



**MEDINA ELECTRIC**  
COOPERATIVE, INC.



# **POLE ATTACHMENT PERMITTING PROCEDURES**

EFFECTIVE DATE: 08/23/2022

# Contents

1.0 Overview .....	1
1.1 Amendments .....	1
2.0 Definitions .....	1
3.0 Pole Attachment Permitting Procedures.....	3
3.1 Pole Attachment License Agreement .....	3
3.2 Pole Attachment Application Process .....	3
3.3 Make-Ready Approval Process .....	6
3.4 Post-Construction Inspection Process .....	6
4.0 Construction Requirements .....	7
4.1 Installation Crew Qualifications.....	7
4.2 Work Authorization Proof .....	7
4.3 Attachment Technical and Code Requirements ..	7
5.0 Process Flow Charts .....	8
6.0 NJUNS Medina EC New Ticket example .....	11
7.0 Exhibit A: Fee Summary .....	12



## 1.0 Overview

The Medina Electric Cooperative, Inc. (“Medina EC”) Pole Attachment Permitting Procedures (“Procedures”) includes the processes necessary for cable and telecommunication facility owners and operators to authorize the attachment of their facilities to overhead distribution facilities owned by Medina EC. Adherence to the Procedures will facilitate a timely completion of an Attachment project with minimal delays or conflicts. The Procedures are supplementary to the Medina EC Pole Attachment Standards and Applicant’s executed Pole Attachment License Agreement (“Agreement”). The Procedures shall always be subject to, and are not intended to supersede, amend, or replace, the terms and conditions of the Agreement between Medina EC and Applicant. The Procedures do not apply to any Attachments to be made to Medina EC structures carrying transmission lines of 69kV or higher, the attachment of wireless facilities, or the attachment of any electric facilities.

### 1.1 Amendments

Medina EC may amend these Procedures from time to time. Medina EC shall provide at least forty-five (45) days prior written notice to Licensee before the effective date of any such amendment. In the event Medina EC amends the Procedures, existing Applications shall be grandfathered unless otherwise agreed to by the Parties or prohibited by applicable law or regulation.

## 2.0 Definitions

*The following terms appear throughout these Procedures. Many of the terms that relate to operational matters may also appear in the Agreement and the Pole Attachment Standards. The Agreement will contain additional terms not found in these Procedures. To the extent that there are any discrepancies in these documents, the Agreement definition shall govern.*

**Anchors & Guys:** A tensioned cable and accompanying assemblies designed to add stability to pole structures.

**Applicant:** Any eligible person, public entity, private company, or corporation that applies to make an Attachment to a Pole in accordance with an executed Medina EC Pole Attachment License Agreement.

**Application:** The electronic application submitted by the Applicant through NJUNS requesting permission to install an Attachment on a pole.

**Attachment:** Licensee’s (Applicant’s) facilities as defined by the Agreement.

**CWSZ:** Communication Worker Safety Zone as defined in the NESC, section 235C4.

**Emergency:** A situation that, if not remedied immediately, would result in a threat to public safety, a hazardous condition, damage to property or a service outage.

**Licensed Engineer:** An individual who has fulfilled education and experience requirements and passed required exams that, under state licensure laws, permits him or her to offer engineering services directly to the public in the State of Texas.



**Make-Ready or Make-Ready Work:** All work that Medina EC reasonably determines to be required to accommodate new, additional, or changed Attachments consistent with the Pole Attachment Standards. Such work may include, but is not limited to, administrative work, engineering work, rearrangement and/or transfer of Medina EC facilities or other existing attachments, inspections, tree trimming (other than tree trimming performed for normal maintenance purposes), Pole replacement, Pole additions, and construction. Make-Ready does not include routine maintenance.

**Make-Ready Cost:** All costs necessary for Owner to prepare its Poles for Licensee's Attachments, including the costs of materials, labor, inspections, engineering, supervision, overheads, and tree trimming. Engineering includes design, proper conductor spacing and bonding, calculations to determine proper ground clearances and Pole down guy and anchor strength requirements for horizontal and transverse loading, and compliance with all applicable requirements. Also included among Make-Ready Costs are the costs of installing or changing out primary Poles, secondary Poles and Drop/Lift Poles, including the cost of installation and/or removal of guys, anchors, stub Poles, materials and equipment, temporary construction, and all other construction in accordance with the Pole Attachment Standards. Make-Ready Costs shall not include costs necessary to correct pre-existing non-compliance by other parties or replacements due to age, deterioration, or Owner's needs.

**Medina EC:** Medina Electric Cooperative, Inc.

**NJUNS:** National Joint Utilities Notification System. NJUNS is the joint use notification system software currently used by Medina EC. Approved notification software is subject to change; Applicants will be informed of any changes.

**Overlashing:** The placement of an additional wire or cable on an existing Attachment owned by Applicant. Overlashing requires an Application in accordance with these Pole Attachment Permitting Procedures. Licensee shall not allow third party Overlashing without Owner's prior approval.

**Plan View:** A type of engineering document that shows pole locations as seen from above.

**Pole:** Medina EC poles supporting electrical conductors of less than 69 KV; this does not include streetlight poles, guy poles, non-wood poles, and all other such special purpose poles or pole lines of non-standard design that do not support Medina EC's electrical distribution system. Use of non-wood poles and special purpose poles shall be at Medina EC's discretion.

**Service Drop:** The communication attachment going from the last (i.e. closest) Medina EC pole to the building, or structure being served. Intermediate attachments connected to other Medina EC poles en route to the service drop are considered standard attachments and shall not be included in a Service Drop Only Application. Service Drops are those that do not require guys and are not considered to be Attachments if placed within the twelve (12") space as stated in Article 2 of the Agreement. Guyed Service Drops will be considered an Attachment and require an approved Application prior to installation.

**Service Drop Only Application:** An Application containing ONLY communications Service Drops. An Application submitted containing both Service Drops and other types of attachments will be treated as a standard Application.



## 3.0 Pole Attachment Permitting Procedures

Medina EC may use a representative (consulting service) to complete all or part of the Pole Attachment Permitting Procedures, which consist of four parts:

- Execution of Medina EC Pole Attachment License Agreement
- Pole Attachment Application Process
- Make-Ready Approval Process
- Post Construction Inspection Process

### 3.1 Pole Attachment License Agreement

Prior to making any Attachment to a Pole, Applicant and Medina EC must each have executed a valid and binding Agreement authorizing and establishing the terms and conditions applicable to such Attachments. Applicant may download the Agreement template from the Medina EC website (<https://MedinaEC.org/Attachments>).

Note that Applicant is responsible for coordinating with any other third-party Applicant as may be needed to facilitate shared use of a Pole.

### 3.2 Pole Attachment Application Process

Follow the sections below after the Agreement has been executed.

#### 3.2.1 Obtain NJUNS Code:

**3.2.1.1** Applicant shall obtain a member code from the National Joint Utilities Notification System (“NJUNS”). Applicant may visit <https://web.njuns.com> to initiate the registration process. Medina EC’s NJUNS member code is: “MECTX”

#### 3.2.2 Create a new permit ticket (Application) in NJUNS

**3.2.2.1** The maximum number of Attachments allowed per Application is 50. A separate Application must be submitted for any Pole lines which are not part of a continuous area of operations.

**3.2.2.2** All timeframes listed in the Procedures are subject to change if more than 150 attachments in a 30-day period are requested by an Applicant.

**3.2.2.3** Service Drop Only Applications must be submitted within thirty (30) days of installation as long as installed according to the Standards herein. All other Applications must be submitted before installation. Failure of Licensee to submit a Service Drop Only Application within the 30-day time frame will deem the Service Drop to be an Unauthorized Attachment under the Agreement.

**3.2.2.4** Except for transfers and risers attached to horizontally run cables, Applicant must submit an Application in NJUNS to attach facilities to Medina EC Poles including Overlashing. Overlashing cables on existing Poles shall not count as additional billable Attachments. An Application to remove Attachments must also be made through NJUNS within seven business days prior notice to Owner before removing facilities



from Poles. For major Department of Transportation road work and Medina EC system improvements where poles are relocated, Medina EC and the Licensee shall communicate as to the work involved in these projects. Once the details of the work are known, Licensee shall submit Applications for facilities that will be attached or removed (not just transferred) to keep the numbers of Attachments accurate.

**3.2.2.5** If the Application is incomplete, Medina EC shall notify the Applicant within fifteen (15) days. If Applicant chooses to re-apply, the revised Application restarts the process.

### **3.2.3 Upload the proposed Design Package**

A complete design package must include the following information:

#### **3.2.3.1 Plan View Drawing**

Shows attachment pole locations (including Medina EC Pole numbers if available) and relevant locational markers (e.g. roads, etc.) in PDF format.

#### **3.2.3.2 Completed Medina EC survey spreadsheet**

Provides field data on all existing attachments, relevant technical information, and all proposed Make-Ready to meet NESC compliance at final post inspection. The spreadsheet can be downloaded from the Medina EC website (<https://MedinaEC.org/Attachments>).

#### **3.2.3.3 Pole Loading Analysis (“PLA”) Documentation.**

Each pole must have pole loading analysis performed using the latest version of O-Calc, SPIDAcCalc, or other software as approved by Medina EC. The Applicant has the following options for submitting the PLA:

- The PLA may be provided by the Applicant in accordance with the Pole Attachment Standards and the Agreement, and must be sealed by a Professional Engineer registered in the state of Texas
- Medina EC (or their representative) may provide the PLA at Applicant’s expense.
- Medina EC will perform a pre-construction inspection of the Poles to which Applicant desires to attach as part of the Application process.

Corrections and final approval of Applicant-provided PLA will be as follows:

- Approval is performed by a Medina EC-approved consultant
- Estimate 2 poles per hour reviewed unless corrections are required
- In order to minimize Application processing time, only one round of corrections will be allowed before a Medina EC-approved consultant is tasked with providing the Pole Loading Analysis.

Service Drops do not require pole loading analysis if the following conditions are met:

- Spans are one hundred fifty (150) feet or less
- Service drop is self-supported (embedded messenger)
- Service drops are installed at 200 lbs. of tension or less and still maintain NESC clearances



- These conditions must be clearly defined and met in the application in order to waive the pole loading analysis requirement for Service Drops.

#### **3.2.3.4 Proposed Construction Schedule.**

The Applicant shall provide a proposed construction schedule for installation.

#### **3.2.4 Wait for Conditional Approval/Denial Status**

**3.2.4.1** Medina EC will use commercially reasonable best efforts to respond to each fully complete Application within forty-five (45) days of the date accepted by Medina EC; however, any failure to respond shall not constitute an approval.

**3.2.4.2** No Application shall be deemed approved without notice of approval from Medina EC via NJUNS. Both approval and denial of Applications shall be through NJUNS.

**3.2.4.3** Medina EC may deny any Application for the following reasons:

- Insufficient capacity (when all potential accommodations have been reviewed by Medina EC and communicated to Applicant)
- Facilities are necessary for Medina EC's sole utility business use
- Applicant's proposed attachment violates the NESC or any other applicable code, law, rule, or regulation.
- Applicant's proposed attachment unduly compromises safety or system reliability.
- Applicant's proposed attachment does not comply with generally applicable engineering standards
- Applicant's account is not in good standing.
- Failure to pay fees with submittal of Application

#### **3.2.5 Pay fees in full to Medina EC.**

##### **3.2.5.1 Fee Summary**

The Applicant must pay the non-refundable Application fees listed in Exhibit A to cover Application processing. These fees will cover administrative costs, pre-construction inspection, Pole Loading Analysis if performed by Medina EC, Make-Ready summary report, and one initial post-construction inspection. These fees do not cover any material and labor Make-Ready costs required for changes to Medina EC's facilities. The Application and all fees must be received prior to any reviews.



The fees may be adjusted periodically based upon actual costs incurred by Medina EC. Any additional costs incurred as the result of Applicant's failure to provide a complete and accurate Application will be at Applicant's expense.

#### **3.2.5.2 Escrow Account**

Licensee shall be allowed to establish an "escrow account" with Owner for the Application fees provided for herein. Licensee shall maintain the "escrow account" at a level that is mutually agreed to by both Parties, but not to exceed an amount equivalent to six (6) months forecasted permit activity.

### **3.3 Make-Ready Approval Process**

**3.3.1** If the Application has been approved subject to completion of Make-Ready, Medina EC will provide Applicant a written estimate of the time and cost of such Make-Ready. If Applicant desires to continue with Application process, Applicant shall provide Medina EC written authorization via NJUNS to proceed along with payment of estimated costs within thirty (30) days of notification and receipt of Make-Ready estimate.

**3.3.2** The estimated Make-Ready Costs shall be true-up to actual costs following the completion of the work.

**3.3.3** Medina EC shall complete the Make-Ready construction within sixty (60) calendar days of receipt of payment for such work. Medina EC will provide notification to the Applicant that the Make-Ready work is complete, and the Pole is ready for the Attachment pending any work by other attaching entities via NJUNS.

### **3.4 Post-Construction Inspection Process**

**3.4.1** Applicant shall complete installation of Attachments within ninety (90) calendar days after Make-Ready is completed by all parties. Once Applicant has completed installation of its Attachment, Applicant shall notify Medina EC via NJUNS within thirty (30) days

**3.4.2** Medina EC, or a Medina EC approved consultant, will inspect the Attachment within sixty (60) days. If the installation is not in compliance with the terms of the Application, the PLA, the Medina EC Pole Attachment Standard, NESC, other applicable laws, or codes, Medina EC will notify Applicant via NJUNS.

**3.4.3** If the inspection fails, Applicant is responsible for the entire cost of additional field inspections and any Medina EC performed corrective construction work. Applicant shall make all corrections found during inspections within thirty (30) days.

**3.4.4** Medina EC will close the Application in NJUNS after Post Construction inspections are passed.





---

## 4.0 Construction Requirements

### 4.1 Installation Crew Qualifications

Applicant shall only use authorized and qualified employees and personnel, and all contractors shall be appropriately licensed for the installation and maintenance of communications facilities near or around the electric supply space on a pole. Refer to the most recent edition of the NESC including but not limited to, Part 4 Work Rules for the Operation of Electric Supply and Communication Lines and Equipment; Section 41 - Supply and Communication systems - Rules for Employers; Subsection 411E - Identification and Location and all other governing standards.

### 4.2 Work Authorization Proof

When installing or removing an Attachment, Applicant's construction crews, whether employees or contractors, must be able to provide an approved Application covering the specific construction. This includes Overlashing.

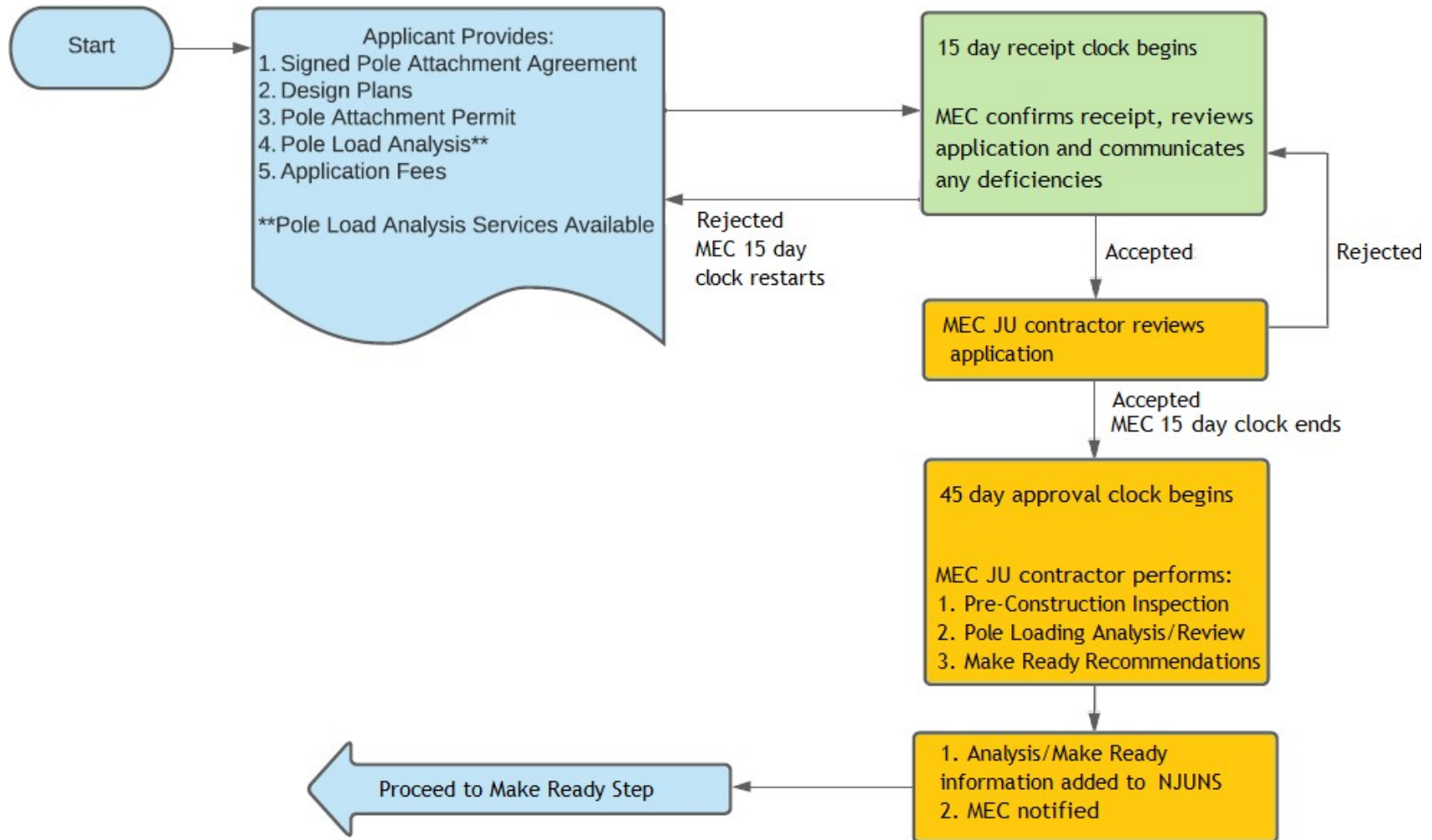
### 4.3 Attachment Technical and Code Requirements

All attachments shall meet the technical requirements of the Medina EC Pole Attachment Standards, the code requirements of the National Electric Safety Code (NESC), the National Electric Code (NEC), the Bellcore Manual of Construction Procedures (Blue Book and subsequent revisions thereof), The Society of Cable Telecommunications Engineers Recommended Practices for Coaxial Cable Construction and Testing (where applicable), and Recommended Practices for Optical Fiber Cable Construction and Testing and subsequent revisions thereof (where applicable), Rural Utilities Service regulations and standards as they apply to Attachments, and all other applicable governing codes. The Medina EC Pole Attachment Standards can be downloaded from the Medina EC website at (<https://MedinaEC.org/Attachments>).



## 5.0 Process Flow Charts

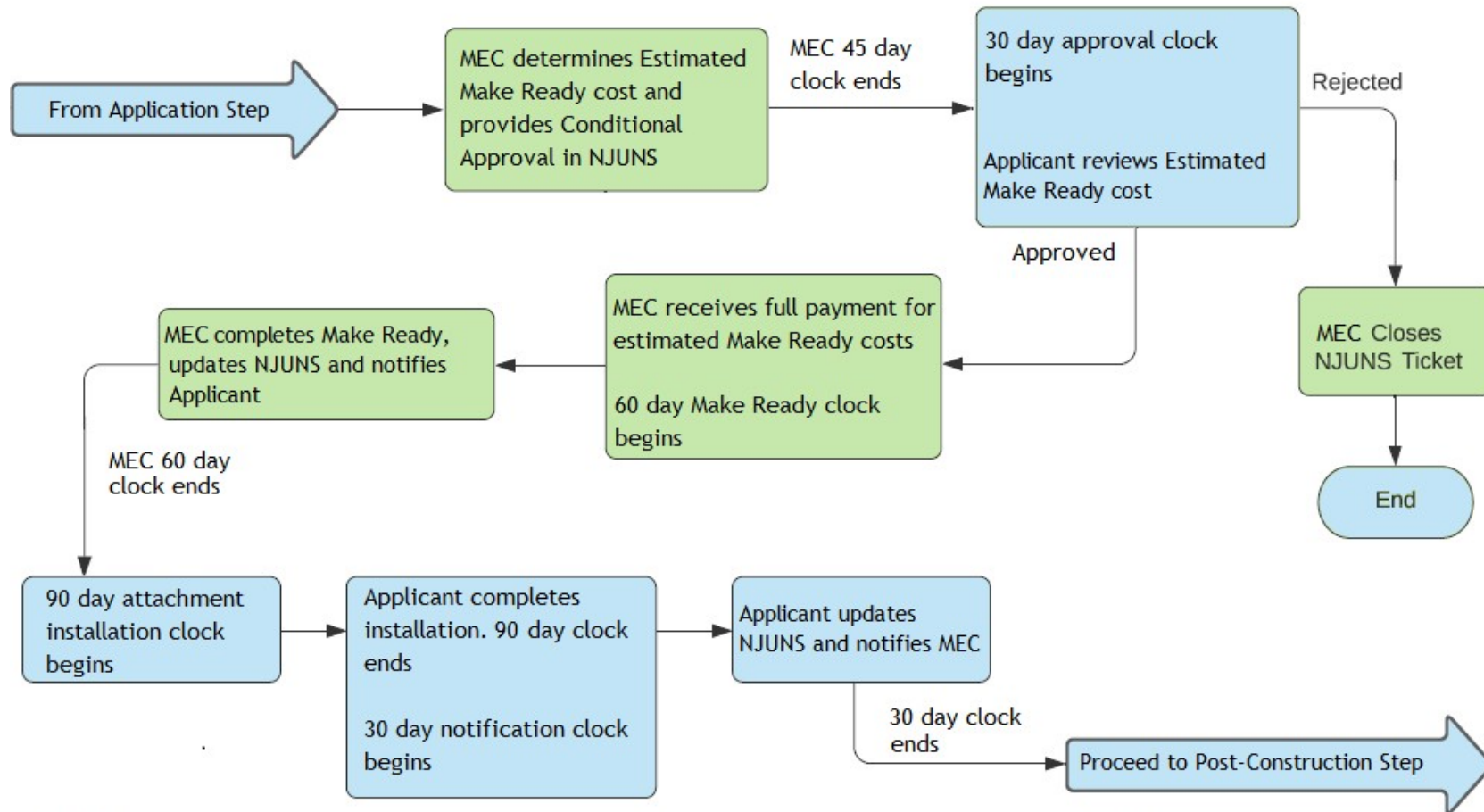
Successful Application Process Flow Chart



NOTE: Clock times shown may change based on the number of attachments and permits requested within a 30 day period



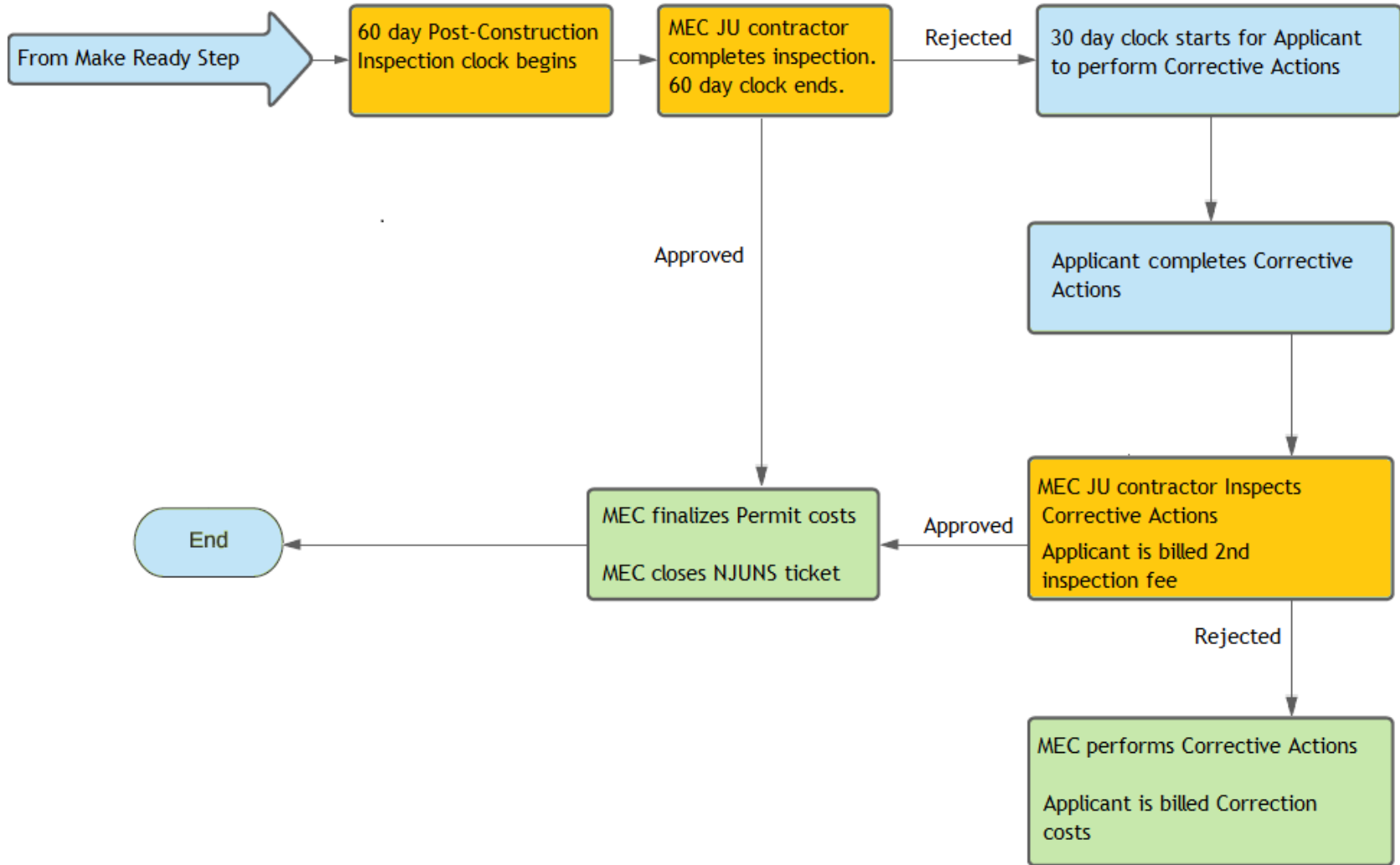
### Successful Make Ready Process Flow Chart



NOTE: Clock times shown may change based on the number of attachments and permits requested within a 30 day period



### Successful Post-Construction Process Flow Chart





# 6.0 NJUNS Medina EC New Ticket example

Tickets Poles/Assets Steps Projects Members Run Reports Map Tools Help

New Ticket\* x

Save and close Save Cancel History Reports Actions Ticket Map Add Poles

Ticket - New Ticket - Attachment Request (PA) - PA:Default

Ticket #  Creator TRC NTG Member TRC Priority  Status Draft Owner MECTX Start Date  Pole/Asset #

Details Poles/Assets Associations Parties

Details

Work Requested Date  State Texas County Medina Place Hondo Contact Name Renae Parker Contact Phone 770-947-4272 x239 Contact Email rparker@trcsolutions.com Reference Id  Misc Id  # of Poles/Assets  Remarks  Full Screen

Dynamic Attributes

Attachment Type  Request Number  Contract Date  Owner Permit Number  Owner2 Permit Number  Owner2 Permit Remarks  Owner Granted Date  Owner2 Granted Date  Owner Cost  Owner2 Cost  Total Other Cost  Total Cost  Approved Date

Workflow

Title  Description  Assigned Party  Assigned Date  Due Date

Diagram Complete

Wall Documentation



## 7.0 Exhibit A: Fee Summary

EXHIBIT A: COMPENSATION TABLE (1 of 3)

Item	Item	Deliverable	Description of Deliverable Work	Contract Rate	
				Labor	Vehicle /Other
"Back-Office" Engineering	A.	Initial Application Review	<ul style="list-style-type: none"> <li>Perform initial intake processing of Application upon receipt from Applicant. This review is required to verify that the submitted Application is complete and compliant with Medina EC's Pole Attachment Permitting Procedures.</li> </ul>	\$275.00 Per Application	
	B.	Initial Service Drop Only Application Review	<ul style="list-style-type: none"> <li>Perform initial intake processing of Application upon receipt from Applicant. This review is required to verify that the submitted Application is complete and compliant with Medina EC's Pole Attachment Permitting Procedures.</li> </ul>	\$275.00 Per Application	
	C.	Review Submitted Pole Loading Analysis	<ul style="list-style-type: none"> <li>Perform an engineering review of the Application and Initial Field Inspection results to ensure that all Poles requiring Pole Loading Analysis (PLA) have been submitted with the required PLA(s).</li> <li>Review the submitted PLA(s) for compliance with all Applicable Engineering Standards.</li> </ul>	\$45.00 per pole	
	D.	Perform Pole Loading Analysis	<ul style="list-style-type: none"> <li>Perform an engineering review of the Application and Initial Field Inspection results to determine all Poles requiring Pole Loading Analysis (PLA).</li> <li>Perform PLA(s) in compliance with all Applicable Engineering Standards.</li> </ul>	\$85.00 per pole	
	E.	PE Stamping	<ul style="list-style-type: none"> <li>Make Ready Electrical Design, Pole Loading Analysis cover sheet; as applicable</li> </ul>	\$255 per hour	
	F.	Make-Ready Electrical Design	<ul style="list-style-type: none"> <li>Produce and approve Make-Ready Electrical Construction design requirements and submit to Medina EC for line design/cost estimate creation.</li> </ul>	Time & Expense - As required	



	G.	<b>Application Close-out</b>	<ul style="list-style-type: none"> <li>• Document all necessary "As-built" corrections, applicable field measurements and inspection reports and provide information to Medina EC for their GIS system.</li> <li>• Ensure all documentation related to the Application is complete and properly archived.</li> </ul>	<b>\$120.00 / Application</b>	
	H.	<b>Required Permit Coordination</b>	<ul style="list-style-type: none"> <li>• Coordination with Attaching Entities /Contractors on permit items to progress the application through the process. To include the following but not limited to:</li> <li>• Application Issues, Markups, Quality Assurance/Quality Control (QA/QC) of Initial Application Review, Initial Field PLA, Make Ready Electrical Design, Initial Field Inspection Notes, Rejection Notifications, overlapping permits, Notice to Proceed, Final Permits</li> </ul>	<b>Time &amp; Expense - As required</b>	



**EXHIBIT A: COMPENSATION TABLE (2 of 3)**

Item	Item	Deliverable	Description of Deliverable Work	Contract Rate	
				Labor	Vehicle /Other
Field Inspection Work	I.	Initial Field Inspection of Application	<ul style="list-style-type: none"> <li>Perform initial field inspection following receipt of Application from Applicant. This inspection is required to verify that field physical data provided on the Application is accurate.</li> </ul>	\$95 per pole	\$2.55 / mile
	J.	Initial Field Inspection of Service Drop Only Application	<ul style="list-style-type: none"> <li>Perform initial field inspection following receipt of Application from Applicant. This inspection is required to verify that field physical data provided on the Application is accurate.</li> </ul>	\$250 for the permits with 5 poles or less, and \$45 per pole after 5.	\$2.55 / mile
	K.	Conduct Post-Construction Field Inspections (Initial)	<ul style="list-style-type: none"> <li>Perform Post-Construction Inspection following work completion notice by Applicant. Engineer will verify that all construction is in compliance with the Applicable Engineering Standards. Data to be gathered at the job site includes: identification and measurements of all Attachments.</li> <li>Prepare Post-Construction Inspection published report for Medina EC and Applicant noting any deficiencies and required corrections.               <ul style="list-style-type: none"> <li>Email notifications (through NJUNS) notating each with violations in which telecommunication construction was not completed per the application submitted and that should be corrected within the allotted timeframe</li> </ul> </li> </ul>	\$60.00 / per pole	\$2.55 / mile
				Time & Expense	





	L.	<b>Conduct Post-Construction Field Inspections (Subsequent)</b>	<ul style="list-style-type: none"> <li>• Perform subsequent Post-Construction Inspection following corrective work completion notice by Applicant. Engineer will verify that all construction is in compliance with the Applicable Engineering Standards. Data to be gathered at the job site includes: identification and measurements of all affected Attachments.</li>   <li>• Prepare Post-Construction Inspection report for Medina EC and Applicant noting any deficiencies and required corrections. <ul style="list-style-type: none"> <li>• Email notifications (through NJUNS) notating each with violations in which telecommunication construction was not completed per the application submitted and that should be corrected within the allotted timeframe</li> </ul> </li> </ul>	<b>\$70.00</b> / per pole	<b>\$2.55</b> / mile
			<b>Time &amp; Expense</b>		



**EXHIBIT A: COMPENSATION TABLE (3 of 3)**

Item	Item	Deliverable	Description of Deliverable Work	Contract Rate	
				Labor	Vehicle /Other
<b>Work Directly for Medina EC</b>	M.	<b>Application Process Status Reporting</b>	<ul style="list-style-type: none"> <li>Record the status of each Application through the Application process, including invoicing, as provided in the Pole Attachment Permitting Procedures and contractual requirements.</li> <li>Provide reports and metrics to Medina EC consistent with policies established by their Joint Use program or as requested by their Joint Use Point of Contact.</li> </ul>	<b>Time &amp; Expense - As required</b>	
	N.	<b>Safety Incident Reports</b>	<ul style="list-style-type: none"> <li>Report all vendor safety incidents to the Medina EC Joint Use Point of Contact in the format requested by Medina EC.</li> </ul>	<b>Time &amp; Expense - per Report</b>	<b>\$2.55 / mile</b>
	O.	<b>Member Contacts Reports</b>	<ul style="list-style-type: none"> <li>Provide a brief description of any contact with Medina EC members. Report should include issue discussed and resolution of issue (pending or completed).</li> </ul>	<b>Time &amp; Expense - As required</b>	<b>\$2.55 / mile</b>
	P.	<b>Program Performance Reporting</b>	<ul style="list-style-type: none"> <li>Provide Medina EC higher-level reports regarding the work undertaken in a given month related to the Joint Use Program. Report to include narrative and dash-board level information.</li> </ul>	<b>Time &amp; Expense - As required</b>	
	Q.	<b>Technical “White-Papers” or Other Studies/Special Assignments</b>	<ul style="list-style-type: none"> <li>Provide Medina EC technical assistance in the development of “white-papers” or other appropriate technical documentation or special assignments.</li> </ul>	<b>Time &amp; Expense - As required</b>	<b>\$2.55 / mile</b>