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June 8, 1998

Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

**Re: Columbus Southern Power Company and Ohio Power
Company
Case Nos. 97-1568-EL-ATA and 97-1569-EL-ATA**

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Vice President, Secretary
and Associate General Counsel

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Tax Counsel

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Chief Counsel - Regulatory Services

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Chief Counsel - Power Generation
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Anthony J. Swaneck
William E. Johnson
Attorneys

Dear Madam / Sir:

Enclosed are the original plus ten (10) copies of Columbus Southern Power Company's and Ohio Power Company's Pole Attachment Construction Standards in the above-captioned cases.

I hereby certify that a copy of the foregoing Pole Attachment Construction Standards was served upon Stephen M. Howard, Vorys, Sater, Seymour and Pease, 52 East Gay Street, P.O. Box 1008, Columbus, Ohio 43215-1008 and upon Kevin M. Sullivan, Calfee, Halter & Griswold, 1800 McDonald Investment Center, 800 Superior Avenue, Cleveland, Ohio 44114-2688 by regular U.S. Mail on this 8th day of June, 1998.

Very truly yours,

F. Mitchell Dutton

F. Mitchell Dutton

Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business
Technician *Anna M. Lewis* Date Processed *June 9, 1998*

COLUMBUS SOUTHERN POWER COMPANY

POLE ATTACHMENT CONSTRUCTION STANDARDS

OVERVIEW

The following set of policies and construction standards are applicable to parties utilizing Columbus Southern Power Company ("CSP") poles in accordance with CSP's Pole Attachment Tariff on file with the Public Utilities Commission of Ohio, P.U.C.O. No. 3, 1st Revised Sheets No. 43-1 through 43-5 (the "Tariff").

These construction standards shall serve as the "Construction Standards" referenced in the Tariff. All other capitalized terms which are not defined herein shall have the definition set forth in the Tariff. Any changes to these standards, including the exhibits hereto, will be provided to all authorized Permittees on record with CSP sixty (60) days prior to their effective date.

PROPOSED ATTACHMENTS

Prior to making an initial attachment or modifying an existing pole attachment on any of CSP's poles, Permittee shall submit a proposal requesting CSP's consent to such addition or modification. A modification includes, but is not limited to, overlash of additional conductors to existing facilities, the addition of separate conductors above or below existing attachments (including temporary rebuilds) and adding risers or other appurtenances to CSP's poles.

CSP shall provide a proposal form, which shall be used in making the applications referred to above. Each proposal shall be limited to 50 poles per proposal form. Additional poles may be submitted on separate proposal forms. Each proposal submitted by Permittee shall specify the pole number or location of each pole to be attached, the character of the proposed attachments (or modifications), the location of space desired, the diameter and weight of the cable, the stringing tensions, and the final sag. Utilizing the information supplied by Permittee on the proposal form, CSP shall evaluate criteria concerning the design, strength and loading characteristics of the pole.

Within forty five (45) days after receipt of a proposal form, CSP shall notify Permittee, in writing, whether CSP will permit the proposed use by Permittee of such pole. CSP shall have the sole right to determine the location and availability of space on such pole for use by Permittee and shall be under no obligation to grant permission for its use by Permittee, except that such permission shall not be arbitrarily withheld and CSP shall, at all times, review proposals in a nondiscriminatory manner. Upon receipt of an approved proposal, Permittee shall be allowed to proceed with its attachment in a fashion that conforms to the practices and standards set forth by CSP.

Permittee does not have permission to make any attachment to CSP poles prior to receiving written authorization from CSP in the form of a signed proposal. Should make ready work be required prior to an attachment being permitted, such attachment permission will not be granted until all make ready work on a given permit has been completed.

JOINT RIDE-OUT

In the event that the pole a Permittee is proposing to attach to has other parties currently attached to it, an initial Joint Ride-Out will be arranged. CSP shall notify either orally or in writing Permittee, and all other parties who have attachments on the effected pole of the date of such Joint Ride-Out. Participation in such Joint Ride-Out is voluntary.

Items reviewed during the initial Joint Ride-Out shall include availability of space on the pole, code clearance requirements, pole loading and the ability to rearrange existing attachments (if necessary) to accommodate the proposed attachment.

POLE ATTACHMENTS

As referenced in the Tariff, all attachments shall be made in conformance with these construction standards, the National Electrical Safety Code ("NESC") and all other federal, state and local requirements. Such code conformance is a continuing obligation of Permittee and as such extends to cover the life of the attachment and not just the initial installation of facilities.

Permittee shall maintain the clearances set forth in "Clearances for Joint Use Telecommunication Equipment and Cables", attached as Exhibit I, and _____, attached as Exhibit II. In no event shall Permittee maintain less than one (1) foot of vertical clearance on the pole from the next attaching party. Exhibit I further provides a general reference diagram regarding the location and character of Permittee's attachment to CSP's pole.

Permittee shall only make one attachment within one (1) foot of vertical space on the pole. Service drop lines (taps) shall not be attached to the pole. As described in Exhibit I, Permittee's service drop lines shall be taken off the messenger cable, at least fifteen (15) inches (measured horizontally) away from the pole attachment (center of the pole). Likewise, any "hanging hardware" such as amplifiers, shall be located on the strand at least fifteen (15) inches away from the pole.

At midspan, Permittee shall follow the sag of CSP's facilities. NESC midspan clearance shall be maintained between electrical and communication facilities as referenced in Exhibit I. A one (1) foot midspan clearance from other communication facilities shall

also be maintained unless the owners of said facilities agree to reduced clearances mid span in accordance with the current version of the NESC.

Minimum clearance to ground shall be measured and maintained as per note 8 of Exhibit I.

TRANSFER OF FACILITIES

Upon written notification of the need to transfer, Permittee shall transfer its facilities in the time frame provided, which shall be not less than ten (10) days from the date of notification. Transfers shall be made to the same side of the pole as all other licensees are attached. If transfers are not made in the specified time frame and such delay results in an additional trip to the field by CSP or another party, Permittee shall be billed the cost of the return trip to the location.

CSP poles that have not been topped in the field are to remain in such condition. If the Permittee tops an untopped CSP pole to facilitate the transfer of their attachment, CSP will bill the Permittee the current Total Cost of such pole depreciated at three (3) percent per year for each year the pole has been set, but in no event shall the cost be less than 25% of the current Total Cost for such a pole.

RISER INSTALLATION

CSP reserves the right to approve the installation of any riser to an existing or new pole. If Permittee desires to install a riser to a new or existing pole, Permittee shall submit the installation design, including the size of the proposed riser and adequate loading data. CSP will evaluate the proposed riser installation and approve, deny or recommend changes to the proposal. At CSP's request, a standoff bracket shall be installed on any pole where a new riser of the Permittee is approved and where one or more risers currently exist. Permittee shall pay the Total Cost of the standoff bracket, including all materials, labor and overheads associated with the installation and transfer of existing risers to the standoff bracket.

All risers shall be installed in conduit. On poles where no riser exists, CSP reserves the right to be the first to install its riser, thereby requiring any subsequently approved riser installations to require a standoff bracket.

GUYING

Any guying required, by reason of the attachments of Permittee, shall be installed by and at the expense of Permittee and shall meet requirements of all applicable codes or regulations. Use of CSP's guys and anchors by Permittee is strictly prohibited at all times.

GROUNDING

Permittee shall insure that its system is fully and properly grounded. Permittee should not assume that CSP's grounding system, at the pole or meter location, is available or capable of accommodating Permittee's grounding needs. Permittee shall not install grounding clamps to any CSP meter base.

BRACKETS

Brackets or extension arms may not be used except upon the written consent of CSP. Such consent shall only be granted in rare instances where a pole is out of line or where it is necessary to avoid an obstacle such as a tree or bush. Permittee shall obtain CSP's prior approval of any such bracket or side arm hardware.

POWER SUPPLIES AND ASSOCIATED METERING

Power supplies and the associated metering shall not be installed on CSP poles.

Existing power supplies, which were granted permission for attachment to CSP poles in the past, will be permitted to remain on the pole until such time as the pole is replaced or the facilities are modified by the Permittee. If such pole replacement or modification occurs, CSP will require Permittee to remove the power supply from the pole and place it and the associated metering, on a ground-mounted pedestal or stub pole (set and owned by Permittee). Diagrams depicting the typical ground-mounted pedestal and stub pole installations of power supplies are included as Exhibits III and IV respectively.

APPLICATION FORM

Any new entity requesting to make attachment to CSP's poles (including the assignment of an existing agreement to another legal entity) shall submit to CSP an application form provided by CSP. Upon receipt of a completed application form a copy of the pole attachment construction standards will be issued to the new Permittee.