



Ann D. Berkowitz  
Director  
Federal Regulatory Affairs

1300 I Street, NW  
Suite 400 West  
Washington, DC 20005  
(202) 515-2539  
(202) 336-7922 (fax)  
aberkowitz@verizon.com

May 10, 2010

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: In the Matter of Implementation of Section 224 of the Act Amendment of the Commission Rules and Policies Governing Pole Attachments, WC Docket No. 07-245; RM-11293 and RM-11303**

Dear Ms. Dortch:

On May 7, 2010, Rashann Duvall and the undersigned from Verizon met with Priya Aiyar, Legal Advisor to Chairman Genachowski, Sharon Gillette, Bureau Chief, Bill Dever, Marcus Maher, Al Lewis, Randy Clarke, Jonathan Reel, Jeremy Miller, Marv Sacks, and Jennifer Prime of the Wireline Competition Bureau. In addition, Verizon met separately with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell. During the meetings, Verizon explained that the Commission should push forward with its tentative conclusion to adopt a uniform rate for broadband attachments, and that the Commission has the authority to do so under the language in Section 224 (b). In addition, Verizon explained that “one-size” fits all rules governing access to poles are not appropriate because of the need to consider applicable safety regulations and other site-specific factors for each attachment. Verizon used the attached materials during this discussion. Please let me know if you have any questions.

Sincerely,

Attachments

cc: Christine Kurth                      Priya Aiyar  
Sharon Gillette                      Randy Clarke  
Bill Dever                                  Al Lewis  
Marcus Maher                          Jennifer Prime  
Jonathan Reel                          Marv Sacks

# Pole Attachments



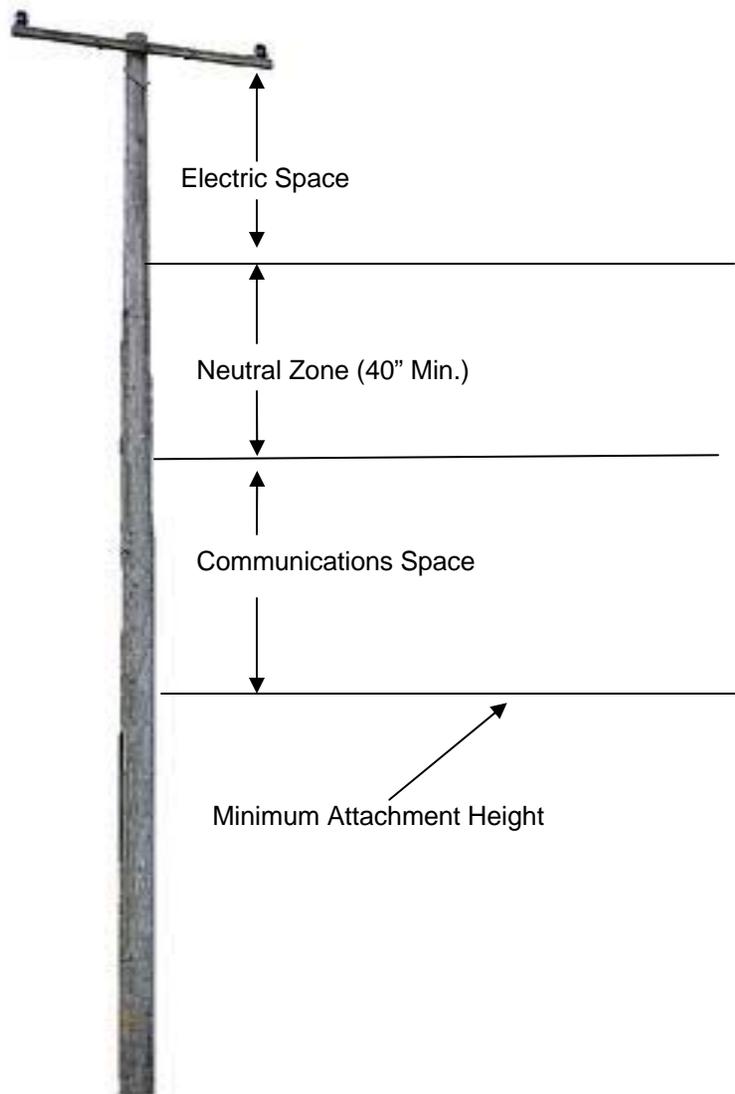
## Rates:

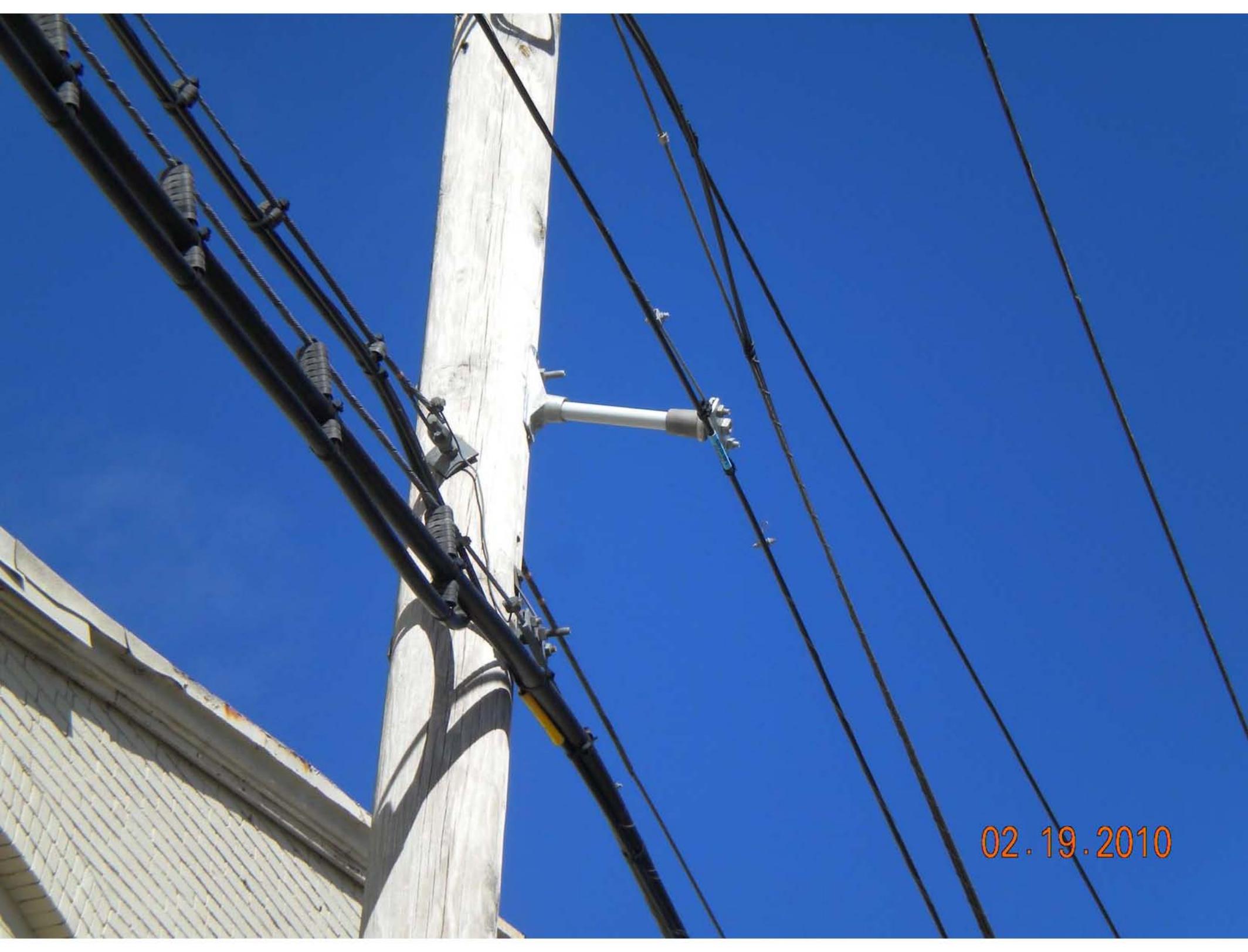
- The current regulatory regime is broken and, as a result, attachers pay widely varying rates for the same type of attachments and services.
- The Commission has the authority under Section 224 to ensure that rates for all attachments used to provide Broadband services are just, reasonable, and as close to uniform as possible.

## • Access:

- Consistent with the existing regulatory framework, Verizon does not favor itself over other parties.
- Adopting strict, standardized requirements for pole attachment processing and make ready work would threaten the reliability and safety of the poles. Flexibility is key.

# Pole Space for Attachments





02.19.2010



Pole 61 Academy Avenue, Providence, RI