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April 30, 2018

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: Ex Parte Notice
WC Docket No. 17-84**

Dear Ms. Dortch:

On April 26, 2018, Pam Ellis (Utility Business Development Service Manager, American Electric Power Service Corporation), Tom St. Pierre (Associate General Counsel, American Electric Power Service Corporation), Allen Bell (Distribution Support Manager, Georgia Power), Natalie Beasman (Senior Counsel, Georgia Power) and I met separately with Will Adams (Commissioner Carr's Wireless Advisor) and Erin McGrath (Commissioner O'Rielly's Wireless Advisor). During the meetings, we discussed the following points:

- If and when the Commission addresses wireless antenna pole attachment issues, it should do so in a separate docket. Wireless antenna attachments are fundamentally different than wireline pole attachments, from both an economic and physical perspective, and should be treated differently from a regulatory perspective.
- The Commission should not merely try to “convert” rules and policy developed specifically in the wireline pole attachment context into rules/policy applicable to wireless pole attachments. Even setting aside the fundamental differences between wireline and wireless pole attachments, the approach taken by the Commission with respect to wireline attachments over the past forty years does not appear to have satisfied any of the stakeholders. Wireline attachers are always asking for more and more regulations on the providers of pole space and the Commission itself seems to consistently believe its own rules are inadequate for the impending challenges ahead.
- Given the above, the Commission should take a completely different approach with wireless pole attachments. It should take an approach that moves away from rock-bottom rates and access micromanagement and adopt regulatory policies that encourage cooperation and incentivize innovative deployment solutions. In other words, the Commission's regulatory approach with respect to wireless pole attachments should be

“light touch” and should send signals to the stakeholders that it expects sophisticated investor-owned firms to reach negotiated solutions that bring value to both parties.

- All stakeholders appear to agree that electric utilities currently lack direct incentives to seek-out and implement the most efficient deployment solutions possible. Wireless carriers and wireless infrastructure providers, though, appear to believe the solution is heaping more rate/access regulations on the providers of pole space. This approach would likely lead to the same dissatisfaction now seen with wireline carriers after forty years of incrementally more burdensome regulations on the providers of pole space.
- In their advocacy, wireless carriers and wireless infrastructure providers talk about their facilities as being the size of a pizza box or a backpack. This claim is not only at odds with the experience of many electric utilities, but also at odds with the volumetric permissibilities recently sought and obtained by the wireless industry in numerous state level small bills. These state-level small cell bills typically included allowances for antennas of six cubic feet and ancillary equipment of twenty-eight feet.

This ex parte notice is being filed electronically in the above-referenced docket pursuant to section 1.1206(b) of the Commission’s rules.

Very Truly Yours,

/s/Eric B. Langley

Eric B. Langley

EBL/lk

cc: Will Adams (will.adams@fcc.gov)
Erin McGrath (erin.mcgrath@fcc.gov)