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March 1, 2010

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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RECEIVED-FPSC
10 MAR - 1 PM 4: 14
COMMISSION
CLERK

**Re: AT&T Florida's Pole Inspection Report
January 2009 thru December 2009**

Dear Ms. Cole:

Enclosed for filing is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Pole Inspection Report for the period January 2009 through December 2009. The attached report has been redacted to protect confidential proprietary business information. The confidential version of the report is being filed separately. The report is being filed pursuant to order No. PSC-06-0168-PAA-TL in docket No. 060077-TL and Order No. PSC-07-0198-PAA-PU in Docket No. 070634.

Sincerely,

Tracy W. Hatch

- COM _____
- APA _____
- ECR _____
- GCL Enclosures
- RAD** _____
- SSC _____ cc: All parties of record
- ADM _____ Jerry D. Hendrix
- OPC _____
- CLK _____ Gregory R. Follensbee
- E. Earl Edenfield, Jr.

This confidentiality request was filed by or for a "telco" for DN 01379-10. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER-DATE
01378 MAR-1 2010
FPSC-COMMISSION CLERK



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CLERK

March 1, 2010

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: AT&T Florida's Pole Inspection Report
January 2009 thru December 2009
CONFIDENTIAL VERSION**

Dear Ms. Cole:

Enclosed for filing is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Specified Confidential Classification of it Pole Inspection Report for the period January 2009 through December 2009.

Sincerely,

Tracy W. Hatch

Enclosures

cc: All parties of record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

DOCUMENT NUMBER-DATE

01378 MAR-10

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

BellSouth Telecommunications, Inc. d/b/a AT&T)
Florida's Pole Inspection Report January 2009)
through December 2009)
_____)

Filed: March 1, 2010

**AT&T FLORIDA'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby files its Request for Specified Confidential Classification.

1. On March 1, 2010, AT&T Florida filed its Annual Pole Inspection Report for the Period from January, 2009 through December, 2009 pursuant to Florida Public Service Commission Order No. PSC-06-0168-PAA-TL in Docket No. 060077-TL, and Order No. PSC-07-0918-PAA-PU in Docket No. 070634-EI and Docket No. 070635-TL. AT&T Florida's Pole Inspection Report contains information to be considered confidential business information.

2. Pursuant to Rule 25-22.006, AT&T Florida hereby files this Request for Specified Confidential Classification because the above document contains information considered confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. A more specific description of this information is contained in Attachment A.

3. Public disclosure of this information would cause competitive harm to AT&T Florida and provide competitors with an unfair advantage. The information discussed in this Request for Specified Confidential Classification is valuable and AT&T Florida strives to keep it secret. Therefore, such information should be classified as

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FPSC-COMMISSION CLERK

confidential business information pursuant to Section 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, *Florida Statutes*.

4. Attachment A to AT&T Florida's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by AT&T Florida as confidential.

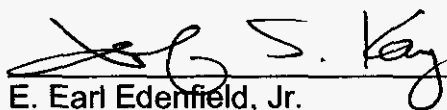
5. Attachment B to AT&T Florida's Request for Confidential Classification is redacted copies of the document containing the confidential information.

6. Attachment C to AT&T Florida's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

WHEREFORE, based on the foregoing, AT&T Florida respectfully requests that, pursuant to Section 364.183, *Florida Statutes*, the Commission enter an order declaring the information described above to be confidential, *proprietary business information* that is not subject to public disclosure.

Respectfully submitted this 1st day of March, 2010.

AT&T FLORIDA



E. Earl Edenfield, Jr.
Tracy W. Hatch
Manuel A. Gurdian
Jennifer S. Kay
c/o Gregory R. Follensbee
150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5558

**REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF
AT&T FLORIDA'S POLE INSPECTION REPORT
JANUARY 2009 THROUGH DECEMBER 2009**

Explanation of Proprietary Information

1. This information is considered by BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") to be proprietary confidential business information within the scope of Section 364.183(3) of the Florida Statutes. The information is intended to be and is treated by AT&T Florida as private, and has not otherwise been disclosed to the public. Further, the disclosure of this information would cause harm to the Company's business operations as third parties may attempt to take the information out of context and use it to form a predicate for claims or lawsuits against the Company. To the extent a third party had a valid claim or lawsuit against the Company, that party would have the opportunity to seek this information through the discovery process in a legal action. AT&T Florida does not concede that such claims or lawsuits would have merit and, to the contrary, believes that its infrastructure has performed well in past storms.
2. This information is the product of an internal audit of AT&T Florida's Pole inventory and, thus, is considered proprietary confidential business information by the Company within the scope of Section 364.183(3) of the Florida Statutes.

Location

Reason

Page 4; D-2, E-2, F-2, G-2, H-2, I-2	1, 2
Page 6; Lines 13, 15, 20, 22, 24, 26, 30 and 31	1, 2
Page 7; Lines 3, 4, 8, 14, 16, 19, 22, 26 and 28	1, 2
Page 8; Lines 19 thru 21, 24 thru 26	1, 2
Page 9; Columns A thru I; Lines 1 thru 23	1, 2
Page 10; Columns A thru I; Lines 1 thru 43	1, 2
Page 11; Columns A thru I; Lines 1 thru 34	1, 2
Page 12, Columns A thru I; Lines 1 thru 27	1, 2
Page 13, Columns A thru I; Lines 1 thru 43	1, 2
Page 14, Columns A thru I; Lines 1 thru 31	1, 2

ATTACHMENT B

**AT&T Florida
AT&T Florida's Pole Inspection Report January 2009 through December 2009
Page 1 of 1
03/01/09**

**REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF
AT&T FLORIDA'S POLE INSPECTION REPORT
JANUARY 2009 THROUGH DECEMBER 2009**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

Annual Pole Inspection Report of BellSouth Telecommunications, Inc d/b/a
AT&T Florida
January 2009 – December 2009

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, 2009 – December, 2009. The Annual Wood Pole Inspection Report spreadsheet required by the Revision to the Pole Inspection Order is included as Attachment 1 to this report.

This report also reflects the Revisions to the Annual Reporting Requirements pursuant to Order NO. PSC-07-0918-PAA-PU, Docket NO. 070635-TL, Docket NO. 070634-EI, Issued November 14, 2007

- 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, Florida Keys Electric Cooperative, Orlando Utility, City of Homestead Electric and Gulf Power Company to perform inspections in 2009. 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*

➤ **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 2009, AT&T Florida performed pole inspections in South Florida, Central Florida, Northeast Florida 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.

REDACTED

ORDER NO. PSC-07-0918-PAA-PU
DOCKET NOS. 070634-EI, 070635-TL

ATTACHMENT 1

**AT&T Florida
Annual Wood Pole Inspection Report
Reporting Year 2009**

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
461,173	57,646	61,957	■	■	■	■	■	■	V,E,P,S,B	57,646	218,499	47.4%

If b-c >0, provide explanation

No explanation required

If d-g >0, provide explanation

Poles identified for replacement are engineered, constructed, submitted for transfer by third parties and then for removal of old pole.
The difference between d and g represent those poles in the 'pipeline' of poles identified during the 2009 Annual Inspection

ATTACHMENT B

Pole Inspection Report

Company: AT&T Florida

Summary of Pole Inspections

Period: January 2009– December 2009

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

461,173

Number of Inspections Planned this Annual Inspection

57,646

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

61,957

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.

1-6-2009-8

Number of Inspected Poles Addressing a Prior Backlog - 0

9

None

10

See explanation above for Number of Inspections Planned and Completed

11

Number of Poles Failing Inspection

12

Of the 61,957 poles inspected, AT&T Florida identified [REDACTED] that warrant replacement as a result of the 2009 pole inspections.

13
14

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.

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Pole Failure Rate (%) this Annual Inspection

19

[REDACTED]

20

This rate is based on the fact that 61,957 poles were inspected and [REDACTED] were found as warranting replacement.

21
22

Number of Poles Designated for Replacement this Annual Inspection

23

As previously indicated, [REDACTED] poles have been designated for replacement as a result of the 2009 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.

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

28

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In connection with the [REDACTED] poles designated for replacement as a result of the 2009 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

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threat, Osmose notifies AT&T Florida and AT&T Florida replaces such poles on an expedited basis.

1

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.

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Number of Poles Requiring Minor Follow-Up

[REDACTED]

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“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.

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Number of Poles Requiring a Change in Inspection Cycle

[REDACTED]

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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.

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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)

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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.

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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.

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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

57,646

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

218,499

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

47.4%

Status of Pole Replacement from 2008 Pole Inspection

In its 2008 pole inspection report, AT&T Florida indicated that [REDACTED] poles warranted replacement as a result of the 2008 pole inspections. Of these [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 2008 pole inspection report, AT&T Florida designated an additional [REDACTED] poles for replacement within 18 months. 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.

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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.

Vintage	Class of Poles									Total
	A	B	C	D	E	F	G	H	I	
1908	1									1
1909	2									2
1910	3									3
1913	4									4
1914	5									5
1916	6									6
1918	7									7
1919	8									8
1920	9									9
1921	10									10
1922	11									11
1923	12									12
1924	13									13
1925	14									14
1926	15									15
1927	16									16
1928	17									17
1929	18									18
1930	19									19
1931	20									20
1932	21									21
1933	22									22
1934	23									23

	A	B	C	D	E	F	G	H	I
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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.

Vintage	Class of Poles								Grand Total
	A 1	B 2	C 3	D 4	E 5	F 6	G 7	H 9	
1908									
1909									
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REDACTED

	A	B	C	D	E	F	G	H	I	
1939										1
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1981										43

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ATTACHMENT C
AT&T Florida
AT&T Florida's Pole Inspection Report January 2009 through December 2009
Page 1 of 1
03/01/09

REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF
AT&T FLORIDA'S POLE INSPECTION REPORT
JANUARY 2009 THROUGH DECEMBER 2009

ONE HIGHLIGHTED COPY

COMMISSIONERS:
NANCY ARGENZIANO, CHAIRMAN
LISA POLAK EDGAR
NATHAN A. SKOP
DAVID E. KLEMENT
BEN A. "STEVE" STEVENS III

STATE OF FLORIDA



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

DATE: March 1, 2010

TO: Tracey Hatch, At&T

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 100000 or, if filed in an undocketed matter, concerning Pole Inspection Report for 1/09 through 12/09, and filed on behalf of At&T. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.

DOCUMENT NUMBER - DATE
01379 MAR-10
PSC-COMMISSION CLERK

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