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# ATTACHMENT A

## ATTACHMENT A – VERIZON COMMENTS ON PROPOSED DECISION ON TRACK 2 ATTACHMENT DATA

**Recommended Changes:** Verizon recommends that the PD be revised so that:

- Workshops are held to develop Track 2 attachment data, as anticipated by the Assigned Commissioner’s Amended Scoping Memo and Ruling
- The requirements that attachers provide the proposed list of attachment data points be eliminated, pending the development of attachment data points in workshops
- The Commission recognize that potential data points that are ultimately required for inclusion in the five major pole owners’ databases are confidential, trade secrets, and sensitive critical infrastructure information that should only be accessed under nondisclosure agreements, by those with a need to know and for the purpose of pole loading calculations.
- Pole owners shall implement (and update) robust cybersecurity measures for their pole databases to prevent security breaches of the pole owners’ and attachers’ data.

### Findings of Fact

1. The list of data points proposed in the October 8, 2020 *Ruling* ~~does~~ **are not necessary for the pole databases.** ~~include all relevant pole attachment information.~~

2. **Many of the** ~~Certain~~ data points proposed in the October 8, 2020 *Ruling*

are dynamic and would change depending on subsequent changes or modifications to a pole. ~~require revision to provide greater granularity and understanding.~~

3. Because ~~Certain~~ data points proposed in the October 8, 2020 *Ruling* are too variable and dynamic, they would be difficult to be relied upon for assessing safety or access to a pole and should be deleted.

4. Workshops were held in Track 1 of this proceeding and workshops are necessary in Track 2 to identify and define the specific data points for attachments that may be helpful for the Commission's goals in this proceeding of ensuring safety and competition.

5. To the extent that any pole attachment data is provided to pole owners for their pole databases, the record reflects that such data is highly sensitive, competitive trade secrets, and critical infrastructure information, the disclosure of which would cause competitive harm and/or could pose security threats.

## Conclusions of Law

1. It is reasonable to conclude that the proposed data points in the October 8, 2020 *Ruling* ~~shared utility and communication pole data~~ will not enhance and expedite the ability of utilities to assess the safety of their utility infrastructure due to the fact that the data points are dynamic and may become outdated.

2. It is reasonable to conclude that it is premature to decide which attachment data points may help to enhance safety and access to poles.

3. It is reasonable to conclude that the five major pole owners should manage their pole owner ~~attachment~~ databases.

~~4. It is reasonable to conclude that attachment owners should be responsible~~

~~to provide the information regarding their attachments to the five major pole owners.~~

5. It is reasonable to conclude that pole attachers **or owners** should cooperate with a company performing load calculations by promptly providing or making reasonably available the most recent intrusive pole test data and information regarding their facilities already on the poles, **per General Order 95.**

6. It is reasonable to conclude that the list of data points proposed in the *Ruling* should **not be adopted at this time for the pole owners' databases.** ~~revised as set forth in Attachment A to this decision.~~

7. It is reasonable to conclude that the five major pole owners must know the specifications of the existing attachments on their poles as they have a responsibility to determine whether pole attachment applications meet pole loading safety requirements.

8. It is reasonable to conclude that attachers must notify the five major pole owners when they alter their attachments.

9. It is reasonable to conclude that **prior to placing their attachments** all attachers should be required to provide the five major pole owners with the loading information for their attachments.

~~10. It is reasonable to conclude that a pole database with comprehensive pole attachment information may will provide greater efficiencies for attachers.~~

~~11. It is reasonable to conclude that each of the five major pole owners should identify all attachment statuses that will be tracked in their databases.~~

~~12. It is reasonable to conclude that terms in each major pole owner's databases should be standardized across pole databases as part of the Track 2 Glossary development process.~~

~~13. It is reasonable to conclude that, within reason, the five major pole owners~~

should not be liable for the accuracy of the attachment data received from attachers.

14. It is reasonable to conclude that, to the extent that any attachment data is required by the Commission, the data ~~this decision~~ should be made available to facilities-based CPCN and video franchise holders only pursuant to nondisclosure agreements and that such access should be restricted to persons with a need to know and for the purpose of performing pole loading calculations.

~~15. It is reasonable to conclude that attachment data required by this decision should be made available to state and local government officials upon request and provided that they identify the purpose for receiving access to the information.~~

16. It is reasonable to conclude that the five major pole owners should implement and timely update robust reasonable cybersecurity measures to prevent widescale public access to the attachment data required by this decision and that they would be liable for any breaches of other attachers' data.

~~17. It is reasonable to conclude that to the extent they are not already in place, this decision should decline to require third parties to execute a non-disclosure agreement to access the attachment data required by this decision.~~

18. It is reasonable to conclude that the five major pole owners and/or attachers may not require Commission staff to sign a non-disclosure agreement before receiving access to the attachment data required by this decision, given the applicability of General Order 66-D and Public Utilities Code section 583 to the staff.

19. It is reasonable to conclude that the five major pole owners and/or

attachers have not demonstrated that the attachment data required by this decision is confidential, trade secret protect, privileged, exempt from disclosure from Section V (Nondisclosure of the Commission's Right-of-Way Rules), or protected from disclosure by national security concerns.

~~20. It is reasonable to conclude that Commission staff may modify the data attachment requirements adopted by this decision by a resolution.~~

## O R D E R

IT IS ORDERED that:

1. The Commission staff shall hold workshops on which pole attachment data points may be necessary for enhancing safety and competitive access to poles. ~~The pole attachment data points attached hereto as Attachment A are adopted. These data points establish the minimum requirements for identifying each attachment to each pole.~~

~~2. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective~~

~~reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility)) shall include the data points identified in Attachment A for each owner's pole and shall store this information in each pole owner's data base.~~

3. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall manage their respective pole databases.

~~4. Pole attachers shall be responsible for providing the information required by Attachment A for existing and new pole attachments within 12 months from the effective date of this decision.~~

~~5. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall add the datasets set forth in Attachment A to their pole databases within six months from the date pole attachers provide the information required by Attachment A.~~

~~6. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall file a Tier 2 Advice Letter three months from the effective date of this decision and identify the specific format that attachers shall submit their data in, any additional data points they require in addition to~~

General Order 156; and expected timeline for the implementation of a database system enabling attachers to update their attachment information in real time.

~~7. Pole attachers shall maintain attachment asset management databases.~~

~~8. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall identify all pole attachment statuses that will be tracked in their respective databases. Terms shall be standardized across pole data bases as part of the Track 2 Glossary development process.~~

9. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall **propose** develop comprehensive attachment **data** descriptions for their databases **for discussion during the workshops**. Terms shall be standardized across pole databases as part of the Track 2 Glossary development process.

10. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall **propose** develop comprehensive attachment location descriptions for their databases **for discussion during the workshops**. Terms shall be standardized across pole databases as part of the Track 2 Glossary development process.

~~11. Every pole attacher shall maintain attachment asset management~~

databases.

~~12. Every pole attacher shall provide real time updates on any modifications made to their attachments, starting at the date specified by the respective pole owners initiating that functionality.~~

13. **During workshops, parties shall discuss the data points for attachments and whether and how updates may be made to the databases.** ~~Every pole attacher shall provide to the pole owner the loading information for each of their attachments affixed to that owner's pole.~~

~~14. Every pole attacher shall update the database if changes to a pole attacher's equipment alters the load of a pole.~~

~~15. Every pole owner shall notify the Commission's Communications Division, Safety Enforcement Division, and Utility Audits Branch of each attacher that fails to comply with the requirements adopted by this decision.~~

~~16. Attachers are liable for the accuracy of the attachment data they submit to each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]).~~

17. **To the extent that any pole attachment data is included in pole owners' databases,** Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall include a disclaimer indicating that the data may not be completely accurate, that the information provided is the most recent information available, and that it is the responsibility of the information requestor to verify and validate the information in accordance with all existing

safety requirements.

~~18. Any costs already incurred by any of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]), as well as the costs to implement the decisions in this proceeding, shall be itemized and made available to any attacher upon request.~~

~~19. For pole owners subject to a general rate case, those costs incurred to implement the decisions in this proceeding shall be distributed as appropriate between electric utility rates for electric attachments (e.g., cost of cataloging and making available in the pole database for any attachment data), and for pole attachment rates for costs incurred for communications attachments (e.g., cost of managing data submissions from attachers, providing technical support staff, information technology equipment).~~

~~20. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall make their respective pole attachment databases available to facilities-based Certificate of Public Convenience and Necessity and video franchise holders.~~

~~21. Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall make their respective pole attachment~~

databases available to any state and/or local government official upon request provided the official identifies the purpose for receiving access.

22. **To the extent that pole attachment data is included in their databases,** ~~e~~Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall implement **and update robust** reasonable **cyber**security measures to prevent widescale public access to their pole attachment databases.

23. **To the extent that pole attachment data is included in their databases,** ~~e~~Each of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) and attachers shall not require Commission staff to sign a nondisclosure agreement to gain access to their pole attachment databases.

24. ~~Unless a nondisclosure agreement has been in effect six months prior to the effective date of this decision,~~ **To the extent that pole attachment data is included in their databases,** the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) shall ~~not~~ require attachers to sign a nondisclosure agreement as a condition to gaining access to a pole owner's attachment database. **Attachers shall only use attachment data to complete pole loading calculations. Attachment data shall only be access by person**

with a need to know and shall not be used for anti-competitive reasons.

~~25. The pole attachment database information set forth in Attachment A is exempt from Section V: Nondisclosure of the Commission's Right of Way Rules.~~

~~26. If any of the five major pole owners in California (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T [AT&T is the collective reference for Pacific Bell Telephone Company d/b/a/ AT&T California, AT&T Corp., and AT&T Mobility]) or attacher claims that any of the pole attachment database information set forth in Attachment A is confidential, trade secret, privileged, and/or protected from disclosure as critical infrastructure information, any of the five major pole owners or attacher who wishes to assert such grounds shall file a motion, within 60 days from the effective date of this decision, for confidential treatment and shall follow the following protocol:~~

- ~~a. designate what portions of the pole attachment database information are confidential and/or privileged;~~
- ~~b. state a specific legal basis for the claim (e.g. not just "section 583");~~
- ~~c. explain in detail how the pole attachment database information fits within the legal basis for the claim of confidentiality and/or privilege;~~
- ~~d. provide a declaration in support of the claim of confidentiality and/or privilege; and~~
- ~~e. provide a name and email address of a person to contact regarding potential release of the information.~~

~~27. The Commission authorizes its staff in the Communications Division to modify, by resolution, the pole attachment database information set forth in Attachment A as needed to ensure the information required is up to date.~~

~~28. In a subsequent phase, the Commission will review whether Track 1 and~~

~~Track 2 requirements adopted in this proceeding should be imposed on Publicly Owned Utilities as well as smaller pole owners.~~

29. This Investigation remains open.

This order is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

~~ATTACHMENT A: POLE ATTACHMENT  
DATA BASE INFORMATION~~

## ATTACHMENT A

Item #	Field Name	Field Description	Field Type
1	Number of Existing Attachments on Pole	The number of existing attachments on any given pole.	Integer
2	Attachment Owner	The name of the company in ownership of a specific attachment.	Text
3	Attachment Identifying Number	The unique number used to track an attachment.	Text
4	Attachment Status	<i>e.g., submitted, pending, approved, installed, etc.</i>	Text
5	Attachment Status Date	Date of the most recent status update on any given attachment.	Date
6	Attachment Location on Pole	Location of attachment on pole ( <i>e.g., within-comm. zone, pole top, cross arm, pole mount, etc.</i> ).	Text
7	Pole Attachment Elevation	Expressed in feet and inches from ground.	Integer
8	Attachment Description	<i>e.g., cable, antenna, service drop, electric utility equipment, etc.</i>	Text
9	Attachment Dimensions	Detailed information specifying the size of the attachment. For cables, the gauge of the cable must be provided.	Integer
10	Attachment Weight	Weight of attachment. For cables, the weight per linear foot must be provided.	Integer
11	Attachment Grade	Grade of the attachment.	Text
12	Cable Tension	Tension of the cable.	Integer
13	Cable Tensile Strength	Tensile strength of the cable.	Integer
14	Cable Average Span Length	Average span length of the cable.	Integer
15	Wind Loading	Wind loading of the attachment.	Integer

16	Vertical Loading	Vertical loading of the attachment.	Integer
17	Bending Moment of Attachment	Calculation of the load added to the pole by the attachment.	Text
18	Support Structures	Identify support structures on pole added for the attachment, including but not limited to: guy wires, anchors, cross arms, etc.	Text
19	Abandoned Attachment	Identify whether the attachment has been abandoned.	Text
20	Voltage	Attachment voltage.	Integer

~~(END OF ATTACHMENT A)~~