

**PRELIMINARY STATEMENT**

Per the Massachusetts Department of Public Utilities' and Department of Telecommunications and Cable's ("Departments") January 17, 2025 Notice of Inquiry and Request for Comments, AT&T Enterprises, LLC and TC Systems, Inc. (hereinafter, "AT&T") submit their response to the request for information posed in the Joint Order Opening Inquiry<sup>1</sup> in D.P.U. 25-10/D.T.C. 25-1.

AT&T's responses are based on diligent investigations and reasonable inquiries and reflect only the current state of AT&T's knowledge, understanding, and belief with respect to the matters about which the questions seek information. AT&T's responses are subject to change if further information becomes available. AT&T expressly reserves the right to supplement or modify its responses, and to correct any errors or omissions.

**REQUEST FOR INFORMATION****b. By the Numbers**<sup>2</sup>

The Departments request the following information from all utility pole and conduit owners, including the EDCs, Verizon, MLPs, and others. Please identify as of December 31, 2024:

**1. By statewide total and by individual city and town, the number of single and jointly owned poles that your company owns.**

**Response:**

AT&T does not own any poles in the Commonwealth.

**2. By statewide total and by individual city and town, the number of poles that your company owns with conduit attached for wires providing service to local residences and businesses.**

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth.

**3. By statewide total and by individual city and town, the number of poles that your company owns with streetlights attached.**

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth.

**4. By statewide total and by individual city and town, the average height of single and jointly owned poles that your company owns.**

---

<sup>1</sup> Joint Order Opening Inquiry at 19-22.

<sup>2</sup> *Id.*

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth.

5. **By statewide total and by individual city and town, the total number of attachments on your company's Massachusetts poles by attachment type, i.e., telecommunication, cable television, wireless, pole-mounted EV attachments, etc.**

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth.

6. **The total miles of overhead lines or wires that your company owns in the Commonwealth and approximately what percentage of those lines are located on public ROWs.**

**Response:**

AT&T owns approximately 700 miles of aerial cable in the Commonwealth.

7. **The total miles of underground conduit that your company owns in the Commonwealth and approximately what percentage of that conduit is located on public ROWs.**

**Response:**

AT&T owns less than 135 miles of underground conduit in the Commonwealth. The underground conduit is located on public ROWs.

8. **The pole attachment and conduit access rates charged by your company to wireline (i.e., non-wireless) telecommunications and cable television attachers for each of the past five calendar years through 2024, and to the extent that they have been established, 2025. Please identify with specificity any assumptions and sources, including lines, tabs, and/or page numbers, relied upon.**

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth. Additionally, AT&T does not resell its underground conduit in the Commonwealth.

- a. **Identify and discuss any differences in rates charged to attachers on jointly owned poles or other differences due to type of attacher, region, etc.**

**Response:**

Not applicable. See AT&T Response to No. 8.

- b. **If the company's attachment and/or conduit access rates have not been updated in the past five years, explain why.**

**Response:**

Not applicable. See AT&T Response to No. 8.

- c. **Confirm whether your company charges attachment and conduit rates utilizing the Massachusetts Formula. See D.P.U. 19-76-A/D.T.C. 19-4-A at 16-17 (discussing the history of the Massachusetts Formula and the data to be used). If your company charges pole attachment and/or conduit access rates that differ from those that would apply using the Massachusetts Formula, explain why and provide a comparison of the current rate(s) charged versus the applicable rates calculated using the Massachusetts Formula.**

**Response:**

Not applicable. See AT&T Response to No. 8.

- d. **For poles that are jointly owned, discuss how attachment rates are billed to attachers, e.g., direct billing to attachers by each pole owner or some other method.**

**Response:**

Not applicable. See AT&T Response to No. 8.

9. **The rates charged by your company to wireless attachers for each of the past five calendar years through 2024, and to the extent that they have been established, for 2025. Please explain how wireless attachment rates are calculated and identify any sources and assumptions relied upon.**

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth.

10. **The rates charged by your company to pole-mounted EVSE attachment providers for each of the past five calendar years through 2024, and to the extent that they have been established, for 2025. Please explain how pole-mounted EVSE attachment rates are calculated and identify any sources and assumptions relied upon.**

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth.

11. **The accounting method relied on by your company in calculating your existing pole attachment and conduit rates (e.g., Generally Accepted Accounting Principles versus Uniform System of Accounts). See D.P.U. 19-76-A/D.T.C. 19-4-A at 16-19; Accounting Practices and Recordkeeping of Telecommunications Carriers, D.T.C. 18-3, Notice of Proposed Requirements and Further Request for Comment at 2-3, 11-13 (2022).**

**Response:**

Not applicable. AT&T does not own any poles in the Commonwealth. Additionally, AT&T does not resell its underground conduit in the Commonwealth.