



Control Number: 32182



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PROJECT NO. 32182

**INVESTIGATION OF METHODS TO) PUBLIC UTILITY COMMISSION
IMPROVE ELECTRIC AND TELECOM)
INFRASTRUCTURE THAT WILL) OF TEXAS
MINIMIZE LONG TERM OUTAGES)
AND RESTORATION COSTS)**

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PUBLIC UTILITY COMMISSION

**COMMENTS OF
TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.**

Texas Statewide Telephone Cooperative, Inc. (TSTCI) files these comments regarding the Commission Staff's recommendations contained in the draft Executive Summary that was released on June 9, 2006. TSTCI is an organization representing 38 small, rural incumbent local exchange carriers (ILECs). Please see "Attachment I" for a list of TSTCI member companies.

TSTCI has reviewed Staff's recommendations and commends the Staff's efforts to minimize long term outages and restoration costs associated with Gulf Coast hurricanes. TSTCI has not been actively participating in this project until recently because of limited resources; however, review of the draft Staff recommendations has raised substantial concerns about the potential impact on TSTCI member companies. As a result, TSTCI is filing these brief comments to apprise the Commission of our concerns and will submit expanded comments during the rulemaking.

TSTCI has reviewed the comments filed by AT&T Texas and Verizon Southwest, and TSTCI supports the general approach and specific recommendations expressed in these comments. Overall, TSTCI is very concerned that the costs of the recommendations would far outweigh the potential benefits. In particular, TSTCI is very concerned about the potential costs of conducting a vegetation management program as provided in Recommendation No. 1 and a ground-based inspection program for all overhead facilities as provided in Recommendation No. 2. Further, all other recommendations applicable to telecommunications utilities are of concern to TSTCI as well, because they would be both costly to implement and burdensome, while the potential benefits are unclear or negligible at best. TSTCI does not see the need for applying these recommendations to all Texas utilities, instead of only those in hurricane-prone areas.

In addition, the recommendations relating to the removal of trees and vegetation located within the right of way (ROW) and outside the ROW would require utilities to engage in activities that are likely prohibited by local laws and regulations and that impinge on the rights of local property owners. The recommendation for additional regulations of poles and pole attachments would be burdensome; additional regulation of these facilities are unnecessary and are not likely to contribute to reducing damage in the event of a hurricane or other weather-related incident.

TSTCI appreciates this opportunity to file comments and looks forward to working with Staff on these issues.

Respectfully submitted,

A handwritten signature in cursive script that reads "Cammie Hughes". The signature is written in black ink and is positioned below the typed name.

Cammie Hughes
Authorized Representative

TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

Big Bend Telephone Company, Inc.
Brazos Telecommunications, Inc.
Brazos Telephone Coop., Inc.
Cameron Telephone Company
Cap Rock Telephone Coop., Inc.
Central Texas Telephone Coop., Inc.
Coleman County Telephone Coop., Inc.
Colorado Valley Telephone Coop., Inc.
Comanche County Telephone Company, Inc.
Community Telephone Company, Inc.
Cumby Telephone Coop., Inc.
Dell Telephone Coop., Inc.
E.N.M.R. Telephone Coop., Inc.
Eastex Telephone Coop., Inc.
Electra Telephone Company
Etex Telephone Coop., Inc.
Five Area Telephone Coop., Inc.
Ganado Telephone Company, Inc.
Industry Telephone Company, Inc.
La Ward Telephone Exchange, Inc.
Lake Livingston Telephone Company
Lipan Telephone Company
Livingston Telephone Company
Mid-Plains Rural Telephone Coop., Inc.
Nortex Communications, Inc.
North Texas Telephone Company
Panhandle Telephone Coop., Inc.
Peoples Telephone Coop., Inc.
Poka Lambro Telephone Coop., Inc.
Riviera Telephone Company, Inc.
Santa Rosa Telephone Coop., Inc.
South Plains Telephone Coop., Inc.
Tatum Telephone Company
Taylor Telephone Coop., Inc.
Wes-Tex Telephone Coop., Inc.
West Plains Telecommunications, Inc.
West Texas Rural Tel. Coop., Inc.
XIT Rural Telephone Coop., Inc.