



National Cable & Telecommunications Association
25 Massachusetts Avenue, NW – Suite 100
Washington, DC 20001
(202) 222-2300
www.ncta.com

Steven F. Morris
Vice President and Associate General Counsel

(202) 222-2454
(202) 222-2446 Fax

October 1, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Pole Attachments, WC Docket No. 07-245

Dear Ms. Dortch:

On September 29, 2015, Steve Morris and Jennifer McKee of the National Cable & Telecommunications Association met by phone with Amy Bender, Legal Advisor to Commissioner O’Rielly, to discuss NCTA’s pending reconsideration petition in the above-referenced proceeding.¹ On October 1, 2015, we met by phone with Nick Degani, Legal Advisor to Commissioner Pai, and Travis Litman, Senior Legal Advisor to Commissioner Rosenworcel, on the same topic. In these meetings, NCTA explained that granting its petition would promote broadband investment and competition by ensuring that the rate for telecommunications attachments is comparable to the rate for cable attachments in all circumstances, just as the Commission intended in its *2011 Pole Attachment Order*.²

Respectfully submitted,

/s/ **Steven F. Morris**

Steven F. Morris

cc: A. Bender
N. Degani
T. Litman

¹ See Petition for Reconsideration or Clarification of the National Cable & Telecommunications Association, COMPTEL and twtelecom, Inc., WC Docket No. 07-245 (filed June 8, 2011) (NCTA Petition).

² *Implementation of Section 224 of the Act*, WC Docket No. 07-245, Report and Order and Order on Reconsideration, 26 FCC Rcd 5240, 5298-99, ¶ 136 (2011) (“[W]e believe the telecom rate should be lowered to more effectively achieve Congress’ goals under the 1996 Act to promote competition and ‘advanced telecommunications capability’ by both wired and wireless providers by ‘remov[ing] barriers to infrastructure investment,’ and the broader pro-competitive goals and policies that Congress directed the Commission to carry out under the 1996 Act.”).