

Pole Top Antenna Streetlight Antenna RF Signal Equipment Fiber Optic Telephone Cable Service Drops **Power Supply** Meter Street Signs



## Identify current obstacles to meeting the 90-day double pole removal deadline. D.P.U. 25-10/D.T.C. 25-1

- Financial and Resource Constraints: Particularly on Municipalities
- Scheduling/Cost Efficiencies: Some attachers wait for a threshold of transfer work to hire a contractor.
- **90 Day Timeline:** The amount of attachers, upwards of 7+ on poles, allotted 15-day transfer window, exceeds 90 days.
- Impact of Unlicensed Attachments: Pole Owner cannot remove pole until all attachments are identified and transferred.
- Lack of Up-to-Date Cable/Fiber Labelling: Legacy cable tags display obsolete information or may be missing.



Discuss how a single visit transfer for shifting attachments and removing double poles can be accomplished.

**EDC's support Single Visit Transfer (SVT) in the Communications Space** 

Develop and finalize agreements that address:

- Cost sharing
- Liability considerations
- Labor agreements
- Cost recovery for abandoned attachments
- Qualifications of available personnel
- o Adherence to strict standards being followed on transfers
- o NJUNS Participation and Timely Updates

Single visit transfer is not in place due to the complexities surrounding the necessary agreements.

## If the agencies initiate a new informational-only reporting docket, please provide input on whether the agencies should:

Similar to the initial process in D.T.E. 03-87, establish a new start date for backlog double poles, with subsequent reports addressing, in part, which and how many backlog poles were replaced during the reporting period.

- The EDCs support a new informational-only proceeding; the original backlog is near completion.
- The EDCs support a pole audit to collect refreshed double poles information.
- Streamlined reporting and new metrics should be discussed.

Verizon to continue to provide the primary report on behalf of itself and EDCs on all new and removed double poles during the reporting period, with the EDCs each providing a narrative and company-specific numbers. If so, identify the details that should be addressed by Verizon and the EDCs.

- Verizon should continue to provide primary reports, with EDCs supplying narrative and company-specific data.
- The EDCs suggest including a categorical breakdown of outstanding transfers by company.

## Discuss whether the agencies should add any new narrative requirements including:

Discussion of particular steps taken by the company if the next-in-line attacher remains the same for a particular period of time (> 90 days? 180?)

Discussion of the company's evaluation process for abandoned and unlicensed attachments.

Identification by the company of any abandoned or unauthorized attachments during the reporting period, and discussion of how the company addressed the abandoned and unauthorized attachments.

- EDCs support transparency regarding NTG Next-to-go attachers.
- **Current measures:** 
  - Bi-Weekly NJUNS reports highlight days since the last action for major attachers.
  - Outreach to minor attachers that have outstanding tasks.
  - Ongoing training sessions for municipalities.

- **Abandoned Attachments:** Desktop reviews and site visits, coordinate with licensees for removal.
- Unauthorized Attachments: Record review and outreach to attachers. If no license is provided, the attacher must apply for a license or risk removal.
- Municipal Attachments: Generally, are not registered in NJUNS and drive costs for removal.

• EDCs support reporting and accountability related to unauthorized or abandoned attachments.

Discuss whether the agencies should require Verizon's report to include all "next-in-line"/"ball-in-court" info and require the EDC-specific reports to all include narrative on the "next-in-line"/"ball-in-court" info.

• The EDCs do support that Verizon's report should include all relevant next-in-line and ball-in-court information to ensure transparency and accountability.

To the extent the agencies initiate a new informational-only reporting docket, discuss procedural suggestions for allowing stakeholders input on the reports.

- EDCs support stakeholder (pole owners) input on reports.
- A comprehensive review and process would need to be established.
- Accountability of attachers to adhere to timelines.

## Discuss whether your company has any suggestions for accelerating double pole removals. D.P.U. 25-10/D.T.C. 25-1 Page 13

- Requiring all attachers to supply pole owners with data on the locations of their attachments
- Consider agreements between municipalities and cable and fiber attachers to accelerate transfer work

Identify any additional considerations relating to this topic that the Departments should consider and discuss why.

• Consider increasing timeframe to accommodate the increase in average number of attachments

