

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

In the Matter of)	
)	
Implementation of Section 224 of the Act)	WC Docket No. 07-245
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
)	
)	

OPPOSITION OF TW TELECOM

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November 1, 2010

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OPPOSITION OF TW TELECOM

tw telecom inc. (“TWTC”), by its attorneys, hereby submits the enclosed opposition to the petitions for reconsideration filed by various utilities.¹

DISCUSSION

The utilities seek reconsideration of the FCC’s decision in its May 2010 pole attachment order that pole owners must, pursuant to the non-discrimination requirement in Section 224(f)(1), “allow attachers to use the same attachment techniques [e.g., boxing and bracketing] that the utility itself uses.”² Among other things, the utilities argue that the non-discrimination requirement in Section 224(d)(1) does not require a utility that uses boxing or bracketing (or

¹ *Implementation of Section 224 of the Act; A National Broadband Plan for Our Future*, Petition for Reconsideration of the Coalition of Concerned Utilities, WC Docket No. 07-245, GN Docket No. 09-51 (Sept. 2, 2010) (“Concerned Utilities Petition”); *Implementation of Section 224 of the Act; A National Broadband Plan for Our Future*, Petition for Reconsideration and Request for Clarification of the Florida Investor-Owned Electric Utilities, WC Docket No. 07-245, GN Docket No. 09-51 (Sept. 2, 2010) (“Florida IOU Petition”); *Implementation of Section 224 of the Act; A National Broadband Plan for Our Future*, Petition for Reconsideration and Request for Clarification of Oncor Electric Delivery Company LLC, WC Docket No. 07-245, GN Docket No. 09-51 (Sept. 2, 2010).

² *Implementation of Section 224 of the Act; A National Broadband Plan for Our Future*, Order and Further Notice of Proposed Rulemaking, FCC 10-84, ¶ 1 (rel. May 20, 2010) (“Order”).

similar techniques) in the electrical space to use such techniques in the telecommunications space because (1) the use of such techniques in the electrical space presents distinct safety and engineering issues; (2) use of such techniques would force utilities to permit attachment in cases where there is “insufficient capacity” within the meaning of Section 224(d)(2); and (3) the “insufficient capacity” exception bars the FCC from mandating that the utility undertake any rearrangement or make-ready work in the communications or electrical supply space in order to facilitate attachment by a third party. These arguments rest on a misreading of the statute, FCC and court precedent, and must be rejected.

The FCC’s new and existing rules that establish utilities’ responsibilities to undertake make-ready work so as to ensure efficient use of the existing capacity of the pole are crucial to the success of broadband deployment. The FCC should therefore reject the utilities’ arguments and reiterate that utilities must allow third party attachers to utilize the existing space on the pole by (1) permitting the use of boxing and/or bracketing where appropriate and (2) rearranging or relocating their own facilities where necessary.

First, the utilities assert that boxing and bracketing as used in the communications space cause problems that utilities do not encounter when comparable techniques are used in the electrical space. They argue that the non-discrimination requirement in Section 224(f)(1) does not apply because of the additional difficulties encountered when these practices are employed in the telecommunications space.³ But whether or not comparable (or identical)⁴ practices in the

³ See Florida IOU Petition at 8-9 (“While all of the above construction configurations might inaccurately be described as boxing, bracketing or both ... none of these construction techniques within the electrical supply space pose the same problems as if similar practices were used in the telecommunications space. ... [B]oxing and bracketing in the communications space each slow down pole change-outs, complicate transfers of attachments, make poles more difficult to climb, and can prevent proper bucket truck positioning. ... These same problems do not exist under the electrical supply construction configurations described above (or other similar configurations)

electrical and telecommunications spaces present different engineering and safety issues (and it is not clear that they do) is irrelevant to whether the Section 224(d)(1) non-discrimination duty is triggered or how that duty is defined. As the FCC recognized in the *Order*, *once the Section 224(f)(1) duty is triggered*, a utility has a right to deny the use of a particular technique, “when necessary to ensure safety, reliability, and sound engineering [practices].”⁵ The right to deny access due to safety or engineering concerns is an exception to a utility’s obligation to comply with its Section 224(f)(1) non-discrimination duty; the utilities’ safety or engineering concerns do not define the duty itself.

The utilities’ reliance on differences in safety and engineering concerns could be manipulated to define the non-discrimination duty out of existence. For example, if a utility employed a particular type of boxing for its own telecommunications attachments, the utility could argue that it need not allow a third-party attacher to use the same technique because the different size of the third-party attacher’s attachments implicates slightly different safety issues. Because the safety issues are slightly different, the utility might argue that the practices themselves are sufficiently different so that the non-discrimination duty is not triggered. This

simply by virtue of their positioning higher up on the pole and the fact that linemen typically harness into the pole beneath the electrical supply conductors.”).

⁴ While the utilities argue that the use of particular techniques in the communications and utility spaces implicate different safety and engineering issues, they admit that the techniques themselves are similar or identical. *See* Florida IOU Petition at 7 (noting that “all of the above construction configurations *might inaccurately be described as boxing, bracketing, or both*, (insofar as they include electric supply lines on both sides of the pole and/or the placement of supply lines on an insulated extension from the pole)...”) (emphasis added); Concerned Utilities Petition at 4 (“In addition, while boxing in the communications space greatly impedes pole replacement, no such concern exists with cross arms used in the electric space (*which one could argue is similar to boxing*)....”) (emphasis added).

⁵ *Order* ¶ 9.

would be so even though the use of the technique in question on a third-party's attachments does not violate the NESC or the utility's own safety guidelines. Such an absurd outcome is clearly not what Congress intended when it mandated that utilities offer non-discriminatory pole access.

Second, the utilities argue that the FCC's rule regarding boxing and extension arms is contrary to the 11th Circuit's interpretation of "insufficient capacity" in *Southern Company*.⁶ But the *Southern Company* decision is irrelevant. In that case, the 11th Circuit struck down a rule which required utilities to replace existing poles with taller poles, while the requirement to permit the use of boxing and extension arms involves the "utilization of existing infrastructure, rather than replacing it."⁷ Moreover, as the FCC found, *Southern Company* does not bar the FCC from adopting its new rule because the holding of that case only applies where it is "agreed that capacity on a given pole or other facility is insufficient."⁸ The FCC found that there were disagreements in the record regarding whether boxing or bracketing is necessary only in cases where capacity is insufficient. As the FCC explained, *Southern Company* does not apply because "there is no 'agree[ment] that capacity is insufficient' where an attachment can be accommodated through the use of boxing or bracketing."⁹

⁶ See Florida IOU Petition at 13-18.

⁷ Order ¶ 16.

⁸ *Id.* ¶ 15 (emphasis added); see also *Florida Cable Telecomm. Ass'n, Inc. v. Gulf Power Co.*, Initial Decision, 22 FCC Rcd. 1997, ¶ 24 (2007) ("ALJ Order") (holding that in those cases where "there was never an agreement between [attachers] and [the utility] regarding pole capacity, the Southern Co. decision is not relevant.").

⁹ Order at n.58.

The Florida IOUs also argue that the FCC is using the non-discrimination duty in Section 224(d)(1) to “trump” the insufficient capacity exception of Section 224(d)(2).¹⁰ But this is a misreading of the *Order*. Again, the FCC’s definition and interpretation of “insufficient capacity” continues to provide a limitation on when the duty to treat attachers in a non-discriminatory manner applies. For example, the FCC held that if pole replacement is required, there is “insufficient capacity” on the pole.¹¹ This is so regardless of the circumstances in which the utility replaces poles for its own purposes. TWTC, like the cable petitioners, disagrees with the assertion that there is “insufficient capacity” where a utility needs to replace a pole to accommodate a new attachment.¹² However, there can be no doubt that in those circumstances where the FCC determines there is “insufficient capacity” under Section 224(f)(2), the utility need not comply with its Section 224(f)(1) duty.¹³

Third, the utilities impermissibly engage in a collateral attack on the longstanding rule that pole owners must allow rearrangement of facilities and perform make-ready to ensure that attachers are able to utilize the usable space on the pole. The utilities argue that because make-

¹⁰ See Florida IOU Petition at 18 (“The Commission is repeating -- almost verbatim -- the error found by the Eleventh Circuit in *Southern Co. v. FCC*: ‘insufficient capacity’ is an exception to nondiscriminatory access that does not depend on whether or how the utility would expand capacity to meet its own needs.”).

¹¹ *Order* ¶ 16 (“At the other extreme, the statute might be read to require a utility to completely replace a pole—an interpretation that some commenters oppose. We see no reason to adopt either of those extreme positions.”).

¹² See generally *Implementation of Section 224 of the Act; A National Broadband Plan for Our Future*, Petition for Reconsideration of Alabama Cable Telecommunications Association *et al.*, WC Docket No. 07-245, GN Docket No. 09-51 (Sept. 2, 2010).

¹³ See 47 U.S.C. § 224(f)(2) (“Notwithstanding [the non-discrimination duty under § 224(f)(1)], a utility providing electric service may deny a cable television system or any telecommunications carrier access to its poles....where there is insufficient capacity.”).

ready work is only necessary if there is “insufficient capacity” on the pole for a new attachment, the FCC cannot mandate the use of make-ready in either the *telecommunications or the electrical* space.¹⁴ This assertion is contrary to the clear language of the Act, has been rejected by the FCC, and it would permit utilities to deny pole access in nearly all cases contrary to Congressional intent.

Section 224(i) states that an existing attacher “shall not be required to bear any of the costs of rearranging...the attachment, if such rearrangement or replacement is required as the result of an additional attachment.” Congress did not limit rearrangement to rearrangement in the telecommunications space. Indeed, the Senate Report to the 1978 Act recognized that rearrangement of *electrical and telecommunications facilities* was part and parcel of the make-ready work necessary to ensure access to poles: “Make-ready costs are those necessary to *rearrange existing telephone and power lines* to maintain clearances between different pole lines required by individual utility construction and safety standards and national electrical safety codes...”¹⁵

The FCC has already specifically rejected the pole owners’ interpretation. For example, Gulf Power previously argued before the FCC that poles should be deemed “full” (i.e., having

¹⁴ See Florida IOU Petition at 3 & n.8 (“[I]nsufficient capacity’ only requires accommodation of a new attachment via rearrangement or space-saving techniques within the communications space, and does not require rearrangement or use of space-saving techniques for electric facilities in the supply space. ... The Florida IOUs are not conceding that electric utilities must allow rearrangement of communications lines. Because rearrangements of communications lines is a means of capacity expansion, an electric utility is within its statutory rights to disallow such work (on a nondiscriminatory basis) under Section 224(f)(2).”).

¹⁵ S. Rep. No. 95-580, at 19 (1977) (emphasis added).

insufficient capacity)¹⁶ in those cases where “a pole cannot accept an additional attachment due to inadequate clearance space between transformers” without “taking into consideration make-ready adjustments or reconfigurations in order to accommodate another attachments.”¹⁷ The FCC rejected this argument. It explained that, “pointing to the need for rearrangement of existing attachments and/or compliance with safety codes in order to accommodate new attachments do not meet Gulf Power’s burden [to show that the pole is full]. Such changes and rearrangements on poles are normal to accommodate new attachments.”¹⁸ As the FCC found, pole owners’ contracts often contain provisions allowing for the rearrangement of electrical facilities to effectuate make-ready.¹⁹ TWTC’s contracts contain similar provisions. As the attached make-ready survey indicates, the utility must routinely move its facilities within the electrical space to free-up usable telecommunications space on the pole.²⁰

¹⁶ In *Alabama Power*, the court found that a pole is “full” in those cases where there is “insufficient capacity” under Section 224(f)(2). *See Alabama Power Co. v. FCC*, 311 F.3d 1357, 1370 (11th Cir. 2002) (“Congress contemplated a scenario in which poles would reach full capacity when it created a statutory exception to the forced attachment regime. 47 U.S.C. § 224(f)(2). When a pole is full and another entity wants to attach, the government taking forecloses an opportunity to sell space to another bidding firm - a missed opportunity that does not exist in a non-rivalrous scenario.”).

¹⁷ *ALJ Order* ¶ 17.

¹⁸ *Id.* ¶ 19.

¹⁹ *Cavalier Telephone LLC v. Virginia Electric and Power Co.*, Order and Request For Information, 15 FCC Rcd. 9563, n.50 (2000) (“Section 7 states that ‘Customer shall, on demand, pay to Virginia Power, or other party as the case may be, the full cost of maintenance, replacement, rearrangement, extension, enlargement or operation of the *facilities belonging to Virginia Power* or any other party having pole attachment rights when such costs are incurred because of the existence of Customer’s facilities and would not have been incurred in the absence of Customer’s attachment to Virginia Power’s poles.’”).

²⁰ *See Make-Ready Survey*, attached hereto as Appendix A.

Such work in the electrical space is typically necessary to facilitate attachment because it has been TWTC's experience that the utilities often attach their own facilities without regard to the future needs of attachers.²¹ For example, in those cases where the NESC mandates at least a 40 inch separation between electrical conductors on the pole, the utility may install a transformer 60 inches below an existing electrical conductor simply because it is easier for the electrical crews to install facilities lower on the pole. However, the presence of a conductor lower on the pole impinges on attachers' ability to utilize the usable space. When an attacher seeks to attach, there may be no available space on the pole unless and until the utility raises the transformer 20 inches to produce a 40 inch separation between conductors. It is important to note however, that this make-ready work, and indeed a significant amount of other make-ready work that must be performed in the electrical space, could be avoided if utilities uniformly permit the use of boxing and bracketing on their poles.

Similarly, electrical lines from a pole to an end-user location may run at a high to low angle off of the pole to the customer location because of the relative heights of the pole and customer location or because there is substantial slack in the line which causes the line to sag. As the enclosed make-ready survey indicates, the utilities must often move, set-off or eliminate slack in the line to allow for attachment in these circumstances.²²

²¹ It is important to note TWTC is not arguing that utilities need to plan their electrical networks with the future needs of attachers in mind. Rather, in those cases where the electrical utilities practices in the electrical supply space prevent attachers from accessing the usable space on the pole, utilities should continue to be obligated, consistent with safety and standard engineering practices, to engage in the necessary make-ready within the electrical supply space to permit attachment.

²² See, e.g., Make Ready Survey at 5 (reference to moving "Drip Loop").

If utilities are not obligated to engage in the minimal make-ready work in the electrical space that is often necessary because of the utility's own practices, Congress' and the FCC's goals will be frustrated. In fact, according to the utilities, even in those cases where a pole has 10 feet of usable telecommunications space, utilities could completely bar access to that space simply because utilities' facilities in the electrical space preclude attachment. Alternatively, utilities may argue (as Gulf Power did before Judge Sippel) that if make-ready work is required, the pole is "full" as defined by the 11th Circuit in *Alabama Power*, permitting the utility to charge in excess of the of the statutory maximum rates.²³ The utilities' cramped reading of the statute would also provide an incentive for utilities to purposefully deploy their electrical facilities to crowd the usable space on the pole, thereby increasing the number of poles where they may deny access or seek monopoly rents. The FCC must not permit the utilities to engage in such gaming and should reconfirm that electrical utilities are obligated to perform make-ready and to rearrange facilities in the electrical space to facilitate attachment in the telecommunications space.

CONCLUSION

For the foregoing reasons, the FCC should reject the utilities' petitions for reconsideration.

²³ See *Alabama Power Co.*, 311 F.3d at 1370 (“[B]efore a power company can seek compensation above marginal cost, it must show with regard to each pole that (1) the pole is at full capacity and (2) either (a) another buyer of the space is waiting in the wings or (b) the power company is able to put the space to a higher-valued use with its own operations.”).

Respectfully submitted,

/s/Thomas Jones

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November 1, 2010

APPENDIX A

Georgia Power Make-Ready Work Locations

Time Warner 2001647 Suwanee

Georgia Power Work Locations Only

Date Printed: 12/5/2006

Work Order# 893061006166

Tracking # 2001647

Page 1 of 17

Pole# .29	PowerMap# . . . 0441-1346	Location. . . At intersection of Buford Hwy and Langford Rd	Rev#: 0
PoleOwner. . . Georgia Power	CommMap#	Station#.	NJUNS#: 471250
			Comp_ID: 1002400000052639

POA's:	Midspans
Georgia Power Neutral. 34' 5"	Georgia Power Neutral. To: South. Over: Trav. by Veh. 31' 2"
Georgia Power Secondary-MPX. . . 33' 4"	Comcast Cable. To: South. Over: Trav. by Veh. 26' 7"
Georgia Power FL Bkt-Gnd. 32' 5"	Gwinnett Co DOT Traffic Light To: South. Over: Trav. by Veh. 22' 10"
Georgia Power Drip Loop-Sec. . . . 31' 10" Raise 18" to. . . 33' 4"	
Comcast Cable. 30' 0" Lower 12" to. . . 29' 0"	
BellSouth Cable. 22' 10"	
Time Warner Fiber Optic. Attach at. 30' 0"	

Construction Notes

- Georgia Power. 1 Raise secondary drip loops up to secondary height (3-4DA sec)
- Comcast. 2 Lower Facilities as noted -- retention down guy at pole across street in front of CVS Pharmacy
- Time Warner. 3 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground

Pole-Clearance Violations

Comcast Cable<40" from Drip Loop-Sec. 22"



Georgia Power Make-Ready Work Locations

Time Warner 2001647 Suwanee

Georgia Power Work Locations Only

Date Printed: 12/5/2006

Work Order# 893061006166

Tracking # 2001647

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Pole# .31	PowerMap# . . . 0441-1346	Location . . . 5262 Buford Hwy		Rev#: 0
PoleOwner . . . Georgia Power	CommMap#	Station#. 3338	NJUNS#: 471253	Comp_ID: 100240000052636

POA's:	Midspans
Georgia Power Secondary-MPX. . .31' 5"	Georgia Power Neutral. To: 32. Over: Trav. by Veh. 25' 6"
Georgia Power Neutral.31' 5"	Georgia Power Secondary-MP To: 32. Over: Trav. by Veh. 24' 6"
Georgia Power Drip Loop- TR. . . .30' 8" Lower 16" to. . . 29' 4"	ABS Fiber Optic. To: 32. Over: Trav. by Veh. 24' 0"
Georgia Power Transformer.30' 6"	Gwinnett Co DOT Interconnec To: 32. Over: Trav. by Veh. 21' 3"
Georgia Power Secondary-MPX. . .30' 0" Raise 17" to. . . 31' 5"	Comcast Cable. To: 32. Over: Trav. by Veh. 17' 11"
Comcast Drop.27' 8"	BellSouth Cable. To: 32. Over: Trav. by Veh. 15' 6"
ABS Fiber Optic.26' 6"	BellSouth Cable. To: NW. Over: Trav. by Veh. 19' 4"
Gwinnett Co DOT Interconnect. . .25' 5"	
Comcast Cable.24' 6"	
BellSouth Drop.24' 2"	
BellSouth Cable.23' 5"	
BellSouth Drop.22' 8"	
BellSouth Cable.22' 5"	
Time Warner Fiber Optic. Attach at. 27' 6"	

Construction Notes

- | | | |
|------------------------|---|--|
| Georgia Power. | 1 | Raise bottom secondary into Neutral spool (2TA sec) -- RM:
SD1
Lower transformer low side leads 10" above bottom of transformer (25KVA, 2-svc) |
| Time Warner. | 2 | Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground |

Pole-Clearance Violations

Comcast Drop<40" from Secondary-MPX.	28"
Comcast Drop<40" from Drip Loop- TR.	36"

Midspan-Clearance Violations

ABS Fiber Optic <30" separation to Secondary-MPX. 6"

Utility Consultants, Inc

1810 Water Place Suite 200 Atlanta, GA 30339

(770) 955-9922

Utility Consultants, Inc. (UCI) has reviewed certain field conditions as authorized in the scope of work of the stated project number. UCI does not warrant and accepts no responsibility for the identification of any conditions related to NESC safety violations not specifically required to be identified by the scope of work of this project.



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Georgia Power Make-Ready Work Locations

Time Warner 2001647 Suwanee

Georgia Power Work Locations Only

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Tracking # 2001647

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Pole# .32	PowerMap# . . . 0441-1346	Location. . . 5246 Buford Hwy		Rev#: 0
PoleOwner. . . Georgia Power	CommMap#	Station#.	NJUNS#: 471255	Comp_ID: 100240000052635

POA's:	Midspans
Georgia Power Neutral. 29' 8"	Georgia Power Neutral. To: 33. Over: Trav. by Veh. 24' 4"
Georgia Power Secondary-MPX. . . 28' 10" Raise 10" to. . . 29' 8"	ABS Fiber Optic. To: 33. Over: Trav. by Veh. 23' 1"
Georgia Power Drip Loop-Sec. . . . 28' 1" Raise 19" to. . . 29' 8"	Comcast Cable. To: 33. Over: Trav. by Veh. 20' 1"
ABS Fiber Optic. 25' 4"	BellSouth Cable. To: 33. Over: Trav. by Veh. 15' 0"
Gwinnett Co DOT W/head-Comm. 25' 3"	
Gwinnett Co DOT Interconnect. . . 25' 2"	
Comcast Cable. 24' 3"	
BellSouth Drop. 22' 3"	
BellSouth Cable. 22' 0" Raise 15" to. . . 23' 3"	
Time Warner Fiber Optic. Attach at. 26' 4"	

Construction Notes

- Georgia Power. 1 Raise secondary into Neutral spool (2TA sec) -- RM: SD1
Raise secondary drip loops up to secondary height -- resag secondary to maximum height per NESC
- Time Warner. 2 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground
- BellSouth. 3 Raise Facilities as noted -- resag cable per NESC to maximum height

Pole-Clearance Violations

ABS Fiber Optic < 40" from Drip Loop-Sec. 33"

Midspan-Clearance Violations

BellSouth Cable < 15.5' over Trav. by Veh. 15'



Georgia Power Make-Ready Work Locations

Time Warner 2001647 Suwanee

Georgia Power Work Locations Only

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Work Order# 893061006166

Tracking # 2001647

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Pole# .33	PowerMap# . . . 0441-1346	Location . . . 5236 Buford Hwy		Rev#: 0
PoleOwner . . . Georgia Power	CommMap#	Station#. 3340	NJUNS#: 471264	Comp_ID: 1002400000052634

POA's:

Georgia Power Secondary-MPX. . .31' 8"
Georgia Power Neutral.31' 8"
Georgia Power SL Bkt-Gnd.30' 5"
Georgia Power Secondary-MPX. . .30' 2"
Georgia Power Transformer.30' 0"
Georgia Power Drip Loop-SL.29' 7"
Georgia Power Drip Loop- TR.29' 6"
ABS Fiber Optic.27' 10" Lower 24" to. . . 25' 10"
Comcast Cable.26' 10" Lower 24" to. . . 24' 10"
BellSouth Drop.22' 6" Raise 16" to. . . 23' 10"
BellSouth Cable.21' 10" Raise 24" to. . . 23' 10"
Time Warner Fiber Optic. Attach at. 26' 10"

Midspans

Georgia Power Neutral. To: 34. Over: Ped. Only. 31' 4"
Georgia Power Secondary-MP To: 34. Over: Ped. Only. 28' 7"
ABS Fiber Optic. To: 34. Over: Ped. Only. 27' 0"
Comcast Cable. To: 34. Over: Ped. Only. 25' 2"
BellSouth Cable. To: 34. Over: Ped. Only. 20' 3"
BellSouth Drop. To: 34. Over: Ped. Only. 19' 9"
BellSouth Drop. To: 34. Over: Ped. Only. 15' 8"

Construction Notes

- | | | |
|------------------------|---|--|
| Georgia Power. | 1 | Raise transformer low side leads 10" above bottom of transformer (25KVA, 1/0TA sec, 4DA sec, svc) |
| Comcast. | 2 | Lower Facilities as noted -- resag cable per NESC
Note: wreck out abandon bolt |
| ABS. | 3 | Lower Facilities as noted -- resag cable per NESC
Note: wreck out abandon bolt |
| Time Warner. | 4 | Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground -- resag cable 30" below power |
| BellSouth. | 5 | Raise Facilities as noted -- resag cable and drop per NESC |

Pole-Clearance Violations

ABS Fiber Optic<40" from Secondary-MPX.	28"
Comcast Cable<40" from Drip Loop- TR.	32"
ABS Fiber Optic<40" from Drip Loop- TR.	20"
ABS Fiber Optic <30" from Transformer.	26"

Midspan-Clearance Violations

ABS Fiber Optic <30" separation to Secondary-MPX. 19"



Georgia Power Make-Ready Work Locations

Time Warner 2001647 Suwanee

Georgia Power Work Locations Only

Date Printed: 12/5/2006

Work Order# 893061006166

Tracking # 2001647

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Pole# .42	PowerMap# . . . 0441-1346	Location . . . 5074 Buford Hwy		Rev#: 0
PoleOwner . . . Georgia Power	CommMap#	Station#.	NJUNS#: 471275	Comp_ID: 1001600001993646

POA's:	Midspans
Georgia Power Transformer.34' 0"	Georgia Power Neutral. To: 41. Over: Trav. by Veh. 30' 2"
Georgia Power Secondary-MPX.32' 8"	ABS Fiber Optic. To: 41. Over: Trav. by Veh. 26' 5"
Georgia Power Neutral.32' 8"	Comcast Cable. To: 41. Over: Trav. by Veh. 24' 1"
Georgia Power Drip Loop- TR.30' 9" Raise 49" to. . . 34' 10"	BellSouth Cable. To: 41. Over: Trav. by Veh. 19' 8"
Georgia Power SL Bkt-Gnd.30' 8"	Georgia Power Neutral. To: 43. Over: Trav. by Veh. 25' 10"
Georgia Power Drip Loop-SL.29' 5" Raise 15" to. . . 30' 8"	ABS Fiber Optic. To: 43. Over: Trav. by Veh. 22' 8"
ABS Fiber Optic.27' 0"	Comcast Cable. To: 43. Over: Trav. by Veh. 21' 3"
Comcast Cable.25' 10"	BellSouth Cable. To: 43. Over: Trav. by Veh. 20' 2"
BellSouth Cable.24' 2"	
BellSouth Cable.23' 8"	
BellSouth Drop.21' 6"	
Time Warner Fiber Optic. Attach at. 28' 0"	

Construction Notes

- | | | |
|------------------------|---|---|
| Georgia Power. | 1 | Raise transformer low side leads 10" above bottom of transformer (2-25KVA, 37.5KVA, 1/0QA sec & svc)
Tighten light leads |
| Time Warner. | 2 | Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground |

Pole# .51	PowerMap# . . . 0447-1348	Location . . . 4930 Buford Hwy		Rev#: 0
PoleOwner . . . Bellsouth	CommMap#	Station# 5517	NJUNS#:	Comp_ID: 1001600001995099

POA's:	Midspans
Georgia Power Neutral.28' 6"	Georgia Power Neutral. To: 52. Over: Trav. by Veh. 24' 8"
Georgia Power Transformer.27' 4"	ABS Fiber Optic. To: 52. Over: Trav. by Veh. 21' 9"
Georgia Power 1" PVC.26' 10" Raise 24" to. . . 28' 10"	Comcast Cable. To: 52. Over: Trav. by Veh. 20' 7"
Georgia Power 1" PVC.26' 8" Raise 24" to. . . 28' 8"	
Georgia Power Drip Loop- TR.26' 3" Raise 23" to. . . 28' 2"	
ABS Fiber Optic.24' 10" Lower 13" to. . . 23' 9"	
Comcast Cable.23' 9" Lower 12" to. . . 22' 9"	
Time Warner Fiber Optic. Attach at. 24' 10"	

Construction Notes

- | | | |
|------------------------|---|---|
| Georgia Power. | 1 | Raise transformer low side leads 10" above bottom of transformer (25KVA, 2-2TA sec, 2-4UTA) |
| Comcast. | 2 | Lower Facilities as noted -- resag cable per NESC |
| ABS. | 3 | Lower Facilities as noted -- resag fiber per NESC |
| Time Warner. | 4 | Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground |

Pole-Clearance Violations

ABS Fiber Optic<40" from Drip Loop- TR.	17"
Comcast Cable<40" from Drip Loop- TR.	30"

Utility Consultants, Inc

1810 Water Place Suite 200 Atlanta, GA 30339

(770) 955-9922

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Pole# .58	PowerMap# . . . 0447-1350	Location . . . 4848 Buford Hwy		Rev#: 0
PoleOwner . . . Bellsouth	CommMap#	Station#. 252385	NJUNS#:	Comp_ID: 1001600001995165

POA's:	Midspans
Georgia Power Secondary-MPX. . .29' 10"	Georgia Power Neutral. To: 59. Over: Trav. by Veh. 29' 11"
Georgia Power Neutral.29' 10"	ABS Fiber Optic. To: 59. Over: Trav. by Veh. 27' 0"
Georgia Power Transformer.28' 7"	BellSouth Cable. To: 59. Over: Trav. by Veh. 23' 1"
Georgia Power Drip Loop- TR.28' 4" Raise 13" to . . . 29' 5"	BellSouth Drop. To: 59. Over: Trav. by Veh. 15' 9"
Georgia Power Drip Loop-SL.26' 5"	BellSouth Cable. To: West. Over: Trav. by Veh. 19' 5"
Georgia Power SL Bkt-Gnd.26' 4"	BellSouth Drop. To: West. Over: Trav. by Veh. 17' 0"
ABS Fiber Optic.24' 4"	
Comcast Cable.23' 6"	
BellSouth Cable.22' 8"	
BellSouth Cable.21' 5"	
Time Warner Fiber Optic. Attach at. 25' 4"	

Construction Notes

- | | | |
|------------------------|---|---|
| Georgia Power. | 1 | Raise transformer low side leads 10" above bottom of transformer (15KVA, 2TA sec, 4DA sec) |
| Time Warner. | 2 | Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground |



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Time Warner 2001647 Suwanee

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Pole# . 72	PowerMap# . . 0447-1350	Location . . Transformer bank at 4600 Buford Hwy	Rev#: 0
PoleOwner . . Bellsouth	CommMap#	Station# . 255942 NJUNS#:	Comp_ID: 1001600001996266

POA's:	Midspans
Georgia Power Secondary-MPX . . 27' 7"	Georgia Power Neutral To: 71 Over: Ped. Only 25' 0"
Georgia Power Neutral 27' 7"	ABS Fiber Optic To: 71 Over: Ped. Only 20' 0"
Georgia Power Secondary-MPX . . 26' 7"	Comcast Cable To: 71 Over: Ped. Only 18' 4"
Georgia Power Transformer 25' 10"	BellSouth Cable To: 71 Over: Ped. Only 14' 10"
Georgia Power Secondary-MPX . . 25' 4" Raise 15" to . . 26' 7"	Georgia Power Neutral To: 73 Over: Trav. by Veh. 27' 0"
Georgia Power Drip Loop- TR . . . 24' 4" Raise 27" to . . 26' 7"	ABS Fiber Optic To: 73 Over: Trav. by Veh. 22' 0"
Comcast Drop 23' 2" Lower 12" to . . 22' 2"	Comcast Cable To: 73 Over: Trav. by Veh. 20' 4"
ABS Fiber Optic 23' 0" Lower 12" to . . 22' 0"	BellSouth Cable To: 73 Over: Trav. by Veh. 17' 8"
Comcast Cable 22' 0" Lower 26" to . . 19' 10"	Georgia Power Secondary-MP To: North Over: Trav. by Veh. 21' 9"
BellSouth Cable 20' 10" Lower 28" to . . 18' 6"	Comcast Drop To: North Over: Trav. by Veh. 19' 8"
BellSouth Cable 20' 6" Lower 30" to . . 18' 0"	BellSouth Cable To: North Over: Trav. by Veh. 18' 5"
BellSouth Cable 19' 10" Lower 12" to . . 18' 10"	
Time Warner Fiber Optic Attach at 23' 0"	

Construction Notes

- Georgia Power 1 Raise transformer low side leads to middle secondary attachment (37.5&25 KVA, 4DA & 2TA sec, 1/QA svc)
Reconnect or wreck out cut leads (1/0QA svc)
Raise bottom secondary to middle secondary attachment height (4DA sec, RM: SD1)
- BellSouth 2 Lower Facilities as noted -- resag cable per NESC cable to pole North and to pole #73
- Comcast 3 Lower Facilities as noted -- resag drop 30" below power
- ABS 4 Lower Facilities as noted
- Time Warner 5 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground -- sag cable per NESC

Pole-Clearance Violations

Comcast Drop <40" from Secondary-MPX	26"
ABS Fiber Optic <40" from Secondary-MPX	28"
Comcast Drop <40" from Drip Loop- TR	14"
ABS Fiber Optic <40" from Drip Loop- TR	16"
Comcast Cable <40" from Drip Loop- TR	28"

Midspan-Clearance Violations

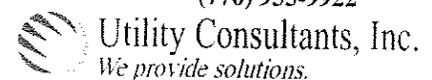
Comcast Drop <30" separation to Secondary-MPX 25"

Utility Consultants, Inc

1810 Water Place Suite 200 Atlanta, GA 30339

(770) 955-9922

Utility Consultants, Inc. (UCI) has reviewed certain field conditions as authorized in the scope of work of the stated project number. UCI does not warrant and accepts no responsibility for the identification of any conditions related to NESC safety violations not specifically required to be identified by the scope of work of this project.



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Pole# .75	PowerMap# . . . 0447-1350	Location. . . 4598B Buford Hwy		Rev#: 0
PoleOwner. . . Georgia Power	CommMap#	Station#.	NJUNS#: 471283	Comp_ID: 1001600001996219

POA's:	Midspans
Georgia Power Neutral. 25' 7"	Georgia Power Neutral. To: 74. Over: Trav. by Veh. 28' 10"
Georgia Power Secondary-MPX. . . 24' 5" Raise 14" to. . . 25' 7"	Georgia Power Secondary-MP To: 74. Over: Trav. by Veh. 24' 2"
Georgia Power Relay box (top). . . 24' 0"	ABS Fiber Optic. To: 74. Over: Trav. by Veh. 22' 7"
Georgia Power Drip Loop-Sec. . . . 23' 3" Raise 28" to. . . 25' 7"	Comcast Cable. To: 74. Over: Trav. by Veh. 20' 10"
Georgia Power Drip Loop-Relay. . . 23' 0"	Georgia Power Neutral. To: 76. Over: Ped. Only. 26' 8"
ABS Fiber Optic. 21' 8" Lower 44" to. . . 18' 0"	ABS Fiber Optic. To: 76. Over: Ped. Only. 22' 2"
Comcast Cable. 20' 8" Lower 44" to. . . 17' 0"	Comcast Cable. To: 76. Over: Ped. Only. 20' 2"
BellSouth Cable. 19' 10" Lower 46" to. . . 16' 0"	BellSouth Cable. To: 76. Over: Ped. Only. 20' 0"
Time Warner Fiber Optic. Attach at. 19' 0"	

Construction Notes

- Georgia Power. 1 Raise secondary to back of Neutral spool (RM/IN: SD1)
Raise secondary drip loops up to secondary height -- resag 4DA sec >30" above comm. to pole #74
- BellSouth. 2 Lower Facilities as noted -- resag cable per NESC
- Comcast. 3 Lower Facilities as noted -- resag cable per NESC -- relash cable to strand to pole #76
- ABS. 4 Lower Facilities as noted -- resag cable per NESC
- Time Warner. 5 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground -- sag cable 30" below power to pole #74

Pole-Clearance Violations

ABS Fiber Optic < 40" from Secondary-MPX.	33"
ABS Fiber Optic < 40" from Drip Loop-Sec.	19"
Comcast Cable < 40" from Drip Loop-Sec.	31"
ABS Fiber Optic < 40" from Drip Loop-Relay.	16"
Comcast Cable < 40" from Drip Loop-Relay.	28"
BellSouth Cable < 40" from Drip Loop-Relay.	38"

Midspan-Clearance Violations

ABS Fiber Optic < 30" separation to Secondary-MPX. 19"



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Pole# . . . 86	PowerMap# . . . 0450-1352	Location . . . 4th pole NE of Simpson Circle on Buford Hwy	Rev#: 0
PoleOwner . . . Bellsouth	CommMap#	Station# E0812 NJUNS#:	Comp_ID: 1001600001996410

POA's:	Midspans
Georgia Power Neutral. 30' 8"	Georgia Power Neutral. To: 85. Over: Trav. by Veh. 28' 9"
Georgia Power Secondary-MPX. 29' 7"	ABS Fiber Optic. To: 85. Over: Trav. by Veh. 24' 9"
Georgia Power SL Bkt-Gnd. 27' 5"	Comcast Cable. To: 85. Over: Trav. by Veh. 23' 7"
Georgia Power Drip Loop-SL. 27' 0"	BellSouth Cable. To: 85. Over: Trav. by Veh. 19' 4"
Georgia Power Drip Loop-Sec. 27' 0" Raise 31" to. . . 29' 7"	BellSouth Cable. To: 85. Over: Trav. by Veh. 18' 0"
ABS Fiber Optic. 26' 9" Lower 23" to. . . 24' 10"	BellSouth Cable. To: Nw. Over: Trav. by Veh. 19' 4"
BellSouth Drop. 26' 1"	
Comcast Cable. 25' 8" Lower 22" to. . . 23' 10"	
BellSouth Cable. 25' 1" Lower 27" to. . . 22' 10"	
BellSouth Drop. 22' 10"	
BellSouth Drop. 22' 3"	
BellSouth Cable. 21' 10"	
BellSouth Cable. 20' 7"	
Time Warner Fiber Optic. Attach at. 25' 8"	

Construction Notes

- Georgia Power. 1 Raise secondary drip loops up to secondary height -- tighten light leads (4DA sec)
- BellSouth. 2 Lower Facilities as noted -- resag cable per NESC
- Comcast. 3 Lower Facilities as noted
- ABS. 4 Lower Facilities as noted
- Time Warner. 5 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground -- sag cable per NESC

Pole-Clearance Violations

ABS Fiber Optic<40" from Secondary-MPX.	34"
BellSouth Drop<40" from Drip Loop-Sec.	11"
BellSouth Cable<40" from Drip Loop-Sec.	23"
Comcast Cable<40" from Drip Loop-Sec.	16"
ABS Fiber Optic<40" from Drip Loop-Sec.	3"
BellSouth Drop <12" from Drip Loop-SL.	11"
ABS Fiber Optic <12" from Drip Loop-SL.	3"



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Pole# .87	PowerMap# . . . 0450-1352	Location. . . 4434 Buford Hwy		Rev#: 0
PoleOwner. . . Bellsouth	CommMap#	Station#. 8021	NJUNS#:	Comp_ID: 1001600001996411

POA's:	Midspans
Georgia Power Transformer. 27' 9"	Georgia Power Neutral. To: 86. Over: Ped. Only. 28' 9"
Georgia Power Secondary-MPX. 26' 10"	ABS Fiber Optic. To: 86. Over: Ped. Only. 25' 1"
Georgia Power Neutral. 26' 10"	Comcast Cable. To: 86. Over: Ped. Only. 23' 0"
Georgia Power Drip Loop- TR. 24' 2" Raise 43" to. . . 27' 9"	BellSouth Cable. To: 86. Over: Ped. Only. 21' 4"
ABS Fiber Optic. 22' 10"	BellSouth Cable. To: 86. Over: Ped. Only. 19' 8"
Comcast Cable. 21' 10"	BellSouth Drop. To: 86. Over: Ped. Only. 18' 5"
BellSouth Cable. 20' 8"	Georgia Power Neutral. To: 88. Over: Trav. by Veh. 24' 9"
BellSouth Drop. 20' 0"	ABS Fiber Optic. To: 88. Over: Trav. by Veh. 21' 4"
BellSouth Cable. 19' 6"	Comcast Cable. To: 88. Over: Trav. by Veh. 19' 8"
Time Warner Fiber Optic. Attach at. 23' 10"	BellSouth Cable. To: 88. Over: Trav. by Veh. 17' 6"
	BellSouth Cable. To: 88. Over: Trav. by Veh. 16' 0"

Construction Notes

- Comcast.
- ABS.
- Georgia Power. 1 Raise transformer low side leads to bottom of transformer (2-15KVA, 25KVA, 4/0QA svc)
- Time Warner. 2 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground

Pole-Clearance Violations

ABS Fiber Optic<40" from Drip Loop- TR.	16"
Comcast Cable<40" from Drip Loop- TR.	28"



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Pole# .88	PowerMap# . . 0450-1352	Location . . . 4420 Buford Hwy		Rev#: 0
PoleOwner . . . Bellsouth	CommMap#	Station#.	NJUNS#:	Comp_ID: 1001600001996412

POA's:	Midspans
Georgia Power Transformer.29' 2"	Georgia Power Neutral. To: 87. Over: Trav. by Veh. 23' 8"
Georgia Power Secondary-MPX.27' 6"	ABS Fiber Optic. To: 87. Over: Trav. by Veh. 20' 5"
Georgia Power Neutral.27' 6"	Comcast Cable. To: 87. Over: Trav. by Veh. 18' 10"
Georgia Power Drip Loop- TR.26' 4"	BellSouth Cable. To: 87. Over: Trav. by Veh. 16' 6"
Georgia Power FL Bkt-Gnd.24' 9"	BellSouth Cable. To: 87. Over: Trav. by Veh. 15' 3"
ABS Fiber Optic.24' 0"	Georgia Power Neutral. To: 89. Over: Ped. Only. 27' 8"
BellSouth Drop.23' 7"	ABS Fiber Optic. To: 89. Over: Ped. Only. 23' 9"
Comcast Cable.23' 0"	Comcast Cable. To: 89. Over: Ped. Only. 22' 9"
BellSouth Drop.21' 8"	BellSouth Cable. To: 89. Over: Ped. Only. 21' 4"
BellSouth Cable.21' 4"	BellSouth Cable. To: 89. Over: Ped. Only. 19' 2"
BellSouth Drop.21' 3"	
BellSouth Cable.20' 2"	

Construction Notes

- | | | |
|------------------------|---|--|
| BellSouth. | 1 | Install a 50-2 pole |
| Georgia Power. | 2 | RM: 3-PH Primary Horizontal Tangent (steel bkt w/clamps), Secondary Double Deadend
IN:50-2, 3-PH Primary Horizontal Tangent (fiberglass bkt), Secondary Double Deadend
XFER: 400W HPS Floodlight, 2-15KVA, 25KVA, 2-1/0QA svc, 3-397A, 4/0AN |
| Time Warner. | 3 | Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground |
| ABS. | 4 | Transfer to new pole in compliance with all NESC and pole owner requirements
Bond to pole ground |
| Comcast. | 5 | Transfer to new pole in compliance with all NESC and pole owner requirements
Bond to pole ground |
| BellSouth. | 6 | Transfer both cables to new pole in compliance with all NESC and pole owner requirements
Resag cables per NESC to maximum height
Remove stub pole |

Pole-Clearance Violations	Midspan-Clearance Violations
BellSouth Drop<40" from Drip Loop- TR. 33"	BellSouth Cable <15.5' over Trav. by Veh. 15'
ABS Fiber Optic<40" from Drip Loop- TR. 28"	

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Pole# .89	PowerMap# . . . 0450-1352	Location. . . Transformer bank NE of 4420 Buford Hwy	Rev#: 0
PoleOwner. . . Georgia Power	CommMap#	Station#. 258613 NJUNS#: 471300	Comp_ID: 1002200000413646

POA's:	Midspans
Georgia Power Transformer.28' 0"	Georgia Power Neutral. To: 90. Over: Trav. by Veh. 24' 10"
Georgia Power Secondary-MPX.27' 2"	ABS Fiber Optic. To: 90. Over: Trav. by Veh. 20' 9"
Georgia Power Neutral.27' 2"	Comcast Cable. To: 90. Over: Trav. by Veh. 19' 7"
Georgia Power Drip Loop- TR.26' 1" Raise 13" to. . . 27' 2"	BellSouth Cable. To: 90. Over: Trav. by Veh. 18' 4"
ABS Fiber Optic.23' 0" Lower 12" to. . . 22' 0"	BellSouth Cable. To: 90. Over: Trav. by Veh. 17' 2"
Comcast Cable.22' 0" Lower 14" to. . . 20' 10"	
BellSouth Cable.20' 10" Lower 12" to. . . 19' 10"	
BellSouth Cable.19' 9" Lower 12" to. . . 18' 9"	
Time Warner Fiber Optic. Attach at. 23' 0"	

Construction Notes

- Georgia Power. 1 Raise transformer low side leads up to secondary height (2-25KVA, 37.5KVA, 4/0QA sec)
- BellSouth. 2 Lower Facilities as noted
- Comcast. 3 Lower Facilities as noted
- ABS. 4 Lower Facilities as noted
- Time Warner. 5 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground

Pole-Clearance Violations

ABS Fiber Optic<40" from Drip Loop- TR. 37"



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Pole# . . . 90	PowerMap# . . . 0450-1352	Location . . . 4416 Buford Hwy		Rev#: 0
PoleOwner . . . Bellsouth	CommMap#	Station#. 24314	NJUNS#:	Comp_ID: 1001600001996413

POA's:	Midspans
Georgia Power Top of pole 36' 7"	Georgia Power Neutral To: 91 Over: Trav. by Veh. 25' 1"
Georgia Power Primary Bkt. 35' 1"	ABS Fiber Optic. To: 91 Over: Trav. by Veh. 19' 7"
Georgia Power Transformer. 26' 0" Raise 36" to . . . 29' 0"	Comcast Cable. To: 91 Over: Trav. by Veh. 18' 10"
Georgia Power Neutral. 25' 0" Raise 60" to . . . 30' 0"	BellSouth Cable. To: 91 Over: Trav. by Veh. 17' 0"
Georgia Power Secondary-MPX. 25' 0" Raise 60" to . . . 30' 0"	BellSouth Cable. To: 91 Over: Trav. by Veh. 15' 7"
Georgia Power Drip Loop-Sec. 24' 2" Raise 68" to . . . 29' 10"	Georgia Power Secondary-MP To: North. Over: Trav. by Veh. 20' 7"
Georgia Power SL Bkt-Gnd. 22' 10" Raise 60" to . . . 27' 10"	Comcast Drop. To: North. Over: Trav. by Veh. 18' 0"
BellSouth Drop. 22' 6" Raise 6" to . . . 23' 0"	BellSouth Drop. To: North. Over: Trav. by Veh. 16' 1"
Georgia Power Drip Loop-SL. 22' 2" Raise 68" to . . . 27' 10"	BellSouth Drop. To: North. Over: Trav. by Veh. 15' 8"
Comcast Drop. 22' 0" Raise 24" to . . . 24' 0"	Georgia Power Secondary-MP To: NW. Over: Trav. by Veh. 20' 3"
BellSouth Drop. 21' 0" Raise 24" to . . . 23' 0"	BellSouth Drop. To: NW. Over: Trav. by Veh. 17' 0"
ABS Fiber Optic. 20' 9" Raise 51" to . . . 25' 0"	
Comcast Cable. 19' 11" Raise 49" to . . . 24' 0"	
BellSouth Drop. 19' 7" Raise 41" to . . . 23' 0"	
BellSouth Cable. 18' 9" Raise 51" to . . . 23' 0"	
BellSouth Cable. 17' 7" Raise 53" to . . . 22' 0"	
Time Warner Fiber Optic. Attach at 26' 0"	

Construction Notes

- Georgia Power. 1 Raise Neu/Sec 5' (4/0AN, 2-1/0TA sec) -- raise transformer 3' (25KVA)
 Raise transformer low side leads 10" above bottom of transformer (2-1/0TA sec)
 Raise street light 5' along with tighten light leads to bracket (250W HPS 8'bkt)
 Resag both secondaries to maximum height
- Time Warner. 2 Attach to pole in compliance with all NESC and pole owner requirements Attach to pole 40" below
 power in compliance with all NESC and pole owner requirements below power
 Bond to pole ground -- sag cable per NESC
- ABS. 3 Raise Facilities as noted -- resag cable per NESC
- Comcast. 4 Raise Facilities as noted -- resag cable per NESC
- BellSouth. 5 Raise Facilities as noted -- resag cables per NESC -- resag drops 30" below power

Pole-Clearance Violations

BellSouth Drop<40" from Secondary-MPX.	30"
Comcast Drop<40" from Secondary-MPX.	36"
BellSouth Drop<40" from Drip Loop-Sec.	38"
BellSouth Drop<40" from Drip Loop-Sec.	20"
Comcast Drop<40" from Drip Loop-Sec.	26"
BellSouth Drop <12" from Drip Loop-SL.	-4"
Comcast Drop <12" from Drip Loop-SL.	2"



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Pole# .92	PowerMap# . . . 0450-1352	Location. . . Transformer pole NE of 4408 Buford Hwy	Rev#: 0
PoleOwner. . . Bellsouth	CommMap#	Station#.	NJUNS#: Comp_ID: 1001600001996416

POA's:	Midspans
Georgia Power Secondary-MPX. . . .31' 1"	Georgia Power Neutral. To: 93. Over: Trav. by Veh. 30' 0"
Georgia Power Neutral.31' 1"	ABS Fiber Optic. To: 93. Over: Trav. by Veh. 22' 10"
Georgia Power Transformer.29' 8"	Comcast Cable. To: 93. Over: Trav. by Veh. 20' 9"
Georgia Power Drip Loop- TR.28' 2" Raise 28" to . . . 30' 6"	BellSouth Cable. To: 93. Over: Trav. by Veh. 18' 9"
ABS Fiber Optic.24' 3"	BellSouth Cable. To: 93. Over: Trav. by Veh. 17' 2"
BellSouth Cable.23' 6"	
Comcast Cable.22' 1"	
BellSouth Cable.20' 11"	
BellSouth Drop.20' 5"	
BellSouth Drop.20' 0"	
BellSouth Cable.19' 9"	
Time Warner Fiber Optic. Attach at. 25' 3"	

Construction Notes

- | | | |
|------------------------|---|---|
| Georgia Power. | 1 | Raise transformer low side leads 10" above bottom of transformer (37.5KVA, 4-1/0TA sec, 2-2TAsvc) |
| Time Warner. | 2 | Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground |



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Pole# .93	PowerMap# . . . 0450-1352	Location. . . 2nd transformer pole NE of 4408 Buford Hwy	Rev#: 0
PoleOwner. . . Georgia Power	CommMap#	Station#. 7358 NJUNS#: 471301	Comp_ID: 1001600001996389

POA's:

Georgia Power Secondary-MPX. . . 31' 3"
 Georgia Power Neutral. 31' 3"
 Georgia Power Transformer. 30' 0"
 Georgia Power Drip Loop- TR. . . 29' 6" **Raise 28" to. . . 31' 10"**
 ABS Fiber Optic. 27' 11" **Lower 26" to. . . 25' 9"**
 Comcast Cable. 27' 0" **Lower 30" to. . . 24' 6"**
 BellSouth Cable. 25' 9" **Lower 27" to. . . 23' 6"**
 BellSouth Cable. 24' 10" **Lower 22" to. . . 23' 0"**
 Time Warner Fiber Optic. **Attach at. 27' 0"**

Midspans

Georgia Power Neutral. To: 92. Over: Trav. by Veh. 29' 1"
 ABS Fiber Optic. To: 92. Over: Trav. by Veh. 23' 4"
 Comcast Cable. To: 92. Over: Trav. by Veh. 21' 6"
 BellSouth Cable. To: 92. Over: Trav. by Veh. 18' 3"
 BellSouth Cable. To: 92. Over: Trav. by Veh. 16' 6"

Construction Notes

- Georgia Power. 1 Raise transformer low side leads 10" above bottom of transformer (37.5KVA, 2TA sec)
- BellSouth. 2 Lower Facilities as noted -- resag both cables per NESC
- Comcast. 3 Lower Facilities as noted -- resag cable per NESC
- ABS. 4 Lower Facilities as noted -- resag cable per NESC
- Time Warner. 5 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Bond to pole ground -- sag cable per NESC

Pole-Clearance Violations

ABS Fiber Optic <40" from Drip Loop- TR. 19"
 Comcast Cable <40" from Drip Loop- TR. 30"
 ABS Fiber Optic <30" from Transformer. 25"

Pole# .98	PowerMap# . . . 0450-1352	Location. . . 4306 Buford Hwy	Rev#: 0
PoleOwner. . . Georgia Power	CommMap#	Station#. 11190 NJUNS#: 471307	Comp_ID: 1001600001014513

POA's:

Georgia Power Neutral. 33' 7"
 Georgia Power Secondary-MPX. . . 32' 7"
 Georgia Power Transformer. 31' 11"
 Georgia Power Drip Loop- TR. . . 31' 7" **Raise 14" to. . . 32' 9"**
 ABS Fiber Optic. 27' 11"
 Georgia Power Ladder Bolt. 26' 11"
 Comcast Cable. 26' 3"
 BellSouth Cable. 25' 5"
 Time Warner Fiber Optic. **Attach at. 28' 11"**

Midspans

Georgia Power Neutral. To: 97. Over: Trav. by Veh. 31' 5"
 ABS Cable. To: 97. Over: Trav. by Veh. 25' 10"
 Comcast Strand (Bare). To: 97. Over: Trav. by Veh. 24' 8"
 BellSouth Cable. To: 97. Over: Trav. by Veh. 21' 6"

Construction Notes

- Georgia Power. 1 Raise transformer low side leads 10" above bottom of transformer (37.5KVA, 2-2TA sec)
Resag 2TA secondary >30" above communication
- Time Warner. 2 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Sag cable per NESC

Utility Consultants, Inc

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Pole# .99	PowerMap# . . . 0450-1354	Location. . . 4296 Buford Hwy		Rev#: 0
PoleOwner. . . Georgia Power	CommMap#	Station#. A1288	NJUNS#: 471309	Comp_ID: 1001600001014516

POA's:	Midspans
Georgia Power Neutral. 29' 4"	Georgia Power Neutral. To: 98. Over: Trav. by Veh. 30' 0"
Georgia Power Secondary-MPX. 28' 3"	ABS Fiber Optic. To: 98. Over: Trav. by Veh. 25' 1"
Georgia Power Drip Loop-Sec. 27' 0"	Georgia Power Secondary-MP To: 98. Over: Trav. by Veh. 24' 0"
ABS Fiber Optic. 25' 4" Lower 8" to. 24' 8"	Comcast Cable. To: 98. Over: Trav. by Veh. 23' 9"
Comcast Cable. 23' 8"	BellSouth Cable. To: 98. Over: Trav. by Veh. 21' 3"
BellSouth Cable. 22' 2"	
BellSouth Cable. 21' 1"	
Time Warner Fiber Optic. Attach at. 25' 8"	

- Construction Notes**
- Georgia Power. 1 Raise secondary attachment to back of Neutral spool -- resag secondary >30" above communication RM/IN: SD1 (2TA & 4DA sec)
 - ABS. 2 Lower Facilities as noted -- resag cable per NESC
 - Time Warner. 3 Attach to pole above existing communications attachments in compliance with all NESC and pole owner requirements
Sag cable 30" below power to pole #98
NOTE: lower to 26'0 if ABS does not lower

Pole-Clearance Violations	Midspan-Clearance Violations
ABS Fiber Optic<40" from Secondary-MPX. 35"	
ABS Fiber Optic<40" from Drip Loop-Sec. 20"	
	ABS Fiber Optic <30" separation to Secondary-MPX. -13"
	Comcast Cable <30" separation to Secondary-MPX. 3"



