

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

Rulemaking to Amend and Adopt Permanent Rules in OAR 860, Divisions 024 and 028, Regarding Pole Attachment Use and Safety.

In the Matter of

Rulemaking to Amend Rules in OAR 860, Division 028 Relating to Sanctions for Attachments to Utility Poles and Facilities.

Case No. AR 506

OCTA'S APPLICATION TO CLARIFY OR FOR RECONSIDERATION

I. INTRODUCTION

Applicant Oregon Cable Telecommunications Association (“OCTA”) respectfully asks that the Commission clarify or reconsider certain issues in its Order No. 07-137 (“Order”) in Docket AR 506. Overall, the OCTA believes that the Commission achieved its stated goals in this proceeding “to provide better guidelines that can be used by the Commission in mediating and resolving disputes between owners and occupants” Statement of Need and Fiscal Impact, AR 506 Phase II (filed with Secretary of State June 15, 2006). Indeed, the OCTA

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applauds the improved processes and greater clarity that the new rules will bring to Oregon's joint-use environments. The OCTA also recognizes, however, that in such a broad and complex proceeding it is not surprising that certain inconsistencies may result in the final analysis.

Specifically, while the Commission ruled that administrative costs for pole maintenance and operation may not be broken out and charged separately, certain language contained in the final rules conflicts with the Commission's Order and should be modified to eliminate the potential for disputes over these rules.

II. DISCUSSION

A. BACKGROUND.

In its Order, the Commission expressly adopted the Federal Communications Commission's ("FCC") approach to rental rates and other charges and thus declined "to adopt the [utilities'] recommendations that administrative costs for pole maintenance and operation be broken out separately." Order at 13 (citations to federal law omitted); *see also* Order No. 05-042, *Central Lincoln P.U.D. v. Verizon* at 15-16. Nevertheless, two of the newly adopted rules fail to reflect the Commission's Order (and previous order) in this regard.

First, although the Commission made it very clear that the administrative costs associated with applications processing are already recovered in the fully allocated rental rate, the final version of rule OAR § 860-024-0110(3) states that:

The rental rates referenced in section (2) of this rule do not include the costs of permit application processing, preconstruction activity, post construction

inspection, make ready work, and the costs related to unauthorized attachments. Charges for activities not included in the rental rates will be based on actual costs, including administrative costs, and will be charged in addition to the rental rate.

Order, Appendix A, OAR § 860-024-0110(3) (emphasis added and “redlining” omitted). Similar language is also contained in the rule on conduit attachments, OAR § 860-024-0310(6). The words “permit application processing” must be deleted from rules OAR §§ 860-024-0110(3) and 860-024-0310(6) to ensure consistency with the Order. Unless these rules are modified as requested by the OCTA, the OCTA is concerned that pole owners will exploit this inconsistency. Indeed, OCTA members report that several pole owners are continuing to charge separate permit application processing fees.

Similarly, the Commission also ruled that “only post-construction inspections . . . requested by pole occupants may be charged separately . . .” Order at 14 (emphasis added). Again, however, final rules 0110 and 0310 include “post-construction inspection” as separately chargeable without the important qualification contained in the Order. Consequently, OCTA requests that the Commission modify rule OAR § 860-024-0110(3) and 0310(6) to include language clarifying that only “post-construction inspections” requested by a pole occupant may be charged separately to the pole occupant, in accordance with the Order. Again, the OCTA understands that certain pole owners continue to charge occupants for post-construction inspections whether or not the occupant has requested the inspection, despite the Order.

B. STANDARD FOR RECONSIDERATION.

Any party may file an application for rehearing or reconsideration of a Commission order within 60 days from the date of service. OAR § 860-014-0095. Although

OCTA seeks more of a clarification than a true reconsideration of the Order, there is no other mechanism in the Commission's rules to request this type of relief. Accordingly, the OCTA's request should be reviewed under the standards of the reconsideration rule. This rule provides, in relevant part:

- (2) The application shall specify:
 - (a) The portion of the challenged order which the applicant contends is erroneous or incomplete;
 - (b) The portion of the record, laws, rules, or policy of the Commission relied upon to support the application;
 - (c) The change in the order which the Commission is requested to make;
 - (d) How the applicant's requested changes in the order will alter the outcome; and
 - (e) One or more of the grounds for rehearing or reconsideration set forth under section (3) of this rule.
- (3) The Commission may grant an application for rehearing or reconsideration if the applicant shows that there is:

* * *

- (d) Good cause for further examination of a matter essential to the decision.

The requirements of the reconsideration rule are met in this case, as set forth above and below.

C. "GOOD CAUSE" EXISTS FOR RECONSIDERATION.

As discussed above, the Order clearly rejected the utilities' recommendations that administrative costs for pole maintenance and operation, such as those purportedly recovered by application processing fees, be broken out and charged separately, in addition to the fully allocated rental rate. The Commission recognized that its ruling was founded upon long-standing and well-established FCC precedents (Order at 13-14) and that following such

precedents would fairly compensate pole owners for use of space on their poles. *Id.* at 10, 13; *see also* Order No. 05-042, *Central Lincoln P.U.D. v. Verizon* at 15. Despite these findings, because of the inconsistency between the Order and final rules OAR §§ 860-024-0110(3) and 860-024-0310(6), pole owners have already ignored the Commission's explicit rulings.

Experience has shown that in Oregon where ambiguity exists in a pole attachment rule, disputes will arise between pole owners and occupants. *See, e.g., Central Lincoln P.U.D. v. Verizon*, UM 1087; *PGE v. Verizon*, UM 1096; and *Qwest v. Central Electric Cooperative*, UM 1191. These disputes impose unnecessary legal costs and administrative burdens on the parties and the Commission. Now that the Commission has issued its comprehensive Order and adopted new rules, these types of disputes can easily be avoided by modifying the two rules to be consistent with the Order. Thus, under OAR § 860-014-0095(3)(d), good cause exists to eliminate the inconsistency between the new rules and modify them as requested below.

D. THE CHANGE IN THE ORDER WHICH THE COMMISSION IS REQUESTED TO MAKE.

The OCTA requests that Appendix A, OAR § 860-024-0110(3) and OAR § 860-024-0110(6) both be modified to read as follows:

The rental rates referenced in section (2) of this rule do not include the costs of preconstruction activity, post construction inspections requested by the pole occupant, make ready work, and the costs related to unauthorized attachments. Charges for activities not included in the rental rates will be based on actual costs, including administrative costs, and will be charged in addition to the rental rate.

These changes will conform the final rules to the Order.

E. HOW THE APPLICANT'S REQUESTED CHANGES IN THE ORDER WILL ALTER THE OUTCOME.

Granting OCTA's request to modify these two rules will ensure that the Commission's substantive rulings, as set forth in the Order, will be implemented by conforming the final rules to the Commission's Order and prior orders. In the long run, the outcome of conforming the rules to the Order will be to reduce disputes between pole owners and attachers, which was one of the Commission's goals in instituting Docket AR 506.

III. CONCLUSION

For the foregoing reasons, the OCTA requests that the Commission grant OCTA's requested relief and modify final rules OAR §§ 860-024-0110(3) and 860-024-0310(6) to conform to the explicit language of Order No. 07-13.

Respectfully submitted this 11th day of June, 2007.

Respectfully submitted,



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June 11, 2007

**VIA ELECTRONIC MAIL & FEDERAL
EXPRESS**

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Attention: Filing Center
550 Capitol Street NE, Suite 215
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Subject: Docket AR 506

Dear Sir/Madam:

Enclosed, for filing, are an original and one copy of OCTA Application To Clarify Or For Reconsideration in the above-referenced matter.

Very truly yours,

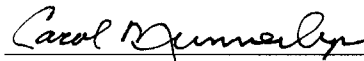
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cc w/enc: Parties of Record

CERTIFICATE OF SERVICE
Docket No. AR 506

I hereby certify that I have served a true and correct copy of the Final Comments Of Oregon Cable Telecommunications Association by electronic mail to the parties on the attached service list.

Dated at Seattle, Washington this 11th day of June, 2007.



Carol Munnetlyn
Secretary

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