



Control Number: 32182



Item Number: 182

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October 29, 2008

Public Utility Commission of Texas  
Attn: Central Records  
1701 North Congress Avenue  
P.O. Box 13326  
Austin, TX 78711

2008 OCT 31 AM 9:09

**RE:** Project No. 32182 – Summary of “PUC Investigation of Methods to Improve Electric and Telecommunications Infrastructure to Minimize Long Term Outages and Restoration Costs Associated with Gulf Coast Hurricanes” due by December 1, 2008 for Facilities-Based Local Exchange Carriers.

Please find enclosed the original and ten (10) copies of the summary request for Project No. 32182. In summary, Comanche County Telephone Company, Inc. has an ongoing process of two (2) programs that aid in the protection of our own overhead facilities and the joint use overhead facilities provided by other utility companies.

First, our vegetation management team makes periodic examinations of the overhead facilities within our service area. It is because of these examinations, our company can choose the proper procedure(s) to remove, control, and/or eliminate any such vegetation from the overhead facilities, and thus possibly prevent a long term outage(s) from occurring. An example of this application is trimming certain trouble areas of unwanted vegetation periodically. At all times, cooperation and coordination with property owners is a factor that must be figured in. Also, the electric companies have tree pruning contractors come and clear their overhead facility right-of-way(s) of any unwanted vegetation. It is because of these joint efforts that the overhead facilities remain virtually trouble free during high wind and turbulent times.

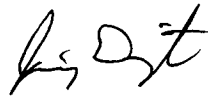
Second, our company personnel routinely inspects the poles, anchors, guy wires, and other hardware required to operate and maintain an overhead facility. It is during these ground inspections that erosion at the base of a pole, the tension of overhead guy wires and anchors, and other overhead facility spot checks

are recorded and noted. An example of an inspection could be a leaning pole due to the erosion of dirt at the base of a pole or a pole that has rotted just below ground level.

There are several things to be considered when inspecting overhead facilities, but safeties of operation for a higher level of service are a couple of things to mention regarding our on-going cyclical ground based inspection program. The periodic examinations can be as simple as a quick glance while driving down the road, a walk down an alley or street right-of-way, or a thorough hands-on exam of a troubled and highly-prone vegetated area. The implementation of the below mentioned programs are designed to reduce the number of outages and keep the overhead facilities as suitable as possible for all utility companies and customers involved.

If you have any questions or concerns regarding this summary of our vegetation management and ground-based inspections for overhead facilities, please feel free to give me a call at the number listed. Also attached is our on-going vegetation management program and ground-based inspection program for overhead facilities within our service area.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dennington", written in a cursive style.

JIMMY DENNINGTON  
Director of Regulatory Compliance

## **I. On-Going Vegetation Management Program-to Protect Overhead Facilities**

Comanche County Telephone Company, Inc. in compliance with the Public Utility Commission of Texas (PUC) has an on-going vegetation management program to protect our overhead facilities, and reduce the number and duration of outages caused by high wind events.

Periodic examinations of our overhead facilities are made. From these examinations, it is determined how our vegetation management team will cut, trim, prune, or in certain circumstances, remove the vegetation entirely from the overhead facilities Right-Of-Way (ROW). The vegetation management team works in coordination with all property and landowners, for the control and removal of any vegetation that may be in or near the right-of-way of the overhead facilities.

The cooperation and understanding of all involved individuals makes it possible to ensure a lesser number and duration of outages, and be assured the facilities will be replaced in a more timely and unhindered manner. This open-minded way of thinking is what keeps our utility company and the local communities working together for a higher standard of service.

## **II. On-Going Cyclical, Ground-Based Inspection Program for Overhead Facilities**

Comanche County Telephone Company, Inc. in compliance with the Public Utility Commission of Texas (PUC) has an on-going cyclical, ground-based inspection program of our overhead facilities. The ground-based inspection program makes sure our overhead facilities are maintained in a manner that will provide a reasonable level of service to our customers. Our company closely monitors the operation and maintenance of the overhead transmission and distribution systems that we own.

Overhead facilities make up approximately four percent (4%) of our total outside plant facility. Although, some of our overhead facilities are attached to structures owned by another utility company, we still maintain a watchful inspection of these facilities. Our company works closely with the other utility companies in maintaining and inspecting the joint use of these overhead facilities. The joint cooperation of both utility companies is what provides the comfort of knowing the overhead facilities are suitable for an extended period of time and continued service without the possibility of overloading the overhead structures.