



Cynthia Manheim
General Attorney

16331 NE 72nd Way
Redmond, WA 98052

T: 425-580-8112
F: 425-580-8333
cindy.manheim@att.com

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Via Web Portal

Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket U-140621

Enclosed for filing are the Comments to the Notice of Opportunity to Comment on Proposed Rules by AT&T Corp., New Cingular Wireless PCS, LLC, and Teleport Communications America, Inc. (collectively "AT&T") in the above mentioned docket.

Sincerely,

Cynthia Manheim by Doc with permission

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**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to Consider Adoption of)
Rules to Implement RCW ch. 80.54,) **Docket U-140621**
Relating to Attachments to Transmission)
Facilities, Docket U-140621)
_____)

COMMENTS OF AT&T

AT&T Corp., New Cingular Wireless PCS, LLC, and Teleport Communications America, Inc. (collectively “AT&T”) respectfully submit comments in response to the Washington Utilities and Transportation Commission (“WUTC”) Notice of Opportunity to Comment on Proposed Rules issued on July 24, 2015 (“Proposed Rules”).

AT&T appreciates the Commission’s considerable effort and careful consideration of the four sets of comments and two workshops that have occurred so far in this docket. Although the Commission may not have accepted all of AT&T’s suggestions, overall the proposed pole attachment rules are fair and reasonable pole attachment and encourage the continued deployment of wireless infrastructure in the state.

The one change that AT&T requests is that the Commission reinsert the phrase “other than a commercial mobile radio service company” into the definition of “Owner” in WAC 450-54-020 (15). AT&T supports the comments and analysis of PCIA and the HetNet Forum in this regard. The Commission lacks jurisdiction to regulate attachments to facilities of wireless carriers and should clarify the issue in the rule to avoid unnecessary future disputes. Therefore, the phrase above should be reinserted into the definition of “Owner”.

Submitted this 24th day of August, 2015

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By: Cynthia Manheim, WSBA# 26524
Representing AT&T Corp., New Cingular Wireless PCS,
LLC, and Teleport Communications America, Inc.
PO Box 97061
16331 NE 72nd Way
Redmond, WA 98073-9761
Telephone: (425) 580-8112
Facsimile: (425) 580-8652
Email: cindy.manheim@att.com