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8-21-02

Gregory J. Zupkus
Director-External Affairs

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August 15, 2002

Mr. Joel Rinebold
Executive Director
Institute for Sustainable Energy
83 Windham Street
Willimantic, CT 06226

Re: Docket No. 02-04-23 Task Force / Long Island Sound Study

Dear Mr. Rinebold:

SBC SNET submits the attached document in response to your request for preliminary position papers from Long Island Sound Task Force members concerning Docket No. 02-04-23. If you have any further questions, please feel free to call me at (860) 947-7080. Once again, thank you for all your help pertaining to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory J. Zupkus".

Gregory J. Zupkus
Director, External Affairs



**Initial Position
To the Task Force Established Pursuant to
Executive Order 26 and Public Act No. 02-95**

**Gregory Zupkus
The Southern New England Telephone Company**

The Southern New England Telephone Company (SNET) is pleased to participate in the work of the task force developing a cohesive policy for addressing utility and public service company issues that concern Long Island Sound.

SNET is responsible for the poles, wires and cables that deliver voice and data communications to residents across the state. While SNET does not immediately foresee the need for telecommunications facilities to cross Long Island Sound, it does have responsibility for existing underwater facilities.

These facilities provide telecommunications services to the peninsulas and islands off the coast of Connecticut, such as the Thimble Islands. These cables have been in place for decades and require minimal, though routine, maintenance and occasional repair. As the task force devises policies for future projects, it is important to recognize SNET's continued obligation to provide reliable service to customers located on, or near, the coastline. It is worth noting that the moratorium passed by the legislature did not apply to the maintenance, repair or replacement of facilities used to provide service to our off-shore customers.

We do not believe that any changes in regulation or other requirements regarding these minimal, existing facilities are necessary or warranted. SNET complies with applicable utility and environmental requirements established by the Connecticut Department of Environmental Protection, the U.S. Army Corps of Engineers and the Department of Public Utility Control in completing any such off-shore work. This is not limited to executive approval, but also includes obtaining permits as necessary. SNET would be happy to share information concerning our facilities and procedures with the task force, should that be desired.

While SNET does not currently operate any facilities that actually run across Long Island Sound to Long Island, and we do not have any plans to construct such a facility at this time, we do believe this is an appropriate time to address such issues. It is SNET's position that the existing regulatory framework and requirements are sufficient to address any potential environmental concerns that would be generated by proposals to extend telecommunications lines across Long Island Sound. Nonetheless, SNET supports the effort to map facilities as well as to discuss of the possibility of bundling electric, gas and telecommunications pipelines together to minimize intrusion into the Sound's ecosystem.