



**Connecticut Department of  
Energy & Environmental Protection  
Bureau of Energy and Technology**

## Confirmation Receipt

<b>Docket Number:</b>	19-01-52
<b>On Behalf Of What Entity:</b>	CTIA
<b>Contact Name:</b>	Dianna Weeks
<b>Telephone No.:</b>	(860) 541-7737
<b>E-mail Address:</b>	dianna.weeks@lockelord.com
<b>Submitter of Filing:</b>	Locke Lord Llp
<b>Pertains To What Entity:</b>	CTIA
<b>Form Submitted:</b>	NoticeComments
<b>Date / Time:</b>	04/29/2019 10:23:08 AM
<b># of Attachments:</b>	1
<b>Attachment Names:</b>	Ltr. J. Gaudiosi in Lieu of CTIA Comments (Docket No. 19-01-52).DOCX

Do another "Add to a Current Docket Filing"

Goto PURA Web Filing - Start Page

PURA's Home Page

BETP's Home Page



20 Church Street  
20th Floor  
Hartford, CT 06103  
Telephone: 860-525-5065  
Fax: 860-527-4198  
www.lockelord.com

David W. Bogan  
Direct Telephone: 860-541-7711  
Direct Fax: 866-877-2145  
david.bogan@lockelord.com

April 29, 2019

***Via Electronic Filing and U.S. Mail***

Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

**Re: Docket No. 19-01-52 – PURA Investigation of Developments in the Third Party Pole Attachment Process**

Dear Mr. Gaudiosi:

CTIA hereby submits this letter in lieu of comments in response to the Public Utilities Regulatory Authority's ("Authority's") April 5, 2019 Notice of Request for Written Comments (the "Notice") in the above-referenced proceeding.

The Notice acknowledges the efforts of the Authority and stakeholders "to develop and implement a safe, efficient, and fair pole attachment process."<sup>1</sup> Going forward, the Authority intends to proceed in four phases as described in the Notice. Phase 1 will focus on identification of the issues and concerns of each stakeholder, along with the factors causing or contributing to each. The Notice provides a table reflecting the Authority's preliminary draft of issues and related factors, which it states are intended to serve as a "scoping document" to ensure that the solutions considered in Phase 2 of the proceeding will be rooted in a common understanding.<sup>2</sup>

CTIA has no comment on the issues and related factors set forth in the table, but instead respectfully implores the Authority to move expeditiously to address issues related to the pole attachment process. As illustrated by Verizon's April 23, 2019 request for the Authority to convene a mediation team to address the growing number of pole attachment applications subject to delays that are approaching one year,<sup>3</sup> the prevailing situation calls for immediate action by the Authority in order to fulfill its objective of an efficient pole attachment process. The wireless

---

<sup>1</sup> Notice at 1.

<sup>2</sup> *Id.*

<sup>3</sup> See, Ltr. To J. Gaudiosi, Docket No. 18-03-37, *Application of MCI Metro Access Transmission Services Corp. for Approval to Install Facilities Within Certain Public Rights-of-Way*.

Atlanta | Austin | Boston | Chicago | Cincinnati | Dallas | Hartford | Hong Kong | Houston | London | Los Angeles  
Miami | New Orleans | New York | Princeton | Providence | San Francisco | Stamford | Washington DC | West Palm Beach

Jeffrey R. Gaudiosi, Esq.  
April 29, 2019  
Page 2

industry is in the early stages of 5G network deployment. By ensuring that the pole attachment process in Connecticut is efficient, the Authority will encourage wireless network deployment and investment in Connecticut. CTIA stands ready to assist the Authority in its effort to achieve this objective, not only for the benefit of attachers, but also for all of the State's consumers of communications services.

Please feel free to contact Kathryn Boucher of this office (860-541-7714) or the undersigned should you have any questions regarding this submission.

I certify that a copy of this submission has also been filed with the Authority as an electronic web filing and is complete.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. Bogan", with a long horizontal flourish extending to the right.

David W. Bogan

cc: Service List