

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

January 15, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 9:02 a.m. at the Committee office. Those in attendance were:**

Mr. Earle Carrion	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Mr. Bryan Strong	Southern California Edison
Mr. Josh Mathisen	AT&T California
Mr. Jeff Williams	City of Los Angeles
Mr. John Bacon	City Of Los Angeles
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Mr. Chad Johnson	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Shawn Henderson	T-Mobile USA
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Iman Yossi Torbati	City of Vernon
Ms. Kay Black	AT&T California
Ms. Linda McLean	Extenet Systems
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Maria Ortiz	XO Communications
Mr. Sven-Axel Knauth	City of Burbank
Ms. Yvonne Johnson	AT&T Mobility

Mr. Carrion called the meeting to order at 9:02 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Carrion inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Carrion opened up the discussion if there was any CPUC activity. Mr. Carrion stated that there were a couple of letters in December 2018. Mr. Williams stated that there will be an informal workshop next week. Mr. Williams stated that there is supposed to be a new scoping memo which will re-outline the schedules due to the cancelation of the 11/16/18 meeting. Mr. Williams stated they will see what comes out of the meeting next week.

Agenda Item 3 – Miscellaneous – Mr. Carrion inquired if there were any miscellaneous items.

- Mr. Brown opened that they had a Compliance discussion. Mr. Strong stated that he would like to discuss their volumes of poles at SCE. He stated that in 2019 there will be an increase in pole replacements anywhere from 20% to 50%. A large number of them being high fire. Mr. Strong stated SCE would will look for continued support on the 15 day review period established. He stated that the members may see OCI written on their JPAs and that is an internal term associated with their program, these are to be treated as Tier 3. Mr. Strong stated that they have situations with Foreign JPAs that have the bill before/bill after. For those they are going resolve them with 18.1F. Mr. Williams stated that forecasts to the SCJPC from SCE on their billing will be helpful. Mr. Strong stated that they had a straight line forecast for 2018 which they were close at month to month. Mr. Strong stated with month end and year end processing, it became a challenge in December to keep it at the same pace. He spoke with his team to work with a buffer to not expect all the JPAs to come through. That they expect there to be a steady volume throughout the year.
- Mr. Plaskey inquired about the OCI. Currently the JPAs are being labeled Tier 3. Mr. Plaskey wanted to know if the OCI is in addition to Tier 3 or if it will be replacing Tier 3. Mr. Strong stated that the OCI is in regards to an inspection component of their program and is not replacing Tier 3.
- Mr. Plaskey inquired about the 20-50% increase from SCE and if there were any months that were targeted to be higher. Mr. Strong stated that they cannot guarantee that it will be smooth, because they have their own resource constraints. Mr. Brown stated that he received an email from Mr. Kerns asking for a forecast for 2019. Mr. Plaskey stated that he will inform the leadership at Frontier. Mr. Plaskey inquired if this spike was for a set amount of time. Mr. Strong stated that the spike is more for 2019. Ms. Hernandez inquired how this would affect the SCJPC office. Ms. Pranata stated that this would be best discussed at the Operating Committee. Mr. Plaskey stated that they should also bring this up at the Administrative Board meeting.
- Mr. Williams asked SCE if they are adding their own internal numbers to the LADWP JPAs. Mr. Brown stated that they add their own accounting

data. Mr. Williams stated that they are getting emails saying LADWP is duplicating their JPAs. He requested that they look at LADWPs JPA number because that is the same. Mr. Brown requested an example. Mr. Williams stated that if this happens again he will forward the example to Mr. Brown.

- Mr. Carrion opened the discussion to pole replacements. He stated that Crown Castle is continuously seeing pole replacements for poles in which they have antennas and requesting pole at taller height so they can follow today's standards. He stated that some of the antennas were attached before Rule 94 was in place. Mr. Carrion stated that they are seeing many poles being replaced as like for like and he wanted to make sure SCE was aware. Mr. Brown stated that SCE's team and Ms. Hernandez's team are supposed to be getting together to discuss this. Ms. DeBarge inquired if SCE has acknowledged that Crown Castle has an antenna out there. Mr. Carrion stated that they have a specific team who works on those antenna transfers. Ms. Hernandez inquired when Mr. Brown's team would be reaching out to them to discuss the antennas. Mr. Brown stated that Ms. Hernandez's team was supposed to be reaching out to them.

Agenda Item 4 - Review of Action Items -

- Mr. Carrion to bring up about the OCI being added to the SCE JPAs during his recap.

The meeting adjourned at 9:16 a.m. until February 19, 2019.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104
San Dimas, CA 91773
Phone (909) 599-3801
Fax (909) 599-3825

February 19, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 11:15 a.m. at the Committee office. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Ms. Maria Ortiz	XO Communications
Ms. Lupe Hernandez	Teleport Communications America, LLC
Mr. Josh Mathisen	AT&T California
Ms. Cory Crawford	AT&T California
Mr. Jeff Williams	City of Los Angeles
Mr. Ronald Schram	City Of Los Angeles
Mr. Johnny Trang	City Of Los Pasadena
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Mr. William Kearns	Frontier Communications
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Anahita Abadian	M Squared Wireless guest of Mobilitie, LLC
Mr. Douglas Sink	Frontier Communications
Mr. Jon Maxwell	M Squared Wireless guest of Mobilitie, LLC
Ms. Kay Black	AT&T California
Ms. Linda McLean	Extenet Systems
Ms. Lynn Prescott	Verizon Wireless
Mr. Pedro Garganera	MCI Telecom/MCI Metro
Ms. Racheal Torres	Mobilitie, LLC
Ms. Shawn Henderson	T-Mobile USA
Mr. Sven-Axel Knauth	City of Burbank
Ms. Yvonne Johnson	AT&T Mobility

Mr. Serrato called the meeting to order at 11:15 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened up the discussion if there was any CPUC activity. Mr. Serrato stated that there was supposed to be an informal workshop to go over a new scoping memo to re-outline the schedule due to the meeting cancellation. Mr. Williams stated that the ALJ (Administrative Law Judge) did an amendment to the scoping memo and two informal workshops were added. Mr. Williams stated that they are waiting on a ruling to see which direction the ALJ wants to go. Mr. Williams stated he spoke with Wendy, who works for the safety enforcement as a staff engineer, and she would rather get away from the CPUC running everything.

Agenda Item 3 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Knauth wanted to know how the members interpret GO 95 Rule 44.2 which is the pole loading for new attachments. He stated that the inspection guidelines for wood poles state that after 15 years, but before 25, need to be inspected and if they pass every 20 years thereafter. He further stated that Rule 44.2 stated that for wood structures more than 15 years old the loading calculations should incorporate the results of intrusive inspections performed within the previous 5 years. He inquired if the members interpret this as if you are going to make an attachment to a pole you need to intrusively inspect it if it hasn’t been inspected within 5 years or if you happen to have the data from within the last 5 years, use it within your loading. Mr. Williams stated that it is both ways he just stated. Mr. Williams stated if the pole is 15 years old and an intrusive inspection has not been done, then it needs to be done. He further stated that if there has one been done within the last 5 years then that data is ok to use. Mr. Plaskey stated that typically the base owner who performs the intrusive inspection results, which they can request to use in their pole loading calculations. Mr. Knauth’s concern was that multiple intrusive inspections could shorten the life of a pole. Mr. Williams stated that hopefully the removable plugs are being used to avoid re-drilling the poles. Mr. Mathisen stated they can use the existing holes or a restrictograph. Ms. Hernandez inquired how they know if the intrusive inspection data is up to date. Mr. Plaskey stated that it should show on the pole load calculation. Mr. Williams stated that it is up to the initiator to verify if the intrusive inspection has been done or needs to be done. Mr. Knauth stated that their concern as a base owner is that they would not want everyone including their tenants drilling holes. Mr. Williams stated normally it is the base owner or the electric utility on top that does the intrusive

inspection. Mr. Mathisen stated he tells his staff to go to the electric company to see if they have an intrusive inspection and if there is none, to ask the electric company what they are to do. The members agreed that there should be some guideline/process for contacting and tracking intrusive inspections which will be worked on more during the Pole Loading Committee Meeting. Mr. Brown inquired if Mr. Knauth would like to join him when he meets with Mr. Williams to work on the guidelines. Mr. Knauth agreed he would, and Mr. Brown stated he will contact him before their next meeting.

- Mr. Plaskey presented a scenario where Frontier received a Form 2 and they agreed to remove a pole, PTD, and transfer their attachments. The work was not completed in that way and the other company went ahead and PTD'd the pole and transferred their attachments without their approval, then a Section 10.8 is being billed. Mr. Plaskey stated that Section 10.8 states upon approval. Mr. Serrato asked how he was informed about the Section 10.8. Mr. Plaskey stated that they found out when they got the Final, no Form 7 was received informing them. They were never given the opportunity to deny. Mr. Plaskey asked the members if when it comes to PTD's and transfer attachments, what is on the Form 2 can be changed on a Form 48. The members agreed.
- Mr. Plaskey gave the example where a company went out and did a pole replacement Section 7.13, but under Frontier it says 18.1D as the approved. He stated that they received the Form 2, Form 7, and Form 48 all at the same time. Ms. DeBarge inquired if they are receiving several like that from SCE. Mr. Plaskey stated that they were from SCE. Ms. DeBarge asked that he can email those to her because the approved section should be blank until the 45 days pass, and she would like to see if she needs to further train her staff.
- Mr. Plaskey opened the topic to crane set vs. composite poles. He wanted to know if there was any way SCE could plan their design to use composite poles instead of a crane and wood poles. Mr. Brown stated that in many cases they are High Fire Tier 3 poles and do not have the time to order composite poles. Mr. Williams stated that composite poles do not hold up in fires. Mr. Brown stated that the best scenario is to reach out to the planner to see if they can expedite a composite or deny it and then they have to redesign. Mr. Brown stated that they are not engineering to use composite. Mr. Plaskey stated that they are looking to do things in the least expensive way. Mr. Brown stated that when they see the Form 2 to reach out to the planner, and if the planner agrees he will send SCE a Form 7.
- Mr. Serrato opened to poles with antennas needing larger poles. Ms. Hernandez wireless group and Mr. Brown's team were to meet in regards to this. Ms. Hernandez stated that she needs to reach out to her wireless group. Ms. Hernandez inquired if Mr. Serrato would like to be included in the meeting. He stated that he would like to be included.

- Mr. Serrato opened to SCE's OCI JPAs and volume. Ms. DeBarge stated that it is no longer OCI but EOI which stands for Enhanced Overhead Inspection.
- Mr. Serrato stated that they are hearing about utilities denying selling space to any wireless equipment. One member denying is Anaheim, and he wanted to know any other members had heard of this. Ms. Hernandez stated that this was true. Ms. Hernandez stated that this was discussed before where Anaheim will not allow them to purchase space, but that they can be a tenant. Mr. Serrato stated that another company that is denying selling space with a JPA is Time Warner Cable. Ms. Hernandez stated that Time Warner Cable should bring this up at the committee. Mr. Serrato will bring this up at tomorrow's Administrative Board Meeting.
- Mr. Serrato stated that Crown Castle is still reconciling poles they find out in the field that they are attached to. The members may see a JPA come through calling them as Unauthorized. Those are not poles they are asking to purchase Unauthorized after the fact, but poles they see they are attached to. Crown Castle purchased a lot of companies and they want to reconcile all of their poles out in the field. Mr. Williams stated if there is any way to avoid that by spelling it out on the JPA and stating which company they purchased from. Mr. Williams stated that many of those companies are tenants and asked if Crown Castle is letting the members know if they are changing the tenancy. Mr. Serrato stated that the ones they know are tenants, they send a note on the JPA saying they are terminating the tenant contract. Mr. Williams stated that if they are doing that with LADWP they need a make ready package. Mr. Serrato inquired if LADWP has a special form like SCE to terminate tenancy. Mr. Williams stated that he would have to see if they had a form. Mr. Mathisen stated that AT&T has a standard form.

Agenda Item 4 - Review of Action Items -

- Mr. Serrato is to find the verbiage from Time Warner Cable about not selling anyone space.
- Mr. Serrato inquired if any Action Items came about from Frontier and Edison. Mr. Brown stated that they will be having a side bar discussion.

The meeting adjourned at 12:04 p.m. until March 19, 2019.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

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Phone (909) 599-3801

Fax (909) 599-3825

March 19, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 10:43 a.m. at the Committee office. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. Bryan Strong	Southern California Edison
Ms. Cory Crawford	AT&T California
Mr. Ronald Schram	City Of Los Angeles
Mr. John Bacon	City Of Los Angeles
Mr. Johnny Trang	City Of Los Pasadena
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Mr. William Kearns	Frontier Communications
Ms. Vivian To	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Michael Mckay	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Josh Mathisen	AT&T California
Ms. Kay Black	AT&T California
Ms. Linda McLean	Extenet Systems
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Shawn Henderson	T-Mobile USA
Mr. Sven-Axel Knauth	City of Burbank
Ms. Yvonne Johnson	AT&T Mobility

Mr. Serrato called the meeting to order at 10:43 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened up the discussion if there was any CPUC activity. Mr. Serrato stated that he heard that there were a couple of workshops. Mr. Mathisen stated that it is an ongoing rulemaking. The workshop report is about to be submitted. He further stated they are getting ready to set the timeline for the proceedings to talk about pole databases. They also waiting for more information on the second half which is the access OIR rulemaking. He will communicate to the committee if anything big comes up.

Mr. Plaskey asked for the members that are part of the NCJPA, a lot of the members there felt that they needed to respond to the CPUC data request. Mr. Plaskey stated that he wanted to bring it up if any of the members in the SCJPC wanted to respond to it. Ms. Pranata noted that she did not receive the emailed request. Mr. Plaskey confirmed that the north was the only one who received it. He wanted to bring it up to see if they needed to respond to it as a committee, though most had responded individually. Mr. Mathisen stated AT&T California believes the SCJPC should respond but that part of the request was inaccurate because it said if the SCJPC should remain as a clearinghouse for pole data information and if any enhancements need to be made. The email also asked how many joint pole associations/committees are needed to manage the joint poles in the state. Mr. Mathisen stated he is agreeable to whatever the committee as a whole thinks. Mr. Plaskey stated that the committee doesn’t seem to feel the need to respond, and Frontier agrees, they just wanted to bring it up to see if any of the other membership felt a need to respond.

Agenda Item 3 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Brown stated that at tomorrow’s Administrative Board Meeting, SCE will be bringing a guest speaker to speak about their high fire mitigation. The speaker will also be doing a demonstration of a new material they will be using on the fire poles, to protect the poles. He stated it is a type of wire mesh that expands to protect the poles. Mr. Brown stated the demonstration will be done in the parking lot with a pole stub in which a torch will be used to show the new material. He stated that if any of the members wanted to invite people for the demonstration, they could let them know. Mr. Plaskey inquired what time the demonstration would take place. Mr. Brown stated at around 9:30 a.m. to 10:30 a.m. Ms. Black inquired if it can be videoed so she could see the presentation. Mr. Plaskey inquired how the costs would be captured in the authorized costs. Mr. Brown stated that SCE will have to discuss that internally. Mr. Serrato asked if they plan on wrapping the poles that SCE has out there. Mr.

Brown stated that they will go further into that at tomorrow's presentation about the in use poles. He stated that the new poles would be delivered by McFarland already wrapped. Ms. Crawford inquired if the fire department should be contacted. Mr. Brown stated that he asked about that and was told it was not necessary and that they would be prepared with fire extinguishers anyways.

- Mr. Serrato opened to NG's 4.1 JPAs. Crown Castle did a study and found that many of the attachments with SCE were old attachments that were reconciled and some of them were other utilities that they were calling out. In order to minimize the number of 4.1 JPAs going out, they may leave it to the base owner to call someone out as 4.1. Crown Castle may start the JPA as 4.0 and when the base owner receives it and has no documentation for the other utility attached, they will leave it up to them to call them out as 4.1. Mr. Brown inquired if Crown Castle is proposing that they will call themselves out as 4.1 and all the other as 4.0. Mr. Brown stated that if a member is not on record they will call them out as unauthorized. Ms. Mitwasi stated that if Crown Castle is out there and they determine someone is unauthorized, then to call them out. Mr. Brown stated that if SCE has something pending they will change it. Ms. Hernandez stated that if there are 3 or 4 members unauthorized on a pole is a red flag, one is possible, but that many would mean research is required. Ms. Hernandez wanted to caution all the members to do their research. She stated that TCA is getting JPAs showing 3 or 4 members unauthorized, and they then find the pending JPAs or the active record, sometimes due to there being a wrong pole number.

Mr. Serrato stated that there are other situations where Crown Castle could not find any information on a particular attachment to a pole, they then send out the 4.1, SCE approves it, but the member does not accept that it is a 4.1. Mr. Serrato inquired if the base owners' comments take precedence over the other utility. Ms. Hernandez stated that the member saying they are not unauthorized need to provide the reason why they are not.

Mr. Serrato stated that there also instances where a utility will deny they are on the pole at all. Crown Castle will do their research and the base owner proves they are on the pole. Mr. Serrato inquired what they would do with the other utility. Mr. Plaskey stated that if the owner is on record, they still have to pay whether they are attached or not, and then they can relinquish. Mr. Serrato stated the situation is more when they are calling out a utility as unauthorized, and SCE agrees that they are unauthorized, but the utility is saying they are not attached at all. Crown Castle has done a visual inspection with wind loading and pictures. Mr. Serrato would like to know if the base owners' comments take precedence. Mr. Plaskey stated that Crown Castles photo supersedes anything else. Ms. Hernandez stated that the cable marker says it's them, but if they say

it is not them then they need to share who they believe who it is. Mr. Serrato stated that they will take it on a case by case basis.

- Mr. Serrato stated also regarding 4.1 JPAs that they are working on putting verbiage on a JPA for old attachments versus new attachments that are unauthorized. This verbiage is explaining that they attached a while ago, and they may not have all the records of the company they purchased. They are working on the verbiage with SCE. He inquired if there any comments on this.

Mr. Brown stated that along the same lines, he has come across a few poles where there is no record at the committee, but SCE has a record in their database. Mr. Brown stated he does not want to call someone out unauthorized if the pole is joint, but there is no record. Ms. Hernandez stated that SCE puts a note that they show a joint record and ask the utility to provide their record, and if they do not have one then they are unauthorized, but if they do then the committee gets told that each member has a copy of the joint card. Ms. DeBarge inquired that it still gets written up as a Section 7.7 without the penalty. Ms. Hernandez stated that it would still be a Section 7.11. Mr. Brown stated that they should be written up as a Section 7.7, requesting a record be provided, and if the record is not provided then they are unauthorized. Mr. Plaskey inquired if there was a timeline for the response, and the members agreed it is 45 days.

Agenda Item 4 - Review of Action Items -

- None at this time.

The meeting adjourned at 11:06 a.m. until April 16, 2019.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

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San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

April 16, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 10:58 a.m. at the Committee office. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Jeff Williams	City of Los Angeles
Mr. John Bacon	City Of Los Angeles
Mr. Johnny Trang	City Of Los Pasadena
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Mr. William Kearns	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Ben Coffey	City of Banning
Ms. Carla Young	City of Banning
Ms. Cory Crawford	AT&T California
Mr. Earle Carrion	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Josh Mathisen	AT&T California
Ms. Kay Black	AT&T California
Ms. Linda McLean	Extenet Systems
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Ms. Mina Shehata	City of Burbank
Mr. Pedro Garganera	MCI Telecom/MCI Metro
Mr. Scot Charlton	Extenet Systems
Ms. Shawn Henderson	T-Mobile USA
Ms. Yvonne Johnson	AT&T Mobility

Mr. Serrato called the meeting to order at 10:58 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened up the discussion if there was any CPUC activity. Mr. Serrato stated that several organizations filed comments and the deadline was Friday, April 19, 2019 for the rest of the comments. Mr. Kearns asked what the data request was for. Mr. Serrato stated it was part of the data request 2017 and the discussion evolved to talking about if they want to have a database for both Northern and Southern California. Mr. Williams stated currently the discussion is on what type of data is required for someone to attach to a pole. Depending on what the CPUC decides will decide what each utility will have to make available and how. Mr. Williams stated that the CPUC has not given their opinion on the workshop proposal or workshop report submitted. They are waiting to see what the ALJ (Administrative Law Judge) has to say. Ms. Pranata stated that in terms of the SCJPC they do not have to submit anything. Mr. Williams stated that the comments were only if the SCJPC wanted to reply. He stated that even the CMUA (California Municipal Utilities Association) decided not to reply, no data was to be submitted, only reply comments on the workshop report.

Agenda Item 3 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Serrato stated that Crown Castle is are still closing out old JPAs from companies they acquired. He stated that they require some pole tag and year sets, which they do get most responses, but there are a few that they are unable to get responses for. He stated that they created a list with what information is needed and a zip folder with the Form 7s that were not responded to that they will send to everyone. Mr. Kearns inquired when it will be sent out, and Mr. Serrato stated that it will be sent out by Thursday.
- Mr. Serrato stated that he had a question from his team and one of the vendors about utilities having special requests to have intrusive inspection results for all poles that are going to be submitted for a JPA, particularly for AT&T California. Mr. Serrato wanted to know if it was true, or if it was a normal requirement of any poles older than 15 years within the last five years. Mr. Williams stated that Crown Castle was correct. Mr. Serrato stated that one of their vendors believes it is for every single pole. Mr. Serrato wants to confirm that they are mistaken. Mr. Mathisen stated that maybe they are talking about a leasing process. Mr. Serrato stated that this vendor does not deal with leasing. Mr. Serrato wanted to confirm that they should just go by the regular requirement. Mr. Mathisen asked Ms. Crawford and Ms. Black if they had heard of any of the JPA desks holding

anything up. Ms. Black stated that she remembers an email asking, but was unsure if it was structure access or not. Ms. Black stated that she will reach out to Mr. Serrato. Mr. Serrato stated that he will send out an email to QU to find out.

Agenda Item 4 - Review of Action Items -

- Mr. Serrato will get with Ms. Black if any of the existing JPAs are being help up and what the rule is with AT&T California.

The meeting adjourned at 11:05 a.m. until May 14, 2019.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

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Phone (909) 599-3801

Fax (909) 599-3825

May 14, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 9:03 a.m. at the Committee office. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. Jeff Williams	City of Los Angeles
Mr. Bret Plaskey	Frontier Communications
Mr. Rey Lopez	Time Warner
Ms. Yesenia Delgado	Time Warner
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Ben Coffey	City of Banning
Ms. Cory Crawford	AT&T California
Mr. Earle Carrion	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Erica Sanchez	Extenet Systems
Mr. Friciveri Carias	Extenet Systems
Mr. Glenn Leckie	Frontier Communications
Mr. Josh Mathisen	AT&T California
Ms. Kay Black	AT&T California
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Maria Ortiz	XO Communications
Mr. Mina Shehata	City of Burbank
Mr. Nicholas Vanstryk	City of Vernon (Petrelli Electric)
Mr. Pedro Garganera	MCI Telecom/MCI Metro
Ms. Rebecca Garcia	Extenet Systems
Mr. Scot Charlton	Extenet Systems
Ms. Shawn Henderson	T-Mobile USA
Mr. Steve LeVeck	Frontier Communications

Ms. Yvonne Johnson

AT&T Mobility

Mr. Serrato called the meeting to order at 9:03 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened up the discussion to CPUC activity. Mr. Serrato stated that Ms. Pranata forwarded a communication from the CPUC yesterday which contained a link. He opened the discussion to this. Mr. Williams stated that they had specific questions in regards to how the SCJPC operates and if it should be part of the right of way rules. He further stated that they do not have an understanding of what the SCJPC does, though they offered to sit down and explain to the CPUC. Ms. Pranata opened the link on the CPUC email for all the members to review. Mr. Williams opened to the questions asked by the CPUC. He stated that the SCJPC is all about billing, not controlling. He further stated that both the NCJPA and SCJPC do not have a requirement to sell assets, only if you choose to sell then that is how they will share in the assets. Mr. Serrato stated that they cannot force anyone to sell space. Mr. Williams stated that an ALJ is not a real judge, jut an assigned administrative staff of the OIR’s. Mr. Williams stated that he would prefer that the SCJPC not respond, but the individual companies. Mr. Mathisen believes that the SCJPC as an organization should try to respond because they are questions as a group. Mr. Plaskey agreed that from Mr. Mathisen’s perspective they could have more leverage if they respond as one. Mr. Williams stated that he believes that they are not asking the SCJPC particularly, but everyone as a whole, because it is not just the SCJPC or NCJPA who will respond. Mr. Mathisen inquired when answers to these questions were due. Ms. Pranata stated that they are due June 10 and June 24. Mr. Williams stated that he would rather file reply comments, rather than commenting. Mr. Plaskey stated that some of the questions are very company specific, and that each company has specific agreements with their tenants. After reviewing the questions, Mr. Plaskey stated he is led to believe that the CPUC is prodding to take control of the NJCPA and SCJPC. Mr. Williams stated that they could answer the questions but be clear that the terms of sale are really the right of way rules. Mr. Mathisen stated that they do not have to go into too much detail. Mr. Mathisen stated that AT&T California does not want to speak for the SCJPC. Mr. Serrato stated that if they file comments they will legitimize their existence as a committee. Mr. Plaskey stated that he will run this by his legal to see if Frontier should answer. After further discussion the members agreed to submit general comments, everyone then reads them and get a consensus, and send to the attorney. The members agreed to submit the comments to Ms. Pranata by May 28, and she can forward the comments to the Compliance committee to review. They can then send them to Mr. Hudson to set it up for filing and it can then be final reviewed before submittal by June 3. Mr.

Serrato inquired if they should let the NCJPA know what their answers will be. Mr. Williams agreed that would be a good idea.

Agenda Item 3 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Brown opened to Guy failures. Mr. Brown stated that SCE is notifying members of Guy failures and not getting responses back. He stated that SCE would like acknowledgement and to know if the issue is remediated. He further stated that if it is not remediated, would there be an issue with SCE remediating it. Mr. Williams stated they would have an issue with SCE remediating. Mr. Mathisen stated that they get the notices sent via email and AT&T California has had issues and is working with the department at SCE to get a format to be more automatic because it is difficult to process them manually. Mr. Mathisen stated that they are also seeing the wrong guy sizes. Mr. Brown stated that he believes that NJUNS is the perfect tool to notify other members. Mr. Brown stated that if SCE is replacing the pole, they will fix the problem, but not in every case are they replacing the pole.
- Ms. Pranata stated that Mr. Coffey from City of Banning stated that they are receiving Form 2's from SCE with the contractors listed as point of contact, but they then say they cannot assist and to contact SCE regarding the Form 2. The Form 2 does not list who to contact at SCE. Mr. Brown stated that they could reach out to him so he can speak with the contractor and the group at SCE.

Agenda Item 4 - Review of Action Items -

- Mr. Serrato reminded the members to get their comments to Ms. Pranata in regards to the CPUC request.

The meeting adjourned at 9:58 a.m. until June 18, 2019.

Anali Spencer - Committee Staff



RIM/eg3 5/10/2019

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05/10/19
02:04 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation into the Creation of a Shared Database or Statewide Census of Utility Poles and Conduit in California.	Investigation 17-06-027
And Related Matter.	Rulemaking 17-06-028

**ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING PARTY
COMMENTS ON RIGHT OF WAY RULES**

Summary

This *Ruling requests* party comments on Right of Way rules.

1. Background

In this proceeding, the Commission stated that it will consider the question of utility pole, conduit, and Rights-of-Way (ROW) access issues.¹ The Order Instituting Investigation (OIR) phase of this proceeding is addressing proposed amendments to the Commission's ROW rules, safety issues, competitive issues, municipal and smart grid issues, and joint pole association or joint pole committee issues.² One of the specific areas of inquiry concerns whether the

¹ Investigation (I.)17-06-027/Rulemaking (R.)17-06-028 OII/OIR at 41.

² I.17.06-027/R.17-06-028 *Assigned Commissioner's Scoping Memo and Ruling* (August 8, 2018), at 11.

Northern California Joint Pole Association (NCJPA) and Southern California Joint Pole Committee (SCJPC) “...have policies, membership rules, or other standards in effect that operate to exclude new members or make access to poles onerous or even impossible.”³ The Commission wishes to obtain additional information concerning the operation of the Commission’s ROW rules, including the extent to which the rules create different rights and obligations for joint owners and attachers, and to understand the effect of NCJPA and SCJPC policies and practices on the utility pole ecosystem in California.

In addition, the Commission wishes to obtain information regarding the regulatory treatment by rate-regulated utility pole owners for revenues they receive from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly-owned poles, and the calculation of their cost basis for poles which were replaced or reinforced at the expense of a 3rd party attacher.

2. Discussion

Accordingly, I invite all parties to comment on the following questions. For questions 9–11, each rate-regulated utility pole owner should comment on its own treatment of costs, revenues and rates.

1. Do the NCJPA and SCJPC pole agreements and associated documents determine the terms of the purchase and sale of utility assets?
2. Are the terms of such pole-related transactions subject to the Commission’s jurisdiction?
3. Should the Commission require Investor Owned Utilities and Local Exchange Companies to submit (before implementation) for Commission review and approval, under Pub. Util. Code § 851, the agreements, forms, procedures, and handbooks which concern the

³ I.17-06-027/R.17-06-028 at 43.

- transfer, sale, lease, assignment, mortgage, or encumbrance of utility-owned poles?
4. Should utility pole owners be permitted to condition the sale of interest in poles to communications providers on the purchasers' agreement to purchase the entire communications space?
 5. Should utility pole owners be permitted to condition the sale of interest in poles in the communications space on the purchasers' adopting the duty to administer attachments by others in the communications space?
 6. If NCJPA and/or SCJPC agreements contain terms pertaining to any of the issues below, should the same terms apply to joint owners and attachers?
 - a. A 45-day attachment approval deadline;
 - b. A 60-day pole replacement timeline;
 - c. The ability to refuse rearrangement of facilities on a pole;
 - d. Advance notice of all pole attachment requests on occupied poles; and
 - e. The requirement to provide 48 hours advance notice of routine maintenance and repair.
 7. With respect to the advance notice of pole attachment requests, are joint pole owners other than the entity which administers the communications space receiving advance notice of attachment requests in the communications space? Does this notice confer a competitive advantage if similar notice is not provided to other joint pole owners and attachers?
 8. With respect to 48-hours' notice of routine maintenance and repair, are joint pole owners required to provide advance notice of routine maintenance and repair to joint pole owners or attachers? Are attachers required to provide such notice to joint pole owners or attachers? Does the 48-hours' notice requirement advance utility pole safety?

9. Describe how rate-regulated utilities who own poles account for revenues they receive from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly-owned poles in their General Rate Cases and in any other proceedings or filings with the Commission.
10. Are revenues received by rate-regulated utilities who own poles from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly-owned poles shared between ratepayers and shareholders? If so, on what basis, and how is such revenue sharing reported to the Commission?
11. How are the costs paid by 3rd-party attachers accounted for in determining the default statutory pole attachment rate?

IT IS RULED that:

1. Parties wishing to file and serve opening comments shall do so by June 10, 2019.
2. Parties wishing to file and serve reply comments shall do so by June 24, 2019.

Dated May 10, 2019, at San Francisco, California.

/s/ ROBERT M. MASON III
Robert M. Mason III
Administrative Law Judge

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

June 18, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 10:53 a.m. at the Committee office. Those in attendance were:**

Mr. Earle Carrion	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. Jeff Williams	City of Los Angeles
Mr. John Bacon	City of Los Angeles
Mr. William Kearns	Frontier Communications
Ms. Yesenia Delgado	Time Warner
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Ben Coffey	City of Banning
Ms. Cory Crawford	AT&T California
Mr. Glenn Leckie	Frontier Communications
Mr. Josh Mathisen	AT&T California
Ms. Kay Black	AT&T California
Ms. Linda McLean	Extenet Systems
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Maria Ortiz	XO Communications
Mr. Scot Charlton	Extenet Systems
Ms. Shawn Henderson	T-Mobile USA

Mr. Carrion called the meeting to order at 10:53 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Carrion inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Carrion opened up the discussion to CPUC activity. Mr. Carrion stated that all the members and the SCJPC’s response was submitted last week. Mr. Williams stated that there will be phone discussions with the parties from the OIR and more workshops. Just the 5 major companies will meet. Mr. Kearns asked if there is a way to reference this information. Mr. Williams stated that Mr. Kearns can go to the CPUC website and search proceedings and look up 117-06-027. Mr. Williams stated that the report and recommendations are due September 10. Mr. Carrion stated this item will remain on hold until they hear from the CPUC.

Agenda Item 3 – Miscellaneous – Mr. Carrion inquired if there were any miscellaneous items.

- Mr. Brown asked if there is a list/updated list of all the members that have a lease agreement program. Ms. Pranata stated that the SCJPC does not have that information. Ms. Mitwasi stated that knowing which members have lease programs would be helpful. Mr. Williams stated that they could just send out an email and ask. Mr. Carrion confirmed that the SCJPC does not have a list.

Agenda Item 4 - Review of Action Items -

- None at this time.

The meeting adjourned at 11:05 a.m. until July 16, 2019.

Anali Spencer - Committee Staff



RIM/eg3 5/10/2019

FILED
05/10/19
02:04 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation into the Creation of a Shared Database or Statewide Census of Utility Poles and Conduit in California.	Investigation 17-06-027
And Related Matter.	Rulemaking 17-06-028

**ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING PARTY
COMMENTS ON RIGHT OF WAY RULES**

Summary

This *Ruling requests* party comments on Right of Way rules.

1. Background

In this proceeding, the Commission stated that it will consider the question of utility pole, conduit, and Rights-of-Way (ROW) access issues.¹ The Order Instituting Investigation (OIR) phase of this proceeding is addressing proposed amendments to the Commission's ROW rules, safety issues, competitive issues, municipal and smart grid issues, and joint pole association or joint pole committee issues.² One of the specific areas of inquiry concerns whether the

¹ Investigation (I.)17-06-027/Rulemaking (R.)17-06-028 OII/OIR at 41.

² I.17.06-027/R.17-06-028 *Assigned Commissioner's Scoping Memo and Ruling* (August 8, 2018), at 11.

Northern California Joint Pole Association (NCJPA) and Southern California Joint Pole Committee (SCJPC) “...have policies, membership rules, or other standards in effect that operate to exclude new members or make access to poles onerous or even impossible.”³ The Commission wishes to obtain additional information concerning the operation of the Commission’s ROW rules, including the extent to which the rules create different rights and obligations for joint owners and attachers, and to understand the effect of NCJPA and SCJPC policies and practices on the utility pole ecosystem in California.

In addition, the Commission wishes to obtain information regarding the regulatory treatment by rate-regulated utility pole owners for revenues they receive from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly-owned poles, and the calculation of their cost basis for poles which were replaced or reinforced at the expense of a 3rd party attacher.

2. Discussion

Accordingly, I invite all parties to comment on the following questions. For questions 9–11, each rate-regulated utility pole owner should comment on its own treatment of costs, revenues and rates.

1. Do the NCJPA and SCJPC pole agreements and associated documents determine the terms of the purchase and sale of utility assets?
2. Are the terms of such pole-related transactions subject to the Commission’s jurisdiction?
3. Should the Commission require Investor Owned Utilities and Local Exchange Companies to submit (before implementation) for Commission review and approval, under Pub. Util. Code § 851, the agreements, forms, procedures, and handbooks which concern the

³ I.17-06-027/R.17-06-028 at 43.

- transfer, sale, lease, assignment, mortgage, or encumbrance of utility-owned poles?
4. Should utility pole owners be permitted to condition the sale of interest in poles to communications providers on the purchasers' agreement to purchase the entire communications space?
 5. Should utility pole owners be permitted to condition the sale of interest in poles in the communications space on the purchasers' adopting the duty to administer attachments by others in the communications space?
 6. If NCJPA and/or SCJPC agreements contain terms pertaining to any of the issues below, should the same terms apply to joint owners and attachers?
 - a. A 45-day attachment approval deadline;
 - b. A 60-day pole replacement timeline;
 - c. The ability to refuse rearrangement of facilities on a pole;
 - d. Advance notice of all pole attachment requests on occupied poles; and
 - e. The requirement to provide 48 hours advance notice of routine maintenance and repair.
 7. With respect to the advance notice of pole attachment requests, are joint pole owners other than the entity which administers the communications space receiving advance notice of attachment requests in the communications space? Does this notice confer a competitive advantage if similar notice is not provided to other joint pole owners and attachers?
 8. With respect to 48-hours' notice of routine maintenance and repair, are joint pole owners required to provide advance notice of routine maintenance and repair to joint pole owners or attachers? Are attachers required to provide such notice to joint pole owners or attachers? Does the 48-hours' notice requirement advance utility pole safety?

9. Describe how rate-regulated utilities who own poles account for revenues they receive from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly-owned poles in their General Rate Cases and in any other proceedings or filings with the Commission.
10. Are revenues received by rate-regulated utilities who own poles from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly-owned poles shared between ratepayers and shareholders? If so, on what basis, and how is such revenue sharing reported to the Commission?
11. How are the costs paid by 3rd-party attachers accounted for in determining the default statutory pole attachment rate?

IT IS RULED that:

1. Parties wishing to file and serve opening comments shall do so by June 10, 2019.
2. Parties wishing to file and serve reply comments shall do so by June 24, 2019.

Dated May 10, 2019, at San Francisco, California.

/s/ ROBERT M. MASON III
Robert M. Mason III
Administrative Law Judge

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

RE: Order Instituting Investigation into the
Creation of a Shared Database or Statewide
Census of Utility Poles and Conduit in California
and Related Matters.

Investigation: 17-06-027
Rulemaking: 17-06-028

COMMENTS

Submitted by the Southern California Joint Pole Committee

ADAMS, HAWEKOTTE & HUDSON

ATTORNEYS AT LAW

790 EAST COLORADO BOULEVARD

SUITE 300

PASADENA, CALIFORNIA 91101-2331

TELEPHONE (626) 583-8000

FACSIMILE (626) 583-8030

ANGELA HAWEKOTTE *
BOYD D. HUDSON *

* ALSO A LICENSED C.P.A. IN CALIFORNIA (INACTIVE)

ROGER ADAMS
(RETIRED)

RE: Response to Order Instituting Investigation into the Creation of a Shared Database os Statewide Census of Utility Poles and Conduit in California dated May 10, 2019.

On behalf of the Operating Committee of the Southern California Joint Pole Committee (the "SCJPC"), the following is in response to questions contained in the Order Instituting Investigation into the Creation of a Shared Database or Statewide Census of Utility Poles and Conduit in California (the "OII") filed with the Public Utility Commission on May 10, 2019.

In particular, the SCJPC is responding to questions 1 through 11 contained on pages 2, 3 and 4 of the OII.

1. Do the SCJPC pole agreements and associated documents, determine the terms of purchase and sale of utility assets?

Response: The SCJPC agreements and associated documents, including its Handbook, contain procedures detailing (1) how to record ownership of space on utility poles, (2) how to establish values for transactions, (3) how to calculate these transactions between SCJPC members. There is no language within any SCJPC agreement or its Handbook which provides rights of access or which limits rights of access to interests in a utility pole; the individual members of SCJPC follow all federal, state and local rules and regulations in the determining the terms of a purchase and/or sale and/or lease of space on a utility pole.

2. Are the terms of such pole-related transactions subject to the Commission's jurisdiction?

Response: The SCJPC is a voluntary association. Some SCJPC members are not currently subject to the jurisdiction of the Commission. The SCJPC agreements and Handbook do not establish authority over SCJPC members regarding the purchase and/or sale/lease of space on a utility pole. Such agreements do outline how cost is to be shared and how to record the ownership of such space on the utility poles. If the Commission chooses to regulate the sale or lease of pole space on utility poles, it should approach the California Legislature regarding amendments to the Public Utility Code.

3. Should the Commission require Investor Owned Utilities and Local Exchnage companies to submit (before implementation) for Commission review and approval, under Pub. Util Code Section 851, the agreements, forms, procedures and handbooks which concern the transfer, sale, lease, assignment, mortgage, or encumbrance of utility-owned poles?

Response. As previously stated, SCJPC is a voluntary membership organization, and some SCJPC members are not subject to regulation by the Commission. The SCJPC agreements and Handbook do not supersede Federal, California or local rules and regulations. If a SCJPC member chooses to purchase, sell or lease space on a utility pole, the transaction is not subject to the consent of the SCJPC.

4. Should utility pole owners be permitted to condition the sale of interest in poles to communications providers on the purchasers' agreement to purchase the entire communications space?.

Response: The Operating Committee of the SCJPC has no comment on such a condition. The SCJPC agreements, associated documents and Handbook do not contain any language regarding requirements for its members to impose upon purchasers or lessees of space on a utility pole they own.

5. Should utility pole owners be permitted to condition the sale of interest in poles in the communications space on the purchasers' adopting the duty to administer attachments by others in the communications space?

Response: The Operating Committee of the SCJPC has no comment on such a condition. The SCJPC agreements, associated documents and Handbook do not contain any language regarding requirements for its members to impose upon purchasers or lessees of space on a utility pole.

6. If the SCJPC agreements contain terms pertaining to any of the issues below, should the same terms apply to joint owners and attachers?

a. A 45-Day attachment approval deadline;

Response: There is a process in the SCJPC agreements and Handbook which provides for the automatic approval after 45 days for SCJPC members. This deadline can be extended at the request of the other owners of a particular utility pole. The Operating Committee of the SCJPC has no opinion on whether such terms should apply to non-member attachers.

b. A 60-Day pole replacement timeline;

Response: The SCJPC agreements and Handbook do not contain a provision for a timeline for pole replacement.

c. The ability to refuse rearrangement of facilities on a pole;

Response: The SCJPC agreements and documents do not address a member's right to allow or to refuse to allow rearrangements of its facilities by another utility. The SCJPC agreements and documents do provide for a process for a member to be reimbursed for such work, in the event the utility permits the member to re-arrange its facilities on the pole.

d. Advance notice of all pole attachment requests on occupied poles;

Response: The SCJPC agreements and documents provide for advance notice for the purchase and sale of space by other SCJPC members. The Operating Committee of the SCJPC has no opinion regarding advance notice to non-member attachers, since such attachers are typically subject to a separate agreement with a SCJPC member who owns the space on the utility pole that they wish to attach. The particular member who owns the space is responsible for notification to the other users of space on the utility pole.

e. The requirement to provide 48 hours advance notice of routine maintenance and repair.

Response: The SCJPC agreements and documents do not address advance notice for routine maintenance and repair.

7. With respect to the advance notice of pole attachment requests, are joint pole owners other than the entity which administers the communications space receiving advance notice of attachment request in the communications spaces? Does this confer a competitive advantage if similar notice is not provided to other joint pole owners and attachers?

Response: When a SCJPC member wishes to acquire space from another joint owner either for their own facilities or to lease space to an attacher, they notify the other joint owners of their interest. The SCJPC does not believe that this notice process confers any competitive advantage on its members

8. With respect to 48-hours' notice of routine maintenance and repair, are joint pole owners required to provide advance notice of routine maintenance and repair to joint pole owners or attachers? Are attachers required to provide such notice to joint pole owners or attachers? Does the 48-hours' notice requirement advance utility pole safety?

Response: There are no provisions within the SCJPC agreements or associated documents for advance notice for members or attachers to perform routine maintenance and/or repairs. The SCJPC has no opinion on whether a 48-hours' advance notice requirement promotes utility pole safety.

9. Describe how rate-regulated utilities who own poles account for revenues they receive from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly-owned poles in their General Rate Cases and in any other proceedings or filings with the Commission.

Response: The SCJPC does not maintain accounting or financial statement records for its members. As such, the SCJPC does not know how its members account for revenues they receive from the sale or lease of space on utility poles they own .

10. Are revenues received by rate-regulated utilities who own poles from the sale of interests in poles and the lease of space for attachments to solely-owned or jointly owned poles shared between ratepayers and shareholders? If so, on what basis, and how is such revenue sharing reported to the Commission?

Response: The SCJPC does not maintain accounting or financial statement records for its members. As such, the SCJPC does not know how its members account for revenues they receive from the sale or the lease of space on utility poles they own. The SCJPC has no financial information as how revenue earned by SCJPC members from the sale or lease of space on utility poles is shared among ratepayers and shareholders.

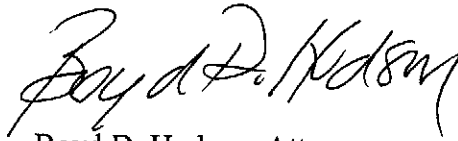
11. How are the costs paid by 3rd -party attachers accounted for in determining the default statutory pole attachment rate?

Response: The SCJPC does not maintain accounting or financial statement records for its members. As such, the SCJPC does not know how its members account for funds received from third party attachers from the sale or lease of space on utility poles they own.

Thank you for your assistance. Please contact the undersigned if you have any questions or comments regarding the above.

Very truly yours,

Dated: June 10, 2019

A handwritten signature in black ink that reads "Boyd D. Hudson". The signature is written in a cursive style with a large initial "B".

Boyd D. Hudson, Attorney
ADAMS, HAWEKOTTE & HUDSON
790 East Colorado Boulevard, Suite 300
Pasadena, CA 91101-2331
Phone: (626) 583-8000 x1011
Email: boyd@ahh-law.com

Attorney for: Southern California Joint Pole
Committee

1 **VERIFICATION**

2 I am the attorney for the Southern California Joint Pole Committee in the above
3 entitled proceeding. I have read the foregoing Comments to the Order Instituting Investigation
4 into the Creation of a Shared Database or Statewide Census of Utility Poles and Conduit in
5 California and Related Matters. and know the contents thereof. I certify that the same is true of
6 my own knowledge, except as to those matters, which are therein stated upon my information or
7 belief, and as to those matters I believe it to be true.
8

9
10 I declare under penalty of perjury under the laws of the State of California the
11 foregoing is true and correct.

12 Executed on June 10, 2019, at Pasadena, California

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15 BOYD D. HUDSON
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Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

July 16, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 9:02 a.m. at the Committee office. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. Jeff Williams	City of Los Angeles
Mr. Ronald Schram	City of Los Angeles
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Yesenia Delgado	Time Warner
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Ben Coffey	City of Banning
Ms. Cory Crawford	AT&T California
Mr. Josh Mathisen	AT&T California
Ms. Kay Black	AT&T California
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Lynn Prescott	Verizon Wireless
Mr. Scot Charlton	Extenet Systems
Ms. Shawn Henderson	T-Mobile USA
Ms. Yvonne Johnson	AT&T Mobility

Mr. Serrato called the meeting to order at 9:02 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened up the discussion to CPUC activity. Mr. Serrato stated that he knows there is an up and coming workshop, but inquired if the members had any items pertinent to the SCJPC. Mr. Brown stated that in regards to SB901 that SCE would like to have an offsite meeting with the municipal companies to see if they have a mitigation plan and work together. Mr. Williams stated that they could meet after January 1, 2020. Mr. Brown stated that a plan is due by January 1, 2020. He stated that SCE would like to pre meet. Mr. Williams stated that they could meet prior to, but it would have to be related to pole replacement and go through LADWP’s government regulatory groups. Mr. Brown stated that he will see if they could set a pre meet with the other municipalities as well by bringing this up at tomorrow’s Administrative Board Meeting. Mr. Serrato asked Mr. Brown if he can set up these meetings. Mr. Brown stated that he could. Mr. Williams suggested that when Mr. Brown sets up the meeting to put what the topics are so the correct people attend. Ms. Pranata confirmed this was on SB901. Mr. Williams confirmed yes and stated that SB901 is really the PUC (Public Utility Code) code 8386 (IOU’s) and 8387(POU’s and cooperatives).

Agenda Item 3 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Serrato stated that he had outside discussions with the City of Vernon and opened up to see if they were on the phone, which they were not at the moment. Ms. Pranata stated that they usually attend the Administrative Board Meetings. Ms. Crawford stated that she was called by the new person responsible for the joint pole responsibilities at City of Vernon. She stated that they thought that every intent would have one of the SCJPC contact names as the signature. She explained that the engineer in the area that would be signing it not one of the SCJPC representatives. Mr. Serrato stated that he explained to City of Vernon’s representative that they will not only be contacted by the official SCJPC representative for each company, but that each company has many personnel who work on JPA’s and are authorized to submit JPA’s and sign things off. Mr. Serrato recalls that City of Vernon may have an additional discussion to bring up which he will inquire from them at tomorrow’s Administrative Board Meeting.

Agenda Item 4 - Review of Action Items -

- Parties are to stand by to an invitation to a pre meet to be set by Mr. Brown at SCE to discuss mitigation plans.

The meeting adjourned at 9:08 a.m. until August 20, 2019.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

August 20, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 9:04 a.m. at the Committee office. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. Jeff Williams	City of Los Angeles
Mr. Ronald Schram	City of Los Angeles
Mr. Bret Plaskey	Frontier Communications
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Ben Coffey	City of Banning
Ms. Cory Crawford	AT&T California
Mr. Glenn Leckie	Frontier Communications
Ms. Kay Black	AT&T California
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Maria Ortiz	XO Communications
Mr. Scot Charlton	Extenet Systems
Ms. Shawn Henderson	T-Mobile USA
Ms. Yesenia Delgado	Time Warner
Ms. Yvonne Johnson	AT&T Mobility

Mr. Serrato called the meeting to order at 9:04 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened up the discussion to CPUC activity. Mr. Williams stated that the CPUC had workshops last week and a workshop report will be coming. Mr. Williams stated he is more interested in the comments made on the workshop.

Agenda Item 3 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Ms. Black stated AT&T California was denied a JPA by SCE because attachment to an engineered steel pole is not allowed. Ms. Pranata opened up the JPA showing the denial (see attached). Mr. Brown stated that if there was an existing record where they went from wood to engineered steel, SCE would allow the existing attachment. On SCE's solely owned/engineered steel poles they do not allow new attachments. Mr. Plaskey asked if these were mostly transmission poles. Mr. Brown confirmed they were. Ms. Hernandez stated that when an engineered steel pole is placed it is has pole loading criteria loaded for existing attachments. Anyone new cannot attach because it will nullify the pole loading. Mr. Brown stated this was correct. Ms. Hernandez inquired if the engineered steel poles are the ones with the platform. Mr. Brown stated this was correct. Ms. Black stated that she would get this information to her team. She requested a picture so she can show her team so they know what an engineered steel pole looks like, and avoid those particular poles and find a different path. Mr. Plaskey asked if these poles will always have a foundation and be bolted down. Mr. Williams stated not always. Ms. Black stated they need a way to tell from the field if this is pole they can attach to. Mr. Plaskey confirmed that Frontier could not over lash due to the additional weight. Mr. Brown stated this was correct. Ms. Hernandez stated that she was told that engineered steel poles have a spigot like thing coming from the bottom. Mr. Brown stated that he was not sure but he would find out. Mr. Williams stated that they may have to check prior to attaching. Ms. Black stated that they will treat this like a no tag and do a little more research. Mr. Plaskey inquired if downsizing could be done. Mr. Brown stated he would think so.
- Mr. Brown stated that he had mentioned that SCE would no longer be doing intrusive inspections on IOU's and POU poles. SCE will be sending letters confirming this. Ms. Pranata asked for clarification. Mr. Williams stated that POU's (Publicly Owned Utilities) and IOU's (Investor Owned Utilities). Ms. Pranata confirmed that they will no longer do intrusive inspections. Mr. Williams clarified that this was if they are the base owner. Mr. Brown stated that they will continue to do an overhead detail inspection of SCE's facilities. Mr. Plaskey stated that they had 40 thousand poles that Frontier is the base owner. He wanted to confirm that SCE is still going to maintain intrusive inspections on these. Mr. Brown

stated that yes, as long as they have electrical facilities on them, but if it just a communication line they will not.

Agenda Item 4 - Review of Action Items -

- Mr. Brown is to send a letter confirming that SCE will no longer be doing intrusive inspections on any POU.
- Mr. Brown will look for pictures of engineered steel poles.

The meeting adjourned at 9:15 a.m. until September 18, 2019.

Anali Spencer - Committee Staff

Anali Spencer

From: Angela Pranata <angela@scjpc.net>
Sent: Monday, August 19, 2019 4:19 PM
To: Anali Spencer; Kathleen Allen
Cc: laptop01@scjpc.net
Subject: FW: No attaching to steel poles?????? A01BBSW_ H-A01BBSW
Attachments: H-A01BBSW-R04_PARTIAL DENIED (E).pdf

Follow Up Flag: Follow up
Due By: Friday, August 30, 2019 8:00 AM
Flag Status: Flagged

Categories: MTG

FYI, Kay will ask the question in RR meeting.

Angela Pranata
Manager of Operations
So. Ca. Joint Pole Committee
279 E Arrow Hwy, Suite 104
San Dimas, CA 91773
Ph: 909-599-3801 x203
Fax: 909-599-3825
angela@scjpc.net

From: BLACK, KAY R [<mailto:kb6314@att.com>]
Sent: Monday, August 19, 2019 1:08 PM
To: Gerald.Brown@sce.com; angela@scjpc.net
Cc: CRAWFORD, CORY R <ck1358@att.com>; MATHISEN, JOSHUA A <jm6347@att.com>; Maria Ortiz <Maria.Ortiz@cableeng.com>; Lupe.Hernandez@cableeng.com; WON, MARIANNA C <mw3151@att.com>; GOMEZ, BRIAN J <bg3893@att.com>
Subject: No attaching to steel poles?????? A01BBSW_ H-A01BBSW

Hi Wayne,

We got this denial. It says we are not allowed to attach to a steel pole. Since when? Did I miss something? Let's discuss this tomorrow. Thanks.

Hi Angela,

I will bring this up in RR MISC. Maybe folks will want me to move it to Compliance.....not sure. But can you have it ready to show where ever please? Thanks.

Kay Black

C & E West, Joint Pole Staff Support
2125 Occidental Road
Santa Rosa, CA 95403

707-575-2180



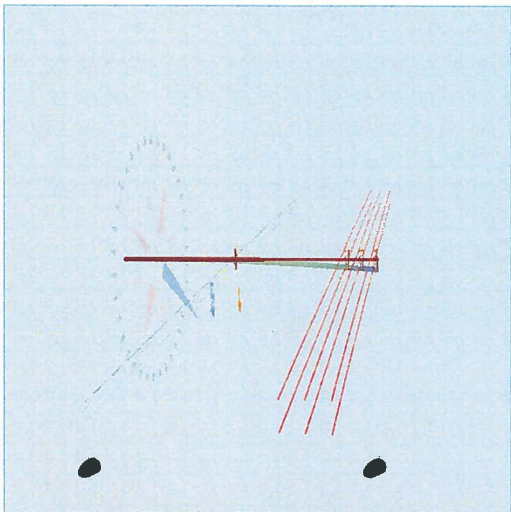
POLE NO.	Pole Location	Year Set	Pole in Class	M	E	ATS	ATC	ATC	Proposed						Item No.	LOCATION AND NATURE OF WORK <small>If not in accordance with Joint Pole agreement and route-data master.</small>
									M	E	ATS	ATC	ATC	H/LA		
4432313E ✓	75	2002	FT 1	68KV	68KV	C	C	C	68-33	68KV	C	C	C	25-7	1	H/LA TO PURCHASE INTEREST SEC 4.0 W/S OVERLAND AV 240' NO MISSISSIPPI AV
4414892E	75	2002	FT 1	68KV	68KV	C	C	C	68-33 25-2 C 25 C 24	68KV	C	C	C	23-5	4	W/S OVERLAND AV 240' SO LA GRANGE AV
220457E ✓	75	1924	FT 1	68KV	68KV	C	C	C	68-33 27-1 C 27	68KV	C	C	C	26-8	7	W/S OVERLAND AV 94' SW/O LA GRANGE AV
4007437E ✓	75	1985	FT 1	68KV	68KV	C	C	C	68-34 26-1 C 26	68KV	C	C	C	25-7	10	W/S OVERLAND AV 88' NO LA GRANGE AV
220455E ✓	80	2016	FT H1	68KV	68KV	C	C	C	70-37 27-2 C 27 C 26	68KV	C	C	C	25-7	11	W/S OVERLAND AV 276' NO NW COR/O LA GRANGE AV
1417875E ✓	55	1982	FT 2	68KV	68KV	C	C	C	30-0 24-6 C 27 C 26	68KV	C	C	C	22-1	13	H/LA TO PURCHASE INTEREST SEC 4.4 W/S OVERLAND AV 16' SO SPL MISSISSIPPI AV
															14	PER FIELDING NO POWER ON POLE

POLE LEGEND: L = LOWER TOP(PHASE SE)
 P = FULL (RMS EA) C100 = FOOTAGE CUT
 F9 = FULL BUTT S22 = SAFETY CLEARANCE ZONE
 T = TRANSPORT (Item 88)
 B = S&L W&E ANCHOR/BUSH LEGEND:
 D = DISPOSE (Item 83) AT = ANCHOR/BUSH REMOVED
 TM = TIE/DOWN AT = ANCHOR/BUSH TRANSFERRED



Show Quantity of Items to be added in the Column of Pole to be Paid.
 Rev: Jul 2013

Pole Num:	P7_4414882E	Pole Length / Class:	75 / 1	Code:	GO 95	Structure Type:	Unguyed Tangent
Region:	Metro	Species:	DOUGLAS-FIR	GO 95 Rule:	At Replace (Existing)	Pole Strength Factor:	0.38
District:	Los Angeles	Setting Depth (ft):	9.50	Construction Grade:	A	Transverse Wind LF:	1.00
Wire Center:	Los Angeles	G/L Circumference (in):	50.00	Loading District:	Light	Wire Tension LF:	1.00
PG&E:	PG&E	G/L Fiber Stress (psi):	8,000	Ice Thickness (in):	0.00	Vertical LF:	1.00
ADDRESS:	Unset	Allowable Stress (psi):	2,973	Wind Speed (mph):	55.90	Pole Factor of Safety:	5.06
Aux Data 6:	Unset	Fiber Stress Ht. Reduc:	No	Wind Pressure (psf):	8.00	Vertical Factor of Safety:	11.70
Latitude:	34.048257	Deg Longitude:	-118.430182	Deg Elevation:	0	Feet Bending Factor of Safety:	5.13



Pole Capacity Utilization (%)	Height (ft)	Wind Angle (deg)
Crossarm allowance 300 lbs	52.7	0.0
Maximum	52.7	0.0
Groundline	22.8	35.2
Vertical		54.9

Pole Moments (ft-lb)	Load Angle (deg)	Wind Angle (deg)
Crossarm allowance 300 lbs	50,990	54.9
Max Cap Util	50,990	54.9
Groundline	98,046	54.9
GL Allowable		

Groundline Load Summary - Reporting Angle Mode: Load - Reporting Angle: 55.4°

	Shear Load* (lbs)	Applied Load (%)	Bending Moment (ft-lb)	Applied Moment (%)	Pole Capacity (%)	Bending Stress (+/- psi)	Vertical Load (lbs)	Vertical Stress (psi)	Total Stress (psi)	Pole Capacity (%)
Powers	518	43.7	30,578	60.0	31.2	928	593	3	931	31.3
Comms	100	8.5	2,396	4.7	2.4	73	51	0	73	2.5
Pole	535	45.7	16,604	32.6	16.9	504	3,315	17	521	17.5
Crossarms	6	0.5	290	0.6	0.3	9	160	1	10	0.3
Insulators	18	1.6	1,122	2.2	1.1	34	81	0	34	1.2
Pole Load	1,170	100.0	50,990	100.0	52.0	1,547	4,200	21	1,568	52.8
Pole Reserve Capacity			47,056		48.0	1,425			1,404	47.2

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

September 18, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 11:49 a.m. at the Committee office. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Maria Ortiz	XO Communications
Ms. Lupe Hernandez	Teleport Communications America
Mr. John Bacon	City of Los Angeles
Mr. Bret Plaskey	Frontier Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. David Campo	City of Lompoc
Mr. Joe Armstrong	City of Pasadena
Mr. John Vu	City of Anaheim
Ms. Yesenia Delgado	Time Warner
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Mr. Ben Coffey	City of Banning
Ms. Cory Crawford	AT&T California
Mr. Dan Luty	Extenet Systems
Mr. Glenn Leckie	Frontier Communications
Mr. Josh Mathisen	AT&T California
Ms. Lynn Prescott	Verizon Wireless
Mr. Pedro Garganera	MCI Telecom/MCI Metro
Ms. Shawn Henderson	T-Mobile USA
Ms. Sherri Duchateau	Golden State Water
Ms. Yvonne Johnson	AT&T Mobility

Mr. Serrato called the meeting to order at 11:49 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened up the discussion to CPUC activity. Mr. Plaskey opened that there was only activity for the ILEX and IOU’s and there was nothing much to share. Frontier provided all their feedback to the CBCOII. Mr. Brown stated that they are still on track one. Mr. Mathisen stated that the workshop report should be out at the end of the month, following comments all on track one. Mr. Plaskey confirmed that they will rule on track one before they move on.

Agenda Item 3 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Brown opened to members attaching after denials and rearranging facilities without approval. Mr. Plaskey inquired that the other members were not rearranging Frontier’s facilities. Mr. Brown stated that they are not rearranging Frontier’s facilities, only SCE’s communication facilities after a denial. Mr. Brown inquired what can be done when things like this happen. Mr. Plaskey stated that other than the unauthorized attachment, it does not end up being that big of a penalty. Mr. Bacon stated it is easier to beg for forgiveness then ask for permission. Mr. Serrato inquired what SCE does when they come across this situation. Mr. Brown stated that it comes back to their department, but they do not have an answer. He further stated that there needs to be more than just a slap on the hand. Mr. Bacon stated that there is no recourse set, where they can’t even rearrange it again or remove it. Mr. Mathisen stated that it is probably on a case by case basis, where it may require a pole replacement where whoever did it has to pay for it. Mr. Brown stated that the representative for MCI needs to talk. Mr. Brown stated that there is no discouragement for them not to do this. Ms. Hernandez inquired if SCE could ask them to take their facilities down. Mr. Brown stated that is what he would like to know. Mr. Serrato inquired if they were being non-compliant. Mr. Brown stated that first they were denied because they did not pass the loading. Second, SCE does not allow attachments above their carrier solutions. After the denial they moved SCE’s trans telecom up in order to attach under. He added, he knows they received the denial because they addressed it. Ms. Hernandez inquired that after rearranging are they GO95 non-compliant. Mr. Brown did not know. She asked if they could be billed unauthorized and then charge them for SCE’s rearrangement. Ms. Mitwasi stated that there is a safety concern with their trans telecom being moved because those lines are tied to their substation and should not be touched. Ms. Hernandez stated they would have to bill them big bucks to hurt their pockets and make a big impression. Mr. Plaskey stated

that they would treat them as a tenant. Mr. Serrato stated they should figure out a fee first. Ms. DeBarge stated that safety comes first. Ms. Hernandez stated they should figure out something short of legal to make them think about doing it again. Mr. Plaskey stated that they would go legal. Mr. Bacon stated that 5G is coming and it will be a nightmare with people moving and rearranging for every 5G cell site. Mr. Bacon stated that LADWP would not want to go to legal because it is expensive and time consuming, but it will be a big mess with 5G being implemented. He further stated that in LA they have 6,000 pending cell sites. Mr. Armstrong inquired if there are any GO95 Rules with regards to all the equipment that is mounted lower on a pole and climbing a pole with their belt. Mr. Bacon stated that LADWP requires a standoff bracket for the risers. Mr. Mathisen stated the GO95 committee addressed those changes with proposed rule changes. Rulemaking 17-10-010 had a workshop report in which a consensus was made in regards to rule changes, filed last year. A request was sent out for more reply comments in which the members companies can reply to because it has to do with using restraint equipment, standoffs, how much space can be between equipment attached to a pole, and removes the requirement for pole steps. He stated that there are many positive changes for workers climbing poles. Mr. Armstrong stated that LADWP has 6,000 cell sites pending and City of Pasadena has 2,000 pending. They are going to be coming much faster than rulemakings, creating an issue, and if the communication companies are taking this into consideration in regards to all the equipment being mounted to the poles. Mr. Mathisen stated that a lot of the communication companies are not under the same rules the power companies yet. AT&T California has adopted the buck squeeze as a standard fall restraint apparatus. Mr. Serrato asked the members if they would like to continue with this discussion further and if they should create a new agenda item. Mr. Brown replied yes. Ms. Pranata asked if they would like a new item number. Mr. Serrato stated yes, because this is different from finding an unauthorized attachment vs. denying attachment and they attach anyway, moving all other's attachments. Mr. Campo stated it places the burden of having to do all new paperwork and sort through what has been done. *"Item 1665: Attachment After Denial - Make Ready Rearrangement"* was created.

- Mr. Brown opened on attaching to anchors. Ms. Pranata opened up a picture Mr. Brown sent that shows five attachments on a double eye anchor (see attached). Mr. Brown stated that SCE does not allow piggybacking. Mr. Bacon stated that they wouldn't know what kind of helix it is and the strain it will hold and they would have to set their own anchor. Mr. Brown stated that SCE requests they set their own anchors. Mr. Plaskey inquired if this would fall under a third party/GO95 infraction. Mr. Serrato stated yes. Mr. Plaskey stated that if Frontier does this, they would like to know so they could fix it, and that he can be cc'd. Mr. Brown stated that they will notify whoever is on the pole and give 30-45 days to

remediate. After that SCE would have to go out there and remove them. Mr. Plaskey asked if SCE would go out there and do a triple eye, reattach, and bill actual costs. Mr. Brown stated that they suggest that people do their own anchors on there. Mr. Plaskey stated that he would be worried if the anchors are taken off something would happen. Mr. Plaskey again stated if this is Frontier's to please let him know. Mr. Brown stated that he will do research on who it is and reach out to that owner.

- Mr. Brown stated that when they receive JPAs from another member that has SCE's three different entities of transmission, distribution, and trans telecom/carrier solutions, all three members need to reply to the JPA. If SCE's distribution replies in 15 days and they approve it, it does not mean the JPA is approved because there still two other entities on the pole. One of the entities may deny the JPA. Mr. Bacon asked if it is one JPA for all three entities. Mr. Brown stated yes, but all three entities are not identified. Mr. Bacon asked how the other companies would know that there are three entities. Mr. Brown stated it was because it is shown on record. Mr. Bacon stated that as part of the approval process how would they know that they need all three. He further stated that the person in the office will not know what the different circuits are, and once they get an approval from SCE they will automatically assume that it has been approved. Mr. Brown stated that what SCE will do is deny it up front because it doesn't show all members. The members disagreed. Mr. Armstrong stated City of Pasadena responds as one member even though they have multiple entities. Mr. Brown inquired if they reply with both entities. Mr. Armstrong stated that they reply as one member. Mr. Plaskey stated that if the entities are not talking to each other, then that is on SCE. Mr. Plaskey stated that this is similar to Frontier's tenants. Frontier will not give a response until they verify with their tenants because they are responsible for that. Mr. Brown stated that SCE's three entities are identified and all three need to reply. Mr. Plaskey stated that there is only one SCE line. Mr. Serrato stated that there is only one entities mailing address. Mr. Brown stated that when every entity that is on the pole is not identified, then SCE has the right to deny it. The members stated no. Mr. Brown disagreed. Ms. Hernandez stated that internally SCE could ask each department for approval before whoever replies to JPA's submits a reply. Mr. Bacon asked if the 45 days applies. The members stated yes. Ms. Mitwasi stated that if they have a response back they will sent a Form 7 saying it is still pending approval from one of the other entities. Ms. Hernandez stated that they should wait for full approval before sending the JPA with an SCE signature. She further stated that if they have a signature then they consider that approved. Mr. Serrato stated that they too have a lot of parties, but they wait for all the responses. Mr. Plaskey stated that it seems like all the members are agreeing that when the Form 2 is signed off, it implies that all departments read thoroughly. If the Form 2 is signed they will bill. Mr. Armstrong stated that how are they to know that SCE needs to get approval from multiple agencies. Mr. Brown stated

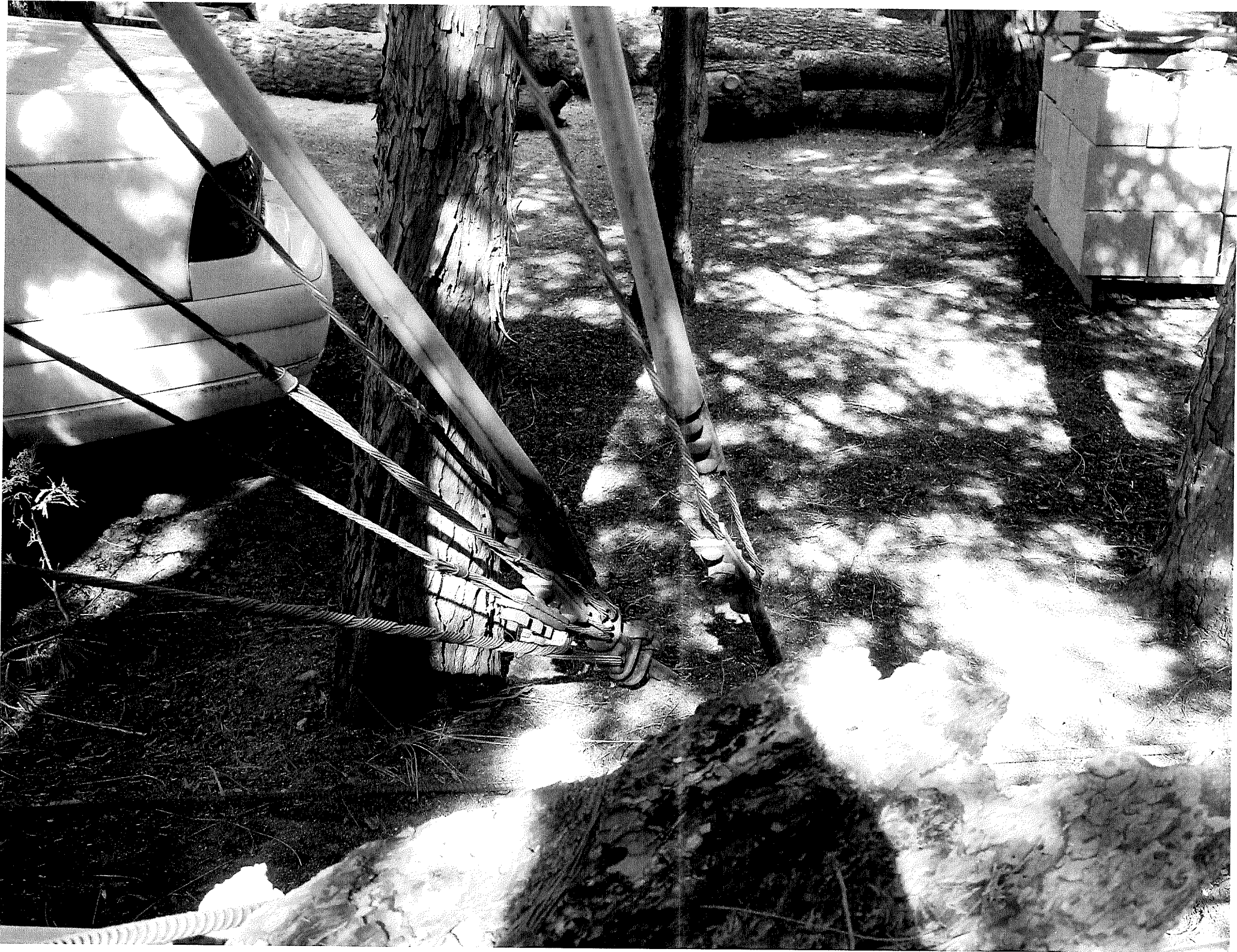
that when SCE gets the JPA they send it to all three of the groups. When the JPA is returned they will see all three groups, but they may only see the approval from the first group that replies, and then a Form 7 that says they are waiting on two more approvals. This has been the actions that SCE has been taking, but he stated that maybe they will need to readdress this internally.

Agenda Item 4 - Review of Action Items -

- None at this time.

The meeting adjourned at 12:53 p.m. until October 16, 2019.

Anali Spencer - Committee Staff



Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

October 16, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 1:06 p.m. at the Committee office. Those in attendance were:**

Mr. Earle Carrion	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Camile Bowie	Southern California Edison
Ms. Maria Ortiz	XO Communications
Ms. Lupe Hernandez	Teleport Communications America
Mr. Ronald Schram	City of Los Angeles
Mr. John Bacon	City of Los Angeles
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. David Campo	City of Lompoc
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner
Ms. Tondra Hill	Time Warner
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. April DeBarge	Southern California Edison
Mr. Bret Plaskey	Frontier Communications
Ms. Cory Crawford	AT&T California
Mr. Glenn Leckie	Frontier Communications
Mr. Pedro Garganera	MCI Telecom/MCI Metro
Mr. Rey Lopez	Time Warner
Ms. Shawn Henderson	T-Mobile USA
Mr. Wayne Brown	Southern California Edison
Ms. Yvonne Johnson	AT&T Mobility

Mr. Carrion called the meeting to order at 1:06 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Carrion inquired if the members had any comments or concerns in regards to the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Carrion opened up the discussion to CPUC activity. Mr. Carrion opened that Mr. Mathisen had stated that there would be a workshop at the end of September. Mr. Carrion asked Ms. Crawford if Mr. Mathisen had any notes. Ms. Crawford stated she would check with Mr. Mathisen. Mr. Plaskey stated that he did not have anything from Frontier’s regulatory people in regards to updates. All the work shop plans/proposals were submitted by the five primary utilities that were requested to submit. Mr. Carrion asked Ms. Crawford to let him know if she hears from Mr. Mathisen. Ms. Crawford confirmed that he was inquiring about updates for Item 1630, which Mr. Carrion stated it was. Mr. Plaskey stated that it was about the OII on the new pole database.

Ms. Crawford stated that she heard from Mr. Mathisen. He stated that the workshop report has been filed and can be found at the CPUC website and that parties’ comments are due on 10/22/19.

Agenda Item 3 – Item 1665: Attachment After Denial – Make Ready Rearrangement (9/18/19)

- Mr. Carrion opened the discussion to the new item on Attachment After Denial – Make Ready Rearrangement. Mr. Carrion stated that he had a comment on rearrangement without approval. If any rearrangement is denied, Crown Castle would like to see specific reasons as to why on the JPA. That way Crown Castle is clear on their end if they are proposing any rearrangement, they need to know as to why they are being denied. He further stated that this goes for any type of denial. Ms. Pranata stated that she had received an email from Mr. Garganera. Mr. Garganera stated that at the last meeting MCI Telecom/MCI Metro had a denial on a Form 7. They met with their vendor, who stated they did not receive the Form 7 on time and went ahead and did the attachments the way they wanted on the original Form 2. He further stated that they did rearrangements on SCE’s P-Comm, but at the meeting their vendor agreed that they will go back and correct their unauthorized attachments and unauthorized arrangements. Mr. Carrion stated that it sounds like if this is seen it be worked out with the two individual members independently. Mr. Garganera stated that MCI Telecom/MCI Metro plans on contacting the person who issued the Form 7 on how to move forward addressing the issue. Mr. Carrion inquired if this item should remain open. Ms. Hernandez stated that Mr. Brown wanted to know what can be done when the unauthorized rearrangements happen. The issue was it had an impact to their substation. The denial was received because SCE’s communication was lowered so MCI Telecom/MCI Metro’s attachment could be where they wanted it to be. She further stated that SCE wanted to know what the recourse for that kind of work was. Mr. Carrion stated that he understands where Mr. Brown was going seeking a penalty, but he believes this could be resolved if examples like this are consistently brought up at the meetings so it gets communicated to everyone that this is not allowed per SCE guidelines. If everyone knows it, it should alleviate the amount of times this is seen in the field. Ms. Prescott stated that Mr. Brown made it seem like this was happening quite a bit. Mr. Garganera stated that this one went through the cracks. He stated that MCI Telecom/MCI

Metro have a lot of vendors, but he quickly contacted the vendors and let them know that they should have known not to touch the SCE P-Comm cables. Mr. Plaskey stated that this is the purpose of the 45 days, to give everyone a chance and this is why they went to electronic forms so they wouldn't wait for mail. He stated that the Form 7 is sent electronically and they have 45 days. If the JPA is denied and someone goes and rearranges, that is an issue. Mr. Plaskey stated that by Mr. Carrion's perspective of wanting to know why they are denied, Frontier will work with them. Mr. Carrion stated that he would like to have an offline conversation with Mr. Plaskey on that. Mr. Plaskey stated that they should be in direct contact with the other member not the contractors. He inquired if he should expect questions from Mr. Carrion or Crown Castle's contractors. Mr. Plaskey stated that it is better that he speak with just Mr. Carrion vs. explaining the same thing to multiple contractors. Mr. Bacon stated that LADWP has one point of contact, and the contractors cannot talk to anyone else. They have only one point of contact that gets the Form 7's and denials. Mr. Plaskey stated that it is not his job to train another member's contractor on how to do JPAs. They still have to figure out what to do when a denial is sent and the contractor goes to do the work anyway. Mr. Bacon stated that they should ask if there is a time limit to remove these, penalties, or can are the owners allowed to remove it from their facilities. Mr. Brown stated that SCE does not want to remove them from their facilities in case of any safety hazards or the type of line it is and SCE does not want to be held liable. Mr. Plaskey stated that it also goes into the records are now incorrect. Mr. Carrion stated that Crown Castle strives to make any rearrangement involved is compliant and safe. Mr. Carrion quoted Ms. DeBarge from the last month meeting minutes that "safety comes first." Mr. Carrion stated that if safety is a concern, then doing a rearrangement of the rearrangement of all the joint pole owners to make it safe. They track down the responsible party and remedy the situation deemed unsafe. Mr. Brown stated that a rearrangement could be a denial of attaching onto the pole. Mr. Carrion stated that the specifics as to why a JPA is denied should be explained. Mr. Brown stated that the other party is doing what they want to do if the rearrangement is denied. Mr. Brown stated that this may not be safe according to the other owner because the pole may be deteriorated. SCE does not allow attachments to deteriorated poles, whether they will be replaced in one to two years. Ms. Bowie asked if any member was ok with facilities being rearranged, especially telecom. She stated that the telecomm is attached to their substation and any rearrangement upsets the communication to the substation and it becomes a bigger issue. She stated that what SCE wants known is that they do not want anyone rearranging SCE's telecomm. Mr. Bacon stated that Ms. Bowie brings up a good point, that it is a safety issue especially if it is tied to substations and for relay information in fire hazard areas. Mr. Bacon stated that the communication companies deserve an explanation as to why they do not pass, and if they can clarify for them whether communication on the phone or via the JPA. Mr. Bacon stated that going out and rearranging facilities causes a risk at damaging cables and safety issues. Mr. Plaskey stated that a lot of the rearranging is unnecessary costs, he doesn't understand why Frontier is asked

to move when there is plenty of space to work with. Mr. Bacon stated that it's important to open the doors to communication. Mr. Brown stated that when another member comes in to rearrange a facility, for example, moving Frontier down and then they give the base owner the rest of the space, he believes that should be Frontier's call if they want to give up the space. Mr. Carrion stated that they should keep this item open for one more month. Members should be more open about the type of rearrangements allowed, if any, and the conditions when rearranging.

Agenda Item 4 – Miscellaneous – Mr. Carrion inquired if there were any miscellaneous items.

- Mr. Carrion had a question about the sharing of anchors discussed the previous month. He stated that in the past it was mentioned, if an anchor had an open eyelet, attachment to that anchor was ok. The way he understood last month's discussion, a U-turn has been taken on this, and if a new down guy needs to be bound, a new anchor needs to be installed completely. Mr. Bacon stated that most companies do not have a record of what type of anchor was placed and how many helixes it is, not allowing them to give the other member a rating. If someone attaches to that eyelet, then LADWP wouldn't be able to guarantee the strength of the anchor. Mr. Bacon stated that for safety reasons they prefer the other members add their own anchor and helixes to have the strength to hold up what they require for the pole.
- Mr. Brown stated that when SCE PTD's a pole, he wants to know what the expectation of the other member's attachments. The example he gave is SCE is doing a temporary transfer, but they are being denied. He stated that they will not leave the other member hanging on the ground, so they will do at the minimum a temporary attachment. Mr. Bacon stated that for a power to power if PTD they are all for it. The problem is SCE uses different type of hardware from LADWP. It is not a safe factor and they may assume it is SCE facilities and not LADWP's. They get confusion on whose circuits it is on. LADWP will deny it because SCE will put different hardware and he was not speaking on behalf of the communication companies. Mr. Bacon stated that LADWP is billed for the transfer and won't go and do the work two times. Mr. Brown stated that the cost for a temporary transfer, not permanent. Mr. Bacon stated why pay to temporary transfer when they can go do it themselves. Mr. Brown asked what SCE should do with the facilities. Mr. Bacon stated to leave LADWP with the PTD. Mr. Brown stated that this was mainly being directed toward the communications. Mr. Bacon stated that when it's power to power the temp transfer is not the same. Ms. Hernandez stated that there may be a training issue. That they should bring up the temp transfers and remind everyone that this has been agreed to before. Mr. Plaskey stated that it seems like a lot of this may be geared towards Frontier. He stated that Frontier's leadership had not agreed to this with SCE. That they need to

set up a meeting with SCE, involving Albert and Oscar, taking a stance on the Form 2 that Frontier wants to PTD and SCE goes and PTD and does the transfer as well. Mr. Brown stated that a lot of cases Frontier is not changing the pulling routine and denying the Item 83. Mr. Plaskey stated that they should take this offline and sit down with leadership. Mr. Brown stated that if the meeting is to be done this year, he would like to do it before 12/5/19, because many people go on vacation. Mr. Plaskey stated that they will try to set something up in November.

Agenda Item 5 - Review of Action Items -

- CPUC party comments due 10/22/19.

The meeting adjourned at 1:51 p.m. until November 20, 2019.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

November 20, 2019

A meeting of the **ad hoc Compliance Committee** took place on the above date, at 12:52 p.m. at the Committee office. Those in attendance were:

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. John Bacon	City of Los Angeles
Ms. Jamie Garcia	City of Los Angeles
Mr. Jeff Williams	City of Los Angeles
Mr. Bret Plaskey	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Camile Bowie	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Mr. Mina Shehata	City of Burbank
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff

Those attending via teleconference were:

Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P.
Mr. Dan Luty	Extenet Systems
Ms. Kay Black	AT&T California
Ms. Yesenia Delgado	Time Warner
Mr. Pedro Garganera	MCI Telecom/MCI Metro
Ms. Yvonne Johnson	AT&T Mobility

Mr. Serrato called the meeting to order at 12:52 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes. Ms. DeBarge inquired about the approval of minutes earlier today in the Administrative Board meeting. Ms. Pranata replied the approval was only for Administrative Board minutes, not for all other minutes. Mr. Serrato explained the Compliance Committee minutes are online on the SCJPC website and any comments or questions can be discussed now. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened up the discussion to CPUC activity and inquired the group if there are updates on this item. Mr. Williams commented there are no updates due to PSPS (Public Safety Power Shutoff) events. He added the CPUC has a new president and she is considered as a problem solver. The new president also has extended some deadlines, including the database issue.

Agenda Item 3 – Item 1665: Attachment after Denial – Make Ready Rearrangement (9/18/19)

– Mr. Serrato opened the discussion to Attachment after Denial – Make Ready Rearrangement. Mr. Serrato inquired if there are updates from an offline meeting that SCE supposed to have with a particular member. Mr. Brown replied he would have to verify with Valerie. Mr. Brown explained that SCE sent a Form 7 to deny a company’s attachment one or two days after the 45 days approval limit. The company proceeded after they were denied. SCE specified on the Form 7 that the company could not attach above ECS (Edison Carrier Solutions). The company then rearranged Edison’s telecoms to make room for an attachment after denial. Ms. Bowie discussed the ramification for attaching above ECS, the issue was on the rearrangement. Communications are tied to substations so if a company removed or moved Edison’s telecoms, the communication link will be broken and it can have all kinds of effects. Ms. Bowie stated that SCE’s proposal was not to attach above ECS. Mr. Serrato stated the item will remain open.

Agenda Item 4 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Plaskey commented Frontier received NG’s Form 2 for placing solely owned temporary poles under Section 3. Mr. Plaskey stated that Frontier don’t need to be notified if members are placing solely owned poles. Mr. Plaskey inquired if members are required to send solely owned pole set notification. Ms. DeBarge replied that SCE will send out notification for members in the area. Mr. Plaskey stated he will notify his team to disregard those poles if Frontier does not need to attach.
- Mr. Serrato commented that Crown Castle has been getting denials “denied off the TTC standards” with no other explanations and inquired how to approach the denials. Mr. Serrato added that he brought up this issue before, and the member who issued the denial stated that it was the member’s internal term and the JPA is still denied. Ms. Prescott commented that when members denied a JPA, they should put a reason, not just entered an internal code. Mr. Serrato stated if he asked the member for a valid reason, it will push back the time line. Ms. Bowie commented she is unsure if Valerie communicated the acronym to everyone, TTC is Trans Telecom Communication. The acronym is used when the members attempting to attach above SCE’s trans telecom. Ms. Prescott inquired if the cable is labeled “TTC”. Ms. Bowie replied the cable

is labeled as SCE's communication line. Mr. Serrato wanted to confirm that SCE will not allow members to attach above P-Comm. Ms. Bowie confirmed the statement. Ms. Black commented that AT&T California has been receiving the denials as well. She inquired if they are not going to invade the safety clearance zone: why attachment is not allowed above P-Comm and why is this a special rule. Mr. Williams commented that LADWP has this rule as well, nothing goes above P-Comm. Mr. Williams explained that when there are automated switches, power company may have to take the communication line up to the automated switch, and take the communication line back to their station. They do not want to go thru other attachments or antennas, to go up to the automated switch. Ms. DeBarge agreed with Mr. Williams. Mr. Williams stated LADWP usually allow an arm. Mr. Serrato asked Edison if P-Comm can be on an arm with Crown Castle, not on the safety clearance zone. Mr. Wayne replied it would be OK.

- Mr. Serrato inquired if Crown Castle could get a list of deteriorated poles and replacement schedule ahead of time before proposing a JPA with those deteriorated poles. Mr. Brown replied that he will check internally. Mr. Plaskey inquired if the information would be in SPIDAcac. Mr. Brown replied the intrusive inspection data would be in SPIDAcac. Mr. Serrato inquired if there is an indication that the pole is deteriorated in SPIDAcac such as recognizable attributes. Mr. Brown stated he will find out internally but members could ask Edison the meaning of the codes. Mr. Shehata stated that even if there is data on deteriorated poles, there is no schedule. Mr. Brown commented the poles would have different priority codes in SPIDAcac but no replacement date schedule. Mr. Plaskey commented that Crown Castle could utilize the contact list that he sent over, to find out Frontier's pole replacement job schedule.
- Mr. Serrato stated Crown Castle is submitting *previously tenant to owner conversion* JPAs, which have no constructions involved. Mr. Williams stated it would be a purchase of interest with notation 'no constructions involved'. He added Crown Castle need to specify the tenant that is becoming an owner. LADWP would need a make-ready package removing the facility from record, with a reference to the JPA. He explained that LADWP would need to update two different databases, tenant and JPA. Mr. Serrato stated that they're not removing the attachment, just changing the record. Mr. Williams commented that pole loading is not required for LADWP but other members might need pole loading. Ms. Black commented that she will notify her team that pole loading is not needed on those JPAs. She inquired what would be the exact notation under location or nature of work on said JPAs so she could communicate the information to her team. Mr. Williams suggested "Tenant to ownership conversion" and "Tenant owner conversion". Mr. Serrato stated because there is no work, there will be no Form 48.

Agenda Item 5 - Review of Action Items -

- Mr. Serrato to come back with solidified process on how to do tenant conversion JPAs.
- Mr. Serrato to educate his team on different ways to find out if a pole is deteriorated before submitting a JPA.

The meeting adjourned at 1:26 p.m. until January 15, 2020.

Angela Pranata - Committee Staff