docket Nos. 070297, 070298, 070299, 070300 and 070301-EI; Embarq Florida, Inc.'s

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. are Embarq's preliminary positions on the Issues and Areas of Concern identified by staff, as requested by Staff at the June 27, 2007, workshop.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

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

Sincerely,

s/ Susan S. Masterton
Susan S. Masterton

Enclosure

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

DOCUMENT NUMBER-DATE

05841 JUL 11 5

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronic mail this 11th day of July, 2007, to the following:

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Florida Power & Light Company
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Juno Beach, Florida 33408-0420

s/ Susan S. Masterton
Susan S. Masterton

**Electric Infrastructure Storm Hardening
Issues and Areas of Concern**

1. Plan Content

1.1 Compliance with National Electric Safety Code

| | Preliminary Position |
|------------------------|---|
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Regarding the joint use of utility poles, Embarq encourages the continued use of the guidelines defined in the NESC to govern the placement of poles and how attachments are placed and maintained. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|------------------------|---|
| PEF | |
| Staff | |
| AT&T | |
| Embarq | Regarding the joint use of utility poles, Embarq encourages the continued use of the guidelines defined in the NESC to govern the placement of poles and how attachments are placed and maintained. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|------------------------|---|
| TECO | |
| Staff | |
| AT&T | |
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| Verizon | |
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| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
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|------------------------|---|
| GULF | |
| Staff | |
| AT&T | |
| Embarq | Regarding the joint use of utility poles, Embarq encourages the continued use of the guidelines defined in the NESC to govern the placement of poles and how attachments are placed and maintained. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

1.2.A Extreme wind loading standards - New distribution facilities

| | Preliminary Position |
|------------------------|---|
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. The NESC extreme wind loading provision is designed for poles exceeding 60 feet in height due to the attachments (electric circuits) with a greater exposure to the wind. Shorter poles with attachments closer to the ground are not as exposed and therefore are not considered by the NESC standards. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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|------------------------|---|
| PEF | |
| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
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|------------------------|---|
| TECO | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. The NESC extreme wind loading provision is designed for poles exceeding 60 feet in height due to the attachments (electric circuits) with a greater exposure to the wind. Shorter poles with attachments closer to the ground are not as exposed and therefore are not considered by the NESC standards. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| GULF | |
| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

1.2.B Extreme wind loading standards - Major planned expansion, rebuild, or relocation of distribution facilities

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|---------|---|
| | Preliminary Position |
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. The NESC extreme wind loading provision is designed for poles exceeding 60 feet in height due to the attachments (electric circuits) with a greater exposure to the wind. Shorter poles with attachments closer to the ground are not as exposed and therefore are not considered by the NESC standards. |
| Verizon | |

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| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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|------------------------|---|
| | Preliminary Position |
| PEF | |
| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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|------------------------|---|
| | Preliminary Position |
| TECO | |
| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| Verizon | |

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| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

1.2.C Extreme wind loading standards - Critical infrastructure and major thoroughfares

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|------------------------|--|
| | Preliminary Position |
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| | Preliminary Position |
| PEF | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| | Preliminary Position |
| TECO | |
| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| | Preliminary Position |
| GULF | |
| Staff | |

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| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

1.3 Mitigation of damage to underground and supporting overhead distribution facilities due to flooding and storm damage

| | Preliminary Position |
|------------------------|--|
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq has no position on this issue at this time. Converting damaged facilities from aerial to buried plant during storm restoration is difficult due to the availability of materials, ability to receive permits and congestion in the ROW. Cost estimates are impossible to determine due to the unknown conditions that would have to be overcome e.g. removing debris, trees, flooding, etc... |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|------------------------|---|
| PEF | |
| Staff | |
| AT&T | |
| Embarq | Converting damaged facilities from aerial to buried plant during storm restoration is difficult due to the availability of materials, ability to receive permits and congestion in the ROW. Cost estimates are impossible to determine due to the unknown conditions that would have to be overcome e.g. removing debris, trees, flooding, etc... |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|--------|--|
| TECO | |
| Staff | |
| AT&T | |
| Embarq | Converting damaged facilities from aerial to buried plant during storm |

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| | restoration is difficult due to the availability of materials, ability to receive permits and congestion in the ROW. Cost estimates are impossible to determine due to the unknown conditions that would have to be overcome e.g. removing debris, trees, flooding, etc... |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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|------------------------|---|
| | Preliminary Position |
| GULF | |
| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

1.4 Placement of new and replacement distribution facilities to facilitate safe and efficient access (Rule 25-6.0341)

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|------------------------|---|
| | Preliminary Position |
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. However, regarding the joint use of utility poles, Embarq encourages the continued use of the guidelines defined in the NESC to govern the placement of poles and how attachments are placed and maintained. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| Staff | |
| AT&T | |
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| | calculate the operational and financial impact on Embarq. However, regarding the joint use of utility poles, Embarq encourages the continued use of the guidelines defined in the NESC to govern the placement of poles and how attachments are placed and maintained. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.0 Deployment strategy

2.1 Description of facilities affected

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| | Preliminary Position |
| FPL | |

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| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
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| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
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| NAWPC | |

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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| | Preliminary Position |
| GULF | |
| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.2 Communities and areas where electric infrastructure improvements are to be made

| | Preliminary Position |
|------------------------|--|
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. Modifications made by the electric utilities may have a significant impact on the Emabarq attachments. Depending on the significance of the change, continued joint use of the structures may not be desirable and could further add to the cost to relocate facilities to ensure an acceptable level of customer service |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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|------------------------|--|
| | facilities to ensure an acceptable level of customer service |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.3 Utility's definition of critical infrastructure and major thoroughfares

| | Preliminary Position |
|------------------------|--|
| FPL | |
| Staff | |
| AT&T | |
| Embarq | What is critical to the electric utility may not be critical to the communications' facilities; however, the financial impact to Embarq could be significant with no substantial benefit for the communications' customers. All parties involved must be considered and provided opportunity for input in determining infrastructure requirements. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|--------|--|
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| Staff | |
| AT&T | |
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| | substantial benefit for the communications' customers. All parties involved must be considered and provided opportunity for input in determining infrastructure requirements. |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.4.A Estimate of costs and benefits - Electric utility

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|---------|---|
| | Preliminary Position |
| FPL | |
| Staff | |
| AT&T | |
| Embarq | The planned measures must be prudent, practical and cost-effective as required by the Rule. |
| Verizon | |

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|------------------------|--|
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
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| | Preliminary Position |
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| Staff | |
| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

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| | Preliminary Position |
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| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
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| Town of Palm Beach | |
| NAWPC | |

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| AT&T | |
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| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.4.B Estimate of costs and benefits - Third-party attachers

| | Preliminary Position |
|------------------------|---|
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. Based on the information provided by FPL to date, Embarq estimates FPL's proposed storm hardening initiatives will impose between \$3,900,000 and \$13,967,200 of additional costs on Embarq in years 2007 through 2009. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|------------------------|---|
| PEF | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. Based on the information provided by PEF to date, Embarq estimates PEF's proposed storm hardening initiatives will impose \$425,000.00 in additional costs on Embarq in years 2007 through 2009. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|------------------------|--|
| TECO | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. Based on the information provided by TECO to date, Embarq estimates TECO's proposed storm hardening initiatives will impose \$6,000,000 of additional costs on Embarq in years 2007 through 2009. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|------------------------|--|
| GULF | |
| Staff | |
| AT&T | |
| Embarq | Embarq needs more specific information regarding affected facilities in order to calculate the operational and financial impact on Embarq. Based on the information provided by Gulf to date, Embarq estimates Gulf's proposed storm hardening initiatives will impose approximately \$195,000 in additional costs on Embarq in years 2007 through 2009. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.5.A Estimate of the effect on reducing storm restoration costs and customer outages - Electric utility

| | Preliminary Position |
|------------------------|--|
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq has no position on this issue at this time. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|------------------------|--|
| PEF | |
| Staff | |
| AT&T | |
| Embarq | Embarq has no position on this issue at this time. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | Preliminary Position |
|-------|----------------------|
| TECO | |
| Staff | |

| | |
|------------------------|--|
| AT&T | |
| Embarq | Embarq has no position on this issue at this time. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | |
|------------------------|--|
| | Preliminary Position |
| GULF | |
| Staff | |
| AT&T | |
| Embarq | Embarq has no position on this issue at this time. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.5.B Estimate of the effect on reducing storm restoration costs and customer outages - Third-party attachers

| | |
|------------------------|---|
| | Preliminary Position |
| FPL | |
| Staff | |
| AT&T | |
| Embarq | The extent of these effects will not be known until the next storm and they cannot be readily quantified in dollar savings; however, Embarq does not believe it is likely these benefits will outweigh the costs. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | |
|-------------|---|
| | Preliminary Position |
| PEF | |
| Staff | |
| AT&T | |
| Embarq | The extent of these effects will not be known until the next storm and they cannot be readily quantified in dollar savings; however, Embarq does not believe it is likely these benefits will outweigh the costs. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |

| | |
|------------------------|--|
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | |
|------------------------|---|
| | Preliminary Position |
| TECO | |
| Staff | |
| AT&T | |
| Embarq | The extent of these effects will not be known until the next storm and they cannot be readily quantified in dollar savings; however, Embarq does not believe it is likely these benefits will outweigh the costs. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | |
|------------------------|---|
| | Preliminary Position |
| GULF | |
| Staff | |
| AT&T | |
| Embarq | The extent of these effects will not be known until the next storm and they cannot be readily quantified in dollar savings; however, Embarq does not believe it is likely these benefits will outweigh the costs. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

2.6 Attachment standards and procedures which address safety, reliability, pole loading capacity, and engineering standards

| | |
|------------------------|---|
| | Preliminary Position |
| FPL | |
| Staff | |
| AT&T | |
| Embarq | Embarq is still reviewing these standards and considering the potential impact to Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |

| | |
|--------------------|--|
| Town of Palm Beach | |
| NAWPC | |

| | |
|------------------------|---|
| | Preliminary Position |
| PEF | |
| Staff | |
| AT&T | |
| Embarq | Embarq is still reviewing these standards and considering the potential impact to Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | |
|------------------------|---|
| | Preliminary Position |
| TECO | |
| Staff | |
| AT&T | |
| Embarq | Embarq is still reviewing these standards and considering the potential impact to Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |

| | |
|------------------------|---|
| | Preliminary Position |
| GULF | |
| Staff | |
| AT&T | |
| Embarq | Embarq is still reviewing these standards and considering the potential impact to Embarq. |
| Verizon | |
| FCTA | |
| MUUC | |
| Time Warner | |
| Town of Jupiter Island | |
| Town of Palm Beach | |
| NAWPC | |