

**COMMENTS ON WORKSHOP ON POLE AND CONDUIT DATABASES  
AND APPLICATIONS IN CALIFORNIA MARCH 17, 2017**

Dear President Picker and Ms. Malashenko,

I am the Joint Pole Association (“JPA”) manager for ExteNet Systems (California) LLC (U-6959-C). ExteNet received its CPCN in 2006 and has deployed communications facilities to meet customer needs in both underground conduit and aerial attachments on utility poles. We therefore have substantial experience with pole attachment issues in California.

I attended the workshop held March 17, 2017 and found it very informative as well as enlightening. In particular, it was helpful to learn that numerous communications carriers are encountering difficulties getting information required to attach to utility poles in a timely fashion

In the absence of a shared data base, ExteNet currently has to request utility maps and data sheets from jointly owned poles from electric utilities in order to apply for attachments. In the case of PG&E, this process is taking up to 2 months to obtain the maps and data sheets, and then we must send back the information to PG&E so it can verify that the pole is a joint use pole and the date of the last inspection. To say the least, it is very inefficient to request information that an electric utility already has in its records, wait 2 months to get it, and then send it back for verification.

ExteNet strongly supports the creation of a centralized database because it will not only resolve the issue of procuring necessary information in a timely manner, but may improve safety of utility poles. Currently, General Order 95 requires each utility to inspect all the poles they are attached to on a regular basis. In the case of the detailed inspections, each utility is required to do a structural calculation as well as an intrusive inspection which requires boring into the pole. If there are 5 utilities on the pole there is the potential of having 5 different holes in the pole all at different intervals depending on each utilities inspection cycle. Although the bore holes are filled after the inspection and/or treatment, the redundancy in these tests could, over time, result in a failing grade well before it should. Knowing the last date of inspection, the type of inspection and utility performing the inspection by whom could enable the Commission to consider revising General Order 95 to eliminate some of the redundant intrusive inspections, thereby saving communications utilities time and money while increasing the life of utility poles.

Developing a centralized or shared database will take some time, as it will require the cooperation of all the utilities involved and compiling all the data from each to ensure accurate records for each pole. In the meantime, ExteNet respectfully requests that the Commission investigate whether immediate improvements can be made to the cumbersome process of getting required information for pole attachments so that it gets closer to the prescribed 15-day turnaround time.

Thank you for your time and consideration.

/s/Wendy Mueller

JPA Manager  
Extenet Systems (California) LLC  
925-895-4614  
wmueller@extenetsystems.com