

# Google fiber

July 19, 2016

**Via Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

**Re: Notice of Ex Parte Communication: *Implementation of Section 224 of the Act, WC Docket No. 07-245; A National Broadband Plan for Our Future, GN Docket No. 09-51***

Dear Ms. Dortch:

On July 15, 2016, Jill Szuchmacher, Google Fiber's Director of Expansion, John Burchett, Google Fiber's Director of Public Policy, Staci Pies, Senior Policy Counsel for Google, and I met with Stephanie Weiner of the Office of Chairman Wheeler, and Matthew DelNero and Madeleine Findley of the Wireline Competition Bureau. We discussed the benefits of "one-touch make ready" or "dig once" policies that allow any communications provider attaching to a utility pole to perform all make-ready work that does not involve a service disruption, as long as the attacher uses engineering designs and contractors approved by the pole owner. Such policies reduce the disruption, inconvenience and delay that come from work by multiple crews, reduce make-ready costs, and improve safety and pole integrity. We provided the attached materials describing the one-touch make ready process.

Sincerely,



Austin C. Schlick  
Director, Communications Law  
Google Inc.

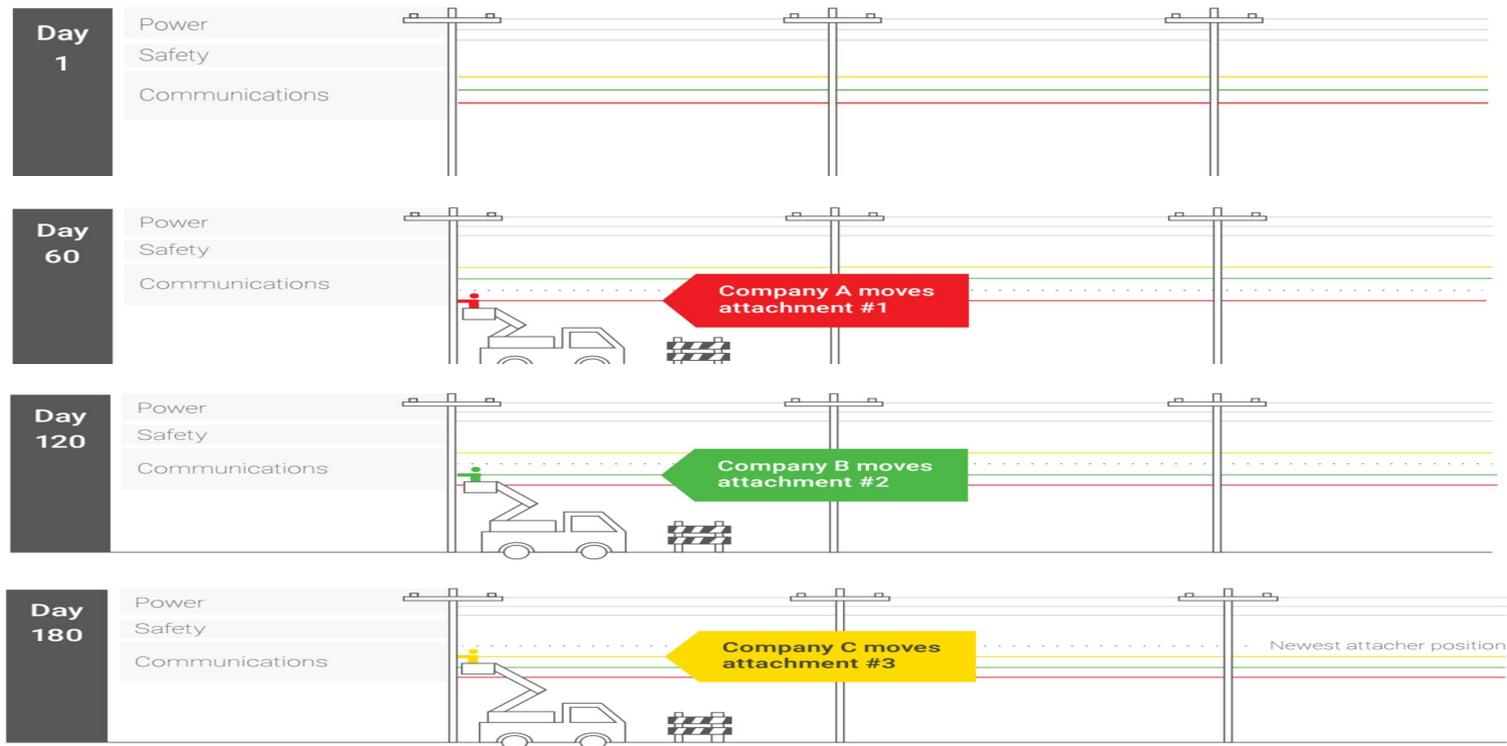
cc: *Via electronic mail*  
Stephanie Weiner  
Matthew DelNero  
Madeleine Findley

# Make-Ready Processes

# Problem

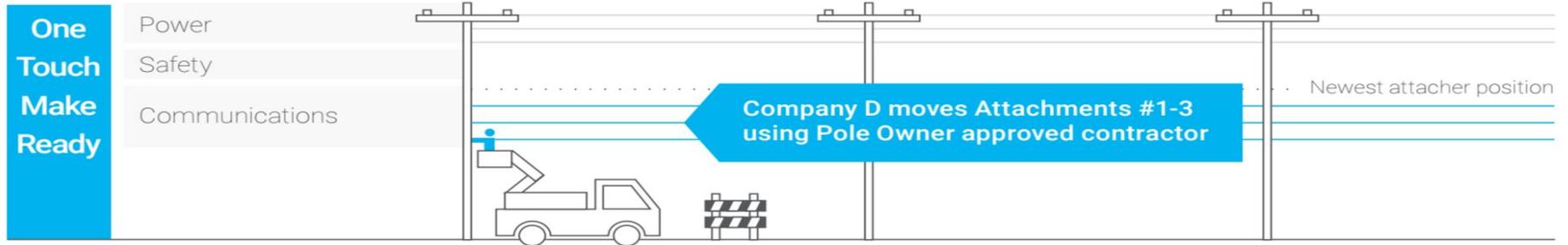
- Current make-ready processes do not allow affordable, timely, or efficient construction of competitive wireline networks
  - Charges are not predictable or verifiable
  - One-at-a-time moves of existing attachments take many months to complete
  - Repetitive climbs by multiple teams
    - Increase costs
    - Compromise pole integrity
    - Endanger workers and public safety
    - Inconvenience residents

# Traditional Make Ready Process



# A Better Way: One-Touch Make Ready (“Climb Once”)

One Touch Make Ready consolidates these steps



- Allows any provider attaching to a pole to perform all make-ready work, as long as it uses engineering designs and contractors approved by the pole owner
  - Exception for work that may put customers out of service
- Reduces the disruption, inconvenience and delay that come from work by multiple crews
- Improves safety and pole integrity

# One-Touch Make Ready Has Broad Support

- **FTTH Council:** “[P]rotect public safety, minimize disruption in the public rights-of-way, and bring competition for broadband and other communications services to residents by adopting a one touch make-ready regime”
- **Next Century Cities:** “[C]ompanies will benefit from less red tape, communities will benefit from less disruption, and everyone will benefit from faster deployment and increased connectivity.”
- **Coalition for Local Internet Choice:** “[W]e support and encourage collaborative, common sense efforts among stakeholders, including ‘one-touch’ programs.”
- **Clinton Tech and Innovation Agenda:** “Localities may seek to stimulate more investment by current or new service providers by . . . pursuing ‘climb once’ policies to eliminate delays”
- **Louisville Ordinance No. O-427-15 (“One Touch Make-Ready Ordinance”)**
  - AT&T and Frontier are challenging
- **CPS Energy Pole Attachment Standards:** “‘One-Touch Transfer Process’ is part of a “streamlined approach for the access and use of CPS Energy Poles”
- **North Carolina State Broadband Plan:** “‘[O]ne touch’ policy . . . promotes safety and limits disruptions to the ROW”