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May 3, 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

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated is a letter to Beth Salak dated May 3, 2006, including Sprint's Wood Pole Inspection and Reporting Plan. This information is being provided as Sprint committed to in its March 22, 2006 Petition and Protest of Order No. PSC-06-0168-PAA-TP. 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,

A handwritten signature in cursive script that reads "Susan S. Masterton".

Susan S. Masterton

Enclosure

**CERTIFICATE OF SERVICE
DOCKET NO. 060077-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 3rd day of May, 2006 to the following:

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

Carl Vinson
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Lisa Harvey
Florida Public Service Commission
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Tallahassee, FL 32399-0850

Rick Moses
Florida Public Service Commission
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
Tallahassee, FL 32301-7748



Susan S. Masterton
Susan S. Masterton



F. B. (Ben) Poag
Director - Regulatory

Regulatory Affairs
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May 3, 2006

Ms. Beth Salak
Director, Competitive Markets and Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dear Ms. Salak:

Attached is the wood pole inspection plan Sprint committed to file in its March 22, 2006 Petition and Protest of Order No. PSC-06-0168-PAA-TP. Sprint will implement this plan pending resolution of the Protest. The plan meets all of the applicable requirements of the National Electric Safety Code (NESC) and provides a rational balance of providing safe, reliable service while controlling costs to current and future customers.

Clearly, in the increasingly competitive communications market, maintaining an appropriate balance between cost of service and service quality is critical to meet customers' expectations. We believe that the attached wood pole inspection program reflects that reasonable balance. It is Sprint's intent that this plan provide a basis for discussions among Commission staff and the parties to Sprint's Protest, with the goal of reaching an agreement regarding an inspection plan for Sprint that would allow Sprint's Protest to be resolved without the need for a hearing.

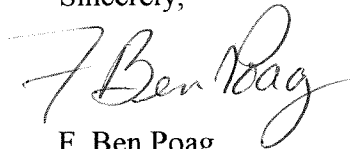
The following is a brief summary of Sprint's proposed wood pole inspection plan:

- Sprint will inspect the identified higher risk poles on an 8-year cycle.
- Sprint will continue to inspect all other poles during the normal course of business.
- Sprint will collect, record and report pole inspection data in accordance with the requirements of Order No. PSC-06-0168-PAA-TL.
- Sprint will use the sound and bore technique, but reserves the right to use a different technology if found to be equally or more reliable and less invasive.
- Higher risk poles will include all poles that are 10 years and older that:
 - ◆ Carry electrical circuits greater than 750 volts to ground or
 - ◆ Are 35 feet or taller.
- Sprint will tag inspected poles and report pole inspection results to the Commission by March 1 of each year, beginning in 2007.
- Sprint will enhance its load bearing calculation methodology to ensure poles are not overstressed.

The detailed inspection plan is attached and includes a comprehensive explanation and supporting rationale for the plan. Sprint believes that this plan meets the Commission's safety and service objectives. The plan is cost-and safety-effective to the extent that it focuses resources on the higher-risk, taller, weight-bearing poles. It also mitigates the additional costs of inspecting on a scheduled basis, as opposed to normal course of business, poles that are less than 35 feet which, as explained in the attached, have significantly less probability of failure. The plan benefits customers to the extent that it minimizes the total costs of the inspection process, costs that must be recovered through revenues paid by customers.

If you have any questions concerning the attached inspection plan, please let me know. Sprint looks forward to working with the Commission staff and other parties to ensure that Sprint implements a cost-effective pole inspection program that ensures the safety and reliability of Sprint's facilities.

Sincerely,

A handwritten signature in cursive script that reads "F. Ben Poag". The signature is written in black ink and is positioned to the left of the typed name.

F. Ben Poag
Director – Regulatory Affairs

cc: Susan S. Masterton, Sprint

**WOOD POLE INSPECTION AND
REPORTING PLAN**

Sprint Florida, Incorporated

May 3, 2006

Docket No. 060077-TL

1.0 Inspection Methodology

1. Abstract

Sprint Florida, Incorporated 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 Sprint is in a distinctly different situation than that of the power industry for the majority of its poles. However, the 35' and taller poles are more akin to the power industry poles.

Sprint will inspect its poles that meet the selection criteria of higher risk poles in an 8-year cycle. All other Sprint-owned poles will continue to be inspected and documented in the normal course of business. Poles found to be defective or not of sufficient strength to carry the imposed load, will be documented and reported and Sprint will take remedial action using an established process, i.e. the Irregular Plant Condition process.

If Sprint's analysis of the inspection results indicate that a geographic area experiences more decay due to environmental influences or bug infestation, Sprint 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 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.

Sprint will place all poles over 30 feet with and without the specified electrical attachments reaching the age of 10 years into the program and these poles will be inspected on an 8-year cycle. Poles over 30 feet without electrical attached are not considered higher risk but will be included in the proposed inspection plan for simplicity of defining the plan.

Sprint also will enhance its load calculation program based on the data provided by the attaching entity to illustrate cumulative load and ensure that higher risk poles, i.e., higher than 30 feet, are not overstressed.

2.0 Pole Inspection Methodology

Sprint will inspect, in an 8-year cycle, all poles that are greater than 10 years old and higher than 30 feet. Additionally, in the unlikely event that there are poles 30 feet or less that carry electric circuits greater than 750 Volts to Ground, these poles also will be included in the 8-year inspection cycle. Poles higher than 30 feet reaching 10 years will be included in the inspection schedule in their 11th year. Additionally, Sprint will:

- 2.1 Utilize the sound and bore technique unless the Resistograph or another technology proves to be more reliable, less invasive and more efficient than the sound and bore methodology.
- 2.2 Record results, and update Sprint's engineering work order and facility systems
- 2.3 Place an inspection tag on each pole delineating the date of the inspection
- 2.4 Report defective poles to engineering for structural bracing or replacement as dictated by the inspection
- 2.5 Provide a summary of the pole inspection results to the FPSC

3.0 Pole Inspection Requirements per the NESC

Sprint will fully comply with Rule 25-4.036, Florida Administrative Code (F.A.C.), Design and Construction of Plant and the 2002 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. Sprint 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 indicates the winds are calculated at a 10 meter /33 foot height. Since the majority of the Sprint poles are 30 feet or shorter, those poles are excluded from NESC load requirements, however if a Sprint pole carries electric company circuits that exceed 750 volts to ground, those poles will be included in the inspection schedule.

4. Pole Inspection Procedures

Sprint Florida owns and maintains approximately 38,800 poles within the boundaries of its Florida service areas. Sprint will inspect poles that meet the selected criteria, as identified in section 1.2, over an 8-year cycle. Sprint will collect data essential for reporting and remediation consistent with Order No PSC-06-0168-PAA-TL. Additionally, Sprint will continue to inspect as normal course of business all other poles not meeting the criteria identified in section 1.2.

- 4.1 Sprint will perform a sound and bore test. However, Sprint reserves the right to use a different technology if it is proven to be equally or more accurate, is less invasive and a more cost effective method of testing.
- 4.2 Results will be used to update Sprint engineering work order and facility records.
- 4.3 Annual inspection results will be reported to the Florida Public Service Commission by March 1 of each year with the first report by March 1, 2007. The information contained in the report will comply with the Pole Inspection Order. However, due to the timeframe required to initiate an effective inspection process and other notification required between utility pole owners the first report will not be a full 12 month inspection report.
- 4.4 Poles that have been inspected will be tagged with the year the inspection was performed.

5. Specific Pole Data Accumulation

Sprint will utilize the following methods to ensure the selected poles are inspected over an 8-year timeframe:

- 5.1 Implement a schedule of pole inventories by wire center
- 5.2 Conduct mutual inspections with electric companies as the agreements between the parties dictate
- 5.3 Utilize a contracted work force to perform pole inspections to complement Sprint trained technicians
- 5.4 Record data for each pole inspected
- 5.5 Pole specific data will include
 - 5.5.1 Number of poles inspected by size and class
 - 5.5.2 Number of poles passing test
 - 5.5.3 Number of poles failing inspection/ reasons for failure
 - 5.5.4 Number of poles requiring minor follow up
 - 5.5.4.1 Minor follow-up encompasses cosmetic improvements, where structural integrity and safety is not compromised

- 5.5.5 Number of poles requiring a change in inspection cycle
- 5.5.6 Number of poles replaced, braced or trussed as a result of the inspection/reason for replacement
- 5.5.7 Number of poles exceeding acceptable load limits
- 5.5.8 Number of poles with an estimated pole life less than 8 years
- 5.5.9 Number of poles replaced not associated with inspection program and reason for replacement

Sprint 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.

6. Compliance

Sprint will ensure compliance through internal processes as follows:

- 6.1 Periodic quality assurance of the contractor or company employees performing the pole inspections and the quality of the data captured
- 6.2 Quarterly progress reports to Network Services operation Director Engineering
- 6.3 Ensure resources are maintained to meet annual pole inspection requirements

7. Poles Inspected During Normal Course of Business

Poles found to be unsafe by technicians during normal course of business in compliance with Sprint Practice 010-100-009 Climbing Equipment, Climbing Safety, Testing Poles and Working On Poles will be tagged per Sprint 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.

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