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VIA E-Filing at PUC.FilingCenter@state.or.us

Rick Carter, CEMS-OR
Oregon Public Utility Commission
201 High St SE, Suite 100
Salem, OR 97301

Re: AT&T 10-year Safety Report in compliance with OAR 860-024-0011

Dear Mr. Carter:

Enclosed in compliance with the above entitled matter, please find the 10-year safety report of AT&T Corp. and Teleport Communications America LLC (“AT&T”) in compliance with OAR 860-024-0011. Note that SBC Long Distance does not own any of its own communication facilities and so this response is limited to AT&T Corp. and Teleport Communications America LLC.

OAR 860-024-0011 requires carriers to make detailed inspections of its Communication Facilities at least once every 10 years. AT&T submits the following 10-Year Safety Report which demonstrates further the safety activity performed for the period 2008-2017 and responds to the following requirements of OAR 860-024-0011 as follows:

- 1) An operator of communications facilities must construct, maintain and operate its facilities in compliance with the Commission Safety Rules. (OAR 860-024-011(1)(a))

Response: AT&T continually constructs, maintains and operates its facilities in compliance with the Commission Safety Rules including visual checks or practical tests of all facilities, to the extent required to identify violations of Commission Safety Rules. This is further described below.

- 2) An operator of communications facilities must conduct detailed inspections of its overhead facilities to identify violations of the Commission Safety Rules. (OAR 860-024-0011(1)(b))

Response: AT&T constructs, operates and maintains its facilities in compliance with the NESC standards. 100% of AT&T’s cable facilities are alarmed and continuously monitored by an AT&T surveillance center. In addition, AT&T conducts thousands of observations per year for its facilities. AT&T also has full time employees in Oregon that are dedicated to locating, inspecting, maintaining and protecting AT&T’s fiber facilities on a daily basis.

- 3) The maximum interval between detailed inspections is ten years, with a recommended inspection rate of ten percent of overhead facilities per year. (OAR 860-024-0011(1)(b)(A))

Response: AT&T inspects its overhead plant during the normal course of business. 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 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.

- 4) An operator of communications facilities must conduct detailed facility inspections of its underground facilities on a ten-year maximum cycle, with a recommended inspection rate of 10 percent of underground facilities per year. (OAR 860-024-0011(c))

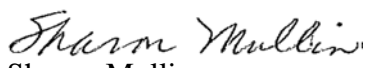
Response: AT&T continually visually inspects the areas surrounding its underground facilities.

- 5) An operator of communications facilities must maintain adequate written records of policies, plans and schedules to show that inspections and corrections are being carried out in compliance with this rule and OAR 860-024-0012. (OAR 860-024-0011(d))

Response: AT&T maintains standards and written records of policies, plans and schedules that utilize NESC standards and demonstrate that inspections and corrections are being carried out.

If you have any questions, please do not hesitate to contact me.

Sincerely,


Sharon Mullin
Director – Regulatory