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Annual Pole Inspection Report of
BellSouth Telecommunications, Inc d/b/a AT&T Florida
January 2007 – December 2007

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Order NO. PSC-06-0168-PAA-TL, Docket NO. 060077-TL (March 1, 2006) ("Pole Inspection Order") and Order NO. PSC-07-0918-PAA-PU, Docket NO. 070634-EI and Docket NO. 070635-TL (November 14, 2007) ("Revision to the Pole Inspection Order"), submits the following information regarding its pole inspection process for the reporting period of January, 2007 – December, 2007. The Annual Wood Pole Inspection Report spreadsheet required by the Revision to the Pole Inspection Order is included as Attachment 1 to this report.

1) **A review of the methods the company used to determine NESC compliance for strength and structural integrity of the wood poles included in the previous year's annual inspections, taking into account pole loadings where required.**

AT&T Florida partnered with Florida Power & Light, Keys Energy, Florida Keys Electric Cooperative, Orlando Utilities Commission, Beaches Energy Services (Jacksonville Beach) and Gulf Power Company to perform inspections in 2007. In connection with this process, AT&T Florida contracted with OSMOSE to inspect AT&T Florida's wood poles. OSMOSE forwarded inspection data to AT&T Florida at regular intervals and AT&T Florida performed quality control checks to validate the inspection data.

Using National Electric Safety Code ("NESC") Grade C Construction Standards as the guideline to determine NESC compliance for strength and structural integrity, and taking into account pole loadings where required, AT&T Florida used the following inspection process for its wood poles:

- **Visual Inspection**

If OSMOSE found an obvious defect that justified pole replacement, no additional inspection was performed. OSMOSE designated the pole as "Non-restorable" and identified it to AT&T Florida Engineering and Construction as a pole to be replaced.

When replacing a pole, AT&T Florida notifies the power company and third party attachers that they need to transfer their facilities to the new pole. Once all facilities are removed or transferred, AT&T Florida removes the old pole.

- **Sound and Bore**

If an initial visual inspection is made of the pole and no apparent defect is recognized, a sound and bore of the pole is completed to determine the soundness of the interior and exterior of the pole

CMP 1
COM
CTR
ECR
GCL
OPC
RCA
SCR
SGA
SEC
OTH

- **Ground Line Excavation**

Ground line excavation is performed on each pole, other than those poles where the base may be surrounded by concrete and/or asphalt, or other factors that would make excavation hazardous. These factors would include the presence buried power facilities, as an example.

- **Load Calculation**

Using a software application (OCALC) developed by OSMOSE and used throughout the industry to analyze pole loading data, OSMOSE performed a load calculation on each pole inspected. The load calculation is based on NESC Grade C Construction standards. It identifies potential loading defects based on remaining pole strength and the profile of all attachments, whether owned by AT&T Florida, a power company or a third party.

OSMOSE also considered other factors to determine the strength and structural integrity of the poles, including:

- Year Pole Manufactured
- Height and Class of Pole
- Species or Material of Pole
- Original Ground line Circumference
- Current Effective Ground line Circumference
- Category of Decay Type, if Present
- Measurements of Decay Width and Depth

2) **An explanation of the inspected poles selection criteria, including, among other things, geographic location and the rationale for including each such selection criterion.**

AT&T Florida met with multiple power companies to determine which areas would be inspected. The key factors used to define the geographical areas for inspection were coastal exposure, population density, and critical infrastructure customers, such as hospitals, 911 centers, etc.

In 2006, AT&T Florida focused pole inspection efforts in Miami-Dade and Broward Counties. AT&T Florida expanded the 2007 program to include areas in Central Florida (Orlando), Palm Beach, Jacksonville and the Florida Panhandle.

3) **Summary data and results of the company's previous year's wood pole inspections, addressing the strength, structural integrity, and loading requirements of the NESC.;**

See AT&T Florida's completed Attachment B hereto which includes the reporting categories outlined in Attachment B to the Pole Inspection Order, together with the new reporting categories required by the Revision to the Pole Inspection Order.

4) **The cause(s) of each pole failure for poles failing inspection, to the extent that such cause(s) can be discerned in the inspection. Also, the specific actions the company has taken or will take to correct each pole failure.**

The requirement for annual reporting of this item was eliminated by the Revision to the Pole Inspection Order.

AT&T FLORIDA ATTACHMENT 1

A	B	C	D	E	F	G	H	I	J	K	L	M
a	b	c	d	e	f	g	h	i	j	k	l	m
Total # of Wooden Poles in the Company Inventory	# of Pole Inspections Planned this Annual Inspection	# of Poles Inspected this Annual Inspection	# of Poles Failing Inspection this Annual Inspection	Pole Failure Rate (%) this Annual Inspection	# of Poles designated for Replacement this Annual Inspection	Total # of Poles Replaced this Annual Inspection	# of Poles Requiring Minor Follow-up this Annual Inspection	# of Poles Overloaded this Annual Inspection	Method(s) V=Visual E=Excavation P=Prod S=Sound B=Bore R=Resistograph	# of Poles Inspections Planned for Next Annual Inspection Cycle	Total # of Poles Inspected (Cumulative) in the 8_year Cycle To Date	% of Poles Inspected (Cumulative) in the 8-Year Cycle To Date
461,789	57,414	64,193	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	V,E,P,S,B	57,724	86,148	18.66%

1

2

If b-c >0, provide explanation — No explanation required

If d-g >0, provide explanation — Once poles are identified for replacement, jobs must be engineered and new poles constructed. The difference between d and g represent those poles still in the engineering and construction phases. After new poles are set, AT&T Florida notifies third party attachers of the need to transfer and upon completion of the transfer work, AT&T Florida removes the old poles.

ATTACHMENT B

Pole Inspection Report

Company: AT&T Florida

Summary of Pole Inspections

Period: January 2007 – December 2007

Type of Inspection:

See response (1) in AT&T Florida's Annual Pole Inspection Report

Type of Pole: Class____ Material____ Vintage____ Installed Population____

See Attachment B-1 to this Attachment B.

Total Number of Wooden Poles in the Company Inventory

461,789

Number of Inspections Planned this Annual Inspection

57,414

The most efficient and effective pole inspection process is to perform inspections within a defined geography in conjunction with a power company performing wood pole inspections, as well. Within any defined geography, be it power company substation boundaries or AT&T Florida wire center boundaries, the mix of ownership of poles will vary. The "Planned" number of AT&T Florida inspections represents a twelve month average forecast of inspections, based on AT&T Florida's total pole population within the state of Florida and the requirement that all poles be inspected over an 8 year cycle.

Number of Pole Inspections Completed this Annual Inspection

64,193

The difference between the "Planned" and "Completed" figures does not represent a backlog of inspections or an acceleration of inspections. It is more

indicative of the areas selected for inspection during this period and the ownership ratios between AT&T Florida and power companies within the selected geographies. Future inspection periods may therefore result in more completions than the average forecast of planned inspections or in some cases less. AT&T Florida is committed to completing an inspection of all its poles over an 8 year period.

Number of Inspected Poles Addressing a Prior Backlog – 0

None

See explanation above for Number of Inspections Planned and Completed.

Number of Poles Failing Inspection

Of the 64,193 poles inspected, AT&T Florida identified [redacted] that warrant replacement as a result of the 2007 pole inspections.

The company identified an additional [redacted] poles that did not fail inspection, but that, based on an analysis of factors such as the existence and extent of any defects, the feasibility of remediation, and the scope of the associated transfer work, AT&T Florida intends to replace in the next 18 months.

Pole Failure Rate (%) this Annual Inspection

[redacted]

This rate is based on the fact that 64,193 poles were inspected and [redacted] were found as warranting replacement.

Number of Poles Designated for Replacement this Annual Inspection

As previously indicated, [redacted] poles have been designated for replacement as a result of the 2007 pole inspections. AT&T Florida has also decided to replace an additional [redacted] poles within an 18-month time frame even though such poles did not fail inspection.

Total Number of Poles Replaced this Annual Inspection and the Plan for Replacement of the Remaining Poles

In connection with the [redacted] poles designated for replacement as a result of the 2007 pole inspections, AT&T Florida has placed [redacted] new poles to date, and plans to place the remaining poles within 9 months from receipt of Osmose's final

inspection results. If Osmose discovers a pole that presents an imminent safety threat, Osmose notifies AT&T Florida and AT&T Florida replaces such poles on an expedited basis.

In connection with the [redacted] poles AT&T Florida has chosen to replace within 18 months, AT&T Florida has placed [redacted] new poles to date, and plans to place the remaining poles within 18 months from receipt of Osmose's final inspection results.

Number of Poles Requiring Minor Follow-Up

[redacted]

"Minor follow-up" is defined by a need to make a subsequent visit to a pole for some type of remediation work. Remediation work would include activities such as straightening a pole that may be leaning or installing a "truss" to brace a pole to correct a minor defect.

Number of Poles Requiring a Change in Inspection Cycle

[redacted]

Due to AT&T Florida's aggressive pole replacement criteria and remediation of poles identified as needing minor follow-up, [redacted] AT&T Florida owned poles were identified or are anticipated to require a change in inspection cycle.

Number of Poles that Required No Change in Inspection Cycle or Remediation

[redacted] - Total number of poles inspected less (the number of poles AT&T Florida plans to replace + the number of poles that require minor follow-up)

Number of Poles that Were Overloaded

[redacted]

See Response (1) in AT&T Florida's Annual Inspection Report for a more detailed description of the loading calculation process.

Number of Poles With an Estimated Remaining Pole Life of Less Than 8 Years

[redacted]

Due to AT&T Florida's aggressive pole replacement criteria and remediation of poles identified as needing minor follow-up, [redacted] AT&T owned poles in the inspection area will have a remaining pole life of less than 8 years.

Method(s) V=Visual, E=Excavation, P=Prod, S= Sound, B= Bore, R= Restiograph

AT&T Florida uses the Visual, Excavation, Prod, Sound and Bore inspection techniques.

Number of Pole Inspections Planned for Next Annual Inspection

57,414

The most efficient and effective pole inspection process is to perform inspections within a defined geography in conjunction with a power company performing wood pole inspections, as well. Within any defined geography, be it power company substation boundaries or AT&T Florida wire center boundaries, the mix of ownership of poles will vary. The "Planned" number of AT&T Florida inspections represents a twelve month average forecast of inspections, based on AT&T Florida's total pole population within the state of Florida and the requirement that all poles be inspected over an 8 year cycle.

Total Number of Poles Inspected (Cumulative) in the 8 Year Cycle to Date

86,148

Percentage of Poles Inspected (Cumulative) in the 8 Year Cycle to Date

18.76%

Status of Pole Replacement from 2006 Pole Inspection

In its 2006 pole inspection report, AT&T Florida indicated that [redacted] poles warranted replacement as a result of the 2006 pole inspections. This figure was reduced to [redacted] as a result of later discovering that another party owned the pole in question or that another party had already replaced the pole. Of the remaining [redacted] poles warranting replacement, AT&T Florida has placed [redacted] new poles, and has removed [redacted] of the old poles. AT&T Florida will continue to remove the remaining old poles upon completion of outstanding transfer work by the attaching entities.

In its 2006 pole inspection report; AT&T Florida designated an additional [redacted] poles for replacement within 18 months. This figure was later reduced to [redacted], for the same reasons referenced in the preceding paragraph. Of the remaining [redacted] poles designated for replacement within 18 months, [redacted] new poles have been placed and [redacted] of the old poles have been removed to date.

Attachment B-1

Type of Pole: Class__ Material__ Vintage__ Installed Population___

The following table represents the Installed Population of AT&T Florida owned poles, by Class and Vintage.

- AT&T Florida does not keep records as to the type, or material of poles owned by AT&T Florida. AT&T Florida is not aware of any pole within the Installed Population that is anything other than Southern Pine. No result of any inspection during this period identified any pole material other than Southern Pine.
- This data is derived from an extract from AT&T Florida Property Records.

	A	B	C	D	E	F	G	H	I	J	
	CLASS										
VINTAGE	0	1	2	3	4	5	6	7	9	Grand Total	
1901											1
1908											2
1909											3
1910											4
1913											5
1914											6
1916											7
1917											8
1918											9
1919											10
1920											11
1921											12
1922											13
1923											14
1924											15
1925											16
1926											17
1927											18
1928											19
1929											20
1930											21
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1938											29
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1940											31
1941											32
1942											33
1943											34
1944											35

	A	B	C	D	E	F	G	H	I	J	
1945											1
1946											2
1947											3
1948											4
1949											5
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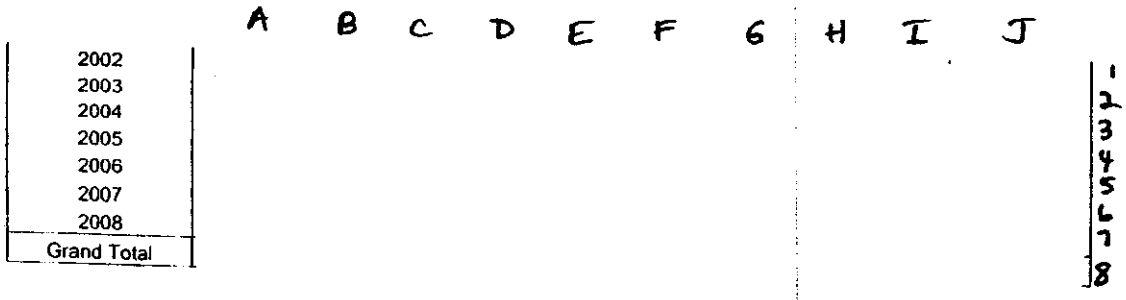
A B C D E F G H I J
2002
2003
2004
2005
2006
2007
2008
Grand Total
1
2
3
4
5
6
7
8

Type of Pole: Class__ Material__ Vintage__ Installed Population___

- The following table represents the percentage of the Installed Population of AT&T Florida owned poles, based on vintage.

- AT&T Florida does not keep records as to the type, or material of AT&T Florida owned poles. AT&T Florida is not aware of any pole in within the Installed Population that is anything other than Southern Pine. No result of any inspection during this period identified any pole material other than Southern Pine.

- This data is derived from an extract from AT&T Florida Property Records.

	A	B	C	D	E	F	G	H	I	J
	CLASS									
VINTAGE	0	1	2	3	4	5	6	7	9	Grand Total
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1909										3
1910										4
1913										5
1914										6
1916										7
1917										8
1918										9
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1943										34
1944										35
1945										36

	A	B	C	D	E	F	G	H	I	J	
1946											1
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1951											6
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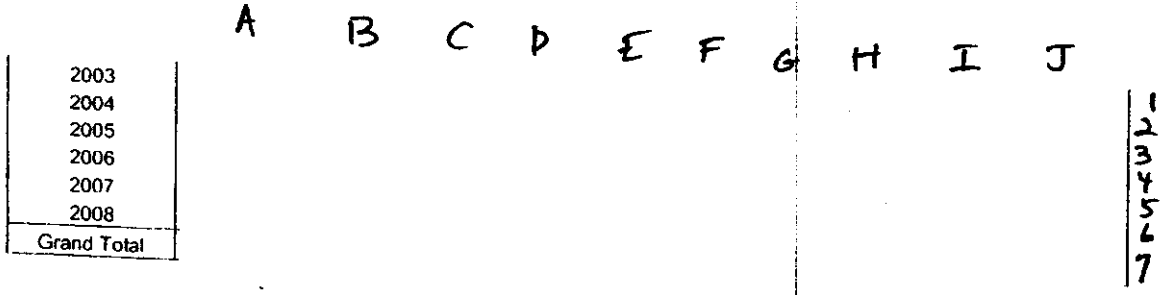
2000											55
2001											56
2002											57


A
B
C
D
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2003
2004
2005
2006
2007
2008
Grand Total
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