

ORIGINAL

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October 26, 2000

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

EX PARTE OR LATE FILED

RE: Application by Verizon New England Inc., et al., for Authorization To Provide
In-Region, InterLATA Services in Massachusetts, Docket No. 00-176

Dear Ms. Salas:

Yesterday, Verizon met with members of the CCB and the Cable Bureau at their request. Attending from the CCB were C. Pabo, K. Farroba, S. Cameron, and E. Einhorn. The Cable Bureau representatives were K. Costello and C. King. Attending from Verizon were K. Zacharia, G. Harrington, J. Pachulski, V. DeSantis and me. Verizon reviewed its policy regarding "boxing" on poles which is attached. The twenty-page limit does not apply as set forth in DA 00-2159.

Please feel free to contact me with any questions.

Sincerely,



Attachment

- cc: K. Farroba
- K. Costello
- E. Einhorn
- C. King
- S. Pie
- C.Pabo

No. of Copies rec'd 0+2
List A B C D E



Outside Plant Network Services Staff Letter

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PR-A97-015

Document Number

<u>Subject</u> POLE ATTACHMENTS		Document Number PR-A97-015	
Type Advisory	Issuing Organization Facilities Management	Date 07/06/98	
References BA Practice 620-060-100, 627-220-202, 919-120-700, Bellcore SR-1421			
Supersedes	N/A	Distribution Codes	File Number
Supplements	PR-D96-087, PR-D96-114	PR1, PR18	N/A

To: Director, Managers, 1st Level Managers; Facilities Management
Facilities Management Training
Directors, Managers, 1st Level Managers; Construction
Directors, Managers, 1st Level Managers; I&M

Abstract This letter will provide a supplement to the Facilities Management Centers for use with the previously issued letters converging procedures to comply with the 1996 Telecommunications Act and FCC 251 Rules.
It will cover different methods of pole attachments and their application in a universal, non-discriminatory approach for Bell Atlantic and all Cable Television and Telecommunications Carriers.
IMPORTANT NOTICE: The Cable Extension Bracket referred to in BA Practice, Issue A, 620-060-100, page 34, was listed in error. It is not an approved product and should not be used.

Effective Date: Immediately

Contact

Name Roger Meeden Telephone 301-236-6261
Approved by Richard L. Fowler Title Manager



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BACKGROUND

On September 25, 1996 a Bell Atlantic document, PR-D96-087, entitled, "Telecom Act 1996; Access to Poles, Conduit and Right of Way" was issued. This document provided Bell Atlantic policy for non-discriminatory access for Cable Television and Telecommunications providers (referred to herein as licensees or approved licensees) to Bell Atlantic poles, ducts, conduit and right of way.

Subsequently, another document, PR-D97-114, entitled "Internal Procedures to Comply with FCC 251 Rule", was issued. This letter provided further details and internal procedures on how to comply with the 1996 Act and the 251 Rules relative to our scheduled occupation of space, notification to licensees of modification to structures that they occupy and denial of access procedures.

While the FCC considers "pole attachments" in the universal sense to include joint occupancy in ducts, conduit and right of way, **this letter will limit its discussion to "poles only" and the various approved methods of attachment to those poles.** These methods will apply unilaterally to joint use as well as non-joint use poles and will be directed specifically toward situations where space on a pole is either being applied for by an approved licensee or will be used by Bell Atlantic. These methods must be applied uniformly to Bell Atlantic and all licensed applicants. While the PR documents referenced on the cover sheet discuss the implementation of the 1996 Telecommunications Act and the FCC 251 Rules, **this letter is intended to address the approved methods of pole attachments for Bell Atlantic and all approved licensees.**

Except where local laws, ordinances, and joint use agreements vary widely from one jurisdiction to another, we must otherwise be consistent in the application of the hardware and methods used to attach cables for ourselves and all approved licensees. Licensees should expect the same standards to apply, within the law, when dealing with Bell Atlantic from one district to another. **This document is not intended to tell the field how to enforce the rules of joint occupancy. Where differences or disputes cannot be resolved between Bell Atlantic and the approved licensees on a local basis, they should be referred to the Joint Use Coordinators for mediation.**



They are:

Don Cameron	804-772-6604	VA and W V
Bruce Stanley	973-649-3007	NJ
Jim Giancola	215-931-4931	PA and DE
Steve Smith	410-393-6711	Md. and DC
George Belcher	207-797-1310	ME, VT, NH
Marc Berlinger	617-342-0428	MA and RI
Jim Slavin	212-395-7208	NY

If the Joint Use Coordinators require additional support, they should contact Alan Young (215-466-8809) whose responsibilities include joint use.

Finally, every method described herein will be subject to all federal, state, county and municipal codes and regulations, as well as the National Electric Safety Code, Bell Atlantic Practices and the terms of any Joint Use Agreements in effect in your area.

APPROVED BELL ATLANTIC METHODS AVAILABLE TO MAKE SPACE FOR ADDITIONAL POLE ATTACHMENTS

The methods listed below, generally speaking, are in order of preference, however the engineer must consider safety and other factors before making a decision.

- 1) Raise or lower the existing attachments on the pole to provide space for the additional attachments. A minimum of 12 inches separation must be maintained between Bell Atlantic and licensee attachments.



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- 2) A "B" bolt or backside hanger may also be used to mount the additional attachment to the field (back) side of the pole where permissible (some joint use agreements may not permit this as an option). Bell Atlantic will not allow other licensees to share our hardware (suspension strand, guys, bolts, extension arms, extension bolts, etc.) for their own attachments since we have no control over their construction standards, hardware or procedures. By the same token, Bell Atlantic will not share the same type of hardware owned by other licensees to make our attachments. It is essentially a safety issue for us. Guy wire anchors may be shared with licensees when so specified in the licensing agreement.

- 3) Based on engineering judgment, B and C Cable Extension Arms may be used, on a limited basis to support additional cables where proper clearance between telephone, power and licensee facilities cannot otherwise be achieved. Historically, Bell Atlantic South has primarily used extension arms to offset a slight pull on a pole when guying was not possible. Bell Atlantic will not permit the use of an extension arm where it would close in an existing cable of another attaching licensee or other joint use entity. The use of an extension arm is generally applicable where the separation between existing telephone cable and a power facility is between 46 and 51 inches (refer to AT&T Practice 627-220-202, page 5, fig. 4, and neither facility can be relocated to achieve clearance for the additional facility.

For details on clearances, refer to Section 3 of the Bellcore Blue Book Manual of Construction Procedures Special Report SR-1421 issue 2, Dec. 1996. Extension arms can physically handle more than one cable based on the cable weight and adjacent span lengths (see AT&T Practice 627-220-202, page 3, table B) but a minimum of 12 inches separation must be maintained between licensees. Bell Atlantic owned extension arms are not to be shared with licensees, nor will Bell Atlantic share extension arms owned by licensees for the same reasons described in item number two (2) above.

Every effort must be made to preserve the climbing space on the pole. Refer to the Bellcore Blue Book Manual, section 3, page 13, mentioned in the previous paragraph for more details about climbing space.



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- 4) **Cable extension bolts and straps** attach to the threaded end of suspension bolts in the pole. The strap supports the outer end of the extension bolt supporting a strand and cable. In the past, this hardware facilitated placing a single cable and strand on a pole where additional clearance was required to avoid contact with a power company vertical run. This application is still relevant and approved for use throughout Bell Atlantic today. Recently, it has come to our attention that cable extension bolts and straps have also been used in some areas of Bell Atlantic North to **temporarily** place an additional (second) strand and cable at the same height, on the same side of the pole, as an existing cable and strand. This **temporary** application for a second cable and strand is now approved for use throughout Bell Atlantic. It should not, however, be used as a permanent method of attaching a second cable and strand.

The extension bolts are available in two sizes: the S type for use with a 5/8" suspension bolt (SSI # 700 064 355) and the C type for use with a 3/4" suspension bolt (SSI # 700 064 363). The Extension Bolt (E. B.) Reinforcing Strap should always be used to support the outer end of the extension bolt and cable. The strap is available in two sizes, corresponding to the two types of extension bolts. The C type is SSI # 400 314 803, while the S strap is SSI # 400 314 811.

The use of the extension bolt is limited to cables not over 5 pounds per foot with a maximum 10M strand. It cannot be used on spans exceeding 150 feet and shall not be attached to cable extension screws. For more details on its use and application, including diagrams, refer to Bell System Practice 627-220-200 and specifically, the NY addendum, Issue G, December 1978. Bell Atlantic will not permit licensees to attach their cable extension bolts to our suspension bolts (for reasons stated in item two (2) above), but they may use them with their own suspension bolts within the same limitations as previously stated.

- 5) Replace the pole with one of an appropriate height.

POLE LOADING CONSIDERATIONS

With the passage of the 1996 Telecommunications Act, the likelihood of having many new licensees apply for space on our poles increases dramatically. Consequently, the Facilities Management Engineer must consider pole loading as part of their engineering process each time an additional cable is attached to a pole. This process applies to Bell Atlantic cables as well as all attachments being applied for by the licensees. Before applications for additional attachments can be approved, the engineer should calculate pole loading based on the specifications provided by the licensee for the additional attachments.



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There are three types of pole loading: transverse storm loading, vertical loading and bending moments due to eccentric loads or unbalanced tensions. Transverse storm loading determines the required class for most poles. Vertical loads may be a controlling factor for poles carrying large cables or transformers, while bending moments usually control at unguyed corners and deadends.

For more information on calculating pole class requirements based on pole loading, refer to section 14, pages 14-22 of the Outside Plant Engineering Reference Manual. For greater detail, refer to the following AT&T practices: 919-120-100 and 919-120-700.

UN-APPROVED METHOD FOR ADDITIONAL POLE ATTACHMENTS

The Cable Extension Bracket referred to in figure 3, on page 34 of the Bell Atlantic Practice, Issue A, 620-060-100 titled, "Bell Atlantic Fiber Optic Cable Placing Practice" dated March 1995 **is not an approved product. This hardware should not have been included in that document.** Although the diagram in figure 3 looks convincing, the reality is that it is not designed for use on a pole as the attachment hole is not large enough for a 5/8" bolt. **Do not use the Cable Extension Bracket.** The same hardware is also referred to in paragraph 7.02, page 10 of the same practice. In this context, it is also listed as a CATV-L bracket. Facilities Management will arrange to have this practice updated to eliminate this error.

ACKNOWLEDGMENTS

I would like to express appreciation to Wesley Wolfert, Alan Young, Bob Langhage, Jim Giancola, Rich Karig, Nick Goff, Don Cameron, John Addicks, Rich Fowler, Tom Gavin, George Belcher, Marc Berlinger, Jim Schafer and Jim Slavin for their suggestions, time and input in helping to prepare this document.