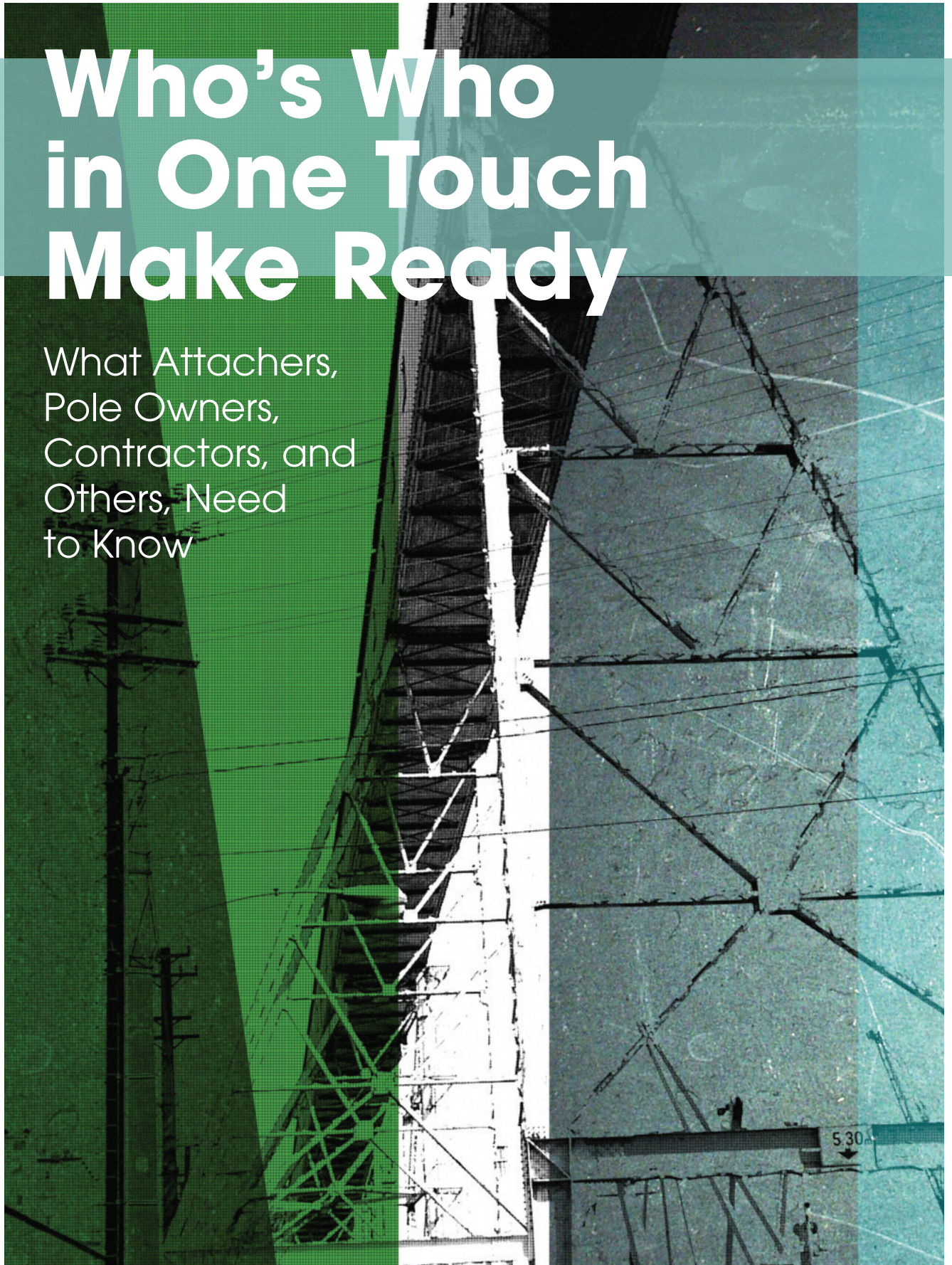


Who's Who in One Touch Make Ready

What Attachers,
Pole Owners,
Contractors, and
Others, Need
to Know





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The FCC's Third Report and Order and Declaratory Ruling on One Touch Make Ready (OTMR) was issued on August 2, 2018. (At the time of this writing, the joint OTMR was scheduled to be published in late March/early April 2019.) As such, the joint use community is busy scurrying to get their processes arranged to accommodate the new regulations.

In short, the OTMR ruling works to break down previous barriers that blocked swift deployment of broadband. It also aims to promote reliable and safe make-ready work on utility systems. The overall goal is to bridge the gap in broadband access and to create opportunities for all Americans to be connected.

Several players in the joint use game are being affected by the FCC's regulations on attachments. Pole owners, companies with existing attachments on poles, providers looking to deploy new attachments, and third-party contractors, must all adjust. And while we've heard about the many changes the Report and Order Declaratory Ruling brings for the overall community, it's time to break down the new responsibilities for each party involved.

Player #1 Companies Deploying New Attachments

New attachers may face the biggest responsibility changes that the Report and Order requires. Although these changes are certainly advantageous, they may seem a bit overwhelming at first. The new changes for attaching companies align with the overall goal of the ruling: to generate swift broadband deployment.

One of the first steps new attachers should take is familiarizing themselves with their local power companies' lists of approved contractors. If the utility does not provide a list, the new attacher will need to be familiar with any other requirements the utility

may have specified. Otherwise, the new attacher should seek out safety guidelines proposed by the BDAC and the NESC.

Under OTMR, the new attacher is responsible for adhering to the new timelines in the Report and Order. They are also responsible for submitting applications, understanding the differences in simple and complex make-ready, performing surveys, generating make-ready estimates, and performing the make-ready work.

If the new attacher chooses the self-help option, it is imperative that they keep pace with timers and timelines. The new attacher is also responsible for maintaining appropriate notifications to the existing attacher and to the utility. Every part of the OTMR process should be documented and communicated with the corresponding parties.

Player #2 Pole Owners

Pole owners are also facing a few big responsibility changes within the OTMR guidelines. The first change owners are accommodating is the shortened timelines. Prior to the Report and Order, pole owners were already having a difficult time meeting the time requirements of permitting applications. The shortened timelines *seem* to only increase this existing burden.

However, much of the pole owners' previous workloads will be offset because of the new attacher's responsibility changes. As noted earlier, if the new attacher is choosing the OTMR path then the workload decreases for the pole owner. Even if multiple permitting applications come in at once, the burden on the pole owner is lessened because of the other responsibility reductions.

This decrease in make-ready related work is due to several factors:

- The pole owner is no longer responsible to perform surveys.
- The pole owner is no longer required to manage any existing attachers' work.
- The pole owner does not have to manage or calculate make-ready estimates.

Instead, they now have the option to attend the survey, make-ready work, and inspection (if they choose to do so). Attending these on-site events is by no means required. In a perfect scenario with the OTMR path, the pole owner simply manages their notifications to know when, where, and who is working on their utility systems. They should also communicate with the appropriate party when necessary.

Lastly, one new optional responsibility for the pole owner is to create a list of approved contractors for the new attachers to use in their make-ready work. This option gives the pole owner an opportunity to control who will be working on their utility systems. The owner also has the choice to specify the criteria that deem a contractor qualified.

Player #3 Companies With Existing Attachments

Under the OTMR ruling, existing attachers have the lightest responsibility load. With the new changes in place, existing attachers are no longer responsible for moving their own attachments on a utility system. This change may spark concern, as other parties will be moving their equipment. However, the new FCC policy outlines these concerns and has secured processes to ensure safety. For example, OTMR can be performed only if the work is simple, and only qualified contractors can work on the system. Further, existing attachers are no longer required to be present for the survey and make-ready work. Although, the new attacher should notify them in case they wish to be on-site. These new roles may lessen backload for companies with existing attachments.

Player #4 Third-Party Contractors

Because of OTMR, contractors are in high demand. In years past, make-ready work has usually been on behalf of communications providers. But with changing technologies and an increasing need for broadband, contractors now have an opportunity to extend their work to a new client base.

The responsibilities of contractors under OTMR include:

- Knowing the power company's specifications for what makes a contractor qualified
- Hiring and training technicians who are aware of simple and complex make-ready standards
- Being aware of the guidelines laid out by the FCC and BDAC regarding safety.

Contractors should lock-in an effective way to communicate with all the corresponding parties, and they should ensure their business processes line up with the timelines that OTMR requires.

The Common Responsibility of All Joint Use Players

All parties involved share a common thread of responsibility when adapting to these changes. Internal business processes should be updated to ensure timelines are met; all parties should have systems in place to stay notified of recent work. But the most important responsibility of all joint use players involved is working together. Using a centralized, automated system where all communication, data, and processes, can be stored in one place is the key in partnering up through these new changes.

A joint use platform may help users transition to the new processes through smart technology. The FCC recommends a web-based pole attachment management system at point 132 of the official Report and Order Declaratory Ruling.

A joint use platform should accommodate every new part of OTMR, including:

- contractor selection
- contractor authorization
- automated timers
- notifications
- self-help path selection
- communication with other joint use parties
- a place to store updated points of contact.

Unfortunately, many joint use professionals are still using multiple methods to manage their data -- including obsolete spreadsheets or disparate systems. With a joint use platform in place, OTMR processes can be swift, reliable, safe, and predictable. Employing smart technologies will help all joint use parties work better together. ■

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