

Green, Shonda (DTC)

From: Gregory M. Kennan <gmk@fhllplaw.com>
Sent: Thursday, April 24, 2025 2:44 PM
To: Phillips, Kerri (DPU); Seigal, Scott (DPU); Bendetson, William (DTC); Roberts, Kevin (DTC); DPU Efiling (DPU); Efiling, DTC
Cc: Jamie Hoare; Browne, Maria; Gregory M. Kennan
Subject: D.P.U. 25-10 / D.T.C. 25-1 -- Pole Attachment Rules Inquiry

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Hearing Officers Phillips, Seigal, Bendetson, and Roberts,

Workshop Topics. GoNetspeed respectfully suggests the following topics for the workshops in June:

(1) Utility Pole Attachment Processes

- Facilitating New Broadband Attachments
 - o Consider the state-of-the-art, core rules proposed by GoNetspeed
- State-of-the-Art, Core Rules
 - o One Touch Make-Ready (OTMR)
 - o Enforceable timelines
 - o Self-help remedy for missed deadlines
 - o Qualified contractors
 - o NESC-compliant temporary attachments using space-saving techniques to obtain required separations
 - o Construction methods to avoid pole replacements
 - Presumptions against blanket prohibitions on boxing, extension arms, lowest position

(2) Phased Approach to New Rules

- o As specified in EOED/EAA comments
- o Adopt core rules in the short term
- o Novel operational issues such as EVSE would be informed by experience with the core rules
- o Complex policy issues, e.g., dispute resolution, MOA, to be debated and resolved in due course, but so as not to delay operational improvements

(3) Guardrails on costs

- o Limits on true-up overcharges and time to claim
- o Binding estimate (as in NY)

(4) Pole replacement costs

Request to Present. GoNetspeed requests the opportunity to present at the June technical sessions.

Thank you.

Greg Kennan

Gregory M. Kennan
Of Counsel
**FAGELBAUM &
HELLER LLP**
20 North Main St., Suite 125
PO Box 230
Sherborn, MA 01770
508-318-5611 Office
508-259-0786 Mobile
gmk@fhllplaw.com
www.fhllplaw.com
[Gregory Kennan | LinkedIn](#)