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May 1, 2006

Vikie Bailey-Goggins
Public Utility Commission of Oregon
Attn: Filing Center
PO Box 2148
Salem, OR 97308-2148

RE: AR 506 Division 24 OAR Safety Standards

Dear Ms. Bailey-Goggins:

Thank you for the opportunity to provide comments on the issues that have been raised in AR 506. We look forward to hearing discussion on the issues at the upcoming workshop. For now, we will limit our comments to Issue #2 concerning training requirements. Sprint believes the proposed rule 860-024-011(1)(b) and (c), which would require contractors to provide evidence of training their employees in the Commission Safety Rules, is vague, unnecessary, and burdensome.

Specifically, the proposed rule, as well as the proposed 860-024-011(1)(b) is unclear about what the term "training" might constitute. The mere existence of a rule establishes the obligation of Companies to ensure its employees and contractors abide by the stated requirements. It is also unclear to whom the evidence would be submitted, and what sort of evidence would be expected of the Company or contractor to provide assurance to the Commission that the training was completed.

Contractors already agree when they sign Sprint contracts to abide by Sprint's construction standards, which encompass the National Electrical Safety Code (NESC) and the Commission's Safety Rules, and are the same standards to which Sprint employees are held accountable. Further, Sprint fully acknowledges its obligation to comply with the Commission rules that govern its operations, regardless of whether the work is performed "in-house" or by contractors. For these reasons, we recommend that 860-024-011(1)(b) and (c) be eliminated.

Again, thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Nancy L. Judy".

Nancy L. Judy