

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Rulemaking to Consider Adoption of Rules) DOCKET U-140621
to Implement RCW ch. 80.54, Relating to)
Attachments to Transmission Facilities,)
Docket U-140621)
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**COMMENTS OF THE BROADBAND COMMUNICATIONS ASSOCIATION
OF WASHINGTON**

The Broadband Communications Association of Washington (“BCAW”), on behalf of its member companies,¹ respectfully submits these Comments pursuant to the State of Washington Utilities and Transportation Commission’s (“Commission”) May 27, 2015 Notice of Opportunity to Respond to the Small Business Economic Impact Statement (SBEIS) Questionnaire (“Notice”), regarding the economic impact of the Commission’s (Draft) Rules to Implement RCW 80.54, Relating to Attachments to Transmission Facilities (hereinafter “Rules”).

BCAW is the trade association representing cable operators doing business in the State of Washington, and companies servicing the cable industry. BCAW members are continually working and investing to deliver state of the art services to Washington’s citizens. BCAW members invest \$365 million annually to bring the state’s residents and enterprises leading edge broadband services including, high-speed broadband internet, home security and a full range of advanced video and voice services.

While it is difficult for BCAW to calculate and provide information regarding the potential cost impact of the Rules on its members, the Commission’s adoption of Rules modeled

¹ BCAW’s member companies include: Charter Communications, Comcast, Inland Networks, Sefnco Communications and Wave Broadband.

on the Federal Communications Commission's ("FCC") pole attachment regime, including the FCC "cable formula" and access timeline, will ensure that access to utility infrastructure will proceed in a cost-effective, predictable and timely manner. In turn, these benefits will redound to the State of Washington's small businesses in the form of greater broadband (and other advanced communications services) availability and competition in communications markets.

Respectfully submitted this 17th day of June 2015.

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