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Legal Department

JENNIFER S. KAY
Senior Operations Counsel - Florida

COMMISSION
CLERK

AT&T Florida
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5332

June 15, 2007

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

070000

Re: AT&T Florida's Supplement to Pole Inspection Report June 2006 through December 2006

Dear Ms. Cole:

On March 1, 2007, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") submitted its Pole Inspection Report for June 2006 through December 2006 (the "Inspection Report"), pursuant to Florida Public Service Commission ("Commission") Order No. PSC-06-0168-PAA-TL in Docket No. 060077-TL. AT&T Florida submitted the Inspection Report under a claim of confidentiality pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, because the Report contained proprietary confidential business information. Under separate cover today, AT&T Florida is filing a revised claim of confidentiality with regard to the Inspection Report, narrowing the claim to certain information contained in the Inspection Report.

CMP ☒ In the workshop held on May 23, 2007, Commission Staff requested that AT&T
COM ☐ Florida provide a status on the progress of its pole replacements. Accordingly, AT&T
CTR ☐ Florida submits the attached Supplement to its Inspection Report. In line with its
ECR ☐ revised claim of confidentiality for the Inspection Report, AT&T Florida hereby makes a
GCL ☒ claim of confidentiality over certain information in the Supplement to the Inspection
OPC ☐ Report that AT&T Florida considers proprietary confidential business information
RCA ☐ pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida
SCR ☐ Administrative Code. Attached is an explanation of AT&T Florida's claim of
SGA ☐ confidentiality, including line item references to the confidential information. Two (2)

SCR ☐

SGA ☐

SEC ☐

OTH ☒ *conf records*

This claim of confidentiality was filed by or on behalf of a
"telco" for Confidential DN 04833-07. The
document is in locked storage pending advice on handling.
To access the material, your name must be on the CASR.
If undocketed, your division director must provide written
permission before you can access it.

(See DN 01941-07)

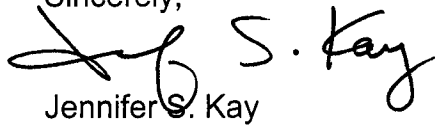
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FPSC-COMMISSION CLERK

redacted copies and one (1) highlighted copy of the Supplement to the Inspection Report are also provided.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer S. Kay". The signature is fluid and cursive, with the first name "Jennifer" written in a large, stylized script, followed by "S. Kay" in a slightly smaller, more compact script. The signature is positioned to the right of the word "Sincerely,".

Jennifer S. Kay

Enclosures

cc: Ms. Lisa Harvey (w/o proprietary enclosure)
Ms. Beth Salak (w/o proprietary enclosure)

ATTACHMENT A

AT&T Florida
Supplement to Pole Inspection Report June 2006 through December 2006
Page 1 of 1
06/12/07

SUPPLEMENT TO AT&T FLORIDA'S POLE INSPECTION REPORT
JUNE 2006 THROUGH DECEMBER 2006

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 1, lines 6 - 8, and 13 -15

1, 2

ATTACHMENT B

AT&T Florida
Supplement to Pole Inspection Report June 2006 through December 2006
Page 1 of 1
06/15/07

SUPPLEMENT TO AT&T FLORIDA'S POLE INSPECTION REPORT
JUNE 2006 THROUGH DECEMBER 2006

TWO REDACTED COPIES

REDACTED

**SUPPLEMENT TO AT&T FLORIDA'S POLE INSPECTION REPORT
JUNE 2006 THROUGH DECEMBER 2006**

1 In response to the request made by Florida Public Service Commission ("Commission")
2 Staff at the May 23, 2007 workshop, BellSouth Telecommunications, Inc. d/b/a AT&T Florida
3 ("AT&T Florida") submits this Supplemental Response to its first pole inspection report filed on
4 March 1, 2007 (the "Inspection Report") pursuant to Commission Order No. PSC-06-0168-PAA-
5 TL in Docket No. 060077-TL.

6 In its Inspection Report, AT&T Florida stated that [REDACTED] poles required immediate
7 replacement and that [REDACTED] poles would be replaced within eighteen months. These figures have
8 changed to [REDACTED] and [REDACTED], respectively. These changes result primarily from a determination
9 that a number of poles initially reported as requiring replacement are owned by other entities,
10 such as power companies or municipalities. Additionally, a number of poles owned by AT&T
11 Florida have already been replaced by power companies between the date of the first inspection
12 report and the date of this letter.

13 Of the [REDACTED] poles requiring priority replacement, [REDACTED] jobs have been engineered and [REDACTED]
14 replacement poles have been placed. Of the [REDACTED] poles to be replaced within eighteen months,
15 [REDACTED] jobs have been engineered and [REDACTED] replacement poles have been placed. As third parties
16 such as power and CATV companies remove their attachments from the poles being replaced,
17 AT&T Florida pulls those poles. It should be noted that a mix of poles, those slotted for priority
18 replacement and replacement within eighteen months, may exist in any given area. The
19 geographical areas in which the poles are located, together with the timing of completed pole
20 inspections and the delivery of inspection data to AT&T Florida, all impact the pole replacement
21 schedule. If AT&T Florida is replacing priority poles in a given area, it is likely to also replace
22 poles slotted for replacement within eighteen months at the same time.

REDACTED

**SUPPLEMENT TO AT&T FLORIDA'S POLE INSPECTION REPORT
JUNE 2006 THROUGH DECEMBER 2006**

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22 poles slotted for replacement within eighteen months at the same time.

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: 6-15-07
TO: Jennifer S. Kay
FROM: T. Henry, Division of the Commission Clerk &
Administrative Services
RE: Acknowledgment of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket
No. 070000 or (if filed in an undocketed matter) concerning
Supplement to Role inspection report, and
filed on behalf of AT & T Fla / Kay. The
document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850)
413-6770.

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