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May 14, 2013

Rick Carter, CEMS-OR
Oregon Public Utility Commission
550 Capitol St. NE, Ste. 215
Salem, OR 97301

Re: AT&T Mid-Cycle Safety Report in compliance with OAR860-024-0011

Dear Mr. Carter,

On April 30, 2013, you asked AT&T to respond to three questions related to the "Commission's NESC Inspection Program." The responses for AT&T Corp. and Teleport Communications America, LLC (collectively, "AT&T") can be found below. The information contained herein includes proprietary and confidential information and, as such, AT&T requests that its confidentiality be maintained.

Q1. Does AT&T have a NESC Inspection Program within Oregon?

A1. AT&T constructs, operates and maintains its overhead facilities in compliance with the NESC standards. AT&T owns less than 130 miles of aerial fiber cable/facilities in Oregon. 100% of these cable facilities are alarmed and continuously monitored by an AT&T surveillance center. In addition AT&T conducts on average more than 10,000 physical observations per year (for both its underground and aerial facilities). AT&T also has eight full time employees in Oregon that are dedicated to locating, inspecting, maintaining and protecting AT&T's fiber facilities on a daily basis.

Q2. If so, since 2008 how much of the overhead/aerial plant has been reviewed?

A2. In the normal course of business, AT&T inspects its fiber facilities on a daily basis, including its aerial plant. Indeed, AT&T's written standards require that, at a minimum, the following areas must be addressed whenever technicians are conducting outside plant maintenance on its leased/owned fiber optic cable plant.

- Aerial: Perform a driven visual inspection of the aerial fiber routes to include poles, riser covers, pole supports and guys, sag of the messenger strand and general clearance and accessibility. Look for potential problems such as tree contacts, new construction close to the Right-of-Way route, any street widening, utility pole maintenance, or any activity that might cause relocations.

In addition, as noted above, AT&T employs eight full time employees, as well as outside contractors, whose responsibilities include routine inspection of AT&T's facilities whenever the employees/contractors are in route to a destination; whenever employees/contractors are conducting outside plant maintenance on

cable plant; during cable locate calls; during capital new build projects; and during relocation requests.

AT&T also submits its attached Mid-Cycle Safety Report which demonstrates further the safety activity performed for the period 2008-2012.

Q3. If none of the overhead/aerial plant has been reviewed since 2008, what will processes will AT&T develop and institute to complete a 100% review of its' overhead/aerial plant by 12/31/2017?

A3. Not applicable. See responses to Question Nos. 1 and 2.

If you have any questions about this information, please contact me at 333-3986.

Very truly yours,

A handwritten signature in black ink, appearing to read "David Collier". The signature is fluid and cursive, with the first name "David" and last name "Collier" clearly distinguishable.

David A. Collier
Area Manager

Attachment

AT&T Proprietary and Confidential Information

**Mid-Cycle Report to Oregon Public Utility Commission on facility inspections
OAR 860-024-011(1)(b)(A)(i)**

From: Sharon Mullin
On behalf of AT&T Corp. and Teleport Communications America LLC
2003 Point Bluff, Austin, Texas 78746
Phone: 512-330-1698
Email: sm3162@att.com

This is a summary of the facilities inspection activity for AT&T during the calendar years 2008 through 2012

| Year | Overhead Facilities (Miles)* | Percentage |
|------|------------------------------|------------|
| 2008 | 39 | 30.00% |
| 2009 | 39 | 30.00% |
| 2010 | 39 | 30.00% |
| 2011 | 39 | 30.00% |
| 2012 | 39 | 30.00% |

* AT&T owns a total of 130 miles of aerial cable in Oregon.
AT&T inspects its fiber facilities on a daily basis throughout the year.
The percentages in this report are conservative.
AT&T has inspected well over 50% of its overhead facilities since 2008.