

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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OFFICE OF THE SECRETARY

In the Matter of )  
)  
Implementation of Section 703(e) )  
Of the Telecommunications Act )  
Of 1996 )  
)  
Amendments of the Commission's Rules )  
And Policies Governing Pole Attachments )

CS Docket No. 97-151

To: The Commission

JOINT REPLY COMMENTS  
OF  
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AND  
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## SUMMARY

In order to implement the new provisions of § 224(e) governing charges for attachments to utility poles, ducts, conduits and rights-of-way, by telecommunications companies, the FCC needs to give full effect to the Congressional emphasis on the use of negotiations as the primary means of establishing pole attachment agreements. In addition, FCC is urged to reconsider its decision not to address the issue of utilizing a forward-looking economic cost pricing methodology.

Commenting parties agree that regulated pole attachment rates are not necessary for the competitive deployment of wireless infrastructure. The application of 224 to wireless attachments is a violation of the Equal Protection clause of the Constitution. Investor-owned utilities should not be singled-out for rate regulated access to their facilities for wireless siting when all other entities, including the Federal government, are permitted to recover market rates for wireless access.

Cable companies should not be counted as attaching entities for purposes of allocating the costs of non-usable space even though they are not required to pay for this space. Similarly, ILECS should not be counted as attaching entities for purposes of allocating the non-usable space on a pole. In addition, the FCC should clarify that electric utilities are only considered attaching entities to the extent they have attachments that are utilized to provide telecommunications services.

The FCC needs to provide utilities with flexibility in determining the geographic boundaries on which they may base their presumptions on the number of attaching entities. Finally, the FCC must clarify that utilities may require attaching entities to pay the costs of developing these presumptions.

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To: The Commission

**JOINT REPLY COMMENTS  
OF  
THE EDISON ELECTRIC INSTITUTE  
AND  
UTC, THE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to Section 1.429 of the Commission's Rules, the Edison Electric Institute (EEI) and UTC, The Telecommunications Association,<sup>1</sup> hereby respectfully submit the following reply comments in response to comments received on the EEI/UTC "Joint Petition for Clarification and/or Reconsideration" of the FCC's *Report and Order (R&O)*, FCC 98-20, released February 6, 1998, in the above-captioned matter.<sup>2</sup>

- I. The FCC's Rules Should Recognize That Congress Adopted A New Approach To Accommodate Telecommunications Attachments That Relies On Negotiations And Full Compensation**
  - A. Negotiations Must Be The Primary Means For Establishing Rates, Terms And Conditions For Pole Attachments**

In the Joint Petition, EEI and UTC noted that the plain language of Section 224(e)(1) and the accompanying Conference Committee Report evidence the clear intent of Congress that voluntary negotiations must be the fundamental means for setting the rates for

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<sup>1</sup> UTC was formerly known as the Utilities Telecommunications Council.

telecommunications carrier attachments to utility poles, ducts, conduits and rights-of-way.<sup>3</sup> Yet, despite this undisputed Congressional preference for the use of negotiations as the principal means of establishing the terms and conditions of pole attachments, MCI argues that the adoption of rigid formulaic rules is a necessary precondition for successful negotiations.

MCI's definition of "negotiations" does not comport with the everyday usage and meaning of the word and should be rejected. The use of negotiations implies a give-and-take process under which the parties have sufficient flexibility to reach an agreement that meets the needs of both parties. The practical effect of overly rigid rules that place significant constraints on the range of terms and conditions that are allowed, will be to stifle any incentive for, or real ability of the parties to engage in meaningful negotiations as was intended by Congress.

Rather than recycling the old cable television pole attachment complaint process and applying it to telecommunications attachments as a "negotiation process," the FCC must recognize the fundamental difference between CATV attachments and telecommunications attachments, and the clear intent of Congress to utilize a different process in accommodating these attachments. As the Joint Petition indicated, the telecommunications attachments that are encompassed under these new rules are far more unique than, and encompass a wide variety of attachments that go well beyond, a simple cable attachment to a suburban wood utility pole. It is in this context that the FCC should reconsider its rejection of the utility industry's proposed modifications to the current CATV complaint process for use in resolving disputes over telecommunications attachments.

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<sup>2</sup> The EEI/UTC petition was placed on public notice in the Federal Register on April 27, 1998.

<sup>3</sup> Conference Report to the Telecommunications Act of 1996, S.652, S.Rep. 104<sup>th</sup> Congress, 2<sup>nd</sup> Sess., p.70.

**B. The FCC Should Reconsider Its Rejection of The Use of Forward Looking Costs**

EEI and UTC have asked the FCC to reconsider its decision not to address the issue of utilizing a forward-looking economic cost pricing methodology to develop rates for instances where agreement is not reached. Contrary to the claim of the Joint Cable Parties<sup>4</sup>, the statute does not require that the rate for telecommunications attachments be based on the actual capital costs of the utility. As was pointed out in the Joint Petition, the FCC has broad latitude to establish just and reasonable rates under Section 224(e). Section 224(e) does not specify the upper or lower bounds of the rental rate for telecommunications attachments. That is one reason why the rate is to be phased-in over five years. Accordingly, and given the Act's explicit preference for the use of market forces and negotiations as the primary means to establish attachment rates, the use of forward-looking replacement costs is reasonable and entirely appropriate in the FCC's formulation of a pricing "backstop" to be used when the parties are unable to negotiate an agreement.

Forward looking pricing reflecting economic capital costs should be used as a surrogate for a market rate because economic theory recognizes that market prices, over the long-term, will approach forward-looking, or replacement costs. Thus, the use of forward-looking costs in a regulated rate (as opposed to a negotiated rate) most effectively approximates the real market cost of access to utility facilities (particularly ducts, conduits and rights-of-way). The fact that Congress specifically adopted a fully-allocated cost formula that looks to the value of the entire pole reinforces the use of forward looking pricing, as it ensures that the owner is provided full compensation for the use of its facilities. Moreover, forward looking pricing is particularly appropriate with regard to the valuation of conduit and right-of-way costs which appreciate in value over time.

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<sup>4</sup> Joint Cable Parties, p. 10.

Finally, the Joint Cable Parties are incorrect in their assertion that the Commission is free to purposely select an economic cost model in one context in order to benefit a certain group of competitors and consumers and not apply that same model where the consumers are of electricity and not telecommunications. The FCC has embraced the use of forward looking pricing as the proper methodology for determining the pricing of access to local telephone facilities in its interconnection proceeding, CC Docket No. 96-98, and the Commission has specifically proposed the use of forward looking pricing for the determination of pole and conduit costs in the universal service context.<sup>5</sup> Absent clear Congressional guidance or a compelling public policy reason, such action indicates a bias that violates the Constitution's requirement of equal protection under the law.

## **II. Cable Companies Should Be Required To Certify That They Are Not Offering Telecommunications Services**

Adelphia Communications, Lenfest Communications and the Joint Cable Companies oppose EEI and UTC's suggested requirement that in order to qualify for the "cable-only" rate a cable company should be required to certify that it is utilizing its pole attachment solely to provide cable television service, and that no other entity is using the attachment to provide services other than cable television. These commenters all object to the proposal on the grounds that it would impose an unnecessary burden on cable operators.<sup>6</sup>

EEI and UTC continue to urge the FCC to reconsider its rejection of a certification requirement. As Bell Atlantic notes, contrary to the claims of the cable companies, such a requirement would impose no discernable burden on cable companies, whereas it would benefit

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<sup>5</sup> *Further Notice of Proposed Rulemaking*, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs, CC Docket No. 96-45, released July 18, 1997, para. 104.

<sup>6</sup> Adelphia/Lenfest, pp. 11-12 and Joint Cable Parties, p. 19.

pole owners who otherwise would have no readily available method for determining whether or not a cable company was utilizing its attachment solely to provide cable service.<sup>7</sup>

At a minimum, the FCC should clarify that it would not consider a requirement for such certification an unreasonable term or condition in a pole attachment agreement. Finally, as indicated in the Joint Petition, the FCC should affirm that if a utility subsequently finds that a cable company has been using its pole attachments to provide non-cable services the utility should be entitled to a recovery of all prior underpayments as well as a penalty.

### **III. The FCC Should Not Have Adopted Wireless Attachment Pricing Rules**

A number of commenters agree with EEI and UTC that the FCC's application of the current "pole" attachment formula to wireless attachments is inherently flawed.<sup>8</sup> As GTE notes, the Commission's *NPRM* in this proceeding did not address any type of detailed wireless formula, and therefore adoption of such a formula is beyond the scope of this proceeding.<sup>9</sup> The FCC did not seek, and did not receive, any information with regard to the types of accounts that should be utilized in developing a wireless pricing formula and has provided the parties with no real guidance as to what it will consider a reasonable rate, term or condition. Moreover, as GTE points out, the FCC's current formula is woefully inadequate to address the unique needs of wireless providers.

Texas Utilities and SBC agree with EEI and UTC that there is absolutely no factual basis or any compelling policy reason for the FCC to attempt to expand the traditional scope of the pole attachment statute and its formula to include wireless attachments.<sup>10</sup> As EEI and UTC explained in the Joint Petition, there are significant distinctions between traditional pole

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<sup>7</sup> EEI and UTC continue to assert that, under Section 224(d), cable companies offering more than cable-only service, such as data transport, Internet access, dark fiber or third-party overlashing, are by law not entitled to the cable attachment rate.

<sup>8</sup> EEI and UTC continue to dispute the application of the pole attachment provisions to wireless attachments.

<sup>9</sup> GTE, p. 3.

attachments and wireless attachments in terms of the types of equipment, types of facilities, location of attachments, and impact on utility equipment that do not easily fit into the pole attachment rate methodology. For example, while cable attachments are situated in a communications space below the electric lines, wireless attachments are usually located above the electric lines raising a host of new safety, reliability and space allocation issues. Further, wireless entities typically seek attachments on taller facilities, such as transmission towers, which petitioners have argued are outside the scope of the Act.<sup>11</sup> Wireless attachments also require much more associated equipment and facilities per attachment than traditional wireline pole attachments.<sup>12</sup> When attached to utility facilities they are routinely located above the electrical space and lightning arrestors and therefore have significant operational impacts.

Finally, SBC echoes the arguments of EEI and UTC that the FCC's pricing rules for wireless attachments should be set aside because regulated pole attachment rates are not necessary for the competitive deployment of wireless infrastructure. As SBC notes, utility poles are not essential sites for wireless transmitters. SBC notes that it is extremely unfair and discriminatory to apply onerous "rent control" to a small segment of the entire population of potential antenna site providers.<sup>13</sup> SBC agrees with EEI and UTC that giving wireless service providers preferential rates (on an order of magnitude lower) for access to utility poles, compared to all other potential antenna site owners (including the Federal government) is not only unfair, but is actually a violation of the Equal Protection clause of the Constitution.<sup>14</sup> Such a

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<sup>10</sup> Texas Utilities, p. 6; and SBC, p. 17.

<sup>11</sup> EEI and UTC have a petition for reconsideration pending on this issue in CC Docket No. 96-98.

<sup>12</sup> If the FCC adheres to its decision, at a minimum, it should limit the application of the pole attachment formula to wireless attachments in traditional communications space.

<sup>13</sup> SBC, p. 17.

<sup>14</sup> "Equal Protection" clause of the Fourteenth Amendment and the "Due Process" clause of the Fifth Amendment of the US Constitution.

discriminatory treatment of utility facilities as potential antenna sites does not rationally further any legitimate Federal purpose.<sup>15</sup>

#### **IV. Counting Attaching Entities**

##### **A. Cable Companies Should Not Be Counted As Attaching Entities Unless Providing More Than Cable-Only Service**

In implementing section 224(e)(2), the FCC concluded that cable companies should be counted as attaching entities for purposes of allocating the costs of non-usable space even though they are not required to pay for this space. Ameritech supports the request of EEI and UTC that the FCC reconsider this decision as it runs counter to the clear language of the statute and places an undue burden on utilities that amounts to an outright unconstitutional taking of property without just compensation. As Ameritech notes, fairness dictates that a utility's ability to recover the costs of unusable space from other attaching entities should not be further reduced by counting the cable system as an attaching entity. This requires the utility to shoulder an additional share of the costs of unusable space rather than spread the burden equally among all parties who benefit from the existence of the unusable space.<sup>16</sup> Such an interpretation contravenes Congressional intent that the new formula embody a fully-allocated cost rate methodology that is equally apportioned among all attaching entities.

##### **B. ILECs Should Not Be Counted As Attaching Entities**

Ameritech, Bell Atlantic, and SBC all agree with EEI and UTC that ILECs should not be counted as attaching entities for purposes of allocating the non-usable space on a pole.<sup>17</sup> As the Joint Petition noted, the new rate under Section 224(e) clearly applies to "telecommunications carriers" who use pole attachments to provide telecommunications services, and 224(a)(5) explicitly states that ILECs are not considered "telecommunications carriers" for pole attachment

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<sup>15</sup> SBC, p. 17.

purposes. Given the literal terms of the Act, and the absence of any evidence of a contrary Congressional intent, it would be appropriate and reasonable for a utility to exclude ILEC attachments in determining the number of attaching entities.

**C. Utilities Should Only Be Considered Attaching Entities To The Extent That They Actually Provide Telecommunications Services**

EEI and UTC adamantly oppose the suggestion of the Joint Cable Companies and MCI that electric utilities that do not themselves have any attachments that are used to provide telecommunications services should nevertheless be counted as attaching entities for the allocation of the costs of non-usable space. There is absolutely no statutory support for such an interpretation. As SBC notes, electric utility attachments are beyond the scope of the FCC's statutory controls.<sup>18</sup>

Recognizing the statutory weakness of their argument, both MCI and the Joint Cable Companies attempt to hinge their argument on the basis that utilities also benefit from the existence of non-usable space on poles, ducts and conduits. EEI and UTC do not dispute this point. However, what MCI and the cable companies fail to acknowledge is that the statute already accounts for electric utility attachments by apportioning 1/3 of the non-usable space costs to the utility in all instances.

As indicated in the Joint Petition, EEI and UTC agree with the FCC's conclusion that Section 224(e)(2) requires a utility or its subsidiary to be counted as an attaching entity for purposes of apportioning non-usable space, if it has attachments that are used to provide telecommunications services. However, EEI and UTC reiterate their request that the FCC

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<sup>16</sup> Ameritech, p. 3.

<sup>17</sup> Ameritech, pp 2-3; Bell Atlantic, p. 9; and SBC, p. 13.

<sup>18</sup> SBC, p. 13.

clarify that this requirement does not apply to utility communications attachments that are not used to offer “telecommunications services” as defined in the Act.<sup>19</sup>

The FCC must reject the Joint Cable Companies’ argument that because the FCC concluded in its *Interconnection Order* that a utility’s use of its poles even for internal communications triggers the mandatory access provisions, the FCC should similarly conclude that private, internal utility communications systems should be counted as attachments for purposes of allocating non-usable space costs. In the *Interconnection Order* the FCC was attempting to determine which utility facilities are encompassed in the mandatory access provisions of the Act, whereas in the current proceeding the FCC is establishing the types of attachments that are subject to the Section 224(e) rate formula. Moreover, in the *Interconnection Order* the FCC was interpreting the term “wire communication” as used in Section 224(a)(1) and concluded that it had a broad definition. In contrast, Section 224(e) is limited to attachments utilized for the provision of “telecommunications services” which has a very specific and limited definition that does not include private internal communications systems.

#### **V. Presumptive Average Number of Attaching Entities**

In order to calculate the costs of non-usable space on a pole, the FCC has adopted a requirement that each utility develop, through the information it possesses, a presumptive average number of attaching entities on its poles based on location (urban, rural, urbanized). A large number of commenters joined EEI and UTC in noting that the US Census Bureau provides for a great deal of overlap between urban, rural and urbanized areas, and that this will cause difficulty for the utilities in attempting to develop such presumptions.<sup>20</sup> These commenters echo EEI and UTC’s request that the FCC should provide utilities with the flexibility to develop

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<sup>19</sup> The Act defines “Telecommunications Services” as “the offering of telecommunications for a fee directly to the public...”

<sup>20</sup> Bell Atlantic, p. 8; GTE, pp. 5-6; MCI, p. 6; and SBC, p. 2.

these presumptions in the manner that best suits their specific location and the type of information that they have available. For example, some utilities might need to use data based on their total service territory while others may determine averages based on the cable system's territory or other geographic area. So long as the utility is willing to disclose how it derived the average, the FCC should not dictate the geographic boundaries that a utility must follow to derive the average number of attaching entities. NCTA fails to explain how the provision of such flexibility will "place an intolerable burden on pole users."<sup>21</sup>

In their Joint Petition EEI and UTC also noted that the FCC provided no guidance with regard to the issue of who is expected to pay the expense of developing these presumptions. As the comments attest, most utilities do not have this information readily available or in a format that is easily adaptable to the creation of such presumptions. SBC characterizes the creation of the presumptions as an extremely burdensome, complex and expensive process.<sup>22</sup> Contrary to NCTA's characterization, the development of this information is not a "reasonable cost of doing business" and should not be borne by the pole owner.<sup>23</sup> Utilities are not in the "business" of providing pole attachments, they do not routinely keep these records and would have no need to develop any presumptions absent the request of one or more attaching entities to access the utility's facilities at below-cost rates. It is for these reasons that EEI and UTC renew their request that the FCC clarify that utilities are permitted to charge an attaching entity up front for the potentially substantial cost of developing such presumptions, just as the FCC has concluded that the first "attacher" within a duct or conduit must pay for all innerduct placed to permit its attachment.

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<sup>21</sup> NCTA, p. 12.

<sup>22</sup> SBC, pp. 2-3.

<sup>23</sup> NCTA, p. 12.

**WHEREFORE, THE PREMISES CONSIDERED,** the Edison Electric Institute and UTC respectfully urge the Commission to take action in a manner consistent with these Reply Comments and their *Joint Petition for Reconsideration and/or Clarification*.

Respectfully submitted,

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May 22, 1998

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