



November 6, 2018

Mr. Malcolm Yeatts, Chair
Community Technology and
Telecommunications Commission
City of Austin, Texas
2006 East Fourth Street
Austin, Texas 78702

Re: One-Touch Make-Ready

Dear Chairman Yeatts:

The purpose of this letter is to inform you and the Commission that Charter Communications has a strong interest in the Commission's, the City's and Austin Energy's ("AE") consideration of possibly moving towards a "One-Touch Make-Ready" ("OTMR") scheme in Austin.

As one of largest network providers in Austin, Charter certainly appreciates the need for efficient access to city and utility rights-of-way and infrastructure. Moreover, as one of the largest network providers in the United States, Charter has considerable experience with the development of the OTMR framework that the Federal Communications Commission ("FCC") recently adopted and that will be applied to investor-owned utilities in those states where the FCC regulates pole attachments. Because AE is not an investor-owned utility, the FCC's OTMR rules do not apply in Austin.

We are particularly concerned with both the substance of the changes, as well as with how an OTMR scheme would be implemented in Austin because of the extreme overcrowding and problems that already exist today on so many of AE's poles. With attachments to approximately 90,000 AE poles, we are very concerned about the impact that an OTMR scheme that is not fully vetted will have on these already-crowded poles—and the safety and integrity of our network. Moving, now, to an OTMR approach to facilitate the addition of multiple, additional, fiber-based networks (when in many parts of Austin today there already as many as 9 or 10 providers on the poles), as well as "small-cell" wireless facilities to those poles poses risks to the networks of existing attachers as well as to public safety.

In addition, we today have a preview of an OTMR regime in Austin as other providers are regularly moving our wireline infrastructure without any notice in direct violation of current Austin Energy

rules and standards – and long-standing industry standards. The unauthorized movement of our wireline attachments is creating code violations and threatens network reliability and safety.

We urge the Commission and the City to thoroughly consider these issues and interests.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Serna', with a stylized flourish at the end.

Ed Serna
Director, Government Affairs
Charter Communications, Inc.