



# Oregon

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## Public Utility Commission

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August 16, 2006

OREGON PUBLIC UTILITY COMMISSION  
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RE: **Docket No. AR 506 Phase II** - In the Matter of a Rulemaking to Amend and Adopt Permanent Rules in OAR 860, Divisions 024 and 028, Regarding Pole Attachment Use and Safety.

Enclosed for electronic filing in the above-captioned docket is the Public Utility Commission Staff's Comments on the Issue List for Phase II.

*/s/ Diane Davis dbd*

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c: AR 506 Service List

## STAFF'S COMMENTS REGARDING DIVISION 28 ISSUES LISTS

### AR 506 PHASE II

August 16, 2006

Verizon, Qwest and the Oregon Joint Use Association (OJUA) ask that the Commission address rules OAR 860-028-0120 through 860-028-0200 ("Sanction Rules") in this rulemaking. Further, the wireless communication industry asks the Commission to consider in this rulemaking issues unique to their operations. Staff opposes both of these requests.

While proposed and final rules need not be identical, the Notice of Proposed Rulemaking must be broad enough so that interested parties are adequately informed that their interests might be affected. *See generally Bassett v. Fish & Wildlife Commission*, 27 Or App 639 (1976). However, there is nothing in the Phase II Notice of Proposed Rulemaking (Notice) that suggests the Commission intends to entertain any discussion regarding the adoption, amendment, or repeal of the Sanction Rules. Staff further believes the issues raised by the wireless communication industry are beyond the scope of the Notice and this docket. Accordingly, Staff believes that, should the Commission decide in this docket to take up the Sanction Rules, or to address the wireless communication industry's issues, the Commission must first file a new Notice with the Secretary of State clearly putting the public on notice that this rulemaking will address both of these matters.

Besides the concerns about the scope of the Notice, Staff notes that Verizon, Qwest or the Oregon Joint Use Association (OJUA) have not shown sufficient justification to address the Sanction Rules now in this docket. They have not addressed specific problems or costs caused by these rules. Importantly, they have not proposed specific language recommendations for how to amend the Sanction Rules. Moreover, licensees and pole owners have not brought specific formal complaints to the Commission about the improper use of sanctions, for example, or other aspects of these rules.

There is no significant nexus between the rules proposed in AR 506 Phase II and the issues in 860-028-0120 through 860-028-0200. The rules in Phase II are focused on:

- Dispute resolution processes for pole owners and licensees;
- PUC recovery of hearing costs in resolving attachment disputes;
- Duties of pole owners over licensees;
- Processes and costs for licensees and pole owners in the making of new or modified attachments;
- Licensee rates, terms and conditions for maintaining attachments on poles after permitted and established; and
- Vegetation management responsibilities of occupants.

These bulleted items have been brought up in UM 1087 and other PUC pole attachment complaint dockets. These issues involving duties and responsibilities of pole owners and licensees need to be resolved now and should not be delayed. The goal of the rules in this Notice is to set better guidelines for pole owners and licensees that will reduce issues and disputes between them. This hopefully will result in sanction costs being reduced, and not increased, for licensees.

Finally, Staff also notes that Qwest has decided to continue its challenge to the Sanction Rules at the Oregon Supreme Court level.

In summary, if issues related to the Sanction Rules are to be addressed, Staff recommends they be considered in a separate docket and rulemaking proceeding. It will take Staff, the OJUA and the utility industry numerous workshops and considerable time to develop new proposed concepts and rules to address the sanctions and other issues.

T-Mobile, Cingular, and Sprint Nextel raise issues about wireless antennas and accessories being attached to poles and towers. These attachments bring special issues to pole owners and licensees in construction, operations, and maintenance on the rights of way. The wireless industry is still an emerging industry and brings unforeseen challenges to the utility industries that need to be thought out carefully. ORS 757.270 through ORS 757.290 do not specifically address wireless operators or their facilities on utility poles. Because of the challenges of wireless issues, Staff recommends that these matters also be put into a separate docket that will promote “safe and efficient utility poles, attachment installation practices and rights of way” as mandated by Oregon Legislature in 1999 (see Section 9, Chapter 832, Oregon Laws 1999).

## **CONCLUSION**

PUC Staff does not support the discussion of issues or rules that exceed the Notice for this rulemaking. Because there is pressing need to resolve the rules currently noticed in this docket, Staff recommends that this rulemaking progress in a timely manner so that the AR 506 rules can be officially adopted by year’s end, as the Commission has mandated. Further, Staff requests that the Commission limit its consideration to those issues that address the rules that are referenced within the Phase II Notice of Proposed Rulemaking and disregard the issues submitted that relate to existing PUC rules 860-028-0120 through 860-028-0200 and the wireless communications industry.

The issues raised by the wireless industry and those issues associated with existing PUC rules 860-028-0120 through 860-028-0200 should be put in separate PUC rulemaking dockets. OJUA, Staff and the industry will need to conduct workshops to develop sound policies and rules that should be considered for later adoption by the Commission.

**PUBLIC UTILITY COMMISSION**

**CERTIFICATE OF SERVICE**

AR 506

I, DIANE DAVIS, of the Regulatory Operations Division, Public Utility Commission of Oregon, hereby certify that on the 16th day of August, 2006, I served a copy of Staff's Comments Regarding Division 28 Issues List AR 506 Phase II upon all persons as indicated on the attached listing, by electronic mail and by depositing in the United States Mail at Salem, Oregon, with postage prepaid.

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Printed: 8/16/2006

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