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Via ECFS

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Re:WC Docket No. 17-84

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

As CTO and GM of Nittany Media, Inc. I would like to add to the seemingly unanimous support of the FCC's goals to accelerate broadband deployment, enable affordability, and through "light touch regulation" encourage market driven ingenuity and investment. I can see the inertia of the "way it was" giving way to the momentum of the growing community vision and desires for our future. The NPRM appears to be on track, however I hope that my 45 years of personal industry experience and insight might be useful to help minimize the costs to deploy "Broadband Beachheads" - a quintessential component of rural broadband deployment. I will address two areas.

First challenge

Over the past 4 years I have seen a tremendous increase in the costs of fiber construction. Although material and labor costs have remained stable and even in some cases become more efficient, pole attachment costs have increased exponentially. The largest component of this cost increase has been in the application engineering fees. Not including make ready, this amounts to the equivalent of 30 years prepayment of pole rental and is sometimes greater than our costs for labor, materials, or make ready! Additionally, there is no standardization among the utilities, some costing many times more than others.

History and how we arrived here

When I started as a young lineman the process was simpler. I would schedule a ride out with the local utility inspector and we would visually inspect the pole line along the proposed route. When there were clearance issues, he would seek my ideas or make suggestions as to a more cost effective solution. The application fee was \$10.00 per pole and about a dozen pole numbers could be submitted on one sheet with virtually instant approval.

Ten years ago, after the utilities' engineering staff had downsized and were overwhelmed, we started "Sticking" the poles as part of our in house engineering survey to measure the placement of each attached cable and propose our new attachment. We submitted a one sheet per pole drawing with all pertinent and other requested measurements. The utility engineering team could then compare this info to their guidelines and issue make ready cost estimates and approval. Again, with a very reasonable turn around time frame.

Shortly after the stimulus, BTOP and the expenditure of significant infrastructure dollars, our rural poles began to be overcrowded. Some of the fiber construction contracts were awarded to less experienced entities. In their earnest to meet grant enforced deadlines, I observed, and believe that some shortcuts were taken. Because of this, trust was broken with the utilities and in 2014 they

decided to employ independent 3rd party engineering firms to do the “sticking”. Because there is limited, or negative incentive to control this cost as it is passed directly, or with an added administrative fee to the applicant, this cost has grown to be burdensome enough to restrict broadband deployment. This cost is not only in dollars, but in days as well since the applicant must do an initial field survey before submitting the application to the utility to submit to the third party, then back for make ready pricing....

Suggested solution

Utilities could certify applicants, or the applicants’ appointed 3rd party contractors to submit the engineering data. This will put the applicant in better control of both the pole survey time and money costs while preserving the utilities’ trust in the data submitted. Again, the applicant would manage the field survey engineering schedule – removing one step, as well as the costs associated with the submission of the completed application. The certification would of course need to have teeth. There must be significant penalties for willfully submitting false data.

Second challenge – One Touch Make Ready

One touch make ready is an awesome and intuitive idea. Its time has come. In the course of the status quo, each attacher makes his changes in turn with about a 2 week scheduling window in between. First the pole must be set by the utility pole owner, then it usually proceeds from the top down. One touch has the potential to significantly improve this as long as the reality of physics are observed. The various utilities use different technologies, have different requirements, and the craft workers use different skill sets.

For one touch to be viable, the workers must be competently skilled in all pertinent technologies. If any technology is mistreated, significant damage will occur. As a cable operator, we find it necessary to go to significant expense to ensure our facilities remain undamaged by well meaning, competent and careful workers that may be unskilled in our techniques. I am happy to provide context.

Finally, I feel that it must be restated that all utility pole attachers should expect to help support the installation and maintenance costs of the poles that they use. They should not expect a subsidized ride, nor should the utilities expect a profit sharing model to subsidize their viability. One example of the detriments to a profit sharing mind set are right of ways. Railroad crossings have historically been expensive with their ancillary charges. My last one cost \$27,000.00 (fees paid to the railroad) which is too much for a school district or hospital to afford, let alone a small business. The annual railroad crossing right of way fees have again doubled with no apparent change in cost or service. I have no suggested solution to this other than ... wireless.

Thank you for considering my input. I remain enthusiastic about the great potential of this NPRM and am available for any questions or further requests for information.

Sincerely,

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