



STRUCTURE ACCESS GUIDELINES

Version 6: November 1, 2026

This document is referenced by the AT&T Stand-Alone 21-State Structure Access Agreement and the AT&T Interconnection Agreement Attachment 03 - Structure Access (collectively, "Agreements") and supplements those Agreements with respect to poles, ducts, conduit, and rights-of-way ("Structure") owned or controlled by AT&T Inc.-owned Incumbent Local Exchange Carrier operating companies ("AT&T").

TABLE OF CONTENTS

1. APPLICABILITY OF GUIDELINES
2. DEFINITIONS
3. STRUCTURE ACCESS MANAGERS
4. GENERAL POLICIES
5. PREREQUISITES FOR REQUESTING ACCESS
6. PROCESS FOR GAINING ACCESS TO STRUCTURE
7. FCC-REGULATED POLE ATTACHMENT REQUIREMENTS
8. CHANGES TO GUIDELINES
9. NOTICES

1. APPLICABILITY OF GUIDELINES

1.1 General

These Guidelines apply to each Attaching Party seeking access to Structure owned or controlled by AT&T, including AT&T affiliates that attach to AT&T-owned Structure.

1.2 Limitation and Order of Authority

These Guidelines supplement, and do not amend, the applicable executed Agreement. In the event of a conflict, applicable federal or state statutes, rules, regulations, commission orders, or tariffs, followed by the executed Agreement, will control. Requirements stated in these Guidelines apply only to the extent permitted by the applicable Agreement and Applicable Law. Nothing in these Guidelines waives or limits a right or obligation under 47 U.S.C. § 224 or 47 C.F.R. Part 1, Subpart J, where applicable.

2. DEFINITIONS

Applicable Law - all applicable federal and state statutes, rules, regulations, tariffs, and commission orders governing access to Structure.

Application - a request for access to Structure submitted by an Attaching Party in the form and manner required by AT&T, the applicable Agreement, and Applicable Law.

Attaching Party - the entity identified as the attaching party in the applicable executed Agreement and that owns the facilities placed in or on the Structure.

AT&T Facility Portal or Facility Portal - AT&T's designated electronic system for requesting Structure records, receiving status information, and submitting Structure Access requests or notices.

Authorized Contractor - a contractor included on AT&T's then-current authorized contractor list for the applicable work and jurisdiction, or another qualified contractor that may be used under Applicable Law.

Conduit - tubes or structures, usually underground or on bridges, that contain one or more Ducts and/or innerducts used to enclose cables, wires, and associated transmission equipment.

Duct - a single enclosed tube, pipe, or channel for enclosing and carrying cables, wires, and other equipment, including innerducts created by subdividing a Duct into smaller channels, but excluding cables and other telecommunications equipment located within the Duct.

Large Order - for requests governed by 47 C.F.R. § 1.1411, a pole attachment order greater than the lesser of 3,000 poles or five percent of AT&T's poles in a state, and up to the lesser of 6,000 poles or ten percent of AT&T's poles in that state.

Make-Ready Survey - an engineering review of proposed attachments, including field review, records review, identification of affected facilities and Other Users, pole loading or other engineering analysis where applicable, and validation against the standards identified in the applicable Agreement and Applicable Law.

Make-Ready Work - all work performed, or to be performed, to prepare Structure and existing related facilities for the requested occupancy or attachment of the Attaching Party's facilities.

Mid-Sized Order - for requests governed by 47 C.F.R. § 1.1411, a pole attachment order greater than the lesser of 300 poles or 0.5 percent of AT&T's poles in a state, and up to the lesser of 3,000 poles or five percent of AT&T's poles in that state.

NJUNS - the National Joint Utilities Notification System.

Other User - an entity, other than the Attaching Party, with facilities in or on the Structure, including another attaching party, municipality, governmental entity, or electric utility.

Poles - poles only, excluding cables and other telecommunications equipment attached to a pole.

Rights-of-Way - the right to use the land or other property of another party to place poles, conduits, cables, other structures and equipment, or to provide passage to access such structures and equipment. Rights-of-Way may run under, on, or above public or private property and may include the right to use defined space in buildings, building complexes, or other locations.

Structure - collectively, the Poles, Ducts, Conduit, and Rights-of-Way owned or controlled by an AT&T ILEC.

Survey Package - the complete results of the Make-Ready Survey, including field data, photographs where required, proposed attachment details, pole-loading or other engineering analysis where applicable, identification of existing

facilities and affected Other Users, proposed Make-Ready Work, Authorized Contractor certification, and evidence of all required survey notifications.

3. STRUCTURE ACCESS MANAGERS

AT&T Structure Access Managers serve as the primary operational contacts for Attaching Parties requesting access to AT&T-owned or controlled Structure. Structure Access Managers support the administration of the Structure Access process by coordinating request intake, reviewing required submissions, facilitating communications among applicable stakeholders, and helping ensure that requests are processed in accordance with the applicable Agreement, these Guidelines, and Applicable Law. Current office and contact information is published on the AT&T CLEC Online Structure Access page. Structure Access Managers are responsible for:

- Answering Attaching Party questions;
- Reviewing and coordinating records requests submitted through the Facility Portal;
- Reviewing Applications and Survey Packages submitted through the Facility Portal;
- Coordinating applicable Make-Ready Work;
- Issuing occupancy permits;
- Coordinating post-construction inspections; and
- Contacting Attaching Parties regarding attachment inventories and other Structure Access matters.

4. GENERAL POLICIES

4.1 Priority Queue

Priority for parties with competing Applications for access to existing capacity in or on the same Structure will be determined by the date and time AT&T receives a complete Application through the Facility Portal, subject to the applicable Agreement and Applicable Law. A submission is not complete solely because it has been transmitted. Material revisions may be treated as an amended or new Application and may establish a new priority date.

4.2 No Available Capacity

If, after taking reasonable steps, AT&T cannot accommodate a request, AT&T will provide a detailed written response in accordance with the applicable Agreement and Applicable Law. Any denial governed by 47 C.F.R. § 1.1403 will identify the supporting evidence and explain how it relates to insufficient capacity, safety, reliability, or generally applicable engineering purposes. If information discovered during Make-Ready Work prevents accommodation, AT&T will provide the written notice required by the applicable Agreement or Applicable Law. At the Attaching Party's request and expense, AT&T will meet to explore reasonable alternatives.

4.3 Capacity Reservation

No party, including AT&T, may reserve space in or on Structure for future needs. Existing space may be assigned for projects initiated by AT&T and complete Applications. The requesting party must occupy assigned space within the period stated in the applicable Agreement, tariff, or law.

4.4 Location of Attachments

AT&T will select or approve the location of attachments on Poles, in Ducts and Conduit, and in Rights-of-Way based on the then-current standards referenced in the applicable Agreement and Applicable Law.

4.5 Franchises, Permits, and Consents

The Attaching Party must secure all necessary franchises, permits, easements, permissions, or consents from governmental authorities and private property owners to survey, construct, operate, maintain, and remove its facilities.

5. PREREQUISITES FOR REQUESTING ACCESS

Before submitting a records request or Application, the following must be active, current, and on file with AT&T, as applicable:

- An executed Structure Access Agreement;
- A Certificate of Insurance meeting the requirements of the Agreement;
- A Structure Access billing account;
- A Letter of Authorization for anyone acting on behalf of the Attaching Party;
- Facility Portal access for the Attaching Party's authorized users;

- Active NJUNS membership, including the Attaching Party's current NJUNS member name, member code, operational contact, and escalation contact; and
- Identification of the Authorized Contractor that will perform the Make-Ready Survey.

The Attaching Party must maintain and promptly update this information throughout the term of the Agreement. NJUNS membership does not replace any notice, coordination, Application, permit, payment, or other obligation under the Agreement or Applicable Law. AT&T may require correction of missing or inaccurate prerequisite information before processing a request, to the extent permitted by the applicable Agreement and Applicable Law.

6. PROCESS FOR GAINING ACCESS TO STRUCTURE

Following are the principal process steps. Completion of these steps does not guarantee that AT&T can accommodate the request:

Step	Process Step	Responsible Party
1	Obtain AT&T records available for the Structure the Attaching Party is proposing to attach to.	Attaching Party
2	Perform a Make-Ready Survey using an Authorized Contractor retained by the Attaching Party.	Attaching Party / Authorized Contractor
3	Submission of a missing pole request to add any poles missing in Facility Portal, if required.	Attaching Party
4	Completion of the addition of any missing poles in Facility Portal, if required.	AT&T
5	Submission of the Application and complete Survey Package through the Facility Portal.	Attaching Party
6	AT&T review, estimate, and occupancy permit.	AT&T
7	Completion of Make-Ready Work.	Non-OTMR = AT&T and Other Users as applicable OTMR = Attaching Party / Authorized Contractor
8	Construction of the Attaching Party's facilities.	Attaching Party / its authorized contractor
9	Notification of completion of the Attaching Party's facilities.	Attaching Party
10	Completion of a post-construction survey.	AT&T

6.1 Required Use of the AT&T Facility Portal

Unless AT&T provides written direction otherwise, the Attaching Party must use the Facility Portal to submit all Structure records requests, Applications and notices, Survey Packages, supporting documents, attachment requests, and other request types supported by the Facility Portal. A request sent by email or another channel will not be treated as received for processing or priority purposes unless AT&T has authorized that channel in writing or the Facility Portal is unavailable and AT&T has designated an alternate method.

6.2 Information Access

An Attaching Party may view and obtain redacted pole and attachment information or request available redacted conduit records through the Facility Portal to identify where Structure exists and what may be available for use. The conduit information request must clearly identify the proposed route, beginning and ending points, and other information required by the Facility Portal.

- AT&T will provide information currently available in its records and will not create additional records or gather information not then maintained.
- Proprietary information will not be made available.
- Records do not guarantee field conditions, capacity, structural integrity, ownership, or approval.
- A confidentiality agreement must be in place when the applicable Agreement does not contain an adequate confidentiality provision.

- Where records do not exist, field research may be performed only in accordance with the Agreement, Applicable Law, and AT&T's written requirements.
- Requests for cyclical pole-inspection information must identify poles covered by the related Application and comply with the applicable Agreement and law.

6.3 Attaching Party Responsibility for the Make-Ready Survey

Before submitting an Application, the Attaching Party must, at its sole cost and expense, retain an Authorized Contractor to perform the required Make-Ready Survey for the Structure included in the proposed request, except where AT&T approves another process in writing or Applicable Law requires a different process. The Attaching Party is responsible for its contractor's acts and omissions; survey safety; access permissions; traffic control; compliance with the Agreement, AT&T requirements, and Applicable Law; and the accuracy and completeness of the Survey Package.

The Make-Ready Survey must identify the proposed attachment location, existing facilities and affected Other Users (for pole related requests, this would include the lowest power attachment and all attachments within the communications space), clearance or capacity issues, structural analysis or pole loading where applicable, and the proposed Make-Ready Work necessary to accommodate the proposed facilities. AT&T may review, validate, supplement, or require correction of the Survey Package and may perform field verification at the Attaching Party's expense when authorized by the Agreement or Applicable Law.

6.4 Survey Notifications and Coordination

The Attaching Party must provide all advance notices required by the Agreement, AT&T's written requirements, and Applicable Law to AT&T, affected pole owners, and affected Other Users before beginning the Make-Ready Survey. Unless a different period is required, the Attaching Party must provide notice not less than three business days before the survey. Notice must be provided via NJUNS, together with any additional method required by the Agreement or Applicable Law.

The Attaching Party must coordinate participation, access, and safety requirements; maintain evidence of delivery and any responses.

6.5 Structure Access Application

To officially request access to Structure, the Attaching Party must submit an Application and the complete Survey Package through the Facility Portal. The Application must contain all information required by the Agreement, these Guidelines, the Facility Portal, and Applicable Law, including, as applicable:

- State, municipality, street names, route, beginning and ending points, and proposed placement path;
- Structure type and identification, including pole tag, manhole number, or the nearest physical address when an identifier is unavailable;
- Type, size, quantity, and proposed location of facilities and equipment;
- Splice, cable loop, coil, and ancillary-equipment locations;
- Authorized Contractor information;
- The complete Survey Package, including pole-loading analysis where applicable;
- Permits, consents, and supporting documents as required; and

AT&T will review the Application for completeness and provide any required notice of incompleteness within the period required by the applicable Agreement or Applicable Law. Material changes may require an amended or new Application and may change priority.

6.6 Make-Ready Estimate and Payment

AT&T will provide an estimate for performing any required AT&T Make-Ready Work associated with the request in accordance with the applicable Agreement and Applicable Law. The Attaching Party must accept and pay the estimate within the applicable period before Make-Ready Work begins. For FCC-regulated pole requests, estimate procedures, timing, payment, and any available estimate self-help rights are governed by 47 C.F.R. § 1.1411 and the applicable Agreement.

6.7 Occupancy Permit

After the applicable requirements have been satisfied, including acceptance and payment of the estimate, AT&T will issue an occupancy permit. The Attaching Party may not construct or occupy Structure before permit issuance and completion of required Make-Ready Work. Rental charges apply as stated in the applicable Agreement, tariff, or law beginning on the date of issuance of the occupancy permit.

6.8 Make-Ready Work

Make-Ready Work may include, for Ducts and Conduit, rodding, assignments, tagging, core boring, couplers, repair or clearing of blocked conduit, innerduct placement, additional conduit, and manhole work. For Poles, Make-Ready Work may include raising or lowering facilities, brackets, anchors, guys, pole replacement, transfers, and related work. Make-Ready Work must be performed by the party and contractor authorized under the Agreement and Applicable Law.

AT&T is not responsible for delays caused by the Attaching Party, an Other User, a contractor, a governmental authority, force majeure, or another circumstance beyond AT&T's control, subject to the applicable Agreement and Applicable Law.

6.9 Construction of the Attaching Party's Facilities

After receiving the occupancy permit and confirmation that required Make-Ready Work is complete, the Attaching Party must construct, place, maintain, repair, and remove its facilities in accordance with the Agreement, the permit, AT&T requirements, Applicable Law, and the then-current applicable editions of:

- The Blue Book Manual of Construction Procedures, Special Report SR-1421, or its successor;
- The National Electrical Safety Code;
- The National Electrical Code;
- These AT&T Structure Access Guidelines; and
- California Public Utilities Commission General Orders 95 and 128 for applicable California Structure.

7. FCC-REGULATED POLE ATTACHMENT REQUIREMENTS

This Section applies only to requests governed by 47 U.S.C. § 224 and 47 C.F.R. Part 1, Subpart J. State-regulated requirements apply in jurisdictions that regulate pole attachments under state law.

7.1 Order Categories and Advance Notice

The Attaching Party must comply with the then-current requirements of 47 C.F.R. § 1.1411. As of November 1, 2026, written advance notice must be provided as soon as practicable, but not less than 15 days before submitting a qualifying Mid-Sized Order and not less than 60 days before submitting a Large Order. The advance notice must include the information required by § 1.1411(c), including contact information, proposed deployment areas and routes, and the anticipated build-out schedule. A Large Order notice must request a meet-and-confer, and the parties will meet and confer as required by § 1.1411(c).

If an Application is filed without required advance notice, AT&T may treat the submission as advance notice in the manner permitted by § 1.1411(c). Requests above the Large Order ceiling will be handled under the Agreement and Applicable Law, including good-faith negotiation of processing mechanics and timing where required.

7.2 Application Review, Survey, and Estimate Timelines

For complete Applications, AT&T will apply the review-on-the-merits, survey, estimate, and make-ready timelines in the then-current version of § 1.1411. As of November 1, 2026, the review and survey period is generally 45 days for a regular order, 60 days for a Mid-Sized Order, and 90 days for a Large Order, subject to the rule's terms, exceptions, amendments, and remedies. AT&T will provide notices required when AT&T knows or reasonably should know that a survey or make-ready deadline cannot be met.

7.3 Authorized Contractors

AT&T will maintain contractor information as required by 47 C.F.R. § 1.1412 and Applicable Law. Where AT&T provides a list for the applicable work, the Attaching Party must select a contractor from that list unless Applicable Law permits another qualified contractor. A request to add a contractor must demonstrate that the contractor satisfies the applicable minimum qualifications and AT&T's publicly available, commercially reasonable safety and reliability standards. AT&T will respond within the period required by § 1.1412(e).

7.4 Self-Help and One-Touch Make-Ready

Nothing in the pre-submission survey requirement eliminates or restricts an Attaching Party's rights, or AT&T's obligations, under the FCC survey, estimate, self-help, make-ready, or one-touch make-ready provisions. Any attacher-performed survey or work intended to satisfy an FCC procedure must comply with the applicable notices, contractor qualifications, certifications, participation rights, safeguards, and deliverables in §§ 1.1411 and 1.1412.

7.5 Application Size and Frequency

AT&T will not impose limits on Application size or frequency that have the effect of restricting the number of pole attachments an Attaching Party may seek in a given timeframe, except as permitted by the applicable Agreement and Applicable Law.

8. CHANGES TO GUIDELINES

AT&T reserves the right to change and update these Guidelines, subject to the applicable Agreement and Applicable Law. AT&T may publish updated forms, checklists, technical requirements, Facility Portal instructions, and Authorized Contractor information from time to time.

9. NOTICES

Formal notices under an Agreement must be delivered using the methods and addresses stated in that Agreement, unless the parties mutually agree to another method. Operational submissions and notices supported by the Facility Portal must be submitted through the Facility Portal as stated in these Guidelines. Notices requiring NJUNS coordination must also be transmitted through NJUNS. Facility Portal or NJUNS submission does not replace a separate formal notice required by the Agreement or Applicable Law.

9.1 Facility Portal Unavailability

If the Facility Portal is unavailable, or the Attaching Party cannot use it because of a documented accessibility or technical issue, the Attaching Party must contact the designated Structure Access support channel. AT&T may provide an alternate submission method. Receipt and priority through an alternate method will be determined under AT&T's written instructions, the Agreement, and Applicable Law. The Attaching Party must upload the submission to the Facility Portal when instructed after service is restored.

END OF GUIDELINES