

Recent Developments in Pole Attachments at the FCC

Georgia Power Joint Use Team
January 30, 2019

Our Purpose Today



Review the changes the August FCC Order had on Georgia Power's permitting process



FCC Pole Attachment Activity



- April 2017
 - FCC issued an NPRM on pole attachments focused on small cells
 - The Broadband Deployment Advisory Committee was established
- August 2018: FCC approved an Order that addressed primarily investor owned utilities
- September 2018: FCC approved an Order that addressed primarily local governments



What was the Broadband Deployment Advisory Committee



- Established by Commissioner Pai to make recommendations on how to deploy 5G
- Committee made up of:
 - Large companies such as AT&T, Google, Sprint, Comcast, Crown Castle, Uniti Fiber
 - Governments such as the San Jose, CA, GA Municipal Association, Lawrence, KS
 - Associations such as the American Cable Association, Wireless Infrastructure Association
 - One lone electric IOU member
- Some recommendations were adopted by the FCC – One Touch Make Ready
- Some issues adopted by the FCC without a BDAC decision – local government issues

What do we need to know from the Orders?



August 2018 Order – Investor Owned Utility and ILEC Poles

One Touch Make-Ready
Overlashing

September 2018 Order – State and Local Government Poles

Shot Clock for applications
Application and Access Fees

Georgia Power's Permitting Process



1. Applicant submits electronic permit application.
 - Access to system is provided only after applicant signs an agreement
2. Engineering is completed by GPC
3. Applicant is provided with an estimate of costs and work directives for Georgia Power
4. Once payment is received, electric space make-ready is performed
5. Applicant is given a conditional permit to proceed with communication make-ready on existing attachments
6. After completion of communication make-ready an inspection confirms compliance
7. Applicant is given notice to proceed with new attachment installation
8. Post inspection to assure compliance
9. If no scope change, no billing changes

<https://www.georgiapower.com/business/industry-services/pole-attachments.html>

What has changed in the current process?



- GPC has 10 days to review the application and confirm permit is complete
 - Georgia Power uses electronic permitting which indicates the fields required in order to have a complete application
- GPC must give 3 days notice before performing engineering survey

One Touch Make Ready



The concept

- Reduce the number of visits to the pole when deploying communication infrastructure by allowing the new entrant to the market to move the existing communication facilities on the pole and increase the speed of deployment

The challenge

- Each attachment has a separate owner and a competitor would be moving their facilities. Who would be responsible for damages and outages?

The result

- Dividing attachments into “simple” and “complex” in order to protect the incumbent facilities

The alternative

- The current process is still an option

One Touch Make-Ready



Only projects with **no electric work** can use the One Touch Make-Ready Process

Key definitions

- Simple – Existing attachments in the communication space of a pole that can be transferred without any reasonable expectation of a service outage or facility damage.
 - Does not require a splice
 - Does not cause a customer outage
 - No pole replacements
- Complex – Transfers and work within the communication space that would be reasonably likely to cause a service outage or facility damage including work such as splicing of any communication attachment. Any and all wireless activities are complex. All pole replacements are complex.

Installing new attachments requires completion of OTMR and approval by GPC

One Touch Make Ready Engineering



- Georgia Power's approved engineering contractors:
 - Davey, Byers, Source One, Enercon, Insight
 - This list is subject to change. Contact Georgia Power prior to initiating work
- The job shall be engineered just as if Georgia Power has engineered it:
 - Existing attachments identified
 - New locations for attachments identified
 - Safety violations identified
 - In accordance with Georgia Power specifications
 - Simple and complex attachments are identified
- Permit application with engineering is submitted to GPC
 - 10 days to confirm it is complete
 - 15 days to complete review
- Applicant is issued a conditional permit for moving existing attachments

Construction



OTMR Construction:

- Applicant provides 15 day notice to existing attachers and GPC of intent to perform OTMR on simple attachments
- After simple make-ready is complete, new attacher notifies pole owner and existing attachers work is complete within 15 days
- Georgia Power completes post inspection within 90 days
- Georgia Power issues a permit for new attachment
- Applicant attaches and notifies Georgia Power new attachments are complete
- Georgia Power completes a post construction inspection

Projects with complex attachments follow the standard process

Overlashing



- Applicant must give 15 days prior notice
- It is the applicant's responsibility to assure host messenger is compliant
- Applicant notifies Georgia Power work is complete
- Georgia Power will complete a post inspection in 90 days



In Conclusion



- This is an evolving process
- If you have a question once you get started, ask
- We all want our facilities installed in a timely and safe manner
- You may be the new attachment today but once on the pole you are the incumbent
 - See Golden Rule
- Does anyone have any questions?

Questions Asked



NJUNS

- ❖ **Will there be a new member code in NJUNS for the One Touch Make Ready to identify these separately:**
 - ✓ *The order is not effective at this point and NJUNS has not currently added functionality specifically for OTMR. In fact, new functionality may not be needed to accommodate OTMR. NJUNS has proven that its adaptability provides an effective tool for communication between utilities for many different situations and uses by its members. If a need is perceived by the NJUNS Board to accommodate or facilitate OTMR, the NJUNS Board will have an opportunity to discuss that at the next meeting in April.*
- ❖ **NJUNS - What should we do for NJUNS Tickets that are not making sense and the contact person does not work there anymore?**
 - ✓ Call Candler, Dee, or the field engineer for the MR project. You can look up the ticket in Varasset to get the engineering firm and call them.

VARASSET

- ❖ **How do I access the NEW Varasset?**
 - ✓ Click this link: <https://www.georgiapower.com/business/industry-services/pole-attachments.html>
 - ✓ Click the Varasset link for access to the application (Coming Soon)
 - ✓ If you cannot log in using the information sent to your current e-mail address, please complete the contact form notating **Varasset Access** in the subject line, someone will contact you to get your set up.
- ❖ **Will there be any training offered to the other utilities on the Varasset system?**
 - ✓ Yes, there will be how to videos on our website, with instructions on how to access Varasset and create attachment requests.
- ❖ **How to ask questions concerning the cost estimate based on the work directives?**
 - ✓ Until the new Varasset is up and running, please contact Dee or Candler. Once in the new Varasset, there will a place to accept or deny the cost of a pole. If you deny the pole cost, that will kick the process back to the Make Ready team.

Questions Asked



OTMR

- ❖ **OTMR indicated that we have the choice of using the current process?** *OTMR is a choice, and you can keep using the current process. OTMR is not required.*
- ❖ **Is a pole change out considered Complex?**
 - ✓ Yes
- ❖ **Could a wireless attachment be simple?**
 - ✓ *No. Most wireless attachments require a pole changeout which is specifically excluded from OTMR. However, it is possible for a wireless permittee to obtain transfer agreements from incumbent attachers that need to be transferred to a new pole outside the OTMR process. This could expedite that process.*
- ❖ **Simple OTMR - Is there a process for a walk through?**
 - ✓ *We are offering a one day walk through for a fee.*
- ❖ **OTMR does not cover governmental attachments - This could be an issue. As an attachment Owner cannot move governmental attachment without prior agreement.**
- ❖ **When will the Order be effective?** *The exact date is unknown at this publication, but we feel like it will be during the first quarter of 2019.*

Questions Asked



- ❖ **What do we do when governmental is attached, and they do not want to move?**
 - ✓ *We are not the referee. As the attachment owner, you will have to work it out with the entity. We have assisted in coordinating all parties on some projects and will continue to do that if necessary.*
- ❖ **What should we do if GPC has created a violation?**
 - ✓ *If Georgia Power causes the problem, then we will correct the violation at our expense.*
- ❖ **Can we continue to ask questions after today?**
 - ✓ *Yes, this is an evolving process and we expect questions. Please feel free to ask. So, that we can continue to update our [FAQ page](#), please use the [contact us](#) on our web page to submit your questions. We will respond as quickly as possible.*