

**SIMPLE - ONE TOUCH MAKE READY (OTMR)
JOINT USE POLE ATTACHMENT PROCESS
For Wireline Pole Attachments in the Communication Space
(Per FCC 18-111)**

Simple Make Ready – Is defined as make ready where “existing attachments in the communication space of a pole could be transferred without any reasonable expectation of a service outage or facility damage and does not require splicing or cutting of any existing communication attachments or relocation of an existing wireless attachment”. Pole change outs or new pole installs, as well as wireless, pole top or strand mounted antennas, do not qualify for “simple” make ready work.

For “simple” OTMR, the new Attacher is in control of notifications to existing attachers, performance of FS&I work, make ready work, final inspections, and determines if “simple” or “complex” make ready work. Notifications will be done in SpidMin within the application, so as to keep the FCC’s OTMR timelines in check.

New Attacher: Selects a PNM approved Contractor to perform FS&I and “simple” make ready work. The hired contractor will have a temporary right to move and rearrange all existing attacher’s attachments. Along with the application submittal, a field survey & inspection (FS&I) report must be submitted, and determined if attachment will be “simple” or “complex” make-ready work (PNM has final say if attacher says it is “simple”, but PNM says it is “complex”, it will be determined “complex”) as long as it is specific and in writing, and PNM must object during the 15-day application review period (#2 below).

If new Attacher determines make-ready to be a mix of “simple” and “complex” make ready work, the Attacher can divide up and submit separate applications, or Attacher can follow the OTMR process, and complete the “simple” make ready work while it waits for the “complex” make ready work to runs its course through the longer existing process, or the Attacher may use the longer existing process for both “simple” and “complex” make ready work.

1. **Notice/FS&I:** New Attacher must notify PNM and existing attachers with at least 3 business days advance notice of the date, time, and location of the FS&I and the contractor chosen, to give them an opportunity to participate.
2. **Complete Application:** PNM determines if the application is complete within 10 business days of receiving the application. If PNM does not respond within 10 business days, application is deemed complete.
 - a) If application is incomplete, PNM within the 10 day time-frame must notify the attacher in writing, why application is incomplete.
 - b) Attacher has 5 business days to re-submit the application to PNM for completeness. If still incomplete, this 5 day cycle continues until application is complete.

- 3. Make Ready notice period:** Once the application and the FS&I work is complete, and is reported as “simple” or “complex” make ready work, the new Attacher must notify PNM and existing attachers with a 15 day prior written notice of the simple make ready work, by giving the date, time, description of make ready work and the name of the contractor which allows for PNM and existing attachers to be present in case they need to address any concerns. This 15 day notice can run concurrently with PNM’s evaluation of whether to grant the application. If the new attacher cannot start make-ready work on the specified date given on the 15 day notice, then the new attacher must provide 15 days advance notice of its “revised make - ready date”. FCC emphasizes that the 15 day s is “only” a notice period before make ready begins, it is not for PNM or existing attachers to complete make ready work on their equipment and then bill the new attacher for that work. However PNM and existing attachers are able to do non-reimbursable work on their equipment during the 15 day notice period.
- a) Damaged equipment – if during make ready work, PNM’s or existing attachers equipment gets damaged or causes an outage, new attacher must immediately notify affected entity.
 - b) Upon notice from existing attacher, the entity with the damage or outage caused by the new attacher, can fix the damage and bill the new attacher for the reasonable costs related to fixing the damage or outage, or require the new attacher to fix the damage at their expense immediately following notice from PNM or existing attacher.
 - c) The damage repair work must be complete before the new attacher resumes it’s make ready work. If entity with the damage or outage wants to make the repairs, the new attacher can only continue its make ready work if it does not interfere with the entity repairing the damage.
- 4. Post Make Ready Notice:** The new attacher must notify PNM and existing attachers when the make ready is complete in order to give them an opportunity to ensure the make ready work was done correctly on their equipment.
- a) The new attacher must notify PNM and existing attachers within 15 days after the new attacher has completed make ready work on a particular pole.
 - b) In the post make ready notification, the new attacher must provide PNM and existing attachers at least a 90-day period for their inspection of make ready work performed by the new attacher’s contractors.
- 5. Post Make Ready Inspection:**
- a) Within 14 days after post make ready inspection, PNM and existing attachers notify the new attacher of any damage or any code violation (safety, electrical, engineering & construction) caused to their equipment by the new attachers make ready work and provide adequate documentation of the damage or violations.
 - b) PNM and existing attachers can either, complete the necessary work and bill the new attacher for reasonable costs related to fixing the damage or violation, or they can require the new attacher to fix the damage or violation at its own expense within 14 days following notice from the utility or existing attacher.