



Control Number: 32182



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PUBLIC UTILITY COMMISSION  
FILING CLERK

September 22, 2006

Mr. James Galloway, Filing Clerk  
Public Utility Commission of Texas  
1701 North Congress Avenue  
Austin, Texas 78711

Re: Project No. 32182 – *Investigation of Methods to Improve Electric and Telecom Infrastructure That Will Minimize Long Term Outages and Restoration Costs*

Dear Mr. Galloway:

On behalf of Electra Telephone Company ("Electra" or "Company"), I am submitting an original and ten (10) copies of this response to the data request issued in this proceeding on August 23, 2006.

Electra maintains minimal aerial facilities, which are linked to municipal electric utility poles. Therefore, the Company generally practices the processes outlined in the Rural Utility Service's Bulletin 1730-1, for which applicable excerpts are attached hereto. The Company considers these excerpts to adequately define its inspection program and vegetation program.

Please file-stamp the additional copies and return them to me by way of our assistant. Your cooperation in this matter is greatly appreciated.

Sincerely,

Dee Dee Longenecker  
Authorized Representative for  
Electra Telephone Company

Attachments

cc: Ms. Debi Nobles, Vice President – Regulatory Affairs  
Townes Telecommunications Services Corp.

HEADQUARTERS:

7852 Walker Drive, Suite 200, Greenbelt, MD 20770  
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**Excerpt from RUS Bulletin 1730-1**  
**Exhibit A**  
**RUS FORM 300 RATING GUIDE**  
**CONDITIONS NORMALLY NEEDED TO JUSTIFY A RATING OF 3**

**PART I – TRANSMISSION AND DISTRIBUTION FACILITIES:**

**3. Distribution Lines – Overhead**

a. Inspection and Maintenance – Program and Records: ...All overhead lines (including those on private right-of-way) patrolled annually (walking, riding or aerial); more frequently if experience dictates. Records maintained for ...line patrol with deficiencies corrected in a timely manner. ...[E]quipment changeout program in place to keep ...failed equipment to a minimum.

b. Compliance with Safety Codes – Foreign Structures: Utility has policy and practice of immediately remedying foreign structures which conflict with primary lines upon observation.

Compliance with Safety Codes – Attachments: All overheard attachments meet NESC separation and clearance requirements...

**PART II – OPERATION AND MAINTENANCE:**

**6. Line Maintenance and Work Order Procedures**

a. Work Planning and Scheduling: ...Work order inspections performed in accordance with 7 CFR 1724, Electric Engineering, Architectural Services and Design Policies and Procedures (i.e., within 6 months of completion of construction.) Utility promptly provides inspector with written notice that clean-up work has been completed...

Work Backlogs – Right-of-Way Maintenance: Adequate resources being provided to address re-clearing on timely basis. Right-of-way re-trimming cycles to be dictated by local conditions.

Work Backlogs – Other: Job orders from line inspection completed in reasonable time frames.