



Control Number: 32182



Item Number: 198

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November 25, 2008

Central Records Filing Clerk
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78711

Re: Docket No. 32182 – PUC Investigation of Methods to Improve Electric and
Telecommunications Infrastructure To Minimize Long Term Outages and
Restoration Costs Associated with Gulf Coast Hurricanes

Dear Filing Clerk:

“CenturyTel” (collectively, CenturyTel of Port Aransas, Inc., CenturyTel of Lake Dallas, Inc., CenturyTel of San Marcos, Inc. and CenturyTel of Northwest Louisiana, LLC) herein submits this original and ten copies of its response to the PUC’s October 15, 2008 notice to electric and telecommunications companies requesting an update related to its programs related to vegetation management and ground-based inspections for overhead facilities.

Vegetation Management Program for Overhead Facilities

Most of CenturyTel’s overhead facilities are located in the cities or towns in which we operate, not in the rural areas of our exchanges where the majority of our plant is buried. In addition, most of our attachments are to poles owned by the local power company, which performs the majority of the vegetation management required for safety/electrical compliance or structural integrity reasons.

CenturyTel maintains a Safety Manual that address general safety rules relative to outside plant and aerial work safety, tree trimming, safeguards against shock hazards for aerial plant and utility poles. These rules are taken into account whenever engineering or construction activity takes place relative to our overhead facilities.

Pre-engineering a construction project will typically include any tree trimming that might be required to comply with our safety rules; if not incorporated into the work order, construction crews can generate work order requests to get necessary vegetation management measures approved.

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Installation and maintenance technicians, in the course of their normal plant operations such as working on aerial drops, are able to perform minimal amounts of trimming. If more significant vegetation management issues are encountered, they report back to management, and any necessary trimming work to comply with safety standards is requested.

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

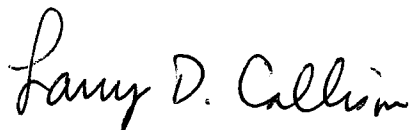
As is the case with the vegetation management program, at any time work is performed on CenturyTel's overhead facilities, a visual inspection takes place. No work is to commence until employees and/or contractors are satisfied that the pole line structure is intact and will comply with the general safety rules applicable to aerial plant. Required procedures include checking for obstructions, checking for stray voltage and testing of wood poles for excessive wear, exterior weathering, deterioration, decay and rot. Poles deemed unsafe must be tagged to alert others of the unsafe condition.

Any unsafe conditions must be reported to a supervisor, and corrective action taken, including completion of a work order to replace dangerous, damaged or unsafe poles.

Compliance with these procedures helps ensure that CenturyTel's aerial plant is structurally sound, which not only promotes employee and public safety, but also enhances the likelihood that the plant can better withstand storm damage.

If you should have any questions, please don't hesitate to contact me at (318) 330-6263.

Sincerely,

A handwritten signature in cursive script that reads "Larry D. Callison".

Larry D. Callison
Manager – Regulatory Government Relations