Date Filed: October 05, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(NESC Non-Compliance – Clarification of "Attacher Name") Referring to OCC-190, Attachment 1, which identifies communications attachers associated with NESC non-compliant poles, the town where the pole is located, relevant work order, the specific non-compliant issue, and the issue's resolution: clarify whether the "Attacher Name" column identifies in every instance

a. the existing attacher whose facilities caused or contributed to the NESC non-compliance condition (i.e., the attacher responsible for the violation), or
b. the attacher that submitted the pole attachment application that led to discovery of the non-compliance, regardless of which attacher's facilities caused the non-compliance. If the answer differs for different entries, identify which entries fall into each category.

Response:

a. The column designated as "Attacher Name" in OCC-190, Attachment 1, does not identify, in every instance, the existing attacher whose facilities caused or contributed to the NESC non-compliant condition. Please note that, on September 9, 2026, PURA issued a ruling on the Company's Motion No. 044 in Docket No. 19-01-52RE01, PURA Investigation of Developments in the Third-Party Pole Attachment Process – Make Ready, granting the opening of a new docket to, among other things, investigate modifications to the current cost allocation methodologies.

b. The column designated as "Attacher Name" in OCC-190, Attachment 1, identifies the attacher that submitted the pole attachment application associated with the reference work order. NESC non-compliant conditions are often identified during the engineering review of an attachment application. Accordingly, the attacher listed in Attachment 1 is the applicant whose attachment request led to the discovery and evaluation of the condition, regardless of which existing attacher's facilities may have caused or contributed to the non-compliance. OCC-190, Attachment 1, was not intended to identify, and generally does not identify, the specific existing attacher responsible for the non-compliant condition.

   Because the entries reflect the applicant associated with the attachment request, all entries in the "Attacher Name" column fall within category (b).