

REQUEST TO ESTABLISH DOCKET

(Please Type)

Date:	1/5/2007	Docket No.:	070096 - T1
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1. Division Name/Staff Name:	Cmp/Salak
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2. OPR:	CMP
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3. OCR:	GCL
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4. Suggested Docket Title:	Determination of TDS Telecom's Compliance with Commission Order Regarding Telephone Wood Poles Inspection Plan
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5. Suggested Docket Mailing List (attach separate sheet if necessary)

A. Provide NAMES OR ACRONYMS ONLY if a regulated company.

B. Provide COMPLETE NAME AND ADDRESS for all others. (Match representatives to companies.)

1. Parties and their representatives (if any):

TDS Telecom	

2. Interested persons and their representatives (if any):

6. Check one:

Documentation is attached.

Documentation will be provided with recommendation.

DOCUMENT NUMBER-DATE
01086 FEB-15

January 3, 2007

Beth W. Salak, Director
Division of Competitive Markets &
Enforcement
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. ~~060077~~^{070096-TI}-TL; Local Exchange Companies Telephone Pole
Inspection Program

Dear Ms. Salak:

On February 7, 2006, the Florida Public Service Commission's (FPSC or Commission) adopted, with minor modifications, staff's recommendation for companies to implement an eight-year telephone inspection program. On March 1, 2006, the Commission issued Order No. PSC-06-0168-PAA-TL (PAA Order), requiring the companies to file plans for implementing an eight-year telephone pole inspection program. At the February Agenda Conference, commissioners made it clear their position on the importance of this program and strongly encouraged companies not to protest the order. TDS' intent was to comply with the order and did not file a protest.

In an effort to comply with the Commission's wood pole inspection program as quickly as possible, TDS' Network Services Department contracted with an outside vendor to begin sound and bore inspections prior to the issuance of the Commission order. The inspection began the week of March 27. Subsequent to the issuance of the Commission order, it was determined that the contract did not meet all of the requirements set forth in the order. TDS' Network Services Department pulled the contractor off the job in order to renegotiate the contract.

During these negotiations, TDS' contractor informed Network Services that Verizon intended to perform their pole inspections using a resistograph, which would eliminate the need to excavate the poles thus reducing the cost of the pole inspection program. Based on this information and the cost reduction, TDS' Network Services entered into a new pole inspection contract using the resistograph.

Given Network Services understanding that Verizon was using the resistograph to complete its pole inspections, Network Services personnel did not realize that if TDS employed the same process that they would need to file for a waiver of the Commission order. It was not until TDS completed inspection of over half of the poles that I became aware that TDS was using the resistograph at which time I shared this information with Commission staff.

TDS acknowledges that its poles inspection program deviated from Commission Order No. PSC-06-0168-TL. However, TDS uses of the resistograph was not a willful intent to disregard the Commission order but rather a misunderstanding that we would need to request a waiver of the Commission order prior to using the resistograph.

While the Commission order required that the pole inspection program be completed over an eight-year cycle, TDS has completed the inspection of 100% of the company-owned poles. TDS is currently in the process of reviewing the data which will be filed with the Commission as set forth in Order No. PSC-06-0168-TL.

If you have any questions please contact me at (850) 875-5207.

Sincerely,

Thomas M. McCabe
Manager – External Affairs
TDS TELECOM