

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
Accelerating Wireline Broadband	)	WC Docket No. 17-84
Deployment by Removing Barriers	)	
to Infrastructure Investment	)	

**REPLY COMMENTS OF
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

The National Rural Electric Cooperative Association (“NRECA”) submits these Reply Comments in response to the Fourth Further Notice of Proposed Rulemaking (“Further Notice”) in the above-captioned proceeding.¹

The Federal Communications Commission (“FCC” or “Commission”) has devoted considerable resources to bridging the rural/urban digital divide and NRECA welcomes this much needed attention. Further, NRECA appreciates the Commission’s efforts to promote rapid broadband deployment and encourages pursuit of this goal with a focus on protecting electric grid reliability and safety and ensuring that electric customers are not unduly burdened with broadband expansion costs. Although attachments made to poles owned by many electric cooperatives are not regulated, the issues raised in the above-captioned proceeding are important to all pole owners,

¹ *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Fifth Report and Order, Fourth Further Notice of Proposed Rulemaking, and Orders on Reconsideration, FCC 25-38, WC Docket No. 17-84 (July 25, 2025) (“Further Notice”).

and NRECA respectfully offers its observations from the perspective of pole owners that are rural electric cooperatives.

A. Background on NRECA

NRECA is the national service organization for nearly 900 not-for-profit rural electric cooperatives that provide electric power to 56% of the nation's landmass, including approximately 42 million people in 48 states, or approximately 13 percent of U.S. electric customers. Rural electric cooperatives serve 88% of the counties of the United States, including 92% of the nation's 353 persistent poverty counties.

Rural electric cooperatives were formed to provide safe, reliable electric service to their member-owners at the lowest reasonable cost. They are dedicated to improving the communities in which they serve, and the management and staff of rural electric cooperatives are active in rural economic development efforts. Electric cooperatives are private, not-for-profit entities that are owned and governed by the members to whom they deliver electricity, are democratically governed, and operate according to the seven Cooperative Principles.² All of NRECA's electric distribution cooperatives are small business entities as defined by the U.S. Small Business Administration.

B. Electric Cooperatives Are Eager for Broadband Deployment To Reach Their Communities

America's rural electric cooperatives are committed to promoting the deployment of advanced telecommunications capabilities within the rural communities and areas in which they serve. America's cooperatives play a crucial role in the development of broadband infrastructure

² The seven Cooperative Principles are: Voluntary and Open Membership, Democratic Member Control, Members' Economic Participation, Autonomy and Independence, Education, Training, and Information, Cooperation Among Cooperatives, and Concern for Community.

to serve rural unserved and underserved locations, by supporting providers of all types in efforts to have vital broadband services deployed to their unserved and underserved communities. One measure of how important broadband services are to rural unserved areas covered by NRECA member cooperatives is that over 200 NRECA members currently are working to provide these much-needed broadband services themselves or through partnerships with affiliated or unaffiliated ISPs. Many additional projects are being considered.

Electric cooperatives view broadband deployments as critical rural development projects necessary for economic growth, distance learning opportunities, and telehealth access. Having served these remote communities for decades with reliable electric service, electric cooperatives are devoted to the well-being of the rural members they serve and have a keen interest in ensuring the development of safe, reliable Internet access service, no matter who provides it.

C. Pole Attachment Requirements Must Minimize Unnecessary Burdens on Electric Customers.

America's not-for-profit electric cooperatives are committed to keeping the lights on at a cost local families and businesses can afford. This commitment to providing affordable, reliable, and safe electricity underpins NRECA's participation in this proceeding. Electric cooperatives operate without shareholders and are uniquely affected by regulatory requirements. Any increased costs for cooperatives must be passed along directly to their electric consumer-members at the end of the line. These electric consumer members include, of course, the broadband providers serving these communities and engaged in this proceeding. Although attachments to the distribution poles owned by NRECA's electric cooperative members are not regulated by the Commission, electric cooperatives understand all too well that accommodating large numbers of new attachment requests safely and efficiently requires a cost-effective process with all relevant parties – pole owners and attachers alike – rowing in the same direction.

D. Certain Proposals in the Further Notice Proceeding Will Facilitate Broadband Deployments

Certain measures being addressed in this proceeding will contribute to a smooth and flexible process that will better facilitate broadband deployments by implementing common sense measures that all responsible attaching entities should find unobjectionable. Several such commonsense measures have been proposed in this proceeding and should be adopted by the Commission. These include the following proposals:

1. To avoid confusion caused by overlapping make-ready work, communications companies should install their new attachments within 120 days after the completion of make-ready.³
2. In order to create and preserve valuable pole space and pole loading capacity, existing attachers should remove their unused attachments.⁴
3. To ensure that pole owners do not waste time with unreliable applications, poorly planned routes, and inefficient attachment activity, attachers should better plan their routes and deployment strategies. NRECA agrees that collaboration between utility pole owners and communications attachers is the key to successful deployments.⁵ To enable such collaboration, communications attachers can and should do much better at planning their deployments and staffing properly in advance of submitting applications for large-scale deployments.⁶
4. So that future attachments are not delayed and made more expensive by noncomplying practices of existing attachers, all existing and new attachers must comply with the pole attachment permitting process, with the National Electrical Safety Code, and with the pole owner's design and engineering standards. To provide the necessary incentives to make this happen, pole owners should be authorized to assess noncompliance fees and charge "imposition" costs to remedy such noncompliance.⁷

³ Further Notice at ¶¶ 52-53.

⁴ CCU Comments, at pp. 54-56.

⁵ Comments of the Coalition of Concerned Utilities on Fourth Further Notice of Proposed Rulemaking, at pp. 8-10 ("CCU Comments").

⁶ CCU Comments, at pp. 15-20.

⁷ CCU Comments, at pp. 56-58.

E. Other Proposals In The Further Notice Proceeding Should Be Rejected

Certain other measures being addressed in this proceeding should be rejected because they would be dangerous, would compromise the integrity of the pole distribution system, and/or would be too onerous to be practical.

1. Contractor onboarding – electric utilities have processes in place to analyze and review the personnel allowed to perform work in the power space. Those processes cannot be shortchanged with the artificial restrictions proposed by some entities.⁸ The safety and reliability of the electric system cannot be jeopardized.
2. Boxing, extension arms and temporary attachments – such practices are not commonplace and are often prohibited. The reason such practices are not commonplace is because they are poor attachment practices that jeopardize the safety of personnel working on the pole and because they make it harder to maintain the system, which increases costs. NCTA’s proposal to allow such practices should be rejected,⁹ and utilities instead should be allowed to establish their own processes for permitting the occasional boxing, extension arm or temporary attachments, if they allow them at all.
3. One touch make-ready should not include any work in the power space on poles.¹⁰ Work in the power space can be hazardous, is potentially fatal, and cannot be artificially accelerated. This is true even when the work is done under the utility pole owner’s supervision, and such work cannot be supervised by communications company attachers.
4. Streetlight-only poles – some cooperatives own poles with only streetlights attached. They are typically designed for streetlight use only and cannot easily be modified to allow wireless or wired attachments. That makes accommodating such attachments considerably more difficult than attachments on electric distribution poles.¹¹

⁸ Comments of NCTA – The Internet & Television Association, at pp. 10-14 (“NCTA Comments”); Comments of INCOMPAS, at pp. 12-14 (“INCOMPAS Comments”); Comments of Crown Castle Fiber LLC in Response to Fourth Further Notice of Proposed Rulemaking, at pp. 13-16 (“Crown Castle Comments”); Comments of the American Conservative Union Foundation’s Center for Regulatory Freedom, at pp. 9-10 (“CPAC Foundation Comments”).

⁹ NCTA Comments, at pp. 24-25.

¹⁰ NCTA Comments, at pp. 21-24.

¹¹ Since these poles often are engineered to hold no more than a light, allowing access would likely require replacement of the lighting only pole.

5. Limitations on make-ready cost recovery. Make-ready work is performed for the benefit of attaching entities, not for the utility pole owner. The proposals offered by some attaching entities to limit the ability of pole owners to recover their out-of-pocket costs to accommodate attachments for the benefit of these attaching entities are counterproductive,¹² as they will make pole owners reluctant to bear the time and expense of performing such work for the benefit of attaching entities. Collaboration between pole owners and attachers, which includes the recovery of pole owner expenses, should be encouraged instead.

CONCLUSION

Because NRECA's electric cooperative members serve the most rural, remote, and high-cost communities in America – and because these communities currently find themselves unserved or underserved with broadband, NRECA supports meaningful efforts to enhance broadband deployments and to remove barriers to full deployment without putting additional burdens on utility pole owners or jeopardizing electric grid reliability and safety. We appreciate this opportunity to offer our perspective in this pole attachment proceeding.

Respectfully submitted,

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¹² NCTA Comments, at pp. 8-10 and 14-19; INCOMPAS Comments, at pp. 6-10; Crown Castle Comments, at pp. 2-5; CPAC Foundation Comments, at pp. 6-8.