

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

FLORIDA CABLE
TELECOMMUNICATIONS ASSOCIATION,
INC., COX COMMUNICATIONS GULF
COAST, L.L.C., et. al.

Complainants,

v.

GULF POWER COMPANY,

Respondent.

E.B. Docket No. 04-381

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Federal Communications Commission
Office of Secretary

To: Office of the Secretary

Attn.: The Honorable Richard L. Sippel
Chief Administrative Law Judge

GULF POWER'S PRELIMINARY REPORT ON POLE SURVEY

Gulf Power Company ("Gulf Power"), pursuant to the Presiding Judge's March 30, 2005 Scheduling Order, submits this Preliminary Report On Pole Survey:

1. Number of poles to be surveyed: Gulf Power estimated that approximately 150,000 of the 235,000 poles in its system were joint use poles. Gulf Power's original goal, as set forth in the Osmose Statement of Work, was to conduct an audit of all 150,000 joint use poles.
2. Number of poles actually surveyed: 9,663. These poles are principally in the Pensacola area (most of which is served by Cox).
3. Number of poles estimated being at full capacity: Of the 9,663 poles actually collected, 7,120 were identified as "crowded" (as that term is defined in the Osmose Statement of Work). The percentage of "crowded" poles is 73.68%. This percentage, applied to Gulf

Power's entire system, would yield 110,525 "crowded" poles. As applied specifically to complainants, the estimated number of crowded poles is as follows:

	Cox	Comcast	Mediacom	Brighthouse
Total Poles (2005)	66,727	22,503	17,059	14,395
Estimated Number of "crowded" poles	49,164	16,580	12,569	10,606

4. Problems encountered with survey: Aside from the weather problems noted in prior Status Reports, Gulf Power also encountered an unexpectedly high number of "crowded" poles. As set forth in the Osmose Statement of Work, the work-up on a "crowded" pole cost Gulf Power \$20.25/pole versus \$2.65/pole for non-"crowded" poles. When a meaningful representative sample of poles revealed "crowding" at a rate of almost 75%, an audit of the entire system became cost prohibitive.¹ Ironically, there are simply too many "crowded" poles for Gulf Power to audit its entire system on a pole-by pole basis within the time allotted by the Scheduling Order.

5. Time estimated for completing survey: Gulf Power hopes to secure additional funding to audit other, limited portions of its system. But barring a change in the Scheduling Order, Gulf Power intends to have completed its audit by the October 31, 2005 deadline for the Final Report on Pole Survey.

6. Summary of preliminary conclusions: 73.68% of Gulf Power's joint use poles are "crowded" or at "full capacity." This percentage is absolutely accurate for the 9,663 poles collected, highly accurate for Gulf Power's largest attacher (Cox), and reasonably accurate for the areas served by the other three complainants (Comcast, Mediacom and Brighthouse). The

¹ Gulf Power had estimated, prior to beginning the survey, that approximately 25% of its joint use poles would meet the narrow, conservative definition of "crowded" set forth in the Osmose Statement of Work.

estimated number of "crowded" poles for each complainants is set forth in the table at paragraph 3, above.

7. Persons participating in preparation of Preliminary Report: The data within the report comes from Osmose. The key Osmose employees involved in this project are David Tessieri (project development/deployment), David Barker (project and field coordinator), and Ken McVeary (data compilation/analysis). Osmose used contractors for the day-to-day field work on this project. The key Gulf Power employees who were involved with this project were Ben Bowen and Eddie Dixon. Counsel for Gulf Power also was involved in the project and the preparation of this written report.



J. Russell Campbell
Eric B. Langley
BALCH & BINGHAM, LLP
1710 Sixth Avenue North
Birmingham, Alabama 35203-2015
Telephone: (205) 251-8100
Facsimile: (205) 226-8798

Ralph A. Peterson
BEGGS & LANE, LLP
P.O. Box 12950
Pensacola, Florida 32591-2950
Telephone (850) 432-2451
Facsimile: (850) 469-3331

Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Preliminary Report On Pole Survey has been served upon the following by Electronic Mail and by United States Mail on this the 30th day of September, 2005:

<p>Lisa Griffin Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>	<p>Shiela Parker Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>
<p>Rhonda Lien Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>	<p>Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, D.C. 20554</p>
<p>James Shook Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>	<p>David H. Solomon Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554</p>
<p>Director, Division of Record and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850</p>	<p>Federal Energy Regulatory Commission Docket Room 1A-209 888 First Street, NE Washington, D.C. 20426</p>
<p>John D. Seiver Geoffrey C. Cook Rita Tewari COLE, RAYWID & BRAVERMAN 1919 Pennsylvania Avenue, N.W. Suite 200 Washington, D.C. 20006 Via E-mail</p>	<p>John W. Berresford Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Via E-mail</p>


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