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September 15, 2017

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

**Re: Ex Parte Notice**  
**WC Docket No. 17-84**

Dear Ms. Dortch:

On September 13, 2017, Pam Ellis (Utility Business Development Senior Manager for AEP), Tom St. Pierre (Associate General Counsel for AEP), Natalie Beasman (Legal Counsel for Southern Company) and I met with Jay Schwarz (Chairman Pai's Wireline Advisor) in connection with the above-referenced docket.

During the meeting, we expressed support for the Commission's proposed revisions to Rule 1.1409(c), insofar as it reflects the long-standing regulatory accounting practice of crediting make-ready reimbursements to the appropriate FERC accounts so that make-ready reimbursements are rate base neutral. We expressed concern, though, with the Commission's inquiries into possible further reductions in the existing pole attachment rate formulas.

We explained that the existing rate formulas already yield prices that are inefficiently low, and that further reductions will do nothing to promote broadband deployment. We reiterated, as all commenters seem to acknowledge, that the timing and predictability of infrastructure access (and the front-end costs associated with access), are the real keys to broadband deployment, and that the Commission's policies should incentivize, rather than discourage, capital investment in infrastructure and innovative make-ready solutions from the providers of pole space.

The positions and data we discussed were consistent with the positions and data set forth the initial comments (at pp. 50-56) and reply comments (at pp. 36-37) filed by AEP and Southern Company (along with Ameren, Duke Energy, Entergy, Oncor Electric and Tampa Electric) in this proceeding.

This ex parte notification is being filed electronically in the above-referenced docket pursuant to section 1.1206(b) of the Commission's rules. Please let me know if you have any questions.

Very Truly Yours,

*/s/ Eric B. Langley*

Eric Langley

EBL/lk

cc: Jay Schwarz ([Jay.Schwarz@fcc.gov](mailto:Jay.Schwarz@fcc.gov))