



STRUCTURE ACCESS APPLICATION PROCESS

Initial Publication April 2018

Version 5: 3/4/2021

21 AT&T Wireline States National Standard Structure Access Process

1. AT&T Structure Access Process

This document is being updated to reflect the FCC Third Report & Declaratory Ruling, FCC No. 18-111 (Order) that modified the existing Pole attachment rules in the following states: **Alabama, Florida, Georgia, Indiana, Kansas, Missouri, Mississippi, Nevada, North Carolina, Oklahoma, South Carolina, Tennessee, Texas & Wisconsin.**

The FCC Order 18-111 is effective as of May 19th, 2019.

In order for an Attaching Party to invoke any part of the 2018 FCC 18-111 Order in the following states; **AL, FL, GA, IN, KS, MO, MS, NV, NC, OK, SC, TN, TX, WI** the Attaching party must request to amend their current Interconnection Agreement (ICA) or Stand-Alone Structure Access Agreement with AT&T in order to take advantage of these rule changes with respect to AT&T poles.

(R) New Agreement Negotiation Process

- If an Attaching Party desires an ICA (Interconnection Agreement) or is a CLEC, CMRS or CATV provider and wishes to enter into a Structure Access Agreement with AT&T in order to attach to AT&T's structure the AP should go to the following [link](#) on the CLEC Online website, where directions on how to proceed exist.
- If an Attaching Party wishes to amend an existing agreement, they should email the Negotiations Mailbox, m41654@att.com. Please state what type of amendment (i.e. Structure Access) and the applicable states.
- **(R)** If a Municipality, School or Governmental agency wishes to enter a limited scope Commercial Agreement, complete and submit a Structure Access Negotiations Request Form (found in the Forms section of the [CLEC Online website](#)) send the request to this email box: [Structure Access Agreement Request](#)

The steps that an Attaching Party, with a valid agreement, must follow in order to gain access to AT&T Structure have not changed. The First Point of Contact for all attaching parties is the [Regional Structure Access Points of Contact](#)

AT&T Wireline transitioned to National Standard Structure Access forms in April 2018

The forms are available on the [Structure Access 21 State](#) section of the CLEC Online website. It is not recommended to save the forms on the user's computer as they are occasionally updated as necessary due to the needs of the business.

Reminder: Field Survey, Record Review, Maintenance Access, and Make Ready work (including some field work inspections associated with an application) are billable items when related to Structure Access. Attaching Parties shall reimburse AT&T for all actual costs incurred by the Regional Structure Access teams associated with the Attaching Parties record request, structure access request, make ready survey, make ready work, applicable inspection work and any other associated costs resulting from their request whether or not access is granted to AT&T's structure. A financial true up will be done when all billable work is complete.

1.1 Structure Access Application Process

The structure access process starts when an Attaching Party notifies AT&T of its wish to access AT&T's structure.

The Attaching Party should complete all required fields on the application form(s), provide all the applicable information required on the form and submit the request to the [Regional Point of Contact](#).

The following table lists various types of information that an Attaching Party may be required to provide.

Pole	Conduit
All drawings or maps that provide details for the location of the work to be performed, the type of work being done, and any schematics/details of facilities being placed	All drawings or maps that provide details for the location of the work to be performed, the type of work being done, and any schematics/details of facilities being placed.
Municipality and street names/addresses, primary & subsequent placement paths, identity of subject AT&T poles including pole number(s) and latitude/longitude	Identification of start and end of work, i.e. MH or bldg. number, street address, distance to next MH
Location, type, size, weight, height of attachment(s) and equipment being placed to include ancillary equipment, splices, and cable loops	Cable outside diameter (OD), cable type (copper, fiber, coaxial), number of tubes, voltage to ground and maximum current of any conductor, spare ducts/innerducts
Existing attachment(s) and height(s) for any attachment(s) on the pole(s)	Splices and/or how much slack to be placed in a MH
All make-ready work required by any existing attacher	Make-ready work required with details, including knockouts or core boring required
Attaching Party point of contact and telephone number/email along with company doing work	Attaching Party point of contact and telephone number/email along with company doing work

- **Information Access Forms**

- **Records Review Request form (REC-REV-002)**

- A record review request may be submitted independently of an Application request
 - The information that is available is what is currently on the records. AT&T will not create additional information or gather information not currently on the records.
 - If records do not exist, the Attaching Party may request that AT&T perform a field visit, at the Attaching Party's expense
 - Proprietary information will not be made available for review by Attaching Parties.
 - The availability shown on the records does not guarantee the actual availability or structural integrity of any Structure.
 - A signed non-disclosure agreement must be on file before AT&T will make available any and all records.
 - Record inspections require supervision and are restricted to specific work areas

- **Application Forms**

An Application form is required for all Structure attachment requests.

Separate applications are required for Pole & Conduit work.

In order to process a request, all necessary drawings and/or maps must be attached to the application. If they cannot be sent electronically, please contact the Structure Access [Regional Point of Contact](#)

AT&T has implemented an upfront flat rate field survey fee estimate based on the type of Make Ready Survey Work that the Applicant is requesting. Specifically, one set of fees applies if AT&T will be completing the Make Ready Survey and another set of fees applies if the Applicant will be completing the Make Ready Survey. The application form acts as the official invoice for the field survey fee.

- **Standard Application form (APP-002)**

- **Conduit Requests** - This Application is to be used in all 21 states for all Conduit attachment requests.
- **Pole Requests** – This form to be used for Pole Attachment requests in all Non-FCC states (AR, CA, IL, KY, LA, MI, OH) and in any FCC States where the 3rd party Attacher does not have an amended or new Agreement that includes provisions for the 2018 FCC 18-111 Order.
 - **IMPORTANT:** Conduit and Poles request may not be combined on the same application; a separate application must be submitted.

- **OTMR Application (APP-OTMR)**

- **Pole Requests** – This form is to be used for Pole Attachment requests by an Attaching Party that wishes to invoke any part of the 2018 FCC 18-111 Order in the following states; AL, FL, GA, IN, KS, MO, MS, NV, NC, OK, SC, TN, TX, WI. The Attaching Party must have an amended Interconnection Agreement (ICA) or Stand-Alone Structure Access Agreement with AT&T to take advantage of these rule changes with respect to AT&T poles.

- **(R) Pole Work Forms**

- **(R) Pole Data Sheet (POLE-DATA-003)**

- Attaching party may submit multiple pole data detail sheets

- **Pole Data Sheet Instructions**

- The Instructions for the Pole Data Sheet are available online

- **Conduit Forms**

- **Conduit Data Sheet (COND-001)**

- The Conduit cover and data sheets are combined into one form. Additional data sheets are required copy page two & enter the data and attach to page 1.

- **Manhole / Vaults Forms**
 - **Manhole/Vault Access Request (MHACC-002)**
 - Anytime an Attaching Party wishes to perform work in AT&Ts Manholes or Vaults. This form should be submitted along with an Application form (APP-002) when the Attaching Party is requesting access to a new structure.
 - Anytime the Attaching Party wishes to perform Maintenance work in an existing licensed Manhole/ Vault structure the MHACC- 002 is required. An application is not required.
 - **Manhole Detail Requirements (MHDET-001)**
 - Standard Manhole detail diagrams are to be filled out and attached to application for each Manhole that an Attaching party is requesting access to.
 - **Request to Core Bore or Modify Manhole (CORE-002)**
 - The CORE-002 form should be submitted in conjunction with a Conduit Application anytime an Attaching Party wishes to modify, or core bore an AT&T Manhole. A Manhole / Vault Access Request form (MHACC-002) is also required.
 - **Request for Emergency Conduit Reservation (EMER-002)**
 - To be used when an Attaching Party wishes to utilize a spare duct/conduit, available for up to 30 days. A Manhole / Vault Access Request form (MHACC-002) is also required.
- **Letter of Authorization for Applications, Record Reviews, Billing & Notices (LOA)**
 - Attaching Party should complete this form and forward it to the [Structure Access Point of Contacts](#) whenever there is a change to those individuals that act on behalf of the Attaching party
- **Notification of Surrender or Modification of Attachment License (SUR-MOD)**
 - SUR-MOD is the form that is to be used when an attacher is either modifying or surrendering a permit. Licensee will continue to be billed for attachments until AT&T is notified and verifies that the facilities associated with this notice has been removed from AT&T's structure. Please provide drawing or sketch showing where the facilities have been surrendered or modified.
- **Notice to Overlash or Rebuild Forms**

Overlashing refers to the practice of placing an additional communications cable by lashing a cable with spinning wire over an existing cable and strand on Poles.

Rebuilding describes the replacement of a cable with a cable of the exact same size/weight.

Overlashing to AT&T facilities is not allowed

 - **Notification to Overlash Standard (NOR-STD)**

This form to be used by an Attaching Party when they wish to Overlash or Rebuild facilities in all *Non-FCC states (AR, IL, KY, LA, MI, OH) and in any FCC States where the

3rd party Attacher does not have an amended or new Agreement that includes provisions for the 2018 FCC 18-111 Order.

*The State of California requires an APP-002 to be submitted for Overlash & Rebuild requests.

- **Notification to Overlash FCC States (NOR-FCC)**

This form is to be used by an Attaching Party when they wish to Overlash or Rebuild facilities and want to invoke any part of the 2018 FCC 18-111 Order in the following states; AL, FL, GA, IN, KS, MO, MS, NV, NC, OK, SC, TN, TX, WI.

The Attaching Party must have an amended Interconnection Agreement (ICA) or Stand-Alone Structure Access Agreement with AT&T to take advantage of these rule changes with respect to AT&T poles.

- **Applicant Submission of Authorized Contractor Form**

This form may only be used by an Attaching Party that wishes to certify that the contractor identified in the form meets or exceeds the minimum requirements established by the FCC in 47 C.F.R. §1.1422(c).

In order to invoke any part of the 2018 FCC 18-111 Order in the following states; AL, FL, GA, IN, KS, MO, MS, NV, NC, OK, SC, TN, TX, WI. The Attaching Party must have an amended Interconnection Agreement (ICA) or Stand-Alone Structure Access Agreement with AT&T to take advantage of these rule changes with respect to AT&T poles.

- **Applicant Submission of Authorized Contractor Form Instructions**

This is the instructions sheet for filling out the Applicant submission of the Authorized Contactor form

- **AP- Notification of MR Const Start Date - AT&T Poles**

The intent of this form is for Attaching Party to notify AT&T of the date when make-ready construction will begin on AT&T's poles. This form may only be used if Attaching Party's current, executed structure access agreement with AT&T provides for OTMR or self-help make-ready, as applicable, and covers the applicable state. This form must be submitted to AT&T, as applicable, at least 15 days before the start of construction for OTMR or at least 5 days prior to start of MR construction under the self-help remedy option.

- **AP- Notification of MR Const Start Date - FO Poles**

The intent of this form is for Attaching Party to notify AT&T of the start date for make-ready construction affecting AT&T attachments on poles owned by another entity. Attaching Party may only perform make-ready work on AT&T's facilities when either: (a) expressly permitted by AT&T; or (b) the pole owner, under federal or state law, allows for OTMR or self-help remedy make-ready work on AT&T attachments. This form must be submitted to AT&T, as applicable,

at least 15 days before the start of construction for OTMR or at least 5 days prior to start of MR construction under the self-help remedy option.

- **AP- Notification of MR Const Complete Date - AT&T Poles or Conduit**

The intent of this form is for Attaching Party to notify AT&T of the date it completed make-ready construction on AT&T's poles or Conduit. OTMR or self-help make-ready may only be invoked if Attaching Party's current, executed structure access agreement with AT&T provides for OTMR or self-help make-ready, as applicable, and covers the applicable state. This form must be submitted to AT&T no later than 15 days following the completion of the make-ready construction on AT&T's structure.

- **AP- Notification of MR Const Complete Date -FO Poles**

The intent of this form is for Attaching Party to notify AT&T of the date it completed make-ready construction on AT&T facilities attached to another entity's poles. Attaching Party may only perform make-ready work on AT&T's facilities when either: (a) expressly permitted by AT&T, or (b) the pole owner, under federal or state law, allows for OTMR or self-help remedy make-ready work on AT&T attachments. This form must be submitted to AT&T no later than 15 days following the completion of the make-ready construction on AT&T's facilities.

- **Inspections**

- Field Inspections may be completed on an Attaching Parties attachment as part of the application process to align with occupancy permit. (pole location, quantity, attachment heights)
 - Attaching Party will receive a form with occupancy permit that they are required to fill out and return when work is complete

Following this process however still does not guarantee that AT&T will be able to accommodate the Attaching Party's request, see section 2.

1. GENERAL POLICIES REMINDERS

• Priority Queue

- The priority for Attaching parties with competing applications for right of access to existing capacity in AT&T Structure will be determined by the actual time that a valid Structure Access application is received by the AT&T Regional Structure Access office.
- Changes to Structure Access applications may be deemed a new request and result in a new date being established for the priority queue.

• No Available Capacity

- AT&T Regional Structure Access office will provide a detailed, written responses when:
- AT&T cannot accommodate the Attaching Party's request.
 - If additional information is discovered that will not allow ATT to accommodate the Attaching Party's request, the AT&T Regional Structure Access office will provide a detailed, written response, within forty-five (45) days of discovery, outlining the reasons why the request can no longer be accommodated.
 - If an Attaching Party's request cannot be accommodated for any reason, AT&T will meet with the Attaching Party, at Attaching Party's request and expense to explore reasonable alternatives to accommodate the proposed attachment.

• Capacity Reservation

- No party, including AT&T, will be allowed to reserve space in or on AT&T's Structure for future needs. However, projects initiated by AT&T and applications in process shall serve to reserve space. In such instances, the requester shall occupy reserved space within twelve (12) months of an approved project (AT&T) or issued Occupancy Permit (Attaching Party) in every ILEC state except California, where the requirement is nine (9) months.

• Location of Attachments

- AT&T will select or approve the location for all attachments on poles, in ducts and conduit, and in rights-of-way. The selection will be based on safety, reliability or general engineering principles.

• OOC (Out of Cycle) & Recurring Billing

- **OOO (Out of Cycle)** billing is the prorated annual rental fee invoices that are issued each month for new structure attachments associated with a newly approved permit in the preceding month
- **Recurring Billing** charges are those fees or charges that an AP pays for the attachments made to AT&T's structure. The billing schedule, annual or semiannual, for an AP is based on an Agreement, regional or local tariffs or Public Utility Commissions. Aps billing for attachments is effective on the date that the

Occupancy Permit is issued.

- Structure attachment bills/ invoices are available on the ECR (Exchange Carrier Relations) website. Invoices are only available via this site. The Attacher has the option to print or download copies of the bills. A courtesy email will be sent to you anytime you have new invoices.
- External Customers – Should use the Following Links.
 - Access Invoices - <https://www.e-access.att.com/ecr/>
 - Forgot Username – Send email to ecrbill@att.com
 - Password Reset – https://ebiznet.sbc.com/ilec_online/ResetPassword.pdf
 - Request Access - https://ebiznet.att.com/ilec_online/accessform.pdf
- In order to ensure that you are always notified when you have a bill please make sure that the Structure Access POC have your updated contact information. Anytime contact info needs to be updated please submit the Letter of Authorization for Applications, Record Reviews, Billing & Notices Form - LOA-002 to the appropriate [Regional Point of Contact](#)
- **RF – Radio Frequency Requirements for Wireless Attachers.**
 - An Attaching Party is responsible for the Radio Frequency (RF) emissions emitted by its equipment and must comply with all FCC regulations regarding the RF exposure limitations. The Attaching Party must install appropriate signage to notify workers and the public of the potential for exposure to RF emissions.
 - Once the Attaching Party's construction is complete they must notify the Structure Access manager and provide a RF compliance analysis, ([example](#)), and digital photos depicting the required signage on the poles. Both the analysis and the photos are to be specific to the associated request.

2. DEFINITIONS

Attaching Party (AP) (aka 3rd Party Attacher) - parties authorized by AT&T to attach facilities to AT&T Structure

Communications Space - The term “Communications Space” refers to the space on a Pole below the communications worker safety zone, as defined in the National Electrical Safety Code (NESC), where communications cables or wires may be attached and span from a Pole to an adjacent Pole or nearby structure while observing NESC-defined clearances from the ground.

Complex Make-Ready Work - The term “Complex Make-Ready Work” refers to any Make-Ready Work on AT&T Poles that involves work that would be reasonably likely to cause a service outage including, but not limited to, splicing an existing attacher’s cable facilities, any rearrangement or transfer of wireless carriers’ attachments, any make-ready involving attachments above the Communications Space, or Pole replacement(s).

Conduit - tubes or structures which are owned or controlled by AT&T and contain one or more ducts and/or inner ducts used to enclose cables, wires, and associated transmission equipment

Maintenance Duct – full sized duct or inner duct reserved for use, on a short-term basis, for maintenance, repair, or emergency restoration activities

Make-Ready Survey - a physical check of Structure to determine availability of space for placing

the Attaching Party's facilities

Make-Ready Work - any work necessary to prepare Structure for attachment or occupancy by an Attaching Party

Non-OTMR - The term "Non-OTMR" describes the Application process utilized when an Attaching Party Application involves any Complex Make-Ready Work, or Attaching Party does not elect, though entitled under the terms of this Agreement and specific circumstances for an Application, to follow the OTMR Application process.

OTMR - The term "OTMR" refers to One-Touch Make-Ready, the Application process chosen by Attaching Party, at its discretion, when **only** Simple Make-Ready Work, and **no** Complex Make-Ready Work, is required for a particular Application, and an Authorized Contractor, selected by Attaching Party, performs all the Make-Ready Work.

Overlashing - The term "Overlashing" refers to the practice of placing an additional communications cable by lashing such cable with spinning wire over an existing cable and strand on Poles.

Rebuild - Describes the replacement of a cable with a cable of the exact same size/weight

Poles - Refers only to poles which are owned, jointly owned, or controlled by AT&T and does not include 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 (including air space above public or private property) and may include the right to use defined space in buildings, building complexes or other locations

Simple Make-Ready Work - The term "Simple Make-Ready Work" refers to Make-Ready Work on AT&T's Poles that does not fit the definition of Complex Make-Ready Work and does not involve Pole replacement(s).

Structure - refers to the poles, ducts, conduit, and rights-of-way that are owned or controlled by AT&T