July 15, 2017

RE: Public Comment on FCC Docket 17-84

Mr. Grossman,

I trust this message finds you well.

I represent a minority owned SaaS Firm here in San Francisco and we have inadvertently developed an app that, based on our understanding of this Notice of Proposed Rule Making, Notice of Inquiry, and Request for Comment, we think can expedite the joint pole application creation and processing which would significantly decrease the survey and make ready time.  We’d love the opportunity to demonstrate for the FCC as well as the telecom and utility community our 100% paperless One-Touch, Make Ready out of the box Solution.

Please advise on the best avenue for this request.

Our understanding and our solution:

* Section II Notice of Proposed Rule Making
  + A. Pole Attachment Reforms
    - 1. Speeding Access to Poles
      * a. Speeding the Current Commission Pole Attachment Timeline

The Dispatchr App can facilitate a shorter timeline for application review and engineering survey (currently 45 days), cost estimate (currently 14 days), attacher acceptance (14 days) and make-ready (60-75 days) to fit/exceed the proposed new timelines of application review and engineering survey (15 - 30 days).  The Notice of Proposed Rule Making, Notice of Inquiry, and Request for Comment on paragraph 8 states “If we adopt a shorter timeline, we also seek comment on situations in which it might be reasonable for the utlity’s review of a pole attachment application to extend beyond the new shortened timeline.”

The Dispatchr App also addresses paragraph 11 – Make Ready.  “We also seek comment on approaches to shorten the make-ready work timeframe.”  It appears to want something less than that perhaps 45 days which we can make happen via our Mobile Workforce Planning Module.  The domino effect from the above will address the lionsshare of “b. Alternative Pole Attachment Process” etc.

In paragraph 21 there is a “One-Touch, Make-Ready” approach that comes close to what we do.  As it is presented, there is still delays due to paper (the application) as well as separate systems with which the information is input.  Having our one app allows the new attacher to create an application electronically in the field in real time with all requirements for approval loaded up and placed as a recommendation for the approver.  There are certain items that are required before the application can even be submitted alleviating that time and expense etc.  The Dispatchr App is a full pull through for the work that allows for all companies to maintain their data on their internal servers and based on employee or contractor log in IDs perform all work in near real time.  The Dispatchr App can quite literally truncate a pole attachment timeline to a week with the time being spent designing and constructing a pole.

We look forward to being a part of the conversation.

Thanks in advance for any assistance or direction!

All best,

Patrick Thomas

PD Thomas