



e-FILING REPORT COVER SHEET

COMPANY NAME: AT&T Corp. and Teleport Communications America LLC (" AT&T ")

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION? No Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

Select report type: RE (Electric) RG (Gas) RW (Water) RT (Telecommunications)
 RO (Other, for example, industry safety information)

Did you previously file a similar report? No Yes, report docket number: RO 11

Report is required by: OAR 860-024-0011

Statute

Order

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

Other

(For example, federal regulations, or requested by Staff)

Is this report associated with a specific docket/case? No Yes, docket number: RO 11

List Key Words for this report. We use these to improve search results.

AT&T 5-year Communication Facilities Inspection Cycle Report

Send the completed Cover Sheet and the Report in an email addressed to PUC.FilingCenter@puc.oregon.gov

Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 201 High Street SE Suite 100, Salem, OR 97301.



David Collier
Area Manager
Regulatory

PO Box 11010
Reno, NV 89520
T: 775 527-4252
dc1787@att.com

November 30, 2023

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

Oregon Public Utility Commission
201 High St SE, Suite 100
Salem, OR 97301

Re: AT&T 5-year Communication Facilities Inspection Cycle Report in compliance with OAR 860-024-0011

Please find the fifth year Communication Facilities Inspection Cycle 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 with a report regarding the fifth and tenth year of its inspection cycles. AT&T last reported its tenth year of the last cycle in 2017, and submits the following 5-Year Inspection Report which demonstrates the safety activity performed for the period 2018-2022 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) During the fifth year of the inspection cycle, the Operator must report to the Commission that 50 percent or more of its total facilities have been inspected pursuant to OAR 860-024-011(1)(A)(i).

Response: AT&T conducts on average more than 10,000 physical observations per year (for both its underground and aerial 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. AT&T inspects its fiber facilities on a daily basis and conservatively inspects 30% of its overhead facilities annually and inspected well over 50% of its overhead facilities for the period 2018-2022.

- 5) If less than 50 percent of its total facilities have been inspected, the Operator must report to the Commission that less than 50 percent of its total facilities have been inspected pursuant to this rule and provide a plan for Commission approval to inspect the remaining percentage within the next five years. The Commission may modify the plan or impose conditions to ensure sufficient inspection for safety purposes (OAR 860-024-0011(1)(A)(ii)).

Response: This does not apply, as AT&T has inspected more than 50% of its overhead facilities for the period 2018-2022.

- 6) 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))

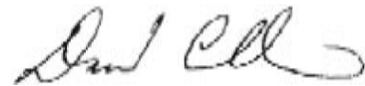
Response: AT&T continually visually inspects the areas surrounding its underground facilities.

- 7) 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,

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 Collier
Area Manager – Regulatory