



Ola Oyefusi
Director – Federal Regulatory

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January 22, 2018

Via Electronic Filing

Ex parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: In the Matter of Accelerating Wireline Broadband Deployment by Removing
Barriers to Infrastructure Investment, WC Docket No. 17-84

Dear Ms. Dortch:

On January 22, 2018, Robert Vitanza (via phone), Josh Woodbridge, and the undersigned, of AT&T, met with the following Commission Staff: Michael Ray, Adam Copeland, Annick Banoun, Deborah Salons, Daniel Kahn, and Paul LaFontaine. The purpose of the meeting was to discuss AT&T's pole attachment and one touch make ready proposal. AT&T's remarks were consistent with the attached presentation.

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

/s/ Ola Oyefusi

cc: M. Ray
A. Copeland
P. LaFontaine
A. Banoun
D. Salons
D. Kahn

Accelerating Wireline Broadband Deployment:

Presentation – Pole Attachment Process with OTMR

WC Docket 17-84



January 22, 2018

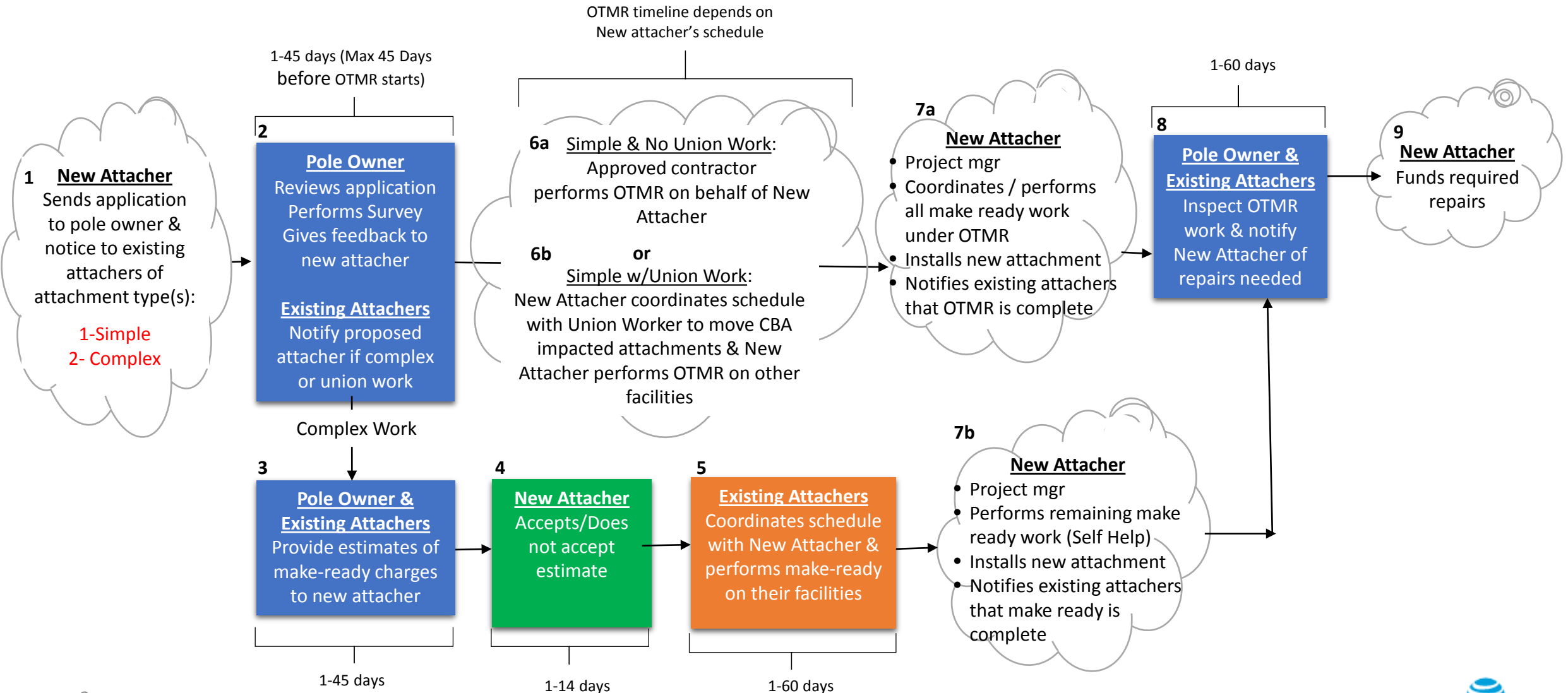
Summary

- **AT&T's Streamlined Pole Attachment Timeline and Balanced OTMR will Enable New Attacher to offer Service Quickly without Degrading Existing Attacher Network:**
 - Commenters agree OTMR can have incremental benefit, but disagree on implementation.
 - AT&T's proposed balanced / sensible OTMR approach will minimize disruption to existing attacher service.
 - To achieve this balance AT&T proposes safeguards, i.e. a OTMR regime would:
 - apply to routine transfers only, with 30-days prior notice to existing attachers – this covers most of the make ready transfers,
 - be performed by pre-approved contractors while respecting existing attachers' collective bargaining agreements (CBA),
 - allow post-OTMR work inspections by pole owners and/or existing attachers, and
 - require new attachers to indemnify pole owners and existing attachers from liabilities associated with OTMR work.
 - The Commission should adopt OTMR for simple transfer while it collects data on its implementation, performs risk assessment for complex transfer.
 - Simple make ready is most of the make ready work (approximately 80% based on AT&T's SME estimate), and so most of the benefits can be realized immediately without risking unnecessary service outages.
 - Adopt AT&T's proposal to streamline current pole attachment timeline, which includes complex make ready.
 - It enables new attacher to offer service on a faster timeline, i.e. 29 days quicker, even when complex make ready and collective bargaining agreement (CBA) safeguards are observed.
 - It relies on proven business processes.



Pole Attachment and OTMR Timeline Comparison

*Make-ready in electric space (including all pole replacements) requires additional time



Pole Attachment and OTMR Timeline Comparison

	Number of days (15-day blocks of time)										
	1-15	16-30	31-45	46-60	61-75	76-90	91-105	106-120	121-135	136-150	151 - 165
Existing Pole Attachment Timeline	Application, Review, Survey (45 days)			Estimate (14 days)	Acceptance (14 days)	Make Ready (60 days)				Pole Owner could complete Make Ready (optional) (15 days)	Self Help, plus completion notice (15 days)
AT&T Proposed Pole Attachment Timeline - (Complex Make Ready)	Application, Review, Survey AND Estimate AND Notice whether Simple or Complex (45 days)			Acceptance (14 days)	Make Ready / Complex (60 days)				Self Help, plus completion notice (15 days)		
AT&T Proposed Pole Attachment Timeline - (OTMR)	Application, Review, Survey AND Estimate AND Notice whether <i>Simple</i> or <i>Complex</i> (45 days)			<div>Simple OTMR</div> <div>(New Attacher determines time frame and notifies Pole Owner / existing attachers of completion)</div>							

* OTMR – One Touch Make Ready

Existing Process: 163 days
 AT&T Proposed: 134 days
 OTMR Timeline: Dependent on New Attachers “Make Ready” schedule.

