

Communications
Workers of America
AFL-CIO, CLC

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March 15, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Ex Parte Notice. In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No 17-84; Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79.

Dear Ms. Dortch:

On March 12, 2018, Debbie Goldman of the Communications Workers of America (CWA) met with Will Adams, Legal Advisor to Commissioner Brendan Carr, to discuss two items in the above-captioned proceedings.

First, Ms. Goldman discussed the proposed Wireless Infrastructure Streamlining Report and Order that would streamline historical and environmental review of deployment applications by private parties for small wireless facilities.¹ Ms. Goldman expressed support for policies that accelerate investment in wireless infrastructure that create good, union jobs in the wireless industry.

Second, Ms. Goldman discussed One-Touch Make-Ready (OTMR) pole attachment proposals. She emphasized that as the Commission considers any changes to the current pole attachment rules, concern for public and worker safety, continuity of service to existing attachers' customers, compliance with all legal requirements, including union contracts, and protecting good, middle-class jobs must be paramount.²

¹ Wireless Infrastructure Streamlining Report and Order. WT Docket No. 17-79, March 1, 2018.

² See CWA Comments, *In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, June 15, 2017, pp. 3-8 ("Accelerating Wireline Broadband Deployment"); CWA Reply Comments, *Accelerating Wireline Broadband Deployment*, WC Docket No. 17-84, July 17, 2017, pp. 2-5; Letter from Christopher M. Shelton, President, Communications Workers of America and D. Michael Langford, President, Utility Workers of America to Ms. Marlene Dortch, *Accelerating Wireline Broadband Deployment*; WC Docket No. 17-84 and GN Docket No. 17-83, Jan. 3, 2018 ("CWA/Utility Workers Letter");

Ms. Goldman emphasized that even so-called “simple” make-ready work may not be so simple, and improper work can result in heavy terminals and wires hanging without proper support, ungrounded wires, and overloaded equipment on damaged or decaying poles. Skilled, properly trained workers who know the equipment, the condition of the poles, and have proper certification can best protect the public and others who work on the equipment.³

It is for this reason, that communications employers have signed collective bargaining agreements with CWA and other unions that give jurisdiction over make-ready work to skilled, career union-represented outside plant technicians.

Ms. Goldman reviewed a joint letter submitted by AT&T and CWA that outlines a balanced OTMR approach with safeguards that would minimize disruptions in service provided to consumers by existing attachers while protecting good jobs. The OTMR regime would (1) apply to routine transfers only with 30-days prior notice to existing attachers; (2) be performed by contractors pre-approved by the pole owner while respecting existing attachers’ collective bargaining agreements; (3) allow post-OTMR work inspections by pole owners and/or existing attachers; and (4) require new attachers to indemnify pole owners and existing attachers from liabilities associated with OTMR work.⁴

CWA has indicated its support for proposals that streamline pole attachment rules.⁵ But any changes must ensure that public and worker safety, continuity of quality service to existing attachers’ customers, respect for legally-binding union contracts, and protection and promotion of good, middle-class jobs in communities across the United States remain paramount.

Sincerely,



Debbie Goldman
Telecommunications Policy Director
Communications Workers of America

cc: Will Adams

Letter from Frank Simone, AT&T, and Debbie Goldman, CWA, to Ms. Marlene Dortch, *Accelerating Wireline Broadband Deployment*; WC Docket No. 17-84 and GN Docket No. 17-83, Jan. 16, 2018 (“CWA/AT&T Letter”).

³ CWA Comments, *Accelerating Wireline Broadband Deployment*, pp. 3-8; CWA Reply Comments, *Accelerating Wireline Broadband Deployment*, pp. 2-5; CWA/Utility Workers Letter, Jan. 3, 2018.

⁴ CWA/AT&T Letter.

⁵ See CWA Reply Comments, *Accelerating Wireline Broadband Deployment*, pp. 3-4; CWA/AT&T Letter, *Accelerating Wireline Broadband Deployment*, Jan. 16, 2018.