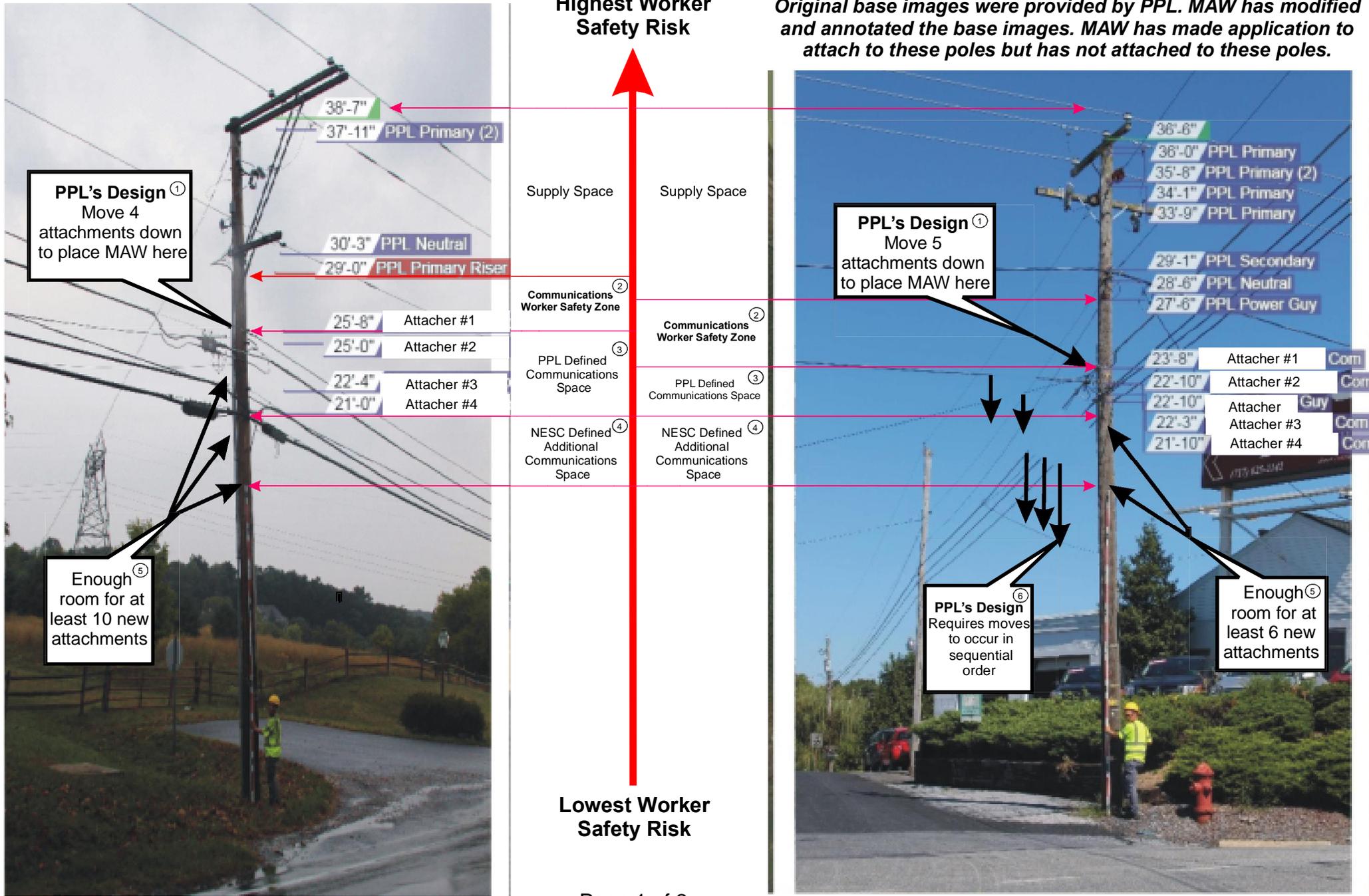


MAW Communications Pictorial Description of PPL's Pole Attachment Policy



MAW Communications' Pictorial Description of PPL's Pole Attachment Policy Notes

1. PPL's Attachment Policy forces the Attacher to be assigned onto the top most position of the Communications Space. All other attachments must be lowered to accommodate the new attachment. PPL does not allow MAW to perform its own network engineering per National Electrical Safety Code (NESC) public utility definitions and joint use specifications. As a result, being assigned into the topmost position creates an exponential increase in Make ready costs that increase with each new attachment. *See NESC : Rule 222, Section 2 Definitions for Joint Use, Utility, Communications Space, Supply Space; MH : Page 149, 151, 155, 169, 170, 171, 582.*
2. NESC defines this space as the safety zone for Communication Space Workers. Per NESC, except for special conditions, all attachments are prohibited in this space. By being assigned into the topmost position of the Communications Space, the Worker is exposed to higher risk being at the topmost point and therefore exposed to the highest risk to work in the Communications Space. PPL's assignment into the topmost position creates additional Worker safety risk each time a new attacher is added. PPL's design methodology is diametrically opposed to NESC engineering position assignment guidelines of the lowest voltage being the lowest Attachment. Fiber optic cables have zero volts and therefore should be the lowest Attachment on the Pole per NESC. *See NESC : Rule 220 A, Rule 235, Section 2 Definitions for Communications Space, Supply Space; MH : Page 163, 165, 167, 270, 271, 274, 275, 579, 580, 603, 604, 605, 606, 607, 608, 609, 610, 611.*
3. PPL's Attachment policy defines the bottom of the Communications Space as the point where the ILEC (Verizon, Windstream, etc.) is attached. The result is an artificially reduced Communications Space. If this space is filled, the pole must be replaced and the cost is passed onto the Attacher. According to PPL's policy, the ILEC can perform their own engineering and reduce available Communications Space, thereby limiting competitive access to the Pole by CLECs (such as MAW) by attaching higher than is required by NESC guidelines. *See NESC : Rule 232, Table-232-1; MH : Page 201, 202, 212, 219, 220, 591.*
4. In its engineering, whenever possible, MAW uses a minimum height of 18 feet of clearance for any span that will eventually cross a state road, represented here by the top of the measuring stick. (In the event that the span does not cross a state road, the NESC defines a number of other minimum height requirements.) This section represents the area between the ILEC attachment, and the actual NESC minimum height requirement, which should be available for additional communication attachments. This artificial reduction in the size of the Communications Space results in additional pole replacement costs for any new Attachments. *See NESC : Rule 232, Table-232-1; MH : Page 201, 202, 212, 219, 220, 223, 591.*
5. If MAW performs its own network engineering per NESC public utility definitions and joint use specifications, MAW would select one of the open positions on the Pole. The amount of Make Ready work is exponentially reduced and in certain instances, eliminated. PPL assignment to the topmost position and their prohibiting of the attaching utility to perform their own engineering in the Communications Space is singularly unique. *See NESC : Rule 222, Rule 232, Table-232-1, Section 2 Definitions for Joint Use, Utility, Communications Space, Supply Space; MH : Page 149, 151, 155, 169, 170, 171, 278, 285 582.*
6. The lowest attachment must move down first to make room for the second lowest attachment, and so on until the topmost position is free. Each movement has its own FCC mandated timeframes. The Attacher must wait for all iterations to complete before being allowed to attach according PPL's policy. Consequently, the time required for all Make ready work can take years to complete and grows with the number of attachers. For example, five existing attachments would require five FCC mandated timeframes to elapse before the new attacher is allowed to attach. The result is additional, needless delay that could add years to the project.
7. The position immediately above a light fixture is normally filled last. See Note – 2.
8. The ILEC is currently not attached to these poles. Consequently, PPL's Communications space agrees with NESC. However, despite the available space for many more attachments, and whenever possible, CATV cables should be placed higher than zero voltage communication cables; PPL's policy places the new attacher (MAW) at the topmost position. The result is unnecessary Make Ready and its associated costs. See Note – 2.

Bibliography: Reference in document = NESC = National Electrical Safety Code Version 2017.

Reference in document = MH = McGraw – Hill's National Electrical Safety Code (NESC) 2017 Handbook