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November 10, 2021

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

Re: Docket No. 20210138-PU - Proposed adoption of Rule 25-18.020, F.A.C, Pole Inspection and Maintenance.

Dear Mr. Teitzman:

Enclosed for filing are BellSouth Telecommunications LLC, d/b/a AT&T Florida's Responses to Staff's Data Request dated October 21, 2021, which we ask that you file in the above captioned docket.

Sincerely,

Tracy Hatch

TWH/vs
Attachments

FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Adoption of Rule 25-18.020, FAC Pole Inspection and Maintenance Plan	)	Docket No. 120208-TX
	)	Filed: November 10, 2021

AT&T's Response to Staff's Data Request dated October 21, 2021

1. Please provide the total number of poles owned by your company that have public utility attachments.

AT&T has 279,515 poles with public utility attachments as or 2019.

2. Please provide the current maintenance inspection cycle or schedule for poles with public utility attachments.

AT&T participates jointly with Florida Power & Light on a pole inspection program within FPL's territory. The inspection cycle is 8 years. We do not participate in a pole inspection program with any other investor owned electric company. In these areas AT&T relies on its technician and engineering force to perform the pole testing methods described in Question #3. AT&T's technicians force perform these activities on a daily basis prior to work beginning on a specific pole location. AT&T's engineering force perform these activities when designing new attachments to specific pole locations. The current maintenance inspection cycle started mid-September 2014 and is on-going in Florida Power & Light territory.

3. Please provide the current maintenance techniques used for poles with public utility attachments.

The Osmose pole inspection program is the current maintenance technique used, which includes inspection and application of remedial treatments. The T-Zone practice defines T-Zone quality guidelines that apply to all construction work forces. The document details responsibilities for each work group that manages and performs installation, rearrangement, turn up, maintenance, and removal of outside plant items for the 21 states in which AT&T operates as an incumbent local exchange carrier.

Types of Remedial Preservatives

Preservative Pastes & Bandages are designed to prevent external decay in the groundline zone (the area with the greatest risk for strength loss). Pastes and bandages are applied to excavated poles after existing decay has been removed.

Fumigants are the ideal preservative to protect heartwood and the inner regions of the pole from decay. Fumigants produce vapors that diffuse and travel both vertically and horizontally from the application point, eliminating wood-destroying fungi and insects.

Solid Rods are easy-to-handle formulations of water-soluble preservatives designed to protect poles from internal decay. When in contact with moist wood, rods dissolve and diffuse following the path of moisture to provide a pattern of protection against future decay.

Liquid Internal Treatments are the ideal preservative to apply to internal voids and insect cavities.

Inspection Methods

Osmose inspection method

Sound and Selective Bore: Poles are "sounded" with a hammer to detect internal decay. Poles that show signs of internal decay (based on the sound test) are bored to determine the location and extent of the decay.

Sound & Bore: Poles are "sounded" with a hammer to detect internal decay and poles are bored to determine the location and extent of the decay.

Sound & Bore with Partial Excavation & Selective Treatment: Poles are "sounded" with a hammer to detect internal decay and bored to determine the location and extent of decay. Poles that show signs of internal or external decay are fully excavated to a depth of 18" to determine the extent of decay at the groundline. Decayed wood is removed, and a preservative paste is applied to protect the remaining sound wood.

AT&T inspection method

Physical Testing Techniques for Examining Poles

A visual inspection of the condition of a pole is the first step in testing a pole. In addition to the visual inspection, one or more of the following tests for pole soundness and mechanical integrity are conducted before a work operation begins on a pole.

Sound Test

Using an approximately 3-lb hammer (e.g., lineman hammer), strike the pole on all sides from the groundline to as high as can be reached. The sounding test consists of applying blows with a hammer to the pole surface completely around the pole from points close to the groundline to as high as can conveniently be reached. The presence of a hollow condition or advanced internal decay can usually be recognized by the characteristic hollow or dull sound resulting from the blows on the wood. A pole free from decay usually sounds clear and the hammer usually rebounds noticeably when the pole is struck sharply and squarely. Wet surfaces due to high soil moisture, wide cracks, or shakes in the pole near the surface may change the sound of a solid pole. Care must be taken not to mistake the altered sound due to these causes for the sound associated with internal decay. The traditional sounding with the 3-lb hammer relies on the experience and training of the lineman in the field.

Prod Test

Using a pole prod tool or lineman's screwdriver with a shaft of 5 inches in length or longer, insert the tool at a 45-degree angle below the groundline and attempt to force or strike the prod tool into the pole at two or three locations around the circumference of the pole. Wood decay

will be evident by the ease with which the tool penetrates the pole. A sound pole should firmly resist the prod penetration.

Prod Test - Below Groundline Inspection
Since decay most often occurs at and below the groundline, it is advantageous to excavate at the base of the pole to a depth of 6 inches and perform the 45-degree prod test below ground level. Excavation should be accomplished with hand tools depending on the soil type and time of year. It may be useful to break the ground with a digging bar or shovel if necessary.

NOTE: If one is unable to excavate (e.g., poles that are set in concrete and asphalt), the prod test at the groundline of the pole should be performed at 4 points, 90 degrees apart with the prod tool angled downwards at approximately 45 degree to better detect decay below the groundline.

NOTE: As an option for avoiding excavation, one can place the prod tool a few (2-3) inches from the pole surface and drive it at 45 degrees through the soil to make contact with and enter the pole 2-3 inches below the groundline. Although this method does allow a more rapid test, it is advisable to excavate if an indication of decay is found through this procedure. When using the pole prod, place the point against the pole surface and push. Do not jab it into the pole since this action may well remove a slab of treated wood. This is important when inspecting poles of the shallow sapwood species. Removal of the thin treated sapwood will expose untreated heartwood to attack and decay by fungi and micro-organisms. If convenient, sound the exposed pole section below the groundline for the presence of hollow heart or enclosed decay pockets. If soil is excavated for this below groundline test, then replace the earth after the test is complete by firmly packing it around the circumference of the pole. If the earth replaced is insufficient to fill the hole and to make a small mound around the pole to compensate for settling, then obtain additional earth and use it for this purpose. Stones removed during the excavation for inspection should be replaced against the pole surface when backfilling.

4. For your most recent maintenance inspection cycle/schedule for poles identified in question 1, please provide the following information:

a. The number of poles that were scheduled for inspection;

The schedule of the inspection is governed by FPL pursuant to agreement. As an inspector enters a quadrant, the goal is to inspect 1/8 of the poles owned by AT&T in a calendar year.

b. The number of poles actually inspected;

170,933

c. The number of poles that failed inspection;

A total of 20,292 poles failed inspection. Non-Priority Poles - 18469; Priority Poles – 1823.

Note: A priority pole is a pole that is in need of immediate attention (restoration or replacement); usually has average shell of one inch for distribution and two inches for transmission or less, or less than one-third of its original circumference.

d. The number of poles strength tested;

144,590

e. The number of poles that failed strength testing;

10,422

f. The number of poles repaired and a summary of the repairs;

12,447 poles were restored by installing a C2 truss.

g. The number of poles replaced and reason for replacement;

22,116 poles were replaced between January 2014 to October 2021 due to failed inspection, overloaded pole condition or storm restoration.

h. The number of poles relocated and reason for relocation;

468 poles were relocated between January 2018 to October 2021 due to customer or government agency request.

i. The total miles of vegetation management conducted;

253 miles vegetation management was performed between January 2019 to October 2021.

j. The total miles of vegetation management conducted for each technique used.

Vegetation management is conducted when AT&T is placing new cable and/or replacing a section of cable. The vegetation is cleared or trees are trimmed to provide a path for the cable. Vegetation is also cleared when necessary to repair or restore service.

AT&T does not track vegetation management by type of technique used to clear vegetation.

NOTE: AT&T's Joint Use Agreements preclude it performing tree trimming if the possibility exists at any time of the item requiring trimming coming into contact with the power company's electrical conductors. No tree trimming shall be permitted, if the possibility exists at any time, of the item requiring trimming coming in contact with the power company's electrical conductors. No tree trimming shall be permitted if the approach distances do not meet the requirements of table 2.1 shown below. Table 2-1 describes the minimum distance required when using a tree pruning tool or operating an

aerial lift vehicle used in line clearance. These situations should be referred to the power company and/or outside tree trimming contractor for resolution.

Figure 1.Minimum Approach Distances

Table 2-1 Minimum Approach Distances (MAD)

Voltage (*) Phase to Phase	Minimum Approach Distances (**)	
	(ft-in)	(m)
300 V and less	Avoid Contact	Avoid Contact
301 V to 750 V	1-1	0.33
751 V to 15 kV	2-2	0.65
15.1 kV to 36 kV	3-0	0.91
36.1 kV to 46 kV	3-6	1.07
46.1 kV to 72.5 kV	4-0	1.21
72.6 kV to 121 kV	4-9	1.43
121.1 kV to 145 kV	5-3	1.60
145.1 kV to 169 kV	5-10	1.78
169.1 kV to 242 kV	7-6	2.29
242.1 kV to 362 kV	12-2	3.70
362.1 kV to 420 kV	14-11	4.55
420.1 kV to 550 kV	23-7	5.38
550.1 kV to 800 kV	23-8	7.19

5. Please provide the criteria/standards used for replacement of existing poles with public utility attachments.

Failure of the pole inspection and testing performed by AT&T employees or the Osmose pole inspection program referenced in question 3 are the criteria used to determine if an existing pole needs to be replaced.

6. Please provide the criteria/standards used for construction of new poles with public utility attachments.

Standards for placing a new pole are dependent on the type of facilities that will be placed on the pole. The types of facilities are encompassed with the Classification of Pole lines.
The classification of telephone pole lines is in accordance with their importance from a service standpoint and is essential to their proper construction and maintenance. Pole lines carrying communication circuits only are divided into five classes on the basis of their scope of the service provided. Pole lines carrying both communication and power circuits are divided into two classes and are constructed and maintained in accordance with the provisions of the current dition of the National Electrical Safety Code (NESC). Lines carrying circuits essential to the national defense and security of the country are classified in accordance with the restoration priorities established in Defense Mobilization Order 3000.1. The seven classes of pole lines and a brief description of them are shown in the following table:

CLASSIFICATION OF POLE LINES	
Class of Line	Description
AA	Over 180 toll circuits or 1800 exchange pairs. Priority I defense circuits.
JB	Lines carrying both communication and power circuits of Grade B construction as defined in the National Electrical Safety Code.
A	100 to 180 toll circuits or 1000 to 1800 exchange pairs. Priority II defense circuits.
JC	Lines carrying both communication and power circuits of Grade C construction as defined in the National Electrical Safety Code.
B	Less than 100 toll circuits or 400 to 1000 exchange pairs. Priority III defense circuits.
C	Exchange only - 25 to 400 exchange pairs.
R	Less than 25 exchange pairs. 1-6M strand or less, 2 multiple line wires or 1 crossarm of open wire.

It is intended that all pole lines of a given class should be built and maintained so as to have the same relative resistance against the loads to which they will be subjected regardless of the storm loading area in which they are located. Pole lines of several classes are built and maintained at strength levels commensurate with their relative service values. This is accomplished by variations in the maximum per cent of fiber stress of a pole timber which may be used for computing the size of pole required to support a given load when new and the amount a pole may deteriorate before it should be replaced.

Lines Carrying Both Communication and Power Facilities

Pole lines used jointly with an electric light or power company are classified either as Class JC or Class JB depending on whether they must meet the requirements for Grade C or Grade B construction as defined in the National Electrical Safety Code. Class AA and Class JB lines are built and maintained at the same strength level. Class JC lines are built and maintained at a strength level midway between the levels for Class A and Class B lines. However, if a jointly used line which would be rated as Class JC under the rules of the NESC carries sufficient toll circuits or exchange pairs to rate it as Class A or Class AA it should be built and maintained at the Class A or Class AA strength level.

7. Please provide the criteria/standards used for repair of existing poles with public utility attachments.

AT&T utilizes the Osmose pole restoration system for repair of existing poles. Osmose pole restoration systems provide reliable, long-term solution for extending service life and repairing the existing pole. Osmose restoration systems:

- Restore poles to code-mandated strength
- Add decades of service life
- Improve structural resiliency of the grid

Determining Restoration Candidates

(**Note:** The following procedure has worked effectively for typical distribution poles. Transmission or very large poles should be evaluated to determine if any modifications to average shell thickness are necessary.)

After Initial Inspection

After initial inspection has revealed the pole to be a reject, the following shall be performed:

- Sound the pole thoroughly above groundline again. Concentrate at the zone 15" to 6 feet above groundline.
- Drill at 15" above G/L against the line of lead. There must be a 2" average of decay-free shell. A minimum of four (4) borings should be made to determine average shell thickness. If the average decay-free shell at 15" is less than 2" go to next step. If the average shell is 2" or greater, go to the Drill at 5feet step. Drill at 5 feet above G/L against the line of lead. For poles with Heart Rot (decay in all four quadrants of the pole) or multiple internal decay pockets there must be an average decay-free shell of 4". A minimum of four (4) borings should be made to determine the average shell thickness. The pole is restorable with one (1) small internal decay pocket occupying only one (1) quadrant of the pole at this banding location. If the average shell thickness is 4" or greater, restore the pole with banding as shown in Figure 2
- Drill at 6 feet above G/L against the line of lead. For poles with Heart Rot (decay in all four quadrants of the pole) or multiple internal decay pockets there must be an average decay-free shell of 4". A minimum of four (4) borings should be made to determine the average shell thickness. The pole is restorable with one (1) small internal decay pocket occupying only one (1) quadrant of the pole at this banding location. If the average shell thickness is 4" or greater, restore the pole with banding as shown in Figure 2. If the average shell is less than 4", the pole should be checked from 6 feet up to 8 feet or as high as one can safely reach for 4" of average shell or be considered for other restoration systems. When a taller truss is used the lower band shell requirements are raised from 15" to 26".

Decay Specifications - General Guideline

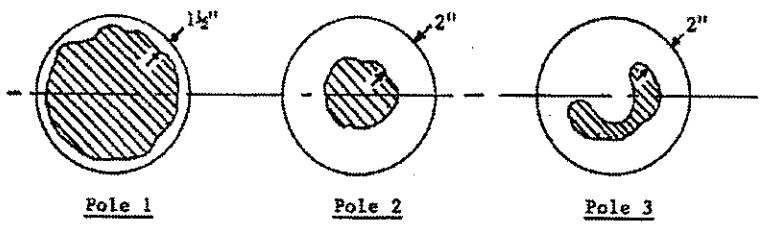
A pole can be restored if it has a *2" or more average decay-free shell at 15" (or 26" when applicable)* above groundline and *4" of average decay-free shell at 5 feet (or from 6 feet to 8 feet when applicable)* for poles with Heart Rot (decay in all four quadrants of the pole) or multiple internal decay pockets. The pole is restorable with one (1) small internal decay pocket occupying only one (1) quadrant of the pole at 5 feet (or from 6 feet to 8 feet when applicable). **It must also be determined that the internal decay can be effectively controlled and treated.**

Decay Situations

Heart Rot and Large Enclosed Pockets

Poles with heart rot and large enclosed pockets can be restored if there is a *2" or more average decay-free shell at 15" (or 26" when applicable)* above groundline and *4" of average decay-free shell at 5 feet (or from 6 feet to 8 feet when applicable)* for poles with Heart Rot (decay in all four quadrants of the pole) or multiple internal decay pockets. The pole is restorable with one (1) small internal decay pocket occupying only one (1) quadrant of the pole at 5 feet (or from 6 feet to 8 feet when applicable). It must also be determined if the internal decay can be

effectively controlled and treated.



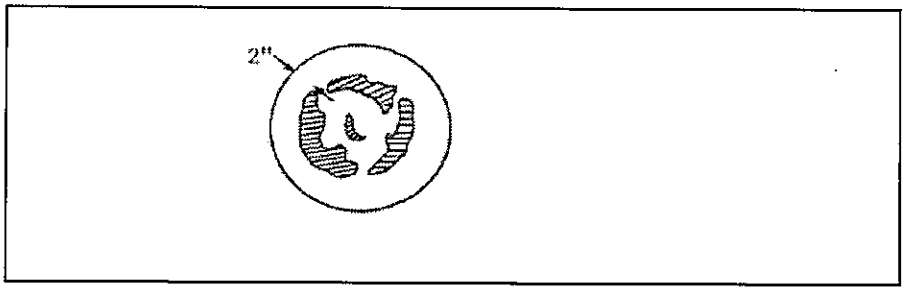
Pole 1: Heart rot with *less than 2"* average decay-free shell, cannot be restored
Pole 2: Heart rot with *2" or more* average decay-free shell, can be restored
Pole 3: Large enclosed pocket (extending into multiple quadrants of the pole) with *2" or more* average decay-free shell can be restored.

Internal Sapwood Decay

Poles with internal sapwood decay and a void is present should be recommended for restoration only when internal treatment can penetrate and properly saturate the decayed areas. Poles with internal sapwood decay without a void present should be recommended for restoration when a fumigant can properly penetrate and saturate the decayed areas.

Guidelines:

A pole dispersed with internal sapwood decay can be restored if it has a *2" or more average decay-free shell at 15" (or 26" when applicable)* above groundline and *4" of average decay-free shell at 5 feet (or 6 feet to 8 feet when applicable).* The pole is restorable with one (1) small internal decay pocket occupying only one (1) quadrant of the pole at 5 feet (or from 6 feet to 8 feet when applicable).



Preservative Treatment of Restoration Candidate

Groundline Treatment

Groundline Treatment is recommended if not accomplished during the inspection process. All poles shall be covered 18" below the groundline to 3" above the groundline by a Company approved preservative. The acceptable sodium fluoride based preservative paste ingredients are:

44.4% Sodium Fluoride 44.4% Sodium Fluoride
17.68% Copper Naphthenate –
(2% Copper as metal)
(or) 20.0% Copper Naphthenate –
(2% Copper as metal)
35.6% Inert Ingredients 35.6% Inert Ingredients

This preservative is to be covered by a Company approved moisture barrier to retain the preservative that shall extend 1" above the treated area and go around the pole with a 4" overlap which is to be stapled to the pole.

Obstructions
When obstructions occur, such as fences, curbs, walls, cable risers, interfering ground rods, etc., the preservative shall be carefully applied near the obstructions and the moisture barrier wrapped as close to the obstructions as possible. Such conditions shall be recorded.

Internal Treatment

- Contractor's pole restoration trucks must have pumping equipment designed for 100 PSI pressure output to apply internal treatment.
- Internal treatments shall have the following chemical compositions. Fumigants cannot be substituted

17.71%	Copper Naphthenate – (1.95% Copper as metal)	(or)	19.25%	Copper Naphthenate – (2% Copper as metal)
3.6%	Sodium Fluoride		80.75%	Inert Ingredients
78.69%	Inert Ingredients			
100.00%			100.00%	

- All rejected poles to be restored must be internally treated. At least nine (9) 3/8" diameter holes shall be bored to the center of the pole starting from groundline in a spiral fashion to just above the restoration steel. The internal treatment shall be applied to all holes bored with a minimum of 80 PSI pressure. The material shall be pumped into the bottom hole until it is noticed at the next higher hole. This hole is then plugged, and additional preservative pumped into the cavity until it is noticed at the next higher hole. This procedure is followed until the cavity is filled. All holes must be plugged with tight fitting pressure treated wooden dowels two inches in length and 7/16" in diameter.
- Appropriate safety equipment must be used at all times.

Fumigant Treatment
Fumigants are used for treatment of solid wood and should be applied above the decayed area when it is recommended for the application.

- Acceptable fumigants will have one of the following chemical compositions:

32.7%	Sodium Methyldithiocarbamate(Anhydrous)
67.3%	Inert Ingredients
	(or)
97.0%	Methylisothiocyanate
3.0%	Inert Ingredients

- Boring diameter, hole length and fumigant application rate shall be as specified on EPA

approved label.

- Borings shall be directed toward the center of the pole at an angle of no less than 45".
- Care should be taken to avoid going through the pole or seasoning checks.
- Borings shall start at the appropriate location and shall be evenly spaced up the pole in a spiral pattern. No less than 6 vertical inches shall separate adjacent holes.
  Plug holes using 15/16" diameter plastic plug or treated wood dowels.

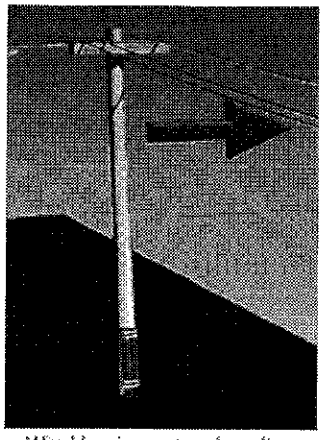
In addition, mechanical remediation of a utility pole may be accomplished by use of a truss.

How Trusses Work

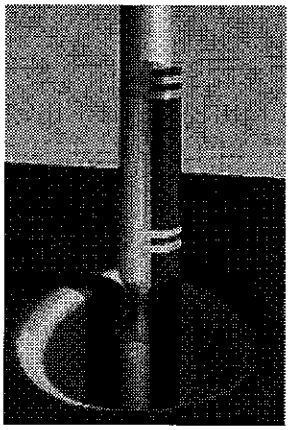
When bending loads are applied to a reinforced pole, they are transferred to the truss. The truss

allows the bending loads to effectively bypass the decayed or damaged groundline area of the pole,

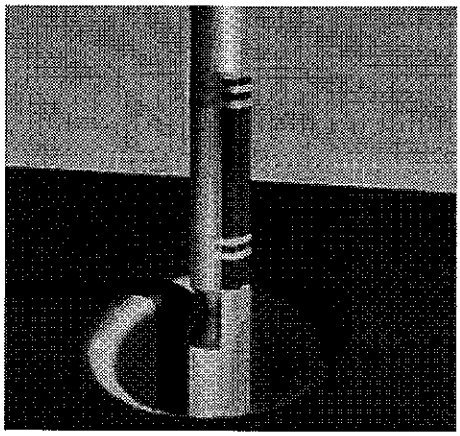
transferring the loads to sound wood foundation below ground. See the illustration below.



Wind loads create a bending moment at groundline.



The decayed area (in orange) is bypassed.



The bending load is transferred to sound wood foundation below ground via the truss.

8. Please explain how the company ensures its poles with public utility attachments meet National Electrical Safety Code (NESC) strength and clearance requirements.

AT&T uses O-Calc to ensure compliance with the NESC structural requirements. O-Calc incorporates the NESC standards within its program.

Pole loading

O-Calc is the **required** pole loading tool for all AT&T regions. The brief list below provides some details when pole loading is required.

Pole loading is required when:

- Placing new poles or replacing an existing pole
- Placing a new pole line
- Placing new cables
- Placing solely owned poles
- Placing joint owned poles
- Placing cabinets (VRADs, VSEMS, etc.)

Pole strength

Pole loading analysis is performed using O-Calc, which is software that automates the process of calculating structural loads on new and existing utility poles. It takes much of the guesswork out of load calculation pole design, replacement, and the joint-use loading analysis process. AT&T utilizes the Pole Loading Consideration outline as a quick reference for when to use O-Calc Pole Loading Analysis Software. The outline is intended to cover the most common occurrences of engineering and construction pole work in NESC and GO95 areas.

Clearances

The clearances described below are based on the 2007 Edition of the National Electric Safety Code (NESC). This is only a summary of the common clearance requirements. This section should only be used as a guideline in conjunction with the NESC guide itself and any additional state and/or municipality requirements.

Basic Clearances

Telephone Conductors from power wires on different pole lines. The NESC specifies both horizontal and vertical clearance between any two crossing or adjacent cables that are carried on different supporting structures. Based on the horizontal and vertical clearances, a clearance envelope is developed. The clearance envelope must be maintained under all conditions of conductor loading.

Horizontal Clearance (Rule 233B1)	
Voltage	**Clearance Ft (mm)**
Up to 129 kV	5 (1500)
Over 129 kV	5 (1500) plus 0.4 in.(10) per kV over 129 kV
Vertical Clearance (Rule 233C1)	
Voltage	**Clearance Ft (mm)**
Supply cables meeting Rule 230C1 and supply cables of 0 up to 750 V meeting rule 230C2 or 230C3*	2 (600 mm)
Up to 750 V	4 (1200)
750 V to 22 kV	6 (1800)
22 kV to 470 kV	6 (1800) plus 0.4 in.(10) per kV over 22 kV
Over 470 kV	See NESC Rule 233C3
* For example, insulated cables supported on a bare, grounded messenger. See NESC for details.	

Vertical Clearances Above Ground, Roads, Rails, Roofs, Water (NESC Rule 232-Tables 232-1 and 234-1)

Vertical clearances shone in the following table apply under the following temperature and loading conditions, whichever produces the largest final sag. 120°F (48.8°C) no wind displacement. The maximum conductor temperature for which the line is designed to operate, if greater than 120°F (48.8°C), with no wind displacement. (not applicable to telephony cable) 32°F (0°C), no wind displacement, with redial ice thickness specified in Rule 250B for the loading district concerned.

Nature of surface underneath wires, conductors, or cables (Table 232-1 NESC)	Clearances (Ft)	Exceptions
Track rails of railroads (except electrified railroads using overhead trolley conductors).	23.5	A, E
Roads, streets, and other areas subject to truck traffic.	15.5	K
Driveways, parking lots, and alleys.	15.5	K
Other land traversed by vehicles, such as cultivated, grazing, forest, orchards, etc	15.5	
Spaces and ways subject to pedestrians or restricted traffic only	9.5	B
Water areas not suitable for sail boating including lakes, ponds or where sail boating is prohibited.	14	J
Water areas suitable for sail boating including lakes, ponds, reservoirs, tidal waters, rivers, streams, and canals with unobstructed surface are of:		F,G,H,I,J,K
a. Less than 20 acres	17.5	
b. Over 20 to 200 acres	25.5	
c. Over 200 to 2000 acres	31.5	
d. Over 2000 acres	37.5	
Where wires, conductors, or cables run along and within the limits of highways or other road rights-of-way but do not overhang the roadway		
Roads, streets, or alleys	15.5	I
Roads in rural districts where it is unlikely that vehicles will be crossing under the line	13.5	C,D

Exception explanations

A. For wires, conductors, or cables crossing over mine, logging, and similar railways that handle only cars lower than standard freight cars, the clearance may be reduced by an amount equal to the difference in height between the highest loaded car handled and 20 ft, but the clearance shall not be reduced below that required for street crossings.

B. Spaces and ways subject to pedestrians or restricted traffic only are those areas where riders on horses or other large animals, vehicles, or other mobile units exceeding a total height of 8 ft are prohibited by regulation or permanent terrain configurations or are otherwise not normally encountered or reasonably anticipated.

C. Where a supply or communication line along a road is located relative to fences, ditches, embankments, etc., so that the ground under the line would not be expected to be traveled except by pedestrians, the clearances may be reduced to the following values:
   a. Insulated communication conductor and communication cables - 9.5'
   b. Conductors of other communication circuits - 9.5'
   c. Supply cables of any voltage meeting Rule 230C1, supply cables limited to 150 V to ground meeting Rules 230C2 or 230C3, and neutral conductors meeting Rule 230E1 – 9.5'
   d. Insulated supply conductors limited to 300 V to ground - 12.5'
   e. Guys - 9.5'

D. This clearance may be reduced to 13' for communication conductors and guys.

E. Adjacent to tunnels and overhead bridges that restrict the height of loaded rail cars to less than 20 ft, these clearances may be reduced by the difference between the highest loaded rail car handled and 20 ft, if mutually agreed to by the parties at interest.

F. For controlled impoundments, the surface area and corresponding clearances shall be based upon the design high-water level.

G. For uncontrolled water flow areas, the surface area shall be that enclosed by its annual high-water mark. Clearances shall be based on the normal flood level; if available, the 10-year flood level may be assumed as the normal flood level.

9. Please provide the vegetation management schedules for poles with public utility attachments. As part of your response, please also identify and explain the type of vegetation management techniques utilized.

AT&T's vegetation management is described above in the response to 4(j). In addition, vegetation management is typically performed when needed to remove an impediment to required work. The technique used is dependent on the type and extent of the vegetation to be removed.
NOTE: As described previously, AT&T is precluded from vegetation management in the public utility space on a pole.

10. Please provide a description of your company's emergency response and storm restoration procedures and protocols with respect to poles with public utility attachments.

The process for storm preparation includes the following:

Tabletop Exercises are conducted to ensure personnel in the impacted areas are familiar with roles as it relates to pre-storm preparation, storm impact and post storm responsibilities.

Each storm's progress is tracked to determine possible impact to AT&T and information is distributed multiple times daily to personnel in the affected area.

Personnel in the potential impacted area conduct and facilitate meetings to work through pre-storm checklists. Discussions include but are not limited to moving vehicles to higher ground, personnel safety and reporting, tie down and relocate items in construction yards, provide personnel direction for reporting after the storm and assign personnel to restoration efforts, etc.

Daily briefing takes place to provide pre-storm preparation updates to AT&T Leadership.

Depending on the level of a storm's impact, the following may be activated:

- The AT&T Emergency Operations Center may be activated as a single point of contact for all organizations to collaborate concerning identified restoration needs and resolution to eliminate roadblocks (Event Assessment Reports are documented and distributed to Leadership).
- All employees in the affected areas are required to positive report through AT&T reporting system to ensure their wellbeing.
- Construction, Engineering and Technicians will be deployed to impacted area's for restoration efforts.
- Local Disaster Recovery Teams will be activated, and meetings facilitated to restore service.

Post storm updates and meetings take place to provide impact and restoration status to AT&T Leadership and other stakeholders.

Process improvement opportunities identified, documented and addressed as needed.

Storm Response and Emergency Restoration Contracts:

AT&T currently has agreements in place with multiple suppliers to provide emergency response in the event of Natural or manmade disasters. These agreements include the ability to utilize the suppliers for the placement/replacement of utility poles, line clearing (tree trimming), and repair/replacement of aerial facilities upon the declaration of a service emergency within AT&T.

Municipal Contacts- Broken Pole/Downed Cable

To assist the communities we serve, a toll-free number has been established that will allow municipality officials, fire and police departments and power companies 24 hour availability to contact AT&T's Narrow Band work group to report broken poles and downed cables in the Central and Southeast regions. Based on the information provided the center will route the referral to the appropriate work group to complete the repairs. Notifications to C&E will

continue to be via WCMT and NCP as outlined in ATT practice, C&E National Callout Program (NCP) Job Aid. In all other regions, managers should provide the **(713) 235-7900** contact number to their local contacts with the *Municipalities, Power Companies & First Responders* they deal with.

In addition to the above, AT&T participates in and works closely with the state and local emergency operations efforts.

11. Please file at least two of your company's attachment agreements that demonstrate the standard or general terms that are contained in these types of agreements.

See the joint use agreements that AT&T has with Duke Energy and with the Orlando Utilities Commission. These agreements were filed concurrently with the filing of AT&T's responses herein.

12. Do your company's attachment agreements with public utilities reference any standards, codes, or requirements in regard to pole maintenance or inspection? If yes, please provide an example of the standards, codes, or requirements included in the agreement.

See the joint use agreements provided in response to Question 11.