Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Section 224 of the Act	)	WC Docket No. 07-245
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	

To: The Commission

COMMENTS IN SUPPORT OF PETITION FOR RECONSIDERATION AND REQUEST FOR CLARIFICATION BY THE FLORIDA INVESTOR-OWNED ELECTRIC UTILITIES

AND

OPPOSITION TO PETITION FOR RECONSIDERATION BY STATE CABLE ASSOCIATIONS AND CABLE OPERATORS

Allegheny Power
Baltimore Gas and Electric Co.
Dayton Power and Light Co.
FirstEnergy Corp.
National Grid
NSTAR
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South Dakota Electric Utilities
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Allegheny Power, Baltimore Gas and Electric Co., Dayton Power and Light Co., FirstEnergy Corp., National Grid, NSTAR, PPL Electric Utilities, South Dakota Electric Utilities, and Wisconsin Public Service Company (collectively, "the *Coalition of Concerned Utilities*" or "*Coalition*"), by their attorneys and pursuant to Section 1.429 of the Rules of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 1.429, hereby respond to requests for reconsideration and clarification of the Commission's Order in this proceeding ("Pole Attachment Order").[1]

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[1] *Implementation of Section 224 of the Act; A National Broadband Plan for Our Future*, WC Docket No. 07-245, GN Docket No. 09-51, Order and Further Notice of Proposed Rulemaking, FCC 10-84 (rel. May 20, 2010). The Order portion was published in the Federal Register on August 3, 2010, 75 Fed. Reg. 45494. *See*, Erratum,

The *Coalition of Concerned Utilities* supports the Petition for Reconsideration and Request for Clarification of the Florida Investor-Owned Electric Utilities (the "Florida IOU Petition"),[2] which highlights some of the concerns of the electric utility industry regarding the Commission's decisions in the Pole Attachment Order. The *Coalition* opposes the Petition for Reconsideration or Clarification of the State Cable Associations and Cable Operators (the "Cable Petition"),[3] which urges the Commission to ignore court precedent and find by declaratory ruling that utilities must replace and "interset" poles on behalf of communications attachers.

I. Summary

The Florida IOU Petition recognizes (as does the *Coalition's* own Petition for Reconsideration) that the configuration of utility equipment in the electric space should not under any theory of "nondiscrimination" obligate utilities to permit the same construction techniques by communications attachers in the communications space. The Florida IOU Petition also emphasizes that the FCC should not require utilities to rearrange equipment or lines in the electric space to accommodate the needs of attachers elsewhere on the pole. The *Coalition* agrees with the Florida IOUs: the facilities of electric utilities in the electric supply space are outside of the Commission's statutory jurisdiction and regulatory expertise, are irrelevant to the configuration of communications attachments in the communications space, and should not be subject to any requirements promulgated in this proceeding.

Comment Sought On Petitions For Reconsideration of Pole Attachments Order, WC Docket No. 07-245; GN Docket No. 09-51, September 23, 2010 (No DA number).

[2] Petition for Reconsideration and Request for Clarification of the Florida Investor-Owned Electric Utilities, WC Docket No. 07-245, *et al.* (filed Sept. 2, 2010).

[3] Petition for Reconsideration or Clarification of the Alabama Cable Telecommunications Association, Bresnan Communications, Broadband Cable Association of Pennsylvania, Cable America Corporation, Cable Television Association of Georgia, Florida Cable Telecommunications Association, Inc., MediaCom Communications Corporation, New England Cable and Telecommunications Association, Ohio Cable Telecommunications Association, Oregon Cable Telecommunications Association, and South Carolina Cable Television Association, WC Docket No. 07-245, *et al.* (filed Sept. 2, 2010).

The Cable Petition argues that utilities should be required to replace and even to "interset" poles if necessary to expand capacity and accommodate the attachment of additional communications equipment. In essence, the Cable Petition asks the Commission to reverse the Court of Appeals decision in the *Southern* case, which held that utilities need *not* expand the capacity of their facilities to accommodate attachers.[4] The Cable Petition is wrong on the merits and especially inappropriate in the context of a declaratory ruling issued in the absence of notice and comment procedures. It should be summarily denied in its entirety.

II. Background

In the Pole Attachment Order, the Commission announced that "*any attachment technique that a utility uses or allows to be used will henceforth be presumed appropriate for use by attachers on the utility's poles under comparable circumstances.*"[5] The Order also ruled that "*[i]f a utility believes that boxing and bracketing are fundamentally unsafe or otherwise incompatible with proper attachment practice, it can choose not to use or allow them at all,*"[6] and that "*[i]f a utility chooses to allow boxing and bracketing in some circumstances but not others, the limiting circumstances must be clear, objective, and applied equally to the utility and attaching entity.*"[7]

Based on the staff's recommendations in the National Broadband Plan, the Commission concluded that it was in the public interest to implement these requirements immediately,

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[4] *Southern Co. v. FCC*, 293 F.3d 1338 (11th Cir. 2002) ("*Southern*").

[5] Pole Attachment Order at ¶10 (emphasis added). The Order noted that electric utilities may rebut this presumption for reasons of "safety, reliability and generally applicable engineering purposes." *Id.* at ¶11. As pointed out in the Florida IOU Petition, however, "insufficient capacity" and "safety, reliability and generally applicable engineering purposes" are two separate exceptions to the statutory requirement that utilities allow communications attachers to access their poles. Any of these exceptions is sufficient to justify a utility's refusal of access. *See* 47 U.S.C. § 224(f)(2).

[6] *Id.* (emphasis added).

[7] *Id.* at ¶13 (emphasis added).

without benefit of prior notice and comment.[8] Unfortunately, as detailed in the *Coalition's* Comments, the staff's recommendations in the Pole Attachment section of the National Broadband Plan were so one-sided that they cannot reliably form the basis for any unilateral actions by the Commission, let alone ones that potentially impact the safe and efficient operation of electric utility distribution systems across the country.[9]

The Commission's staff did not even pretend to be objective in the Infrastructure Chapter of the National Broadband Plan, which addressed Pole Attachments. Throughout the entire Chapter, for instance, there were a total of 38 citations to attacher comments and only 2 citations to largely non-substantive comments by the electric utility.[10]

Rarely, if ever, has a Commission-sanctioned document been so one-sided as the Infrastructure Chapter of the National Broadband Plan. In making its Pole Attachment recommendations, the staff paid no attention to electric utility industry concerns – which were documented in countless pages of Comments, Reply Comments and ex parte presentations – and instead presented to the full Commission a "wish list" for attachers as if it were noncontroversial and beyond debate.

The voluminous substantive comments and concerns of the entire electric industry *were not even mentioned in passing*, let alone discussed or analyzed by the staff in the National Broadband Plan. Nevertheless, without any public comment, the staff's recommendations have now become the basis for the Commission's decisions in the Pole Attachment Order.

It is troubling that the full Commission would bootstrap these staff recommendations into new burdens on electric utilities without first obtaining and (unlike the staff) actually considering

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[8] Pole Attachment Order at 5, ¶7.

[9] *See*, Comments of the Coalition of Concerned Utilities, WC Docket No. 07-245, GN Docket No. 09-51 (filed Aug. 16, 2010), at 3-7.

[10] *Id.* at 4, and **Exhibit A** thereto.

input from the electric utility industry. Instead, the Pole Attachment Order simply relies on the staff's recommendations in the National Broadband Plan to impose these new regulatory requirements.

The Commission's unilateral decision in the Pole Attachment Order to "clarify" the Pole Attachment nondiscrimination requirements based on staff recommendations that paid no attention to electric utility industry concerns must be carefully reviewed and then reconsidered as appropriate. The Commission should exercise extreme caution before adopting in the name of broadband deployment any rule changes that could conceivably affect the safe and efficient delivery of electric utility services or undermine the viability of our nation's electric utility infrastructure -- especially without first seeking and considering input from the electric utility industry.[11]

1. Electric utility construction configurations in the electric supply space should not trigger an attacher's right to similar techniques in the communications space.

The Florida IOU Petition makes the same point as the *Coalition of Concerned Utilities* made in its own Petition for Reconsideration: an electric utility's construction configurations in the electric supply space should not trigger a corresponding right for an attacher to use similar techniques in the communications space.[12]

As described in the Florida IOU Petition, construction in the communications space occurs for an entirely different purpose than in the electric space, is on an entirely different portion of the pole, and raises a host of different safety and reliability concerns. As a result,

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[11] While the Commission is properly recognized as the expert federal agency in regulatory matters related to communications policies, to our knowledge it is not recognized in any venue as an expert agency in matters related to the safe and efficient operation of the nation's electric distribution system.

[12] Florida IOU Petition at 3-11; Petition for Reconsideration of the Coalition of Concerned Utilities, WC Docket No. 07-245, *et al.* (filed Sept. 2, 2010), at 2-4 ("*Coalition* Petition').

attachment techniques in the electric space should not be considered "comparable" or "similar" to construction techniques in the communications space and, therefore, should not trigger the statutory nondiscrimination requirement.

The *Coalition* agrees with the Florida IOUs that boxing, bracketing and other common electric supply configurations such as triangular framing, turkey foot, alley-arm and cross-arm techniques, do not pose the same problems in the electric space as they would if deployed in the communications space. These types of techniques may be safe in the higher electric space but can slow down pole change-outs, complicate transfers of attachments, make poles more difficult to climb, and prevent bucket truck access in the lower communications space.[13] As described in the Florida IOU Petition, if deployed in the communications space these techniques also can impair the removal of injured personnel from poles in emergencies.[14]

Requiring utilities to treat cable and telecommunications attachers in a nondiscriminatory manner in the communications space is completely unrelated to how utilities may treat themselves as distributors of electric services in the electric supply space. The *Local Competition Order* made clear that "*the statute does not require nondiscriminatory treatment of all utilities; rather, it requires nondiscriminatory treatment of all telecommunications and video providers.*"[15] Electric utilities must treat telecommunications carriers and cable operators in a nondiscriminatory manner; they need not treat telecommunications and video providers in the same manner they treat themselves as distributors of electric services.[16]

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[13] Florida IOU Petition at 7-8.

[14] *Id.* at 8.

[15] Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Interconnection between Exchange Carriers and Commercial Mobile Radio Service Providers, 11 FCC Rcd 15499 (*Local Competition Order*) at ¶1170 (emphasis added).

[16] *Id*; *Coalition* Petition at 3-4.

As noted by both the Florida IOUs and the *Coalition*, the statutory nondiscrimination requirement should apply only to the extent a pole owner has allowed itself or others to use boxing, bracketing and other attachment techniques for *communications* attachments in the *communications* space.[17] While the Commission repeatedly states in the Pole Attachment Order that the nondiscrimination requirements apply only in "comparable circumstances" or "similar circumstances,"[18] which should adequately distinguish electric from communications construction techniques, attachers may try to compare apples to oranges and assert a fictitious right to use construction techniques in the communications space that electric utilities use in the electric space.

If the Commission in fact has equated construction in the electric and communications spaces for purposes of applying the nondiscrimination requirements, that mistake must be corrected. The FCC's decisions in this proceeding should have no effect whatsoever on utility construction in the electric space.

The construction, operation and maintenance of electric utility equipment in the electric utility space is far outside the Commission's statutory authority and well beyond its regulatory areas of expertise.[19] The new rule mandating nondiscrimination in the use of boxing, bracketing and other construction techniques should be clarified or reconsidered as appropriate to ensure that what a utility does or does not do for electric distribution purposes in the electric supply

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[17] Florida IOU Petition at 12-13. *Coalition* Petition at 2-3.

[18] Pole Attachment Order at ¶¶ 9, 10.

[19] *See*, Comments of the Edison Electric Institute and the Utilities Telecom Council, WC Docket No. 07-245, GN Docket No. 09-51 (filed Aug. 16, 2010), at 2-5. The Coalition also agrees with the Comments of the Alliance for Fair Pole Attachment Rules that the Commission has no general authority over attachments or attaching parties. On the contrary, as noted in the Alliance's Comments, the Commission is authorized only to regulate "pole attachments" by certain classes of entities, namely cable systems and providers of telecommunications services. The Commission was granted no jurisdiction over electric utility attachments. Comments of the Alliance for Fair Pole Attachment Rules, WC Docket No. 07-245, GN Docket No. 09-51 (filed Aug. 16, 2010), at 29-31; *see also,* 47 U.S.C. 224 (a)(4).

space is irrelevant to what a communications attacher may or may not do for communications purposes in the communications space.

2. Electric utilities should not be required to reconfigure their own electric distribution facilities in order to accommodate communications attachers.

The Florida IOUs point out that some parts of the Commission's decision might even be read as requiring electric utilities to reconfigure their own electric distribution facilities in the electric space order to accommodate communications attachments in the communications space. The *Coalition* believes the Commission did not intend to mandate such an intrusion into the day-to-day operations of electric utility plant, which as mentioned above would exceed its statutory authority and regulatory expertise.

3. Pole owners are not obliged to replace or to "interset" poles at the request of communications attachers.

The State Cable Associations and Cable Operators took the opportunity in their Cable Petition to revisit the Eleventh Circuit's decision in the *Southern* case by requesting reconsideration or clarification of portions of the Commission's Pole Attachment Order. In a nutshell, the Cable Petition expresses concern that pole owners may rely on parts of the Pole Attachment Order "*to refuse to replace (or changeout) an existing pole with a taller replacement pole where a taller pole is needed to accommodate communications plant.*"[20] In other words, the Cable Petition is concerned that the Pole Attachment Order may be misinterpreted to imply that utilities actually need not replace (or changeout) poles to accommodate attachers.

This is a strange concern, considering it has been well established since the *Southern* case that pole owners in fact are *not* required to replace or change-out poles to accommodate attachers. Seeking to clarify or reconsider outside of a notice and comment rulemaking

[20] Cable Petition at 2 (emphasis added).

proceeding an Eleventh Circuit decision that has been followed by the Commission since 2002 is hardly the way to seek reversal of that finding.

The *Southern* case held quite clearly that "*the FCC erred when it issued guidelines stating ...that utilities must expand the capacity of their facilities to ensure that attaching entities have access to those facilities.*"[21] The Cable Petition claims, however, that a contrary ruling will "*protect the efficacy of the National Broadband Plan*" (which, as mentioned, did not address any of the substantial comments and concerns expressed by the entire electric utility industry) and argues that utilities should not be permitted to place at risk infrastructure needed to maximize broadband deployment.[22]

The Pole Attachment Order did not imply that pole replacement was mandatory, which would have been blatantly inconsistent with the *Southern* decision. Rather, the Commission based its decision to mandate additional construction techniques on the pole based on its belief that the statutory term "insufficient capacity" was ambiguous and would not apply if the existing pole could accommodate additional attachments using conventional methods such as boxing and bracketing. In the Commission's view, this would not constitute the type of "capacity expansion" prohibited by *Southern*. We believe this is a faulty conclusion (especially, as mentioned above, with regard to the electric space), but it provides no authority for the Cable Petition's argument that a complete pole replacement – the ultimate "capacity expansion" – is required if attachers ask for it.

In the Pole Attachment Order, the Commission rejected what it considered to be two extreme positions: one advanced by some utilities that any make-ready work constituted an expansion of capacity, and the other put forth by some attachers that "the statute might be read to

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[21] *Southern v. FCC,* 293 F.3d at 1341 (emphasis added).

[22] Cable Petition at 12 (emphasis added).

require a utility to completely replace a pole."[23] In its Order, the Commission found "*more persuasive the position that a pole does not have insufficient capacity if a new attachment can be added to the existing pole using conventional attachment techniques. Utilization of existing infrastructure, rather than replacing it, is a fundamental principal underlying the Act.*"[24]

In reaching its decision on boxing and bracketing, the Commission could not have been more explicit in rejecting the very argument the Cable Petition advances: "*Unlike requiring a pole owner to replace a pole with a taller pole, these techniques take advantage of usable physical space on the existing pole.*"[25] The Cable Petition, on the other hand, seeks the exact opposite conclusion despite a contrary ruling in *Southern*: that pole replacement is somehow the moral equivalent of boxing and bracketing, that it is not really an expansion of capacity, and that pole owners already are under a statutory duty to accommodate an attacher's request to replace a pole. There are no such requirements, nor should there be any.

The fact that many utilities do not refuse to replace poles, and that pole replacement is as "routine" as the Cable Petition notes,[26] is a testament not to the Cable Petition's novel legal arguments but to the willingness of many pole owners to accommodate attachers if practicable.

This situation is similar to the routine process of many utilities, highlighted in the *Coalition's* Comments but inexplicably discounted by the Commission in the Pole Attachment Order, of installing taller poles throughout their networks in order to satisfy anticipated third party attachment demand.[27] For some reason, the Commission is skeptical of this well-known practice, apparently believing that utilities' self-interest requires them to set smaller poles to

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[23] Pole Attachment Order at 9, ¶16.

[24] *Id.* (emphasis added).

[25] *Id.* at 9, ¶14 (emphasis added).

[26] Cable Petition at 10.

[27] Pole Attachment Order at ¶136.

fulfill their own needs and then to decline attacher requests for taller poles in the future (or, alternatively, to charge make-ready for change-outs on a pole-by-pole basis for thousands of poles throughout the utilities' service territories).[28] This is a mistaken assumption and contrary to the manner in which many utilities operate.

The Cable Petition makes much of the fact that under *Southern* the parties must first "agree" that capacity on a given pole is insufficient to accommodate a proposed attachment. Presumably, however, an attacher would not be seeking a pole replacement (the premise of the Cable Petition) if the parties were not already in agreement that the existing pole is insufficient to accommodate the proposed attachments. If the parties were not in agreement that the existing pole was insufficient to accommodate another attachment, there would be no need to discuss pole replacement. The issue would be moot.

Further, the Cable Petition's argument that both parties must first "agree" on the insufficiency of a given pole to accommodate a proposed attachment is misplaced: the requirement in *Southern* for an "agreement" related only to the utilities' ability to *reserve* space on the existing pole for future needs. It had nothing to do with *replacing* the entire pole (or "intersetting" a new one), as suggested in the Cable Petition.[29]

The court in *Southern* never stated or implied that utilities were obliged to accommodate attachers by replacing existing poles with taller poles or "intersetting" new poles within existing lines. In fact, under the plain language of the existing statute, the conclusion that utilities need

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[28] *Id.* at n.365.

[29] The court found that utilities do not "enjoy the right to reserve as much space as they wish for as long as they deem necessary, and on that basis, to deny cable companies attachments based upon a lack of capacity." *Southern v. FCC,* 293 F.3d at1348.

not expand capacity to accommodate attachers was so obvious to the court that it did not feel compelled to go beyond the first step of the Chevron test to interpret Congressional intent.[30]

Under the interpretation suggested by the Cable Petition, attachers likely would never agree that a pole (or a replacement pole) is "full." Instead, since utilities are required over time to change-out poles for their own use, attachers would argue that any refusal to change-out a pole on their behalf would be "discriminatory" since they, too, should be entitled to pole change-outs to accommodate their needs. Under the Cable Petition's theory, pole owners would be obliged constantly to replace poles at whatever height communications attachers insisted upon. Today's 35- or 40-foot poles would be tomorrow's 60-, 80- or 100-foot poles. Anything else would be a violation of the "nondiscrimination requirements" because there would be no "insufficient capacity" since, barring physical impediments, expansion opportunities would be endless.

This interpretation, however, is directly contrary to the *Southern* case, which found that "mandate[ing] capacity expansion is outside of the purview of [the Commission's] authority under the plain language of the statute."[31] As the court noted, "it is hard to see how [47 C.F.R. § 224(f)(2)] could have any independent meaning if utilities were required to expand capacity at the request of third parties."[32]

The Cable Petition also seeks to expand the nonexistent legal right to demand pole replacements into a new, hitherto unknown obligation on the part of pole owners to "interset" poles in existing lines if necessary to accommodate attachers.[33] While undefined in the Cable Petition, we assume that "intersetting" entails the placement of new poles within an existing line

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[30] *Id.*, 293 F.3d at 1347

[31] *Id.*, 293 F.3d at 1352

[32] *Id* at 1347

[33] Cable Petition at 10, 14.

solely to shorten a span between two poles in order to satisfy the additional weight or other requirements of a communications attacher.

The *Coalition* is aware of no statutory obligation that pole owners "interset" poles for the benefit of attachers, and the Cable Petition has pointed to none. On the contrary, "intersetting" poles qualifies as an expansion of capacity even more dramatic than replacing existing poles with taller poles, since "intersetting" poles requires the placement of brand new poles where none existed previously.

The *Southern* court held that utilities need not expand pole capacity to accommodate requests for attachment, finding that when capacity is insufficient there is no obligation to provide third parties with access to a particular pole. Now, the Cable Petition urges a position directly contrary to the court's decision by asserting a right to insist that pole owners replace the entire pole – and even to "interset" a completely new pole within an existing line – solely to accommodate would-be attachers. There is no such legal requirement, and the Cable Petition's attempt to create one should be rejected.

If the Commission were inclined to adopt the Cable Petition's recommendations and impose a new requirement on pole owners to replace poles upon request by attachers or to "interset" new poles, a declaratory ruling certainly would not be the appropriate vehicle to do it. This kind of substantive rule change would be inconsistent on its face with existing case law. It would require a full notice and comment proceeding wherein electric utilities and other interested parties have a fair opportunity to analyze and digest whatever new requirement the Commission might propose, and then to submit comments in response. The process cannot lawfully be short-circuited by imposing yet another entirely new substantive obligation on utilities under the guise of "*protecting the efficacy of the National Broadband Plan.*"

III. Conclusion

WHEREFORE, THE PREMISES CONSIDERED, the *Coalition of Concerned Utilities* urges the Commission to act in accordance with the Petition for Reconsideration and Request for Clarification of the Florida Investor-Owned Electric Utilities and to deny the Petition for Reconsideration or Clarification of the State Cable Associations and Cable Operators.

Respectfully submitted,

COALITION OF CONCERNED UTILITIES

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of November 2010, I caused the "Comments and Opposition to Petition for Reconsideration" to be served on the parties listed below, by U.S. Mail, First-class postage prepaid, addressed to the following:

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