

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

In the Matter of

Accelerating Wireline Broadband Deployment ) WC Docket No. 17-84  
By Removing Barriers to Infrastructure Investment )

Accelerating Broadband Deployment ) GN Docket No. 17-83

To: The Commission

**REPLY COMMENTS OF  
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

The National Rural Electric Cooperative Association (“NRECA”) hereby submits its Reply Comments in the above-captioned proceedings to address Comments regarding overreliance that were filed in response to the Commission’s November 29, 2017 Further Notice of Proposed Rulemaking in WC Docket No. 17-84.<sup>1</sup>

Although attachments to the distribution poles owned by NRECA's electric cooperative members are not regulated by the Commission, the experience that many electric cooperatives have had with overloading is similar to that described by investor-owned electric utility commenters in this proceeding. Specifically, like investor-owned utilities, electric cooperatives are experiencing unauthorized overloading, poorly constructed overloading, overloading that results in excessive wind and ice loads, overloading with insufficient guying to maintain pole integrity, vehicles snagging overloaded wires that hang too low to the ground, and the very

<sup>1</sup> *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking (rel. November 29, 2017) (“*November 29 FNPRM*” or “*FNPRM*”).

dangerous activity of attaching entities overlashing wires that are already dangerously close to energized electric facilities, all in violation of the National Electrical Safety Code.

NRECA therefore supports FCC rules that would establish a best practice to provide meaningful advance notice of overlashing. Such notice would be long enough in advance and contain sufficiently detailed information about the overlashing to enable pole owners to identify potentially dangerous safety violations, to evaluate the effect that the overlashing will have on pole loading and mid-span clearances, and to implement the additional guying and other design specifications necessary to safely and efficiently accommodate the new overlashing.

Adequate advance notice should not be difficult. The large extent of overlashing activity NRECA members continue to experience is the result of network changes, improvements and new installations that likely cost attaching entities millions of dollars to deploy and months (if not years) to plan. If communications attachers want to work as partners with utility pole owners in the proper maintenance and care of pole distribution systems, they should work with pole owners to provide notice sufficient for the pole owner to properly engineer the pole for the benefit of everyone.

NRECA appreciates in particular the Comments of AT&T, a communications attacher on electric cooperative poles but also an owner of millions of distribution poles. AT&T calls for the following meaningful advance notice of overlashing:

A reasoned and practical codification of the Commission's overlashing policy would allow overlashing upon at least 30 days advance notice to the pole owner and host attaching entity and confirmation from the attacher that the overlashing complies with generally accepted engineering practices, the attacher has performed a pole loading analysis and no overloading will occur, and make-ready work is not necessary or will be completed before overlashing.<sup>2</sup>

---

<sup>2</sup> Comments of AT&T, *In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, at 15 (filed Jan. 17, 2018).

Without such meaningful advance notice of overloading, electric cooperative pole distribution systems in rural America will continue to suffer like those of incumbent local exchange carriers and investor-owned utilities to the detriment of existing attachers and new attachers alike.

Respectfully submitted,

**NATIONAL RURAL ELECTRIC  
COOPERATIVE ASSOCIATION**

\_\_\_\_\_  
/s/

Brian M. O'Hara  
Senior Director Regulatory Issues  
National Rural Electric Cooperative Association  
4301 Wilson Blvd.  
Arlington, VA 22203  
(703) 907-5798  
[brian.ohara@nreca.coop](mailto:brian.ohara@nreca.coop)

Dated: February 16, 2018