



May 12, 2026

Massachusetts Department of Public Utilities
1 South Station, 3rd floor
Boston, MA 02110

Massachusetts Department of Telecommunications and Cable
1 Federal Street, Suite 740
Boston, MA 02110

Re: Voltpost Comments on Massachusetts Department of Public Utilities 220 CMR 45.00: Pole Attachment, Duct, Conduit and Right-of-Way Complaint and Enforcement Procedures (D.P.U. 26-10/D.T.C. 26-1)

Dear Massachusetts Department of Public Utilities and Department of Telecommunications and Cable,

Voltpost appreciates the Department of Public Utilities and the Department of Telecommunications and Cable (together, “Departments”) thoughtful guidance on pole-mounted electric vehicle (EV) charging and its recognition of the important role this infrastructure can play in accelerating equitable EVSE deployment. We respectfully seek to clarify, however, that pole-mounted EV charger installations should be classified as “simple make-ready,” rather than “complex make-ready,” under the proposed regulations.

Voltpost is the leading pole-mounted EV charging company, decarbonizing mobility by democratizing charging access. The company retrofits lampposts and utility poles into a modular and upgradable Level 2 EV charging platform. This award-winning solution significantly reduces the cost, deployment speed, and physical footprint of charger deployment. The company is accelerating EV adoption by providing cities and companies scalable curbside and parking lot charging. Voltpost’s retrofit approach not only reduces construction and simplifies permitting complexity, but also accelerates project timelines, allowing chargers to be deployed and operational in a fraction of the time required for traditional Level 2 charging stations.

With a retractable cable and compact design, the Voltpost Air is a Level 2 charger with broad pole compatibility and industry leading reliability. The Voltpost Air Level 2 EV charger reduces installation and construction costs by utilizing existing infrastructure and leveraging the existing conduit or dropping overhead power.

Voltpost and our strategic manufacturing partner have collectively deployed over 600 pole-mounted chargers across the US, including in major cities such as Los Angeles, Portland, and Seattle. Voltpost has active deployment projects in seven markets including California, Connecticut, Massachusetts, Michigan, New York, Illinois, and Washington, DC, with projects in development to expand charger deployments across other states in 2026-2027.

In Massachusetts, we are working with Equal Energy Mobility, Preservation of Affordable Housing, BT2 Energy, and Zipcar to deploy 8 Level 2 charging ports on existing lampposts with funding from the Massachusetts Clean Energy Center (MassCEC). We were recently selected as a finalist for MassCEC’s



InnovateMass program. If awarded funding, Votpost seeks to deploy 30 Level 2 pole-mounted chargers on utility poles owned by Belmont Light, Ipswich Electric Light Department, and Hull Municipal Light Plant. Through these projects, Votpost aims to establish a strong foundation for broader statewide deployment efforts and use these installations as a springboard for larger-scale pole-mounted EV charging expansion across Massachusetts.

Votpost's installation process for the Votpost Air charger is designed to be efficient, code-compliant, and minimally disruptive. For both single and dual-port charger configurations, installation begins with securing the mounting assembly to an existing light or utility pole, followed by routing power from the pole into a circuit breaker box in accordance with all applicable state and local electrical codes. Once the mounting assembly is in place, the EV charger unit(s) are attached and the wiring from the breaker box is connected directly to the charger. Each charger in a dual configuration is mounted using the same standardized approach as a single unit, ensuring consistency and scalability across deployments.

As defined in 220 CMR 45.02, "complex make-ready" includes work that is reasonably likely to cause service outages or damage to existing attachments, or that involves activities such as splicing, relocation of existing attachments (including EVSE or wireless), work above the communications space, or pole replacement. Votpost's pole-mounted charger installation approach does not trigger any of these conditions. Specifically, we conduct technical site surveys to ensure our deployments:

- Do **not** cause service outages or damage to any existing attachment or the pole;
- Do **not** require splicing of existing attachments or relocation of existing communications, wireless, or EVSE infrastructure;
- Do **not** necessitate work above the communications space or within the electric supply space;
- Do **not** require pole replacement; and
- Do **not** involve wireless telecommunications attachments.

Votpost chargers are designed to be compatible with a variety of pole types, including wooden utility poles and metal lampposts. We always ensure there is no conflict with any other attached telecommunications equipment, whether communications equipment. We do not install our charger if there is not sufficient space for EVSE on the pole.

Classifying Votpost installations as "simple make-ready" is also consistent with the intent of the One-Touch Make-Ready (OTMR) framework. Votpost typically deploys infrastructure in smaller batches that fall within small to mid-sized application thresholds, making OTMR a more efficient, cost-effective, and minimally disruptive pathway. Requiring complex make-ready treatment for these installations would introduce unnecessary delays and costs without corresponding safety or reliability benefits.

For these reasons, Votpost respectfully recommends that the Department clarify that pole-mounted EVSE installations—where they meet the criteria outlined above—should be treated as "simple make-ready" and eligible for OTMR processes.

We appreciate the opportunity to provide input and look forward to supporting the Commonwealth's efforts to enable timely, safe, and scalable EV charging deployment.



Please do not hesitate to reach out with any questions about the Voltpost Air hardware or installation process.

Sincerely,

DocuSigned by:
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