



Alliant Energy
Legal Department
4902 North Biltmore Lane
P.O. Box 77007
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November 20, 2019

Submitted via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia 20554

RE: CTIA Petition for Declaratory Ruling, In the matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84

Dear Ms. Dortch:

Alliant Energy, on behalf of its wholly owned subsidiaries Interstate Power and Light Company and Wisconsin Power and Light Company, submits this reply in support of the comments filed by The Edison Electric Institute (“EEI”), the National Rural Electric Cooperative Association (“NRECA”), and the Utilities Technology Council (“UTC”) (together, the “Utility Associations”)¹ in opposition to the declaratory ruling proposed by the Petition for Declaratory Ruling of CTIA, filed on Sept. 6, 2019 (“Petition”).² Alliant Energy serves nearly one million electric, and over 400,000 gas customers in Iowa and Wisconsin.

In addition to supporting the comments filed by the Utility Associations, Alliant Energy wishes to share additional insight regarding one particular aspect of the Petition’s requested relief. As it paints pole owners as a monolithic entity hindering deployment of 5G, the Petition seeks to reverse the development of negotiated agreements and market-based solutions that were expressly encouraged by the FCC for years.³ However, over the past five years, Alliant Energy has developed solutions with wireless and small cell providers who have requested access to street lights, wanted to use the unusable space on those poles, and developed negotiated agreements that have benefitted both parties.

The contracts and construction standards that Alliant Energy has developed over many years take into consideration the practical, logistical, and operational considerations of the service territory we serve. This involves consideration of the local requirements of service territory communities and real-world conditions. These standards apply a consistent approach throughout our service territory to ensure safety and reliability, while allowing small cell and wireless providers access

¹ Opposition to Petition for Declaratory Ruling of Edison Electric Institute, Utilities Technology Council, and National Rural Electric Cooperative Association, filed Oct. 29, 2019 (“Utility Association Comments”).

² *In the Matter of 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), *WIA Petition for Rulemaking*, *WIA Petition for Declaratory Ruling*, and *CTIA Petition for Declaratory Ruling* (RM-11849), Petition for Declaratory Ruling of CTIA, filed Sept. 6, 2019.

³ See Petition at 22, 26, 28.



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to the poles. When questions or issues have arisen, we have worked collaboratively with the attacher to resolve them to serve all parties. Small cell and wireless providers use our construction standards from the beginning of their project to implement best practices safely, prevent later redesign, improve speed of deployment, and reduce costs.

The Petition fails to show how the proposed requests will enhance already effective solutions that we have established within our service territory to balance the needs of the pole attaching entities and our utility customer needs. Therefore, Alliant Energy opposes the Petition and urges the Commission to deny the Petition as requested.

Sincerely,

A handwritten signature in black ink that reads "Lissa Koop".

Lissa Koop
Senior Attorney
608-458-4826