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PROJECT NO. 32182

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PUC INVESTIGATION OF METHODS §
TO IMPROVE ELECTRIC AND §
TELECOMMUNICATIONS §
INFRASTRUCTURE TO MINIMIZE §
LONG TERM OUTAGES AND §
RESTORATION COSTS ASSOCIATED §
WITH GULF COAST HURRICANES §

**DESCRIPTION OF VERIZON SOUTHWEST'S
VEGETATION MANAGEMENT AND GROUND BASED
INSPECTION PROGRAMS FOR OVERHEAD FACILITIES**

In compliance with PUC Staff correspondence dated August 23, 2006, Verizon Southwest (Verizon) herein files its vegetation management program for overhead facilities and its on-going cyclical, ground-based inspection program for overhead facilities.

Vegetation Management Program for Overhead Facilities

Whenever work is performed on outside plant a visual inspection of the surrounding vegetation is performed. In the infrequent instances in which a dangerous or threatening condition exists, it is promptly addressed and the danger removed. In the instances where it is observed that vegetation is threatening the integrity of the outside plant facilities, that situation is also promptly addressed and action is taken to correct the situation.

On-going Cyclical, Ground-based Inspection Program for Overhead Facilities

At the time work is performed on outside plant facilities, inspection of the facilities takes place. No work aloft is started unless the technician is satisfied that the pole line structure has adequate strength to support the load resulting from working aloft and is satisfied with the overall structural soundness of the pole facilities. This includes a visual inspection of the cables

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attached to the pole and the structural soundness of the pole. A sound and probe test of the pole is performed to check for defective conditions before climbing. If any unsafe condition is detected, the unsafe condition is reported and corrective action is taken.

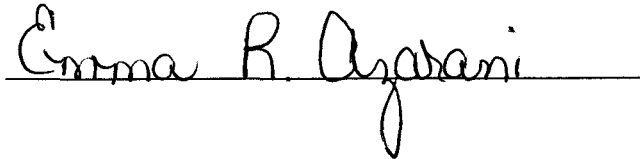
Respectfully submitted,

VERIZON SOUTHWEST

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Comments of Verizon was hand-delivered to the General Counsel this 29th day of September 2006.

A handwritten signature in cursive script, reading "Emma R. Ayasani", is written over a horizontal line.