

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)

**RESPONSE OF PCIA TO THE COMMISSION'S
SMALL BUSINESS ECONOMIC IMPACT STATEMENT INQUIRY**

PCIA –The Wireless Infrastructure Association and the HetNet Forum, a membership section of PCIA (together “PCIA”), on behalf of its member companies,¹ respectfully submits this Response to the Commission’s May 27, 2015 Notice of Opportunity to Respond to Small Business Economic Impact Statement (SBEIS) Questionnaire (“Notice”), which requested that affected companies submit their analysis of whether the Commission’s draft pole attachment rules impose a cost impact on them.

PCIA is the principal organization representing the companies that build, design, own, and manage telecommunications facilities throughout the world. Its over 220 members include carriers, infrastructure providers, and professional services firms. The HetNet Forum, formerly The DAS Forum, is dedicated to the advancement of heterogeneous networks. HetNets provide increased network coverage, capacity and quality through the use of a variety of infrastructure and technology, enabling seamless voice and data communications. The HetNet Forum is a membership section of PCIA – The Wireless Infrastructure Association. PCIA members are authorized to attach to utility poles in Washington under 47 USC §§ 224A(4), (b)(1) and RCW 80.54.010(1) and 80.54.020.

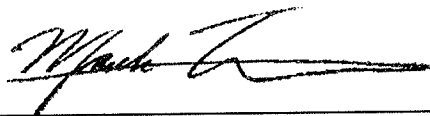
¹ Information regarding PCIA and HetNet membership can be found at the following links:
<http://www.pcia.com/our-current-members> and <http://www.hetnetforum.com/about-us/who-we-are/>.

It is not possible for PCIA to precisely determine the potential cost impact of the Commission's draft pole attachment rules on its member companies. However, PCIA believes the Commission's draft rules, when adopted and effective, will provide PCIA member companies with certainty regarding access to utility poles, ducts, conduits and rights-of-way, make-ready timelines, rental rates, and dispute resolution that will greatly enhance the ability of its member companies to quickly deploy their communications services on a cost-effective basis in the State of Washington. Thus, the rules will likely have a positive economic impact on not only PCIA member companies, but also on the myriad businesses in the State of Washington that will benefit from timely and cost-effective access to communications services, including broadband, that PCIA member companies deploy in the State.

Respectfully submitted this 17th day of June 2015.

DAVIS WRIGHT TREMAINE LLP

By: _____



Mark P. Trincherro
1300 SW Fifth Avenue, Suite 2400
Portland, Oregon 97201
Phone: 503-778-5318
Email: marktrincherro@dwt.com

Attorneys for PCIA and HetNet