



**Town of Shutesbury**

P. O. Box 276  
1 Cooleyville Road  
Shutesbury, MA 01072  
(413) 259-1214

**March 18, 2025**

**Docket: D.P.U. 25-10/D.T.C. 25-1**

**Written Comments**

On behalf of the Town of Shutesbury, I am writing to submit comments in response to the Joint Notice of Inquiry regarding utility pole attachment, conduit access, double pole, and related considerations. We are a rural municipal broadband network serving approximately 780 customers across 42 miles of fiber in Shutesbury.

Our perspective is primarily that of a third-party attacher. We own only two poles out of the nearly 1,500 that we license for our fiber network. The vast majority of our pole attachments are on poles owned by National Grid/ Eversource and Verizon as jointly owned poles. We had to obtain licenses and pay for make-ready work on all of these poles when we built our municipal network in 2019. The cost of the make-ready work totaled one-third of the entire project build and delayed the project by 18 months. This experience gives us a unique insight into the challenges and costs associated with pole attachment in rural areas.

In addition to the costly make-ready to build our network, last year we spent over \$180,000 moving our fiber on six miles of National Grid pole upgrade. This is almost 50% of our entire annual revenue and wiped out our reserves. This significant expenditure highlights the financial burden that pole upgrades and make-ready work place on smaller, municipal broadband providers. These costs are ultimately passed on to our rural customers, impacting affordability and the pace of broadband expansion.

A major concern we face is the inefficiency of the current process for pole upgrades and make-ready work. The process of moving telecommunications lines individually for each attached entity is time-consuming and costly, especially for rural poles with only a few attachers. It leads to repeated truck rolls, delays, and increased expenses.

We strongly advocate for the adoption of a "one-touch make-ready" process. This would involve a single company moving all lines simultaneously during a pole upgrade and then charging a portion of the cost to each attached entity. This approach would significantly streamline the process, reduce costs, and minimize disruptions. One-touch make-ready would be particularly beneficial in rural areas where the number of attachers is limited.

In addition, reduced or subsidized make-ready costs for municipal broadband providers would encourage more municipalities to offer telecommunication services to their residents. There are at least a dozen successful examples of municipal fiber projects currently operating in the state of Massachusetts. These

projects have proven their effectiveness for delivering affordable internet and anything the state can do to encourage municipal broadband development will be in the best interest of Massachusetts residents.

Regarding the areas of inquiry outlined in the Notice, we offer the following:

- **Streamlining Processes:** As mentioned above, one-touch make-ready is crucial for streamlining the process. Additionally, improved communication and coordination between pole owners and attachers are essential. A standardized and transparent process for scheduling and completing make-ready work would also be beneficial.
- **Data Management:** A centralized database with accurate and up-to-date information on pole ownership, attachments, and planned upgrades would greatly improve efficiency. This database should be accessible to all stakeholders.
- **Cost Derivation:** Clear and consistent methodologies for calculating make-ready costs are needed. Transparency in cost derivation would help prevent disputes and ensure fairness.

We appreciate the opportunity to provide input on this important matter. We believe that addressing the challenges faced by third-party attachers, particularly in rural areas, is essential for promoting broadband expansion and ensuring equitable access to reliable internet service. We are available to participate in any technical sessions and provide further information as needed.

Thank you for your consideration.



**Gayle Huntress**

Town of Shutesbury

Municipal Light Plant Manager

413-345-2855

[broadband@shutesbury.org](mailto:broadband@shutesbury.org)