



May 12, 2026

**COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES
AND DEPARTMENT OF TELECOMMUNICATIONS AND CABLE (D.P.U. 26-10 / D.T.C.
26-1)**

In the Matter of

Joint Proposed Amendments to 220 CMR 45.00: Pole Attachment, Duct, Conduit and Right-of-Way Access, Removal, Complaint and Enforcement Procedures

COMMENTS OF EXTENET SYSTEMS, LLC

I. INTRODUCTION

ExteNet Systems, LLC. (“Extenet”) respectfully submits these comments in response to the Department of Public Utilities and Department of Telecommunications and Cable (“Departments”) joint proposed amendments to 220 CMR 45.00 (D.P.U. 26-10 / D.T.C. 26-1). Extenet is a national provider of wireless infrastructure solutions, specializing in the design, deployment, operation, and maintenance of small cell networks, distributed antenna systems (DAS), and related attachments on utility poles, street furniture, and in buildings. Extenet partners with municipalities, wireless carriers, public and municipal utilities, and contractors to accelerate broadband and wireless coverage and capacity projects. As part of its typical business operations, Extenet conducts pole surveys, performs make-ready work under both One-Touch Make Ready (“OTMR”) and coordinated utility processes, manages contractor relationships, and ensures safety and code compliance across joint-use infrastructure. Extenet’s operational experience, NJUNS integration, and field perspective are the bases for these comments.



Extenet strongly supports the Departments goal to promote nondiscriminatory access to utility poles, clarify OTMR and non-OTMR processes, establish enforceable timelines, and increase transparency in the application, review and approval process for fiber attachments. Extenet offers the following specific comments and recommended modifications to the proposed rules to reduce administrative delays and improve deployment efficiency and safety.

II. DISCUSSION

A. The adoption of the OTMR and non-OTMR regulations, if properly implemented, will reduce delays, costs, and uncertainty in the deployment of telecommunication networks.

Extenet has experienced firsthand the significant delays that can occur when deploying attachments to utility owned poles. In one instance, Extenet experienced delays of up to two years to obtain attachment approvals and make ready for utility poles. The adoption of OTMR and non-OTMR procedures, if properly implemented, will reduce costs and project uncertainty by standardizing who performs surveys and make-ready, establishing predictable timelines for review and construction, and also requiring itemized estimates and timely final invoices. A process which is embraced by the FCC and numerous states, OTMR permits qualified New Licensees to perform simple make-ready work, thereby lowering scheduling delays and contracted mobilization costs.

The non-OTMR provisions provide for a utility-managed process for Complex Make-Ready work that provides clarity regarding process and timelines for completing the application review. These provisions reduce multiple field inspections, shorten wait times for permitting. Moreover, the proposed coordination reduces the risk of surprise charges through transparent, pole by pole cost estimates and create enforceable dispute mechanisms, all of which will



decrease soft costs, accelerate deployment schedules and improve budgeting certainty for broadband wireless network projects.

Additionally, utility costs are reduced by not requiring repeated site visits and administrative overhead and by limiting repetitive surveys and inspections. It shortens the time utilities must allocate to routine, low risk make-ready tasks so their crews can focus on complex, safety-critical work. The proposed regulation enforces contractors' minimum qualifications and creates an authorized contractor list, balancing the workload and preserving safety and reliability. They also provide clearly documented objections and post-work inspection procedures that will protect utility's assets and permit rapid remediation when needed.

The public and consumers also benefit from these regulations by lowering the cost associated with deployments which translates directly into more rapid expansion of broadband and wireless capacity, improving coverage capacity and competition. By standardizing safety qualifications, inspection rights and remediation obligations, OTMR preserves safety and reliability while accelerating the public interest goal of timely broadband access and resilience.

B. Extenet recommends that where poles are jointly owned the joint owners have a uniform application and process for submission and review.

Jointly owned poles result in duplicative applications, surveys and billing processes, with each pole owner having their own processes. This duplication of submissions can result in deployment delays, increased cost and potentially complicates coordination with the owners and New Licensee.

Extenet recommends that the regulations be modified to require Joint Owners to adopt a single, uniform application or submission process. One possible means of achieving this would be where a New Licensee submits a concurrent application to all jointly owning utilities for the



same pole. The jointly owning utilities would treat the application as a single application for purposes of completeness review, survey, coordination, and timeline and would notify the applicant in writing of which utility is acting as the lead for the application. A uniform Joint-Owner application process would reduce administrative duplication, shorten the time to survey and make-ready, clarify contractor selection for OTMR and reduce conflicts over which owner leads in the process.

C. Extenet recommends that the regulations be revised to require standardized line-item fields for all survey and make-ready estimates and invoices (e.g., labor, materials, equipment, mileage, overhead, fixed-cost allocation, pole ID, contractor ID) to ensure transparent, consistent audits.

Standardized line-item values and fields for survey and make-ready estimates and invoices create a common scope that significantly improve transparency, comparability and speed of review. By requiring consistent categories, i.e.. labor, materials, equipment, milage, overhead fixed-cost allocation, and standard units, regulators, utilities and licensees can better understand, reconcile cost and compare proposals on an apples-to-apples basis. The result would reduce disputes between parties caused by inconsistent invoice formatting, and would lower administrative review time and cost. It would also shorten the pay cycle. Standardization of the categories supports better workforce and material planning, thereby reducing the cost.

III. CONCLUSION

Extenet supports adoption of 220 CMR 45.00 OTMR and non-OTMR frameworks because they establish clear, nondiscriminatory procedures, predictable timelines, and important transparency measures that will materially reduce deployment delay and cost uncertainty for the broadband wireless projects. To maximize these benefits, the Departments should adopt targeted modifications: (1) require jointly owning utilities to implement a single, uniform joint-owner



applicant and review process for jointly owned poles to eliminate duplicative filings and streamline coordination; and (2) require standardized line-item fields for all survey and make-ready estimates and finale invoices. These changes will further reduce administrative overhead, minimize disputes, and accelerate cost-effective deployments that serve the public interest.

A handwritten signature in blue ink, appearing to read "Michael Watson". The signature is written in a cursive style and is positioned above a horizontal line.

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