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April 1, 2025

The Honorable Joseph Solomon
Chairman, House Corporations Committee
Rhode Island General Assembly
Providence, RI 02903

RE: Opposition of House Bill 5574, An Act Relating To Public Utilities And Carriers

Dear Chairman Solomon and members of the Committee:

On behalf of Verizon, I am offering these comments and testimony in opposition to House bill 5574, a bill that would penalize pole owners for double poles that remain for more than 30 days after their creation. As a provider of critical communications infrastructure, we are committed to maintaining the integrity of pole infrastructure across Rhode Island. To this end, we coordinate with other pole owners to ensure that our crews are able to deliver on new infrastructure projects while also caring for pole attachment transfers and the removal of double poles.

The creation of double poles often accompanies infrastructure investments and upgrades throughout the state, predominantly arising from new commercial and residential construction, public investments (including federal, state and local road improvement projects), third-party license applications for new pole attachments, or capital program work enhancing service reliability. While such economic activity benefits the state and its municipalities, it also produces double poles in the area of these economic activities.

Resultingly, pole owners must continually balance completing new projects with managing pole attachment transfers and removing poles from prior projects. The constant creation of new double poles from ongoing investments and projects further complicates this balance. For example, surges in state or federal highway funding can significantly influence the pace of these projects and the creation of double poles, as seen during 2009-2015 and now with the influx of federal ARPA, Capital Project funds, and BEAD monies.

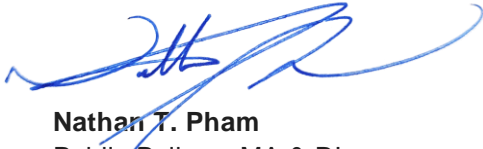
The coordination required for double pole removal varies, as each situation is unique, with poles differing significantly in type and number of attachments. While the simplest cases involve three attachments (power, a third party, and Verizon), more typical situations include primary and secondary power attachments, up to five third-party attachments, and Verizon's attachment. Consequently, double pole removal is more complex than it appears, requiring careful resource coordination.

Addressing a double pole from creation to remediation within 30 days is not possible due to the need for coordination among pole owners, municipalities and other third-party attachers. This shared responsibility requires extensive resource coordination and scheduling. While we cannot speak to the operations of other pole owners and attachees, our own operations team aims to transfer wires and remove the old pole within 30 days when it is our turn to do so after all third-party attachments have transferred to the new pole.

We understand the concerns regarding double poles. Their maintenance is a shared responsibility among pole owners, municipalities, and other attaching parties. Although penalties may temporarily increase removal activity, they could also significantly delay critical infrastructure and economic development projects as resources shift to double pole removal. This shift could lead pole owners to prioritize penalty-prone areas over other priority state and local infrastructure projects.

For the reasons above, we respectfully request that the committee not advance House Bill 5574. Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nathan T. Pham', with a stylized flourish extending to the right.

Nathan T. Pham
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State Government Affairs, Verizon