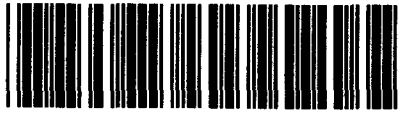




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AT&T
September 29, 2006

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PUC INVESTIGATION OF METHODS §
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COAST HURRICANES §

PUBLIC UTILITY COMMISSION
OF TEXAS

AT&T TEXAS' RESPONSE TO REQUESTS RELATIVE TO FACILITIES AND
VEGETATION INSPECTIONS/MANAGEMENT

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**AT&T TEXAS' RESPONSES REGARDING FACILITIES AND VEGETATION
INSPECTION AND MANAGEMENT**

Southwestern Bell Telephone, L.P., d/b/a AT&T Texas hereby files its responses to Commission Staff's August 23, 2006 information requests in the above-referenced project regarding facilities and vegetation inspection and management.

I. Summary of AT&T Texas' Vegetation Management Program

AT&T Texas' current practices are successful and have a proven track record spanning more than 100 years, and they strike an appropriate balance between protecting the network and the interests of both consumers and municipalities.

Thousands of AT&T Texas technicians visit more than 3.6 million Texas customers annually. During these visits, the technicians adhere to a quality plan that requires them to not only address customer concerns, but to also visually inspect the adjacent network. As the technicians inspect the network, they are instructed to look for trees and other vegetation that may be rubbing cable or creating any other condition that could pose a danger to AT&T Texas' facilities. Those items that cannot be immediately resolved are referred to management for evaluation and necessary action.

In addition to inspecting facilities and correcting problems during new service and maintenance dispatches, AT&T Texas also routinely trims trees and branches when necessary during the placement of new aerial cable.

Design protocols employed by AT&T Texas are also helpful in regard to vegetation concerns. AT&T utilizes double sheath aerial cable, consisting of a strong, low-density polyethylene outer core, and an armored inner layer that protects the cable in cases of outer sheath damage. The outer polyethylene jacket is abrasive and resistant to normal contact from trees, debris, etc. Further, AT&T Texas makes use of wooden branch guards that shield cable from tree damage where pruning is not desired. It must be noted that customers generally are very resistant to tree-trimming as customers typically place high value and personal preferences regarding their trees. AT&T Texas' policies respect customer's wishes – and their property – while simultaneously ensuring that the telecommunications infrastructure is reasonably protected from vegetation-related damage.

AT&T Texas would note that National Electrical Safety Code (NESC) standards for vegetation trimming, and for network design relative to vegetation issues, make no mention of telecommunications infrastructure. But AT&T Texas' policies and designs, as noted above, nonetheless meet those objectives. Section 218 of the NESC guidelines addresses vegetation which may come in contact with electrical conductors. The guidelines recommend trimming and removal of vegetation that interferes with facilities, set forth criteria for determining the extent of trimming required, and recommend the use of guards to avoid facilities damage that might be caused by abrasion through contact.

II. Summary of AT&T Texas' Inspection Program for Overhead Facilities

AT&T Texas has employed a successful ground-based inspection program for its overhead facilities for decades. The inspection program is a part of AT&T Texas'

quality and safety program, and practices and procedures are taught in two training scenarios discussed below.

Initial training is required for all new employees and all employees given new job assignments for which training was not previously received (e.g., a transfer from another department). Initial training is also required whenever new substances, processes, procedures, or equipment are introduced to the workplace and present a new hazard, or whenever management is made aware of a new or previously unrecognized hazard. Refresher training also occurs. Technicians are recertified every three years on issues related to outside plant safety, and they are continually refreshed by monthly safety meetings and monthly safety observations by their managers.

To insure the safety of the public and AT&T Texas employees before any work operation is begun that involves contact with poles (including but not limited to ladders against strand attached to poles, or ladders against poles themselves), the poles are visually inspected. Technicians are trained to look for any of the following when performing their inspections: the presence of warning tags of any kind; unexplained leaning; unbalanced loading or distribution; insufficient depth of setting; collision damage; fungus growth; evidence of insects/damage; bent, loose or missing pole steps; cracks and/or knots; debris at base of pole; climbing obstructions (signs, clotheslines, nails or antennas); electrical conduits, fixtures, exposed ground wires, etc.; and lightning or fire damage.

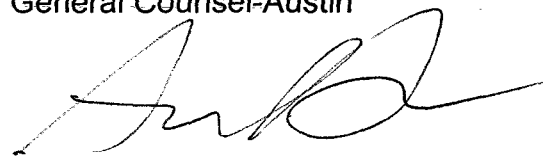
After visual inspection is completed, technicians must test the poles using one of the following methods: pole prod and sound test; hand line test; boring test; or the pike pole test. If the pole fails any of the tests, an appropriate warning tag must be placed

on the pole, the technician's manager notified, and the pole scheduled for replacement or repair.

Technicians are responsible for the repair of all quality and safety defects within one span in all directions of their work area, including drop wire. Life-threatening safety issues are referred to management immediately. All AT&T Texas employees are held responsible for familiarizing themselves with the company's safety practices and policies, and for carrying out their intent in the performance of work.

Respectfully submitted,

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