



Pole Attachments

The Federal Communications Commission (FCC) contends that widespread broadband deployment requires driving down already subsidized rates for attaching telecommunications equipment to electric utility infrastructure.

It is essential to make sure that this convergence of energy and telecommunications policymaking does not have adverse consequences for electric customers and for the reliability of electric utility systems.

Safety and reliability of the electric system is paramount, and over emphasis of speed to market for telecom attachments may jeopardize system reliability with adverse impacts to workers and the public.

- Utilities encounter unauthorized attachments and safety violations that put our line workers and the public at risk. The International Brotherhood of Electrical Workers (IBEW) joined us in *ex parte* filing with the FCC drawing attention to exactly these concerns.
- Many unauthorized attachers avoid the cost and process to safely and legally attach wires to our infrastructure. Preservation of our critical infrastructure is significantly affected by contractors and unauthorized entities disregarding our guidelines and our rules.
- Imposing one-size-fits-all deadlines for make-ready work will make it difficult for utilities to ensure the safety and reliability of attachments, and making pole owners responsible for the multi-party coordination, and penalizing them for not meeting deadlines when existing attachers – over which utilities have no control – is an unfair burden that will not improve the speed of deployment. If timelines are imposed, then the FCC must allow utilities to stop the make-ready clock due to circumstances beyond their control.
- Wireless attachments in the electric utility space is a complicated issue that is best addressed at the local level, or by the parties involved rather than by broad FCC guidelines.
- Electric utilities follow national safety guidelines, as well as local construction standards and specifications, when designing poles. These are not intended to be a one-size fits all national standard as referenced by the FCC in the NPRM and FNPRM.
- The FCC's position would result in *more* attachments with *less* resources to deal with the strain on our distribution systems; this would greatly exacerbate the serious safety issues.

Electric utility customers should not be required to further subsidize broadband deployment.

- Electric utilities already have done far more than their fair share to facilitate deployment of broadband services.
- For decades, communications companies have attached to tens of millions of utility poles – at artificial and extremely modest rates mandated by the FCC – without incurring the substantial costs and maintenance requirements of constructing their own distribution systems. These costs, instead, have been incurred by utility customers.

We understand that utilities' critical infrastructure is going to be a platform for other industries, but our customers shouldn't foot the bill for the development of new business models or provide competitive advantages to established ones.

- Pole attachment rentals alone comprise an amount that is incidental to the cost of rolling out these services; there is no reason to believe that low, uniform rates will result in broadband deployment to these underserved areas. The economics for telecommunications providers will not change on the miniscule benefit of lower attachment rates.
- The FCC's approach undermines its own goal of extending broadband – creating a perverse incentive for broadband providers to stop investing in infrastructure build-out.
- The original intent of the statute was to support CLECs and cable TV providers in the sense that they were competing against the ILECs – who own their own poles. It was never the intention of the statute to subsidize the rates of the incumbent ILEC's.



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