

**AMERICAN ELECTRIC POWER
APPALACHIAN POWER (including KINGSFORT POWER and WHEELING
POWER COMPANY)
POLE ATTACHMENT POLICY**

General Design Policy

Pole Attachments in the states of Tennessee, Virginia, and West Virginia are regulated by the Federal Communications Commission. The policy outlined below shall be followed by Licensees (“Licensees” for purposes of this policy shall include communications companies that do not yet have a pole attachment agreement and communications companies that have existing pole attachment agreements) during the design phase of aerial cable plant proposed for installation on Appalachian Power, Kingsport Power, and Wheeling Power Company (“APCO”) poles:

- **Safety is the top priority for all parties involved in pole attachments. This policy sets out procedures to ensure that APCO poles and Licensees’ Attachments are operating in the safest manner possible.** At all times, Licensees shall consider the electric wires of APCO to be high voltage energized wires. Licensees acknowledge that working in the vicinity of high voltage wires poses potential dangers and should warn its employees, agents, contractors, and subcontractors of the potential dangers.
- Licensees’ Attachments must be installed in accordance with the National Electrical Safety Code (“NESC”) and other state and federal laws, rules, municipal ordinances and regulations which apply. Licensees must determine the load and sag of each cable to ensure compliance with NESC requirements and AEP or APCO Standards. All cables shall not sag lower than 15’6” at mid span under fully loaded conditions over roadways. West Virginia Department of Transportation requires 18’ clearance over roadways and Virginia Department of Transportation requires 21’ clearance over roadways. Please be aware that APCO poles are primarily located in the heavy loading area described in the NESC, however all engineering review will be evaluated under the more restrictive standard of the NESC or AEP or APCO Standards. Special care should be taken at railroad crossings and roadways.
- Licensees’ Wireline Attachments are only allowed in the Communication Space of the APCO pole.
- In all situations, prior permission must be obtained from property owners and governmental entities for use of private property and public road rights-of-way. APCO assumes no responsibility for securing any such permission that may be required, and Licensees should assume no such permission exists based solely on the presence of APCO’s facilities. This includes easements, rights-of-way, or franchises required for the construction and maintenance of facilities such as pedestals, stub poles and anchors.

- Licensees must bond their messenger in accordance with the NESC. If a Licensee chooses to use a separate bond wire down the pole, it must be bonded to the APCO electrical bond at the base of the pole in accordance with the NESC. When grounding at the house, Licensees are not permitted to connect to APCO's meter base.
- A Licensee's Attachments must be installed on the same side of poles (typically the road side) as the existing Attachments. Attachments to both sides of the pole (boxing) are not permissible. The installation of Attachments in aerial inner-duct is not allowed.
- Licensees' Attachments must be installed without the use of extension arms, standoff brackets or similar hardware (unless otherwise approved in advance by APCO for each pole, and specifically referenced on the Licensee's authorized Proposal).
- Licensees' must install their own guys and anchors. Use of APCO's anchors is not permitted. Licensees' guy(s) shall be either effectively grounded or insulated.
- Licensees' shall not install power supplies on APCO poles.
- Service drops shall be taken off the strand at least fifteen (15") inches from the outside of the pole using a crimp-on method, not off the pole with temporary equipment (j-hooks, etc.). Each of Licensees' Attachments must be separated by twelve (12") inches of space.
- Attachments to APCO Transmission poles without Distribution underbuild are not permitted. Consideration for APCO Transmission pole requests will be forwarded to APCO's Transmission Department for review. All expenses for this review are at the expense of the Licensee. Attachment reviews on APCO Transmission poles require significantly more diligence and are generally more expensive than reviews performed on Distribution poles.
- Encroaching into the Communication Worker Safety Zone (as defined in the NESC) or into the Electrical Space is not permissible, even at road crossings. If the Licensee is unable to meet any NESC code requirements for clearances above roads, APCO may rearrange its facilities, or when possible, have others rearrange their facilities, or replace the pole at the Licensee's expense. Clearance measurements are to be taken from the ground up, not from APCO's facilities down.
- APCO recommends the through-bolt method of construction. Licensees must provide APCO loading data and configuration of their Attachments.
- All riser cable attachment approvals shall be at the sole discretion of APCO. If approved, riser cables shall be in conduit and may be required to be installed on stand-off brackets at the Licensees' expense. Risers shall be configured and

installed so as to not impede climbing. Risers shall be installed using AEP or APCO Standards and further restricted to a minimum of (3) spans.

- Licensees shall mark their cables and risers at each pole location with an identifying tag which should include a name and emergency phone number.
- Licensees, their contractors, or their sub-contractors must possess an executed approved Proposal or an executed permit from APCO at the jobsite when working on APCO facilities
- DAS antennas/small cell Licensees must provide manufacturer's specifications to APCO so that any antennas and/or ancillary equipment being considered for installation on or near APCO poles can be reviewed by AEP's or APCO's Standards Organization. Installation of said equipment on APCO poles is contingent upon review and approval by AEP's or APCO's Standards Organization. This equipment review is at the Licensee's expense.

Application Process

If you do not currently have a Pole Attachment Agreement with APCO to attach to our distribution poles, please contact: W. Craig Smith, Joint Use Representative, at wsmith@aep.com or (304)746-2564 to apply for an agreement.

Proposal Process

If you have an active agreement with APCO to attach to our poles:

- Submit your Request to Attach ("Request") via one of the following two (2) methods:
 - Request through the AEP JU Portal at <https://aepjuportal.azurewebsites.net/Account/Login>. Access via the Portal can be granted by contacting the Joint Use Representative.
 - Permission to Attach (Proposal) form which is available upon request. A maximum of 50 attachments on each Proposal is allowed for manageable processing via this form. The completed form and maps may be submitted to apcojointuse@aep.com.
- Should you require attachments to more than 300 poles, please contact W. Craig Smith, Joint Use Representative, at wsmith@aep.com or (304)746-2564 to provide a current route map and discuss processing timelines.
- Provide all pertinent information requested including stringing tension, cable weight, and diameter.
- No attachments are to be made to APCO poles prior to receiving an Approved Proposal.

- APCO will review your Request / Proposal for completeness when received and will respond within 10 business days if there is missing information.
- Please indicate on your request if you are requesting One-Touch Make-Ready (“OTMR”) access. Approval for OTMR will only be granted for simple make-ready and where no other make ready is required.
- OTMR requests that require complex make-ready will be deemed as Non-OTMR and Proposals will be processed by APCO, or a representative thereof, by performing an analysis on each pole including clearances, strength, and capacity. Requesting Attacher will be notified of the date when data collection will begin and APCO will take the applicable steps to meet the required FCC timelines for engineering.
- Should a Licensee decide to invoke their self-help remedy for either engineering or make-ready construction, a written notice must be provided to the Joint Use Representative. Licensee must use an approved APCO contractor for all work undertaken.
- APCO requires a Licensee to provide 15-day advance notice of any overlashing work. Once overlashing has been completed, the Licensee must notify APCO within 15 days and APCO will perform a post-construction inspection at the Licensee’s expense.
- Any excavation work, including the installation of ground rods and anchors, requires a call to the local one-call system 48 hours in advance of any digging to locate all underground facilities. 811 Call Before You Dig.
- An estimate for all APCO pole rearrangements and/or replacement work necessary for the approval of the Proposal will be provided to Licensees for review, with approval and payment in advance of work being scheduled or performed as contractually required.
- A Licensee contact will need to be provided to APCO prior to any Proposals being submitted for invoicing.
- Risers, vertical runs, and ILEC multiple mainline attachments must be clearly identified on all proposals that encompass APCO poles.
- All information exchanged between APCO, Licensee, and Licensee’s representatives, contractors and subcontractors is considered confidential. Any unauthorized reproduction of APCO information or disclosure of any maps and or documents, in print or electronic format, is strictly forbidden without the express written consent of APCO.
- Notwithstanding approval by APCO to construct Licensee’s facilities in a certain manner or at a certain height, it is the responsibility of the Licensee to ensure that the installation and maintenance of their facilities does not cause a hazardous

condition, overload the pole, or otherwise be installed or maintained in a manner that does not comply with the NESC, AEP or APCO Standards and applicable law.

- APCO may perform a post-construction inspection of all Licensees' attachments to ensure full compliance with Design Standards.
- Licensee's facilities not meeting all installation requirements will be corrected at the Licensee's expense.
 - Within 15 days of completion of the project, the Licensee must notify APCO and any existing attachers. Upon notification, APCO and existing attachers have 90 days to complete a post-construction inspection and notify Licensee of any damage or code violations. All issues discovered must be remedied by Licensee within 14 days at Licensee's expense. If work is completed by APCO as a result of Licensee not completing work Licensee was required to do, then APCO will bill Licensee for any work done on Licensee's behalf.

Approved Contractors to Work Above Communication Space

APCO currently has approved the use of the following contractors for work performed above the communication space:

- DHE
- Pike
- Thayer

Approved Engineering Contractors

APCO currently has approved the use of the following contractors for engineering review of proposals:

- TRC Companies, Inc.
- Sigma Technologies
- Pike Engineering, LLC

APCO will perform all engineering reviews using internal resources or one of the above contractors.