



Northwest Public Power Association

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June 1, 2018

Ms. Elizabeth Bowles, Chair  
Broadband Deployment Advisory Committee  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Accelerating Broadband Deployment, Broadband Deployment Advisory Committee, GN  
Docket 17-83

Dear Chairwoman Bowles:

On behalf of the Northwest Public Power Association (NWPPA), I am writing to convey our strong concern with the work of the Broadband Deployment Advisory Committee (BDAC) and the conclusions it has reached. NWPPA is an association of 155 consumer-owned utilities in nine Western states and British Columbia. The central mission of consumer-owned, public power utilities is to serve their communities with reliable and low-cost power on a not-for-profit basis.

The process and the conclusions of the BDAC are in direct contravention of NWPPA members' mission of providing reliable, low-cost electric service to their consumers. The model codes developed by the BDAC would establish a top-down, one-size-fits-all approach to pole attachment practices and procedures. This approach would not allow NWPPA members to utilize the existing case-by-case approach to pole attachments. This case-by-case approach is integral to ensuring the safety of utility and telecommunication company crews and the public, as well as the reliability of the electric system. A one-size-fits-all approach would compromise the safety and reliability of the electric systems while subsidizing private telecommunication companies and raising costs for electric consumers who will not benefit from a compromised electric utility infrastructure.

The BDAC model codes also ignore current law. Section 224 of the Communications Act places the regulation of not-for-profit utility pole attachments at the state level. A federal regulation establishing model codes is inconsistent with current law.

NWPPA is also concerned with the makeup of the BDAC being heavily populated by representatives of the telecommunications industry and with proportionally low representation by the not-for-profit electric utility industry. A simple review of the BDAC's makeup shows a bias towards private companies. A more proportionate representation by not-for-profit electric utilities would have led to more informed and fair conclusions.

NWPPA supports the expansion of the broadband network, particularly in rural areas. NWPPA members have worked with telecommunications companies to safely and reliably install equipment on utility owned and managed poles on a local case-by-case basis. All poles and all utility configurations are not the same. The current system of regulation under section 224 of the Communications Act has served public power consumers and telecommunications companies well. Any “roadblocks” to broadband deployment lies not with the current system of regulation in our member communities, but with the challenges of building infrastructure in sparsely populated areas and the lack of acknowledgment by some telecommunications providers regarding the safety and necessity for providers to pay for the cost causation of any non-electric attachments to electric utility infrastructure.

NWPPA continues to support the current law applicable to not-for-profit electric utilities under section 224 of the Communications Act and opposes the one-size-fits-all “model codes” developed by the BDAC.

Sincerely,



Anita J. Decker  
Executive Director  
Northwest Public Power Association