

ATTACHMENT B

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

ZITO CANTON, LLC,

Complainant,

v.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

Proceeding No. 17-284
File No. EB-17-MD-005

REPLY DECLARATION OF TODD MCMANUS

I, TODD MCMANUS, declare as follows:

1. I am Manager of Outside Plant at Zito Canton, LLC (“Zito”), with a general office address of 102 South Main Street, Coudersport, PA 16915. I make this Reply Declaration in support of Zito’s Reply in Support of Amended Pole Attachment Complaint (“Reply”) in the above-captioned case. I know the following of my own personal knowledge, and if called as a witness in this action, I could and would testify competently to these facts under oath.
2. I have served as Manager of Outside Plant for 11 years. In this role, I am responsible for Zito’s plant construction, including aerial plant construction using existing utility poles.
3. I have reviewed the allegations in the Reply filed in this proceeding and verify that they are true and correct to the best of my knowledge, information and belief.
4. It is common industry practice to conduct joint ride-outs as part of the pre-construction survey process to assess required make-ready work. Based on my experience Verizon, Penelec,

West Penn Power, Frontier, Windstream, Empire Access, and National Grid, among others, incorporate joint ride-outs into their pole attachment application process. In addition, all of the electric utility co-ops with whom I have worked conduct joint ride-outs.

5. On behalf of Zito, I have interviewed, hired, and supervised contractors that perform pre-attachment survey work in connection with Zito's pole attachment applications. I am actively involved in evaluating (in consultation with Zito management) the terms and pricing governing Zito's relationship with its current contractor, Map Masters LLC. Additionally, I frequently review and provide feedback on the work produced by Map Masters.

6. Map Masters LLC performs field survey work in connection with Zito's pole attachment applications, collecting the pole number, street location, type and height of attachments on each pole, the height and class of pole, and midspan clearances.

7. Underground construction is not a viable alternative to aerial construction for Zito's facilities, especially in Pennsylvania, where boring through bedrock and restoration expenses combine to make underground construction cost prohibitive.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

By: Todd McManus
Todd McManus

Dated: December 8, 2017