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AT&T Texas
November 4, 2008

PROJECT NO. 32182

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

**AT&T TEXAS' UPDATE REGARDING ITS VEGETATION MANAGEMENT AND
GROUND-BASED INSPECTIONS FOR OVERHEAD FACILITIES**

At its October 8, 2008 Open Meeting, the Commission directed electric and telephone utilities to update the filings they made in October 2006 on vegetation management and ground-based inspections for overhead facilities. Southwestern Bell Telephone, L.P., d/b/a AT&T Texas (AT&T Texas) hereby files its update.

I. Current Practices

AT&T Texas' experience with storms and hurricanes in the last two years has reconfirmed that damage to overhead facilities and resultant service outages generally do not come from vegetation in the vicinity of the cables, but rather from straight line wind causing fallen trees adjacent to pole leads to be blown into the infrastructure on those pole leads causing pole and service failures.

For that reason, AT&T Texas continues to employ the practices described in its October 2006 response because they are time-tested and successful. They strike an appropriate balance between protecting the network and responding to what consumers and municipalities will accept.

It is important to restate that the design protocols employed by AT&T Texas are also helpful in regard to vegetation impact and concerns to service. As previously reported, AT&T Texas 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 prudent or desired.

II. Customer Concerns

As alluded to above, it is noteworthy to restate that customers generally continue to be very resistant to tree-trimming. This is understandable. As property owners, residence and business customers typically place high value and have personal preferences regarding their trees. AT&T Texas' policies respect customers' wishes – and their property – while simultaneously ensuring that the telecommunications infrastructure is reasonably protected from vegetation-related damage.

III. Current Ground-Based Inspection Program

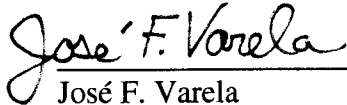
At this time AT&T Texas employs a ground-based inspection program for its overhead facilities that has been successful for decades. That inspection program, which is based on new service installations and customer repair premises visits, is outlined in detail in the October 2006 report.

2006 response:

http://interchange.puc.state.tx.us/WebApp/Interchange/Documents/32182_146_526632.PDF

Respectfully submitted,

JOSEPH E. COSGROVE, JR.
General Attorney and Associate General Counsel

A handwritten signature in cursive script that reads "Jose F. Varela". The signature is written in black ink and is positioned above a horizontal line.

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