



May 23, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street, NW
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 May 18, 2018, Debbie Goldman, Brian Thorn, and Chad Melton – who has worked as an AT&T Southeast field technician for 17 years – of the Communications Workers of America (CWA) met with Lisa Hone, Deborah Salons, Adam Copeland, Michael Ray, William Hupp, and via phone Daniel Kahn of the Wireline Competition Bureau’s Competition Policy Division to discuss the Commission’s One Touch, Make Ready (OTMR) pole attachment proposals, which are a part of the above captioned proceeding. At the meeting, CWA provided the attached material and a previously filed letter.¹

CWA represents outside plant technicians who perform make-ready work for incumbent local exchange carriers. Our members are on the front-lines of this work and best understand how to ensure that the work is done in a safe and reliable manner.

Pole attachment work is complex and, if done incorrectly, can lead to dangerous conditions for workers and the public. In the communications space, unskilled work could leave heavy cables and terminals hanging without proper support. Ungrounded wires could cause electrocution risks. Incorrect placement or overloading equipment on damaged or decaying poles could lead to poles falling into private property or the public right-of-way.

Even so-called “simple” make-ready work – as defined by the Broadband Deployment Advisory Committee (BDAC) – is not so simple.² Mr. Melton shared experiences from his 17 years as a trained,

¹ Letter from Frank Simone, AT&T Vice President – Federal Regulatory and Debbie Goldman, CWA Telecommunications Policy Director, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 17-84, GN Docket No 17-83 (Jan. 16, 2018) (“AT&T/CWA Joint Letter”).

² The Broadband Deployment Advisory Committee defines simple make-ready work in the communications space as “transfers where existing attachments in the communications space could be transferred without any expectation of a service outage(s) or facility damage and which do not require splicing of any communication attachment or relocation of existing wireless attachments.” See Broadband Deployment Advisory Committee, Report of the Competitive Access to Broadband Infrastructure Working Group, Jan. 23-24, 2018, p.13.

union-represented field technician employed by AT&T Southeast. He discussed photographs of pole attachment work, detailing the dangerous mistakes made by contractors in Louisville, KY, where an OTMR ordinance is in place. Mr. Melton explained how shoddy work by inexperienced contractors can threaten worker and public safety and lead to service problems.

Slide 4 of the presentation shows a heavy communications cable that has fallen down from the pole and is hanging just above the ground along a white fence. The cable, which weighs about ten pounds per foot, could have seriously injured someone or been damaged by someone mowing the lawn – leading to service disruption. Slide 5 shows why the cable fell. A contractor secured the hanger in the opposite direction – the lip of the hanger should hold the strand, which supports the cable, to the pole. Shoddy contractor work resulted in a hanging cable, a serious safety and service concern. Slide 6 shows how, on the same pole from slide 5, a contractor improperly secured a two-sided hanger, leaving another cable at risk of falling. Slide 7 shows how Mr. Melton fixed the contractor’s dangerous mistakes – the correct hangers are used and attached in the proper direction. In addition, the copper wire – which had not been grounded properly by the contractor – has been grounded correctly by Mr. Melton to prevent electrocution. Mr. Melton explained that improperly secured cables and ungrounded wires could endanger the safety of an employee climbing a ladder placed on one of those cables in order to resolve a mid-span cable problem.

Slide 8 compares a secure pole attachment completed by Mr. Melton (left) with shoddy contractor work on another pole (right), where a contractor used a “j-hook” to hold heavy communications cable. J-hooks are designed to hold light wires, not heavy cables. This cable will fall. Finally, slide 9 shows instances where contractors got creative in their substandard work. In the left photo, contractors flipped the cable upside-down and tied it to the pole with plastic zip-ties. Plastic zip-ties are not strong enough to secure these heavy cables. They will break. The cable will fall and hang, putting the public and telecom workers at risk. In the right photo, contractors used a square washer to “secure” the cable instead of a hanger. This square washer is not made for securing cable and cannot support the weight of a cable. The washer will snap and the cable will fall.

As Mr. Melton’s explanation made clear, equipment improperly attached to a pole or failure to ground wires could result in serious facility damage, such as falling cables, as well as service outages and dangers to the public and to telecommunications employees. CWA believes that all pole attachment transfers, if done incorrectly, can result in facility damage, service outages, or endanger workers and the public.

CWA recommends the following balanced proposal to safely streamline the pole attachment process.

1. **Streamline the current pole attachment timeline.** CWA supports AT&T’s balanced proposal to reduce the timeline by 29 days.³
2. **Exclude “Complex” make-ready work from the OTMR regime.** Transfers and work within the communications space that would reasonably be likely to cause a service outage(s) or facility damage, including work such as splicing, bolting, or grounding of any communication attachment, equipment, or facilities or relocation of existing wireless attachments should be considered complex make-ready work. CWA concurs with the Broadband Deployment Advisory Committee recommendation that existing attachers be

³ AT&T/CWA Joint Letter, Jan. 16, 2018.

given 30 days with an additional 30 days extension if needed for reasons of safety or service interruption before self-help by a new attacher.⁴

3. **Provide existing attachers a streamlined timeline to complete so-called “non-complex” make-ready work.** All make-ready work – if done improperly -- has the potential to cause facility damage, service interruption, and danger to the public and workers. Therefore, CWA recommends that Commission rules allow existing attachers a streamlined time period (15 days with an additional 15 day extension) to transfer their equipment prior to self-help.
4. **Honor existing attachers’ collective bargaining agreements.** The Commission must ensure that any OTMR regime honor collective bargaining agreements, thereby preserving good jobs in hundreds of local communities. CWA has collective bargaining agreements (CBA) dating back many decades that give jurisdiction over make-ready work to CWA-represented employees.⁵ These CBAs ensure that well-trained employees who are directly accountable for their work perform the job properly and safely. CWA-represented technicians earn good family-supporting wages and benefits. In contrast, contractors advertise lineman positions for \$15-19 per hour – about 40 percent less than the earnings of a union field technician.⁶ Commission OTMR policy should not turn collectively-bargained family-sustaining middle-class jobs into low-wage contractor jobs.

Sincerely,



Debbie Goldman
Telecommunications Policy Director
Communications Workers of America

cc: Daniel Kahn
Lisa Hone
Deborah Salons
Adam Copeland
Michael Ray
William Hupp

⁴ *Id.*, pp. 13-14.

⁵ These include CWA collective bargaining agreements with AT&T Southeast, Verizon NY, and Frontier WV. *See* CWA Comments, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84 (June 15, 2017) pp. 3-7; CWA Reply Comments, WC Docket No. 17-84 (July 17, 2017) pp. 2-5; Letter from Christopher M. Shelton, CWA President, and D. Michael Langford, Utility Workers of America President to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 17-84, GN Docket No 17-83 (Jan. 3, 2018) p. 2.

⁶ Glassdoor website job listing, visited May 17, 2018.

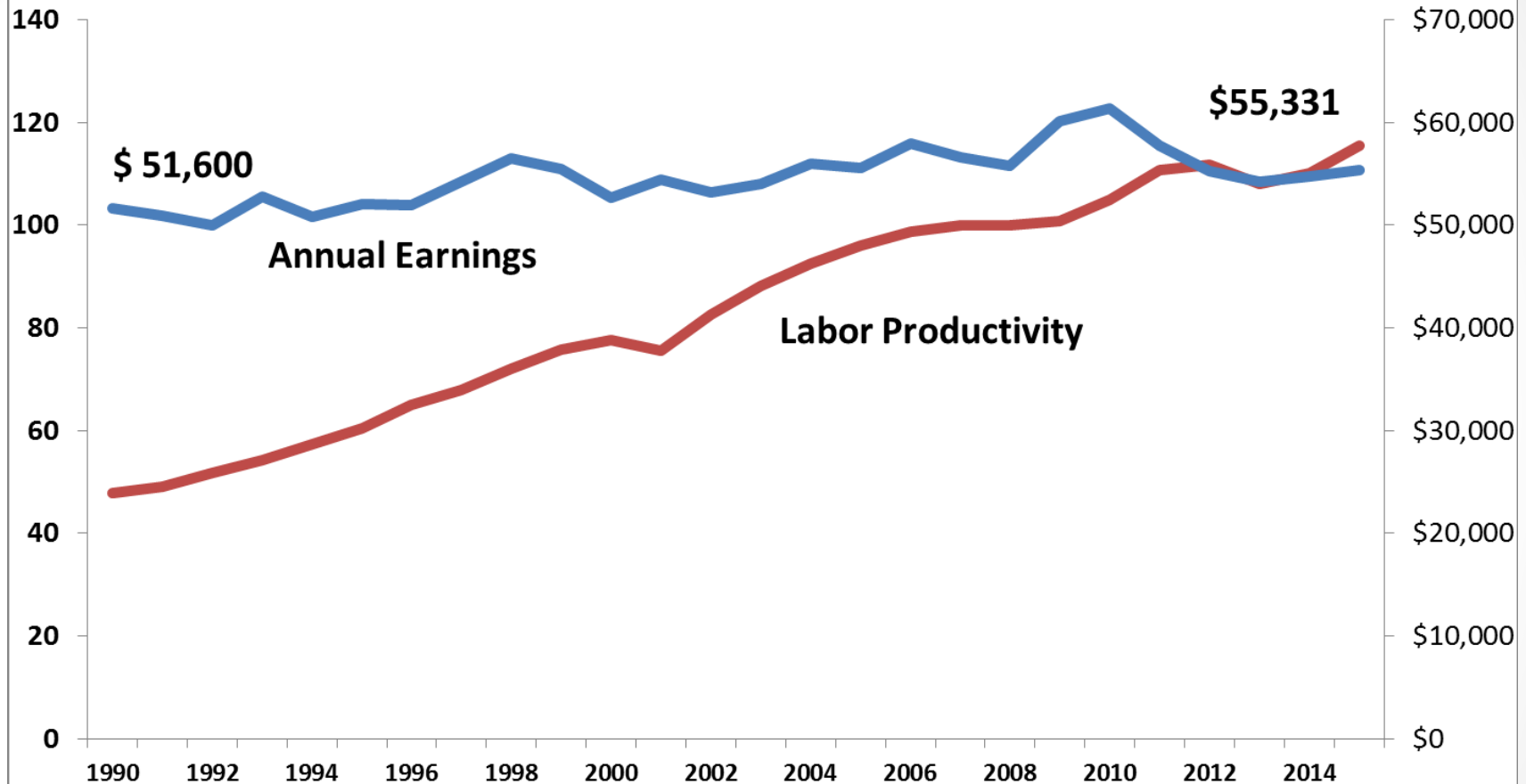
Protecting Public and Worker Safety, Promoting Good Telecom Worker Jobs While Streamlining Pole Attachment “Make Ready” Rules to Facilitate Broadband Investment

WC Docket No. 17-84

Communications Workers of America

May 18, 2018

Wireline Telecommunications Employees' Earnings Remain Flat Despite 138% Rise in Labor Productivity 1990-2015



Source: Bureau of Labor Statistics Current Employment Survey 1990 to 2015; Non-Supervisory Wireline Telecommunications Production Workers' Earnings adjusted with the CPI into 2015 dollars. Wireline Telecommunication; Bureau of Labor Statistics Current Employment Survey Labor Productivity has a base year of 2007 (equal to 100).

Don't Turn Good Middle-Class Jobs into Low-Wage Jobs

	Hourly Wage	Annual Wage	Benefits
CWA-Represented AT&T Field Technician/Lineman (Louisville KY)	\$37	\$78,822	Medical, dental, vision, pensions, disability, vacations
Contractor – Class C Lineman	\$15-\$19	\$30,300 - \$38,800	
Difference		(\$48,522) to (\$40,022)	

Sources: CWA-AT&T Southeast Contract; Glassdoor Job Posting (contractor)

The results of shoddy pole attachment work by a contractor.
This is what we found...



This is a corner hanger that was backwards due to contractor moving it.



This is improper use of a 3-Bolt hanger

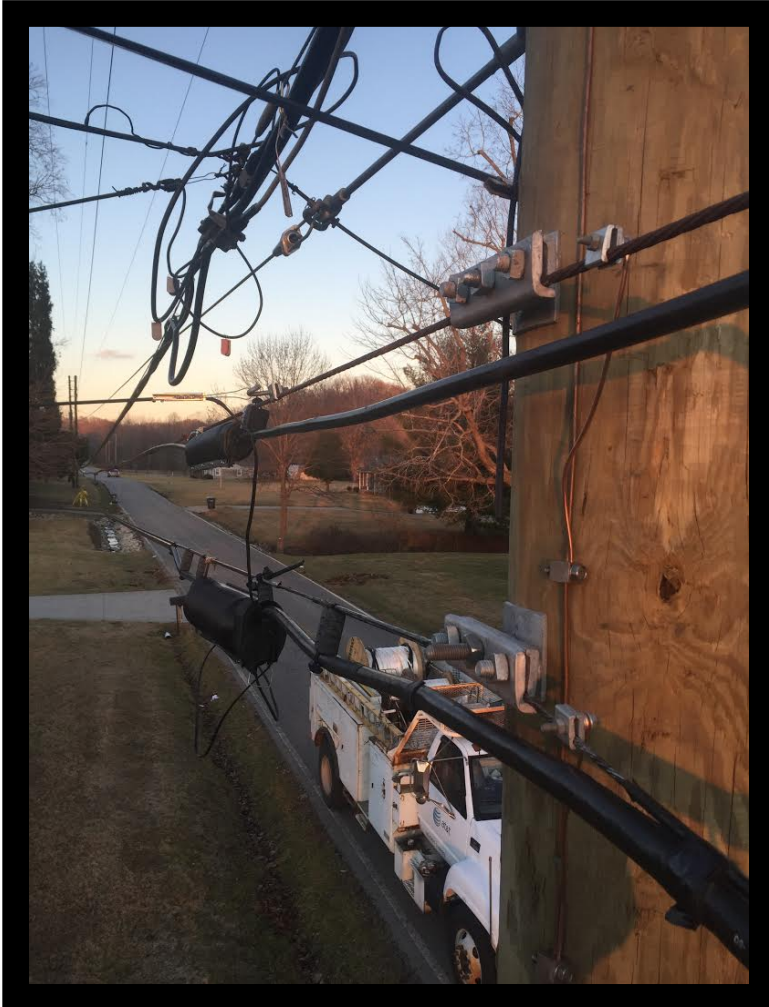


This is after it was fixed.

Notice the hanger is holding the pressure of the corner now.



Left: Properly attached pole equipment
Right: Dangerous contractor work



Shoddy make-ready work poses risks to worker and public safety

