

July 27, 2018

VIA ECFS

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

Re: *Ex Parte Notice: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84*

Dear Ms. Dortch,

On July 26, 2018, the undersigned from INCOMPAS met separately with Jamie Susskind, Chief of Staff for Commission Carr, and Betsy McIntyre of Commission Rosenworcel's office. INCOMPAS supports adoption by the Commission of the one-touch, make-ready ("OTMR") process for pole attachments proposed in the draft *Third Report and Order* ("Draft Order") in the above referenced proceedings.

The proposed OTMR will speed the process and reduce costs for pole attachments, improving the ability of new broadband providers to enter the market and offer competitive services. The current process of multiple touch and multiple truck-rolls to the pole is inefficient, costly and, as a result, can substantially delay and hinder the expansion of broadband. This is true regardless of how short the time period each existing attachers has to move their equipment since it must be done on a sequential basis, which is one of the many reasons NCTA's ASAP proposal would be ineffective in promoting broadband deployment. We also support the decision, in the *Draft Order*, that the benefits of OTMR should not be subverted by binding new attachers' choice in contractor by the private agreements of existing attachers or subjecting them to a federally-imposed indemnification provisions.

In the meeting with Ms. Susskind we discussed the requirement of pole owners to provide new attachers with estimates and invoices itemized by pole. As AT&T even notes in its *ex parte* filing, this requirement relates to "complex and above communications space make-ready (non-OTMR)" charges."¹ Therefore, the claims of the need for additional time to

¹ Letter of Frank S. Simone, AT&T, to Marlene H. Dortch, FCC, WC Docket No. 17-84, at 2, filed Jul. 23, 2018. *See also Draft Order* ¶ 47, n. 172 (referring to elimination of estimate stage under OTMR.)

implement system changes related to this requirement should not impact the effective date of the OTMR policies and procedures.

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy
Vice President, Regulatory

cc: Jamie Susskind
Betsy McIntyre