EXHIBIT A

STREET LIGHT POLE ATTACHMENT
GUIDELINES AND PROCEDURES
Pole Attachment Guidelines and Procedures

Revision July 2016
# POLE ATTACHMENT GUIDELINES AND PROCEDURES

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NOTE: The following frequently-used terms, provided here for general reference purposes, appear throughout these Guidelines and relate directly to electric power and communications attachments on CenterPoint’s Poles.

**Abandoned Attachment** – Attachment for which attachment fees have not been paid and/or attachment to which an Attacher has been unresponsive to CenterPoint’s inquiries or communications for more than six (6) months.

**Anchor** – A device supporting and holding in place conductors terminated at a pole or structure buried and attached to the pole by way of a guy wire to counteract the mechanical forces of these conductors.

**Application for Temporary Construction Permit** – CenterPoint form used by potential Pole user to provide proposed aerial and wireless design and construction data to CenterPoint to request Pole attachments.

**Attacher** – Provider of cable television and/or telecommunications services to which CenterPoint has granted certain non-exclusive rights to use its Poles, pursuant to Section 224 of the Communications Act, as amended, other applicable law, and the parties' Pole Attachment Agreement.

**Authorized Attachment** – Attachment that has been licensed through the Application for Temporary Construction Permit Process.

**As-Built Construction** – An Attacher’s actual aerial cable installations on CenterPoint’s Poles, based on an originally-submitted Application for Temporary Construction Permit for Pole Attachments, and any necessary design modifications and field changes made by the Attacher or requested by CenterPoint during actual construction.

**Boxed-In Pole** – A pole with cable attachments installed on both the street side and the opposite side of a utility pole obstructing safe pole access and either routine or emergency pole replacement.

**Cable Tagging** – Method for the physical identification in the field of an attaching company’s aerial cable plant attached to CenterPoint’s poles.

**Cable Television System Attachments** – Any fiber optic cable, coaxial cable, the cable and wires connected to such fiber optic cable and coaxial cable, and any and all supporting cable used by cable television operators providing only cable television services (“Cable Attachments”), as may be more fully described in the Guidelines;

**Communication Service Drop** – Communications cable from Attacher’s existing attachment to a new customer’s premises for the sole purpose of providing service to the new customer.
Communications Space – The lowest zone on a Pole, located immediately below the Communications Workers Safety Zone. The Communications Space is used primarily for the placement of cable television, broadband, fiber, and telephone wires used to deliver communications services.

Communication Workers Safety Zone – The safety zone, also called the “neutral” space, is the space between the lowest supply conductor or equipment and the highest communication cables or equipment. Spacing requirements for Communication Workers Safety Zone and other workers are specified by the NESC.

Conduit Riser – PVC tubing used to protect cable/fiber facilities that are attached to a Pole via Stand-Off Brackets that transitions facilities from underground to overhead.

DAS/SMALL CELL – A Distributed Antenna System (DAS) is a network of spatially separated antenna nodes connected to a common source via a fiber connection that provides wireless service supported by radio and battery back-up equipment.

Distribution System – The portion of an electric power system that distributes electricity to consumers from a bulk power location such as a substation.

Electrical Supply Zone – (see also Supply Space) the upper portion of a Pole, used for electric lines and other electric supply equipment, located above the Communications Workers Safety Zone, that is reserved to support electric distribution equipment.

Electrical Ground – A conducting connection by which an electric circuit, or equipment, is connected to the earth or some conducting body that serves in place of the earth.

Federal Communications Commission (FCC) – The federal Government agency responsible for implementing and enforcing the pole access requirements of Section 224 of the Communications Act as amended.

Foreign Pole – A utility pole that is not owned by CenterPoint Energy.

Ground Furniture – The electronic and electric hardware used to support wireless antenna(s) located separate from the Node Pole, typically located at the meter service pole.

Ground Rod – A large conductor attached to one side of the power supply that serves as the common return path for current from many different components in the circuit.

Grounding System – A power system providing for a common return path (to earth) for electrical current and for an appropriate current-carrying capability for absorbing an excess amount of current.

Guy Wire – Also known as strand, messenger, support wire, structure cable, or guy, a guy wire is designed to offset the lateral pull of the electrical wires and/or communications cable attachments.
**Horizontal Extension Arm** – A bracket extension arm attached at the Pole for the purpose of suspending cables or conductors at a distance from a pole.

**Irregular Plant Conditions (IPCs)** – Conditions associated with the Attacher’s facilities that CenterPoint has determined adversely impact the safety and reliability of its electric distribution network.

**Lambert Map** – Designation for a single CenterPoint map grid. It is based on the Lambert conic projection system, showing among other things, roadways, poles and electrical facilities. One rectangular Lambert is 13,100 feet east to west by 8,600 feet north to south, it encompasses approximately 4 square miles.

**Make-Ready** – All work on an existing pole, including but not limited to such work required to rearrange and/or relocate existing attachments by CenterPoint and/or third parties, and to correct any existing safety violations, that CenterPoint may deem necessary pre-installation to ensure that any Pole for which Attacher has requested access is safe, reliable, and in suitable condition to support Attacher’s proposed Attachment.

**Mid-Span Clearance** – The required NESC vertical separation between power and communications conductors midway between two distribution poles. Mid-span clearance is the controlling factor in determining NESC clearance between power and communication lines.

**National Electrical Safety Code (NESC)** – The collaborative national standard of the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and the American National Standards Institute (ANSI), providing for the safeguarding of persons from hazards arising from the installation, operation or maintenance of: (1) conductors and equipment in electric supply stations; and (2) overhead and underground electrical supply and communication lines and equipment, as may be amended from time to time.

**Node Pole** – Distribution Pole used to accommodate communications hardware (DAS or Small Cell Wireless Technology) that receive and transmit data does not include Ground Furniture.

**Neutral** – The conductor used to carry unbalanced current. In single-phase systems, the conductor used for a return current path.

**Overlash(ing)** – A specific method of attaching multiple communications cables on a single supporting strand, as further described in the FCC's orders.

**Pole** – CenterPoint’s Poles supporting electrical conductors of less than 69 kV, not including Transmission-only poles, dedicated metal poles, street light poles, and all other such special purpose poles or pole lines of non-standard design that do not support CenterPoint’s electric distribution system.

**Pole Attachment Agreement** – Agreement executed by CenterPoint and Attacher setting forth the terms and conditions pursuant to which Attacher may obtain access to
CenterPoint's Poles, the applicable pole attachment rate(s) or rate formula(s), and the process whereby Attacher may obtain a Site License to use any individual CenterPoint Pole.

**Pole-Top Zone** – Pole space located at the top of the pole.

**Post-Installation Inspection** – Inspection performed by CenterPoint to ensure that Attacher’s installation conforms to the design data approved in Attacher’s Application for Temporary Construction Permit, and fully complies with the NESC, these Guidelines, and applicable regulations, codes, and laws.

**Primary** – A primary voltage distribution circuit delivering electric power through electrically charged conductors usually considered to be between a substation or point of supply and the distribution transformers.

**Public Safety Department** – CenterPoint group responsible for promoting electric safety and educating the general public about the dangers of electricity.

**Regulator** – A device used to control (increase and decrease) the voltage of a circuit.

**Route Map** – Attacher’s map showing intended aerial cable route using individual Poles.

**Service Standards** – CenterPoint’s electric service standard practices compiled for the benefit and guidance of customers, contractors, electricians, architects, and engineers.

**Single Phase** – The distribution of electric power using a system in which the voltage is taken from one phase of a Three-Phase source.

**Site License (SL)** – CenterPoint map document authorizing an Attacher’s non-exclusive right of attachment and ongoing use of specific CenterPoint Poles as indicated thereon, and as the CenterPoint and Attacher may amend from, time to time.

**Stand-Off Bracket** – 9 to 10 inch hardware bracket used to extend Conduit Risers away from Poles to provide safer climbing space.

**Supply Space** – (see also Electrical Supply Zone) the upper portion of a distribution pole located above the Communications Workers Safety Zone, used to support electric cables and other electric equipment, such as Transformers and capacitors, used for electric distribution. Only CenterPoint-authorized electrical workers are allowed to work in or above the Supply Space.

**Telecommunications Attachments** – Any fiber optic cable, coaxial cable, the cable and wires connected to such fiber optic cable and coaxial cable, and any and all supporting cable used to provide Telecommunications Service as defined in Section 153(51) of the Communications Act of 1934, as amended, (“Act”), including without limitation, Broadband Internet Access Service, as defined in the FCC’s rules, or any combination of cable television service and/or telecommunications service with any other service not otherwise classified.
by the FCC ("Commingled Service"), including but not limited to Voice over Internet Protocol ("VoIP") ("Telecommunications Attachments").

**Temporary Construction Permit (TCP)** – CenterPoint map document designating the Poles on which an Attacher has been authorized to place attachments, authorizing such Attacher to proceed with the specific installations approved by CenterPoint, as requested in Attacher's Application.

**Texas Health & Safety Code** – Code enacted by the Texas Legislative Council to ensure the safety of Texas workers.

**Three-Phase** – A circuit consisting of three conductors where the current and voltage in each conductor (phase) is 120° out of phase with each other phase.

**Three-Phase Major Underground (MUG) Terminal Pole** – also known as a “dip pole,” is a medium-voltage, three-phase, coppered-out switch that terminates at the pothead, which is used to transition between three-phase medium voltage overhead lines and three-phase underground medium voltage cable that either continues to feed the circuit or a three-phase underground Transformer.

**Transformer** – An electro-magnetic device used to change the voltage in an alternating current electrical circuit.

**Transmission** – Normally, the highest voltage network of an electric utility system, that carries power over the longest distances, typically operating at voltages of 69 kV (69,000 volts) or greater.

**U-Guard** – U-shaped cover molding designed to protect communications cable facilities is located where communications circuits lead from underground to overhead.

**Unauthorized Attachment** – Any attachment which has not been licensed through the Application for CenterPoint Distribution Pole Attachment process (Section 6).

**Unusable Space** – The space on the pole below the applicable minimum clearance requirement as defined by federal, state, or local regulations.

**Wireless Telecommunications Attachments** – Antennas and support equipment including but not limited to batteries, conduits, and boxes for power supply and other purposes, support mounts and structures, radio access nodes, accessory equipment (including associated hardware), cables and wires connecting antennas to accessory equipment on the same Pole, electronic equipment shelters and all property within such shelters, pedestals supporting equipment cabinets or panels, and other necessary communications equipment (located at the Ground Furniture) (collectively, “Wireless Telecommunications Attachments”) used to provide Telecommunications Service, as defined in Section 153(51) of the Communications Act of 1934, as amended ("Act").
SECTION 1. CenterPoint Energy & Third-Party Communication Attachments

CenterPoint Energy Houston Electric, LLC (CenterPoint) is required by the Communications Act of 1934, as amended, (47 U.S.C. 224) and the FCC’s implementing regulations to provide certain communications service providers non-discriminatory access to its Poles for the sole purpose of attaching facilities used to deliver cable television and/or telecommunications services. CenterPoint Energy’s Pole Attachment Guidelines and Procedures (Guidelines) set forth:

- The general terms, conditions, and processes pursuant to which CenterPoint shall accommodate such attachments in the course of conducting CenterPoint’s core operating business, and
- The required design, construction, and engineering standards and practices that must be followed by all entities attaching to CenterPoint’s Poles.

Notwithstanding CenterPoint’s limited obligation to provide access to its Poles, permission to make an attachment to any Pole or Poles may be denied for reasons where insufficient capacity exists, or for any reason related to safety, reliability, and generally accepted engineering practices.

It is CenterPoint’s practice to install Poles of sufficient height to allow future installation of transformers and other electrical equipment on its Poles, as needed to support CenterPoint’s core business of delivering electrical service. Therefore, CenterPoint’s Design Standards only allow for the attachment of communication facilities to the extent CenterPoint has sufficient capacity to install transformers and other electrical equipment on its Poles. Because such space may not be needed for several years as part of Distribution Operations planning, it is CenterPoint’s practice to allow interim use of the electrical space for communication attachments. This practice avoids the time and expense of replacing existing Poles with new, taller Poles to provide space for each new communications attachment, while still reserving space for CenterPoint’s bona fide future use. In the event any electrical space temporarily used by the communication attachments is needed in the future to install electrical facilities, all affected attachers will be required to relocate their facilities from such reserved space. CenterPoint, in its sole discretion, may install a new or taller Pole(s) where requested to do so by an Attacher, at such Attacher’s sole cost and expense. (See the following section in these Guidelines: Distribution Planning for Bona Fide Future Use of Distribution Poles.)

CenterPoint Energy’s Guidelines are intended to assist Attachers in facilitating Pole attachment requests. In addition to following the Guidelines, Attachers are required to:

1. Negotiate a valid Pole Attachment Agreement with CenterPoint;
2. Remain in full compliance with applicable CenterPoint’s insurance and creditworthiness requirements; and
3. Meet any other Company, local, state, and federal laws, codes, regulations, and policies.
Strict adherence to CenterPoint's Guidelines will ensure a smooth application and approval process and will allow completion of construction with minimal delay and conflict.

Those portions of this document relating to cable design and construction in proximity to CenterPoint's electrical plant are intended to be used in conjunction with the National Electrical Safety Code (NESC), and do not in any way supersede or replace the NESC. The Attacher is independently responsible for its compliance with all NESC guidelines and applicable local, state, or federal laws, codes, and regulations.

CenterPoint is not responsible for ensuring the compliance of attaching companies with applicable laws, regulations, or guidelines. In all situations, it is the ongoing responsibility of the Attacher to be familiar with and adhere to the NESC and these Guidelines during installation, maintenance, and related activities involving their facilities attached to CenterPoint’s facilities. Any attachment found to be in violation of the NESC, any provision of these Guidelines, CenterPoint Standards, or other codes, laws, or regulations, may be subject to removal by CenterPoint at the cost of the Attacher.

Policies and procedures for requesting, constructing, maintaining, repairing, and modifying any Attachment to CenterPoint’s Poles set forth in the Guidelines may be amended from time to time.
SECTION 2. Safety: Notice Working Near Overhead Electrical Distribution System

Attaching companies are on notice that CenterPoint's Poles are part of an overhead electrical Distribution System. The power lines attached to these Poles should be presumed energized at all times, and all persons, including attaching companies' employees and contractors, must exercise caution and take all reasonable precautions when working on or near electric utility Poles and/or near high-voltage lines.

CenterPoint has determined that Poles constructed of steel are unsafe for climbing, and for that reason, prohibits its own employees and independent contractors, as well as employees and independent contractors of Attachers or other Pole licensees, from climbing such Poles for any reason. CenterPoint therefore must reject any request to attach to such Poles unless the requesting Attacher demonstrates that such Poles may be accessed safely through some means other than climbing.

Certain Federal regulations and Texas statutes directly address construction activity in the vicinity of overhead electric lines, and violators are subject to criminal penalties and civil liabilities. These laws apply to employers, contractors, owners and any other parties or persons responsible for or engaged in construction activities.

CenterPoint's Public Safety Department promotes electric safety awareness to the public through seminars and demonstrations. For more specific safety information or to arrange for free safety demonstrations, attaching companies are encouraged to contact CenterPoint's Public Safety Department at 713-945-6707.

Emergency Situations
In the event of contact by construction equipment with overhead or underground electric lines, call 713-207-2222 to provide information as to the location of the incident and whether the situation is life threatening.
SECTION 3. Distribution Planning for Bona Fide Future Use of Distribution Poles

CenterPoint's Service Standards only allow for the attachment of communication facilities to the extent CenterPoint has sufficient capacity to install transformers and other electrical equipment on its Poles. In the event any electrical space, temporarily used by the communication attachments, is needed in the future to install electrical facilities, all affected attachers will be required to relocate their facilities from such reserved space.

Following notice of such a requirement, Attachers are required to relocate their facilities within 45 days of the notice.
SECTION 4. Structure of the Distribution Pole and Working Zones

In all situations, it is the ongoing responsibility of the Attacher to be familiar with and adhere to the NESC definitions, rules, and criteria related to all sections of a distribution Pole. *(See also the following Section in these Guidelines: Attachment, Design, Engineering, and Construction Requirements.)*

The Distribution Pole includes:

- Pole-Top Zone
- The Electrical Supply Zone or Supply Space
- Communication Workers Safety Zone
- Communications Space

The Pole-Top Zone is the Pole space located at the top of the Pole above the energized portion of the Pole.

The Electrical Supply Zone or Supply Space is reserved for electrical supply facilities. Most Supply-Space wiring consists of uninsulated conductors. The Supply Space may include separate facilities operating at different voltages; for safety reasons, the highest voltages are located uppermost on the Pole.

Communication Workers Safety Zone is the safety zone, or “neutral” space, between the lowest electrical supply conductor or equipment and the highest communication cables or equipment.

The Communications Space is the portion of Pole containing Cable Attachments, Telecommunications Attachments, and other communications cables.
SECTION 5. Qualification of Communication Workers

Attachers are responsible for determining the qualifications of the communications workers retained to install, maintain, or repair their attachments. Attachers are responsible for complying with all NESC and other requirements related to the communication worker. CenterPoint, in its sole discretion, reserves the right to prohibit any communications worker found performing in an unsafe manner, or whom CenterPoint otherwise determines is not qualified, to perform the work for which they were retained.

Communications Workers
An Attacher may use its own qualified work crews or independent contractors of its own choice to perform work within the Communications Space; provided, however, that CenterPoint may prohibit any such independent contractor from working within the Communications Space if CenterPoint concludes, in its sole discretion, that such contractor is not qualified to perform the work specified.

Qualified Electrical Workers
All work performed within or above the Electrical Supply Zone (including in the Pole-Top Zone), including work related to the construction, installation, maintenance, or repair of wireless Pole-Top attachments, must be performed by CenterPoint's authorized Electrical Workers. Electrical Workers are those specially trained electrical linemen with the skillset to work with and around electrical wires in or above the Electric Supply Space. These workers may only be employees of CenterPoint or CenterPoint-authorized independent contractors.

Wireless applicants shall establish a separate contractual relationship with a CenterPoint-authorized Electrical Worker who will perform all applicants' work on CenterPoint's Poles within or above the Electrical Supply Space under CenterPoint's direction and supervision.

For all work performed on wireless Pole-Top antennas by Attachers' own qualified work crews or independent contractors, Attacher(s) shall demonstrate that all employees, contractors and agents of Attacher working on CenterPoint's Poles have received the training required by the FCC for Hazardous Radio Frequency Radiation safety.
SECTION 6. Application for CenterPoint Distribution Pole Attachments

All access permission must be in writing, and no verbal permission to attach to CenterPoint Poles will be issued.

Operating under the terms and conditions of a current Agreement with CenterPoint, a prospective Attacher may request access to CenterPoint’s Poles through an Application for a Temporary Construction Permit. The Attacher must provide complete, accurate, and sufficient information in order for CenterPoint to review the Application. If after preliminary review, an Application is deemed incomplete, CenterPoint will reject the Application in its entirety. The Application must include information related to the proposed attachments and any existing facilities that would affect the approval of the attachment (i.e., the existence or request to install a riser, etc.). CenterPoint Energy’s Asset Planning and Optimization Department will approve or deny (in part), the Application within 45 days based on:

- Safety;
- Capacity;
- Reliability; or
- General Engineering Principles.

CenterPoint may deny any proposed attachment(s) that CenterPoint deems:

- Non-compliant with the NESC, the Guidelines, or other applicable law;
- Requires use of any Pole with insufficient capacity; or
- Otherwise would compromise the safety, reliability, or sound engineering of CenterPoint’s facilities.

The Application can be obtained by emailing fijupoles@centerpointenergy.com.

Temporary Construction Permit

If Attacher’s Application is complete, and CenterPoint approves the Application, CenterPoint will issue a Temporary Construction Permit. (But see the section herein on Make-Ready.)

Temporary Construction Permits will automatically expire 90 days after issuance unless the Attacher requests an extension. Only one extension will be given for a 30-day period. Attachers are required to obtain a revised Temporary Construction Permit following the request for extension. If permitted attachments are not installed within the 30-day extension period, and the Attacher still desires to make the attachments, the Attacher must submit a new Application. Attacher is prohibited from accessing CenterPoint’s Poles if the Temporary Construction Permit has expired.

Pole rental charges shall be applied immediately upon issuance of the relevant Temporary Construction Permits. The charges will be detailed on the following year’s annual invoice.
Upon completion of construction, Attacher should notify CenterPoint by e-mail to fjupoles@centerpointenergy.com and CenterPoint, or its designated inspector, will conduct a Post-Installation Inspection of Attacher’s As-Built construction. When Attacher’s As-Built construction passes Post-Installation Inspection, CenterPoint will issue a Site License.

If Attacher’s As-Built Construction, at any time, does not comply with NESC and these Guidelines, Attacher must resolve deficiencies according to the inspector’s instructions, or CenterPoint will not issue a Site License, and the affected attachments will be treated as unauthorized attachments. All deficiencies noting NESC safety violations must be corrected as soon as possible, but no later than 2 days from notice of the deficiency. All other NESC deficiencies must be completed within 30 days’ notice of the deficiency.

Attacher’s construction crews installing or maintaining communication equipment must carry a copy of the Temporary Construction Permit or Site License for the location in which they are working. Failure to provide such documentation upon request is grounds for CenterPoint field personnel to halt activities at the site.

**Change in Pole Ownership**
In the event that CNP acquires new poles with existing third party attachments, CNP will notify existing Attacher(s) of the change in ownership and require confirmation of acknowledgement of the change.

In the event that CNP and any third-party Attacher inherited in the pole swap do not have an existing Agreement, CNP will require Attacher enter into Agreement with CNP. Without an Agreement in place, these attachments are unauthorized and subject to removal at Attacher’s expense.
SECTION 7. Make-Ready

CenterPoint will not re-arrange or re-locate any attachments or other facilities owned or operated by third parties on its Poles to accommodate placement of any new attachment.

In the event any such adjustments are required pre-installation, an Attacher is responsible for coordinating such work with the appropriate third parties, and as appropriate, directly compensating third parties for performing the work requested.

Where Make-Ready is required to provide space for Attacher’s installation, the specific Make-Ready adjustment requested should be stated on the Application.

If Attacher notified CenterPoint of its desire to do Make-Ready in its Application, CenterPoint will provide a cost estimate, and will schedule all Make-Ready work for which CenterPoint is responsible. CenterPoint will perform Make-Ready upon receipt of payment and a completed Facilities Extension Agreement. A Temporary Construction Permit will not be issued until all Make-Ready is completed, including any Make-Ready required by third-party Attachers.

If Attacher has not requested Make-Ready on its Application, and CenterPoint finds that there is insufficient capacity for the Attacher's proposed installations, all such Poles on which insufficient capacity exists will be rejected. Following this rejection:

- Attacher must notify CenterPoint of its intent to proceed with Make-Ready;
- Attacher may choose to withdraw its Application from all Poles, and indicate that no further action is required;
- Attacher may choose to withdraw its Application from all of the Poles requiring Make-Ready, and proceed with attaching only to the Poles for which no Make-Ready is required. CenterPoint will exclude from the Temporary Construction Permit all Make-Ready Poles; or
- Attacher may request a Temporary Construction Permit for those Poles that do not require Make-Ready.

Attacher is responsible for coordinating all Make-Ready with other third-party Attachers.
SECTION 8. Inspection

To ensure compliance with CenterPoint's Pole Attachment Guidelines and Procedures and other applicable law, CenterPoint will conduct Post-Installation Inspections of Attacher's permitted Attachments, at the sole cost and expense of Attacher. The Post-Installation Inspection for each permitted Attachment will occur any time five (5) days after the proposed construction completion date indicated in the Temporary Construction Permit. The scheduled Post-Installation Inspection may be postponed if Attacher applies for an extension of the Temporary Construction Permit, and a new proposed construction completion date is submitted. The scheduled Post-Installation Inspection also may be cancelled if the Attacher notifies CenterPoint of cancellation of proposed construction for which the Attacher was issued a Temporary Construction Permit.

If Attacher fails to notify CenterPoint of a postponement or cancellation of construction, prior to the proposed construction completion date, Attacher will be billed for all associated Post-Installation Inspection expenses actually incurred.

In connection with any new installation, CenterPoint, or its designated inspector, may perform pre-installation inspections, post-installation inspections, and pole loading studies. Attacher will be responsible for applicable costs.

Attacher may request a pre-construction inspection or routing analysis to be performed by CenterPoint at Attacher's expense to review routing- or clearance-related issues on a Pole(s) to accommodate the installations to be proposed in Attacher's Application.

CenterPoint inspects the attachment of its Attachers' facilities in relation to CenterPoint's facilities regardless of Pole ownership.
SECTION 9. Unauthorized Attachments and Irregular Plant Conditions (IPC's)

CenterPoint requires that each Unauthorized Attachment, be licensed through the site licensing process for unauthorized attachments detailed in this section. Attacher will be responsible for all fees and charges associated with the site licensing process, including, but not limited to, fees and charges associated with surveying CenterPoint's poles, all make-ready work, up to and including pole replacement, that CenterPoint requires, and post-installation inspection of the attachment.

Notification and Application

(For any unauthorized attachment notification sent from CenterPoint to Attacher—not a result of the audit—use Application Process in Section 6.)

Upon discovery of unauthorized attachments, CenterPoint will notify the Attacher. The Attacher must submit an Application for Temporary Construction Permit to CenterPoint within sixty (60) days of receipt of the notice. Applications for Unauthorized attachments found as a result of the audit must be submitted as follows:

- Submit one (1) application per Quadrant to AuditResults@CenterPointEnergy.com
- Submit application with the maps provided by CenterPoint to the Attacher with the audit notice

CENTERPOINT RESERVES THE RIGHT TO REMOVE ANY UNAUTHORIZED ATTACHMENT FOR WHICH A COMPLETED APPLICATION FOR TEMPORARY CONSTRUCTION PERMIT (or Dispute as outlined below) IS NOT SUBMITTED WITHIN SIXTY (60) DAYS OF THE DATE OF NOTIFICATION.

The Attacher is responsible for ensuring that all unauthorized attachments are installed properly and comply with all of the NESC, CNP's Pole Attachment Guidelines and Procedures, and all other applicable standards and requirements prior to the construction completion date submitted by the Attacher on the Application.

Back Rent and Penalties

For each Unauthorized Attachment, CenterPoint reserves the right to charge any interest, fees and/or penalties as provided for in the Attacher's pole attachment agreement. In addition, for unauthorized attachments found as a result of the audit, the Attacher will be charged pole attachment fees for the current calendar year and back rent. In the event of non-payment, CenterPoint reserves the right to withhold the issuance of TCPs until all pole attachment fees, back rent, and any interest and/or penalties are paid in full.

Disputes

The Attacher may dispute unauthorized attachments; all disputes will be reconciled through a joint field check. In order to dispute the Attacher shall submit to CenterPoint written notice of such dispute (including all supporting information and documentation), and its request for a joint field check, within sixty (60) days of the date of CenterPoint's notification to the Attacher. Inspection will be scheduled to occur no more than thirty (30) days after the response received by CenterPoint from the Attacher. In the event that the joint field
check confirms the existing unauthorized attachment, the Attacher will incur all costs associated with the joint field check and each unauthorized attachment confirmed through the joint field check must be licensed through the site licensing process for unauthorized attachments detailed herein. In the event the joint field check confirms the Attacher’s position, CenterPoint will be responsible for the cost of the joint field check.

IRREGULAR PLANT CONDITIONS (IPCs) from the Audit

Safety IPCs
As determined by CenterPoint Energy, all deficiencies noting NESC safety violations must be corrected as soon as possible, but no later than 2 days from notice of the deficiency. CenterPoint reserves the right to inspect attachments to verify remediation at the sole cost of Attacher.

Non-Safety IPCs
For each IPC, CenterPoint requires that the Attacher acknowledge receipt of notice within sixty (60) days of the date of being notified; and that the Attacher correct the IPCs and submit its written notice confirming that all remediation is complete within one hundred fifty (150) days of the date of CenterPoint notification. All remediation shall be subject to inspection at the Attacher’s sole cost and expense. CenterPoint requires that, where IPCs and Unauthorized Attachments are found as a result of the audit and in the same Quadrant, actions to remediate the IPCs be completed prior to the proposed construction completion date on the TCP for the unauthorized attachments in the Quadrant. In the event the IPC is not remediated, CenterPoint reserves the right to withhold the issuance of TCPs until all remediation is completed.

IPC Notification Process
- Send acknowledgement of receipt of the IPC notification within sixty (60) days of the notification to AuditResults@CenterPointEnergy.com
- Complete remediation and send confirmation of completion within one hundred fifty (150) days of the notification to AuditResults@CenterPointEnergy.com.

CENTERPOINT RESERVES THE RIGHT TO CANCEL ANY SITE LICENSE, AND TO REMOVE ANY ATTACHMENT FOR WHICH AN IPC IS NOT REMEDIATED WITHIN THE TIME FRAME PRESCRIBED HEREIN.

If there are any questions related to the audit please contact CenterPoint Energy at AuditResults@CenterPointEnergy.com
SECTION 10. Attachment, Design, Engineering, and Construction Requirements

To reduce the impact of communication attachments, attachments should be installed as low as permissible on the Pole.

Reference: Distribution Standard 08-100

No communications equipment is allowed inside the Communications Workers Safety Zone. No communications equipment is allowed inside the unusable space.

Where there are no previous attachments on the Pole, the first attachment shall always be placed at the lowest position that complies with the greater clearance requirements specified by the NESC, CenterPoint, or State and/or County regulations. In such cases, subsequent communication attachment shall be made at the previous attachments and be as low as possible to maintain required clearances from supply and communication facilities.

If a pre-existing violation is identified, additional cables can be installed only if the additional cables can meet NESC clearance requirements or existing attacher(s) adjust their facilities to provide space.

Facilities
Attacher's installations are restricted to facilities approved by CenterPoint used to deliver cable television and/or telecommunications service, as defined in the Communications Act and the FCC's rules, including:

- Fiber communication attachments; and
- Pole-top wireless communication attachments.

CenterPoint does not review the Application to ensure compliance with NESC or local, state, and federal laws and regulations. Compliance with the NESC, CenterPoint Service Standards, these Guidelines, and other local, state, and federal laws, rules, and regulations is at all times the responsibility of the Attacher. Attacher is responsible for the engineering and design of its system. Facilities must be installed in accordance with Attacher's design (per the Attacher's Application for Temporary Construction Permit) and CenterPoint's Temporary Construction Permit.

Electric power service must be installed in accordance with CenterPoint's Service Standards found at http://www.centerpointenergy.com/home. CenterPoint does not provide retail electric service. Attacher must arrange for electric service through a retail electric service provider.

Construction Requirements
1. Communications cables must be designed for installation on the same side of Poles (typically the street side) as CenterPoint's neutral and secondary conductors and any
existing communications cables. In the absence of any existing installations on CenterPoint’s Poles, communications cables must be installed on the street side of Poles.

2. Communications cables must be designed for installation as low to the ground as practical and to conform to CenterPoint’s Specification 08-100 and in accordance with the NESC and any State and/or County regulations.

Reference: 08-100 Communication Conductors Under 12kV Construction and Under 35kV Construction

3. Attacher must bond its messenger in accordance with the NESC. If an attaching company chooses to use a separate bond wire down the Pole, it must be bonded to the CenterPoint electrical bond at the base of the Pole in accordance with the NESC.

Reference: Distribution Standard 08-200

4. Communication cables must be identified by tagging every cable at every Pole. Existing untagged cables should be identified at every Pole during normal maintenance. Untagged cables may be treated as unauthorized attachments.

5. Attacher is responsible for coordinating adjustments of existing attachments with appropriate third parties; prior permission to adjust existing cable facilities between any new Attacher and any existing Attacher should occur before any adjustments are made.

6. To provide safe climbing space on the Poles (for workers’ belts) as of September 1, 2012, only one Conduit Riser not larger than 3” inside diameter and only one Stand-Off Bracket assembly may be attached directly to Poles. Conduit Risers larger than 3” inside diameter must be installed using a 10-inch standoff bracket. No more than three customer Conduit Risers can be attached to a 10” Stand-Off Bracket. Risers installed prior to September 1, 2012, will be grandfathered until the conduit and/or Pole is replaced at which time only one Conduit Riser not larger than 3” inside diameter and only one Stand-Off Bracket assembly may be attached directly to Poles.

Reference: Service Standard 413.2

7. Horizontal Extension Arms are to be used by CenterPoint personnel to maneuver cables/conductors around fixed objects on a Pole, in efforts to accommodate safe Pole access. Horizontal Extension Arms shall not be used by Attachers to achieve required vertical clearances and/or horizontal separation.

8. CenterPoint does not permit risers on Three-Phase Major Underground (MUG) Terminal Poles or Poles with Pole-Top switches.

9. Use of a U-Guard is limited to only one per Pole (see use of Conduit Riser w/Stand-Off Bracket) to accommodate safe Pole climbing access.

10. Vertical extension arms are not acceptable equipment for use on CenterPoint Poles.

11. Overflashing shall be permitted only on Cable Attachments and Telecommunications Attachments.

CenterPoint Energy Pole Attachment Guidelines and Procedures
a. The owner of the cable supporting the overlashed installation is responsible for maintaining both the supporting cable and the overlashed cable in compliance with NESC and these Guidelines.
b. Overlashing will be allowed without prior approval provided that such overlashing is reported to CenterPoint by the Owner of the overlashed cable no less than 30 days prior to the date on which overlashing is anticipated to occur.
c. Overlashing to an Attacher's existing cable will be accommodated based on the same design criteria as other communication installations.
d. CenterPoint reserves the right to perform a pre-installation inspection and/or pole loading analysis at the Attacher's expense.
e. Overlashed attachments not reported to CenterPoint at least 30 days prior to installation will be treated by CenterPoint as unauthorized attachments.

12. Communication Service Drops – For the sole purpose of providing new service to a new customer, Attacher shall have the right to attach Communication Service Drop cables extending from an existing supply line to the new customer's premises provided that:

a. Attacher shall provide to CenterPoint advance written notice of each such Service Drop no less than ten (10) days prior to the date on which the Service Drop is installed. If Attacher fails to provide such notice within the aforementioned ten (10) day time frame, the Attachment supporting such Service Drop may be treated by CenterPoint as an Unauthorized Attachment, and may subject attacher to performing additional make-ready at Attachers expense.
b. The Communication Service Drop is an extension from a cable of a previously licensed Attachment;
c. The Communication Service Drop impacts fewer than five (5) Poles;
d. The distance between communications service drops should be sufficient to clear line-mechanics climbing space, to the nearest communications service drop.
e. The Communication Service Drop is installed in compliance the NESC, any provision of these Guidelines, CenterPoint Standards, or other codes, laws, or regulations;
f. The Communication Service Drop attachments will be subject to a Post-Installation Inspection by CenterPoint, or its designated inspector; and
g. Any Communication Service Drop installed directly to the pole will be treated as an additional Attachment and will be subject to terms and conditions of the Pole Attachment Agreement.

Reference: Distribution Standard 08-200

13. Communications Grounding system must be on the opposite side of the Pole from CenterPoint Ground Wire with the bond communication Grounding conductor with CenterPoint's Pole ground together at base of Pole.

Reference: Distribution Standard 08-800

14. The Guy should be considered as part of the structure, with a designed/installation consisting of proper tension to support the attachment(s) typically installed at
attacher's dead-ended facilities, and/or when a CenterPoint guy is present. Guying adds stability to a Pole structure, with one end of the cable secured to the Pole structure, and the other anchored to the ground at a distance from the Pole structure's base. Each company shall independently guy and anchor its respective facilities where such facilities add an unbalanced tension load to the Pole. Guy Anchors are part of CenterPoint's Post-Installation Inspection review. Communication cables must be properly guyed and anchored before tensioning. Attacher must install separate guying and anchoring devices to secure their cables. Attachers are responsible for ensuring that communication cables are independently guyed and anchored. Attachment to CenterPoint's guys and anchors are not an acceptable design or construction practice. Attacher is responsible for the costs of any damages to CenterPoint’s facilities resulting from improper guying and anchoring of its installation. Broken or damaged electrical guy wires should be reported to CenterPoint at 713-207-2222 and should be avoided until repaired.

*Reference: Service Standard 08-800.*

15. Vegetation Management
a. Attacher is responsible for all vegetation trimming necessary on or around its attachments, both during and after installation.

b. CenterPoint does not provide any vegetation trimming services for communication facilities.
SECTION 11. Pole-Top Attachments

Communications equipment in the Pole-Top Zone shall be connected to communication equipment separately located at the Ground Furniture by cables encased in conduits that run vertically up the Pole through the Communications Workers Safety Space and the Electric Supply Space.

Reference: Distribution Standard 08-300 and 08-310.

Power Supply Generators are not to be mounted on CenterPoint Poles or connected to CenterPoint’s Distribution System. All batteries, power sources, radio heads, or other equipment required to support wireless attachments must be installed at the Ground Furniture located at the meter pole.

CenterPoint requires that a Pole-Top Zone be created by replacing an existing Pole with a taller Pole of sufficient length to provide a Pole-Top Zone to accommodate Pole-top communications attachments with a maximum allowable Pole height of sixty-five (65) feet. CenterPoint does not permit the use of vertical pole-top extensions to provide additional height for the Pole-Top Zone.

The top of a distribution Pole is generally occupied by CenterPoint’s electric equipment, or otherwise reserved to accommodate such equipment pursuant to CenterPoint’s Business Plan.

All antenna facilities must be installed in accordance with the NESC, these Guidelines, CenterPoint Standards, and all other codes, laws, and regulations. The Attacher will incur the cost of relocating existing communication facilities to access the highest position in the communication space on the Pole.

All antenna locations shall be approved by CenterPoint prior to installation and must maintain proper clearance in accordance with the NESC requirements. No antennas are to be mounted on the same side of the Pole where other communication facilities or where the CenterPoint supply conductor are installed.

In accordance with the safety and climbing requirement under NESC 235C4, only one wireless device installation is allowed per Pole.

**Wireless Antenna Overview**

All antenna locations shall be pre-approved by CenterPoint, prior to installation and must maintain proper clearance in accordance with the NESC requirements.

Wireless Antennas shall be mounted at the top of poles in compliance with CenterPoint’s Wireless Standards.
Design & Pole Criteria:
1. Only one Pole-Top antenna equipment installation(s) shall be permitted per Pole to meet safety concerns and climbing requirements.
2. Proposed pole top and small cell attachments must meet the Pre-Determined Acceptance/Rejection Criteria for Wireless Antenna at the Pole-Top. These include:
   a. Poles considered for Wireless Telecommunications Attachments shall be in-line tangent Poles only. No dead-ended, corner, or guyed Poles or Poles framed for junctions or laterals will be considered for attachment. Poles with certain framing, including Poles framed for junctions or laterals that eliminate climbing space, shall not be considered for Wireless Telecommunications Attachments.
   b. Poles with electrical equipment or devices including: transformer banks; manual and remote-controlled switches; sectionalizers; capacitor banks; regulators; reclosers; auto devices, intelligent grid switching device equipment, or 3-phase MUG dip Poles will not be considered.
   c. The installation of Poles taller than 65 feet or larger than Class 1 will not be considered.
   d. Poles selected for Wireless Telecommunications Attachments must be truck accessible on the road ROW.
   e. Equipment and/or device Poles shall not be allowed for selection—no presence of Transformer Banks, Manual and/or Remote Controlled Switches, Sectionalizers, Capacitor Banks, Regulators, Reclosers, Auto Devices, IGSD equipment, or 3 Phase MUG Dip Poles.
   f. New Pole Make-Ready may require Pole height increase of 10', but shall not exceed total height of 65 feet to accommodate the Wireless Telecommunications Attachment.
   g. Pole Class preference number 2, but no installation of Pole larger than Class 1
   h. The Application analysis of Wireless Telecommunication Attachments includes an analysis of the capacity, engineering, reliability, and safety for both the wireless antenna and the fiber attachment(s). Some installations shall be limited to fewer attachments depending on structural loading.
   i. No pre-existing cell-relay equipment on any candidate Pole shall be allowed to accommodate any wireless antenna.
   j. Equipment RF emissions data within CenterPoint specifications.
   k. Installation of Wireless Antenna Equipment - All antenna equipment associated with any Wireless Telecommunications Attachment shall be affixed to CenterPoint's Pole with locking through-bolt designed construction, to avoid any antenna equipment from separation of Pole.
   l. Wireless Antenna Systems – CenterPoint requires that Attacher install and maintain a power "on/off" switch at all locations where a Wireless Telecommunications Attachment is maintained, allowing for manual disconnection of AC and DC power to such attachment by CenterPoint and/or CenterPoint qualified electrical contractors during any emergency event. Communications workers are only allowed in the Communications Zone of the Pole.
3. Only designs with wireless cabinets proposed to be installed on a separate pedestal off of the Pole or on a different Pole installed by the Attacher will be considered.

4. No meters on Node Poles (Poles selected for antenna installation). A meter pole will be required unless the Attacher obtains non-metered service from its retail electric provider.

5. Antenna grounding shall be in compliance with NESC.

Property Rights:
1. Attachers are responsible for obtaining property rights for the installation of the equipment pedestal. CenterPoint will not obtain or negotiate property rights for the benefit of Attacher.

2. CenterPoint gives no guarantee that Attacher will be granted property rights from property owners, municipalities, or other rights-of-way owners for the use of rights-of-way.

3. Attacher is solely responsible for obtaining consent, where necessary, from property owners.

Wireless Antenna Site License Application Process
1. Applicant must apply for an individual Site License for each Wireless Telecommunications Attachment.

2. Applicant must submit the following information for each Wireless Telecommunications Attachment requested:
   a. Specifications for all equipment proposed for installation on CenterPoint's Poles for CenterPoint's review. All equipment must be pre-approved by CenterPoint before installation on CenterPoint's Poles.
   b. A map showing the location of the Pole proposed for the Wireless Telecommunications Attachment.
   c. Contact information of the person or entity responsible for the installation.

3. Within 45 days from receipt, CenterPoint will either:
   a. Inspect and either approve/deny proposed Pole location(s) and provide a cost estimate to replace the approved Pole(s) with a taller Pole suitable for the proposed antenna, or
   b. Provide a written denial of the use of the specific Pole if CenterPoint deems the Pole and requested Wireless Telecommunications Attachment to be: (1) non-compliant with NESC, these Guidelines, or other applicable law; (2) in conflict with CenterPoint's core business, including but not limited to maintenance, renovation, or relocation of CenterPoint's facilities; or (3) otherwise would compromise the safety, reliability, capacity, and/or generally accepted engineering practices of CenterPoint's facilities.

4. Upon Applicant's approval of estimate, and receipt of the applicable fee, CenterPoint will release Pole replacement work-order to Applicant's CenterPoint-approved electrical contractor or may elect to perform the Pole replacement contingent on CenterPoint's current work-schedule.
a. Simultaneously, Applicant will contract with the same CenterPoint-approved electrical contractor to install the approved Wireless Telecommunications Attachment on the replacement Pole.

b. The electrical contractor shall install Applicant’s Wireless Telecommunications Attachment at the same time the contractor or CenterPoint performs CenterPoint’s Pole replacement work. Electrical contractor shall, at all times, perform such work under CenterPoint’s direction and supervision.

5. Upon final Post-Installation Inspection of the Wireless Telecommunications Attachment, as installed, CenterPoint shall provide Applicant with a Site License. Payment of rental fees will continue until equipment is removed.

6. CenterPoint shall perform a Post-Installation Inspection to verify compliance with the NESC and these Guidelines. Any installation causing a violation of the NESC will be rejected.

Supply Space – Wireless Antenna

Only CenterPoint-authorized Contractors (electrical workers) are allowed to work in or above the Electric Supply Zone. Wireless Telecommunications Attachments located below the Electric Supply Zone only, may be installed by qualified contractors of Attacher’s choosing; provided that no work is be performed in the Electric Supply Zone.

No Wireless Telecommunications Attachment may be installed in the Supply Space.

All Pole replacement and work, in and above the Supply Space will be performed by CenterPoint or CenterPoint’s authorized electrical contractors, at the expense of the Attacher.

Tree trimming, where required for Pole replacement or installation, or to provide clearance for the Wireless Telecommunications Attachment will be performed by CenterPoint’s contractors during Pole installation, at Attacher’s sole cost and expense.

CenterPoint’s authorized contractors will install all Wireless Telecommunications Attachments and associated equipment. Attacher will supply the antenna material; the CenterPoint contractor will direct bill Attacher for the antenna installation. This includes equipment within the Communication Space. Attacher shall provide any special instructions or training needed for antenna installation.

RF Emissions Standards

It is the Attacher’s sole responsibility to comply with all applicable CenterPoint policies and all local, state, and federal laws, codes, regulations regarding RF emissions standards.

Reference: Distribution Standard 08-310 Distributive Antenna System on 12kV Delta Tangent.
Reference: Distribution Standard 08-310 Distributive Antenna System on 35kV Delta Tangent.
Reference: Distribution Standard 08-320 Distributive Antenna System on 35kV Vertical Tangent.
SECTION 12. Removal Notification and Abandonment Attachment

Attachment Removal Notification
Attacher must provide CenterPoint written notice of each licensed Attachment removed from CenterPoint's pole. Absent such notice, each Attachment will remain subject to the terms and conditions of the Pole Attachment agreement. Upon receiving written notice from the Attacher that the attachments have been removed, CenterPoint reserves the right to inspect the designated attachments to verify removal. Upon verification of removal, CenterPoint shall reissue the applicable Site License for the remaining authorized attachments. In the event the inspection finds that attachments have not been removed from CenterPoint poles in the field, each Attachment shall remain subject to the terms and conditions of the Pole Attachment agreement and the Attacher will be assessed the fees associated with the inspection.

Attachment Removal Notification Process

- Upon completion of removal of the licensed attachments, submit confirmation of removal to FIUPoles@CenterPointEnergy.com
- Include in the confirmation notice a copy of the Site License designating the licensed attachments that have been removed.

Abandoned Attachment
Attacher shall bear all costs of removal and any CenterPoint costs incurred as a result of such removal, and shall continue to pay all Attachment Fees due to CenterPoint under the applicable section of the Attacher's Agreement up to and until the date on which such Attachment(s) have been removed from the abandoned Pole.

CENTERPOINT SHALL MAKE NO REFUND OF ANY AMOUNT PAID BY ATTACHER FOR USE OF SUCH POLE, NOR SHALL ANY OTHER OBLIGATION OR LIABILITY OF ATTACHER UNDER THIS AGREEMENT BE AFFECTED BY SUCH ABANDONMENT.
SECTION 13. Pole Transfer

CenterPoint at times will send Attachers notifications of Pole Transfer requests. Pole Transfers occur when CenterPoint’s core business requires maintenance, renovation, or relocation of CenterPoint’s facilities, and Attachers’ facilities will be affected. CenterPoint requires Attachers to respond and transfer their facilities within 45 days from the date notice is provided.

Failure to complete the Pole Transfer of the Communication Attachments within 45 days will result in CenterPoint relocating and/or removing Attachers’ facilities at Attachers’ sole cost and expense.
SECTION 14. Property Rights

Non-CenterPoint facilities cannot be installed on CenterPoint's property or within CenterPoint's rights-of-way without prior written approval of CenterPoint's Surveying & Right-Of-Way Department (1-713-207-5769).

In all situations, prior permission must be obtained from property owners and governmental entities for use of private property and public roads. CenterPoint assumes no responsibility for securing any permission that may be required, and attaching companies should not assume that such permission exists based solely on the presence of CenterPoint's facilities.

CenterPoint will not obtain or negotiate rights-of-way for the benefit of Attacher, and no guaranty is given by CenterPoint of permission, from property owners, municipalities or others ("Right-of-Way Owners"). Attacher shall in all cases be solely responsible for obtaining consent, where necessary, from landowners and governmental entities involved.

Wireless Attachers must obtain all required permits and approvals from any municipality, homeowners association, or other public or private property owner. Wireless Attacher will resolve property owner complaints over the location of a Pole or the Wireless Telecommunications Attachments will be removed and/or relocated at Antenna Company's expense.

Attachers are at all times responsible for obtaining property rights or easements from property owners and governmental entities for use of private property and public roads. CenterPoint's approval of a TCP or granting of a Site License in no way conveys a property interest in the underlying property. CenterPoint assumes no responsibility for securing any permission that may be required, and Attachers should assume no such permission exists based solely on the presence of CenterPoint's facilities.
SECTION 15. Foreign Poles

Many of the Poles to which CenterPoint's electrical lines are attached are not owned by CenterPoint. CenterPoint cannot give permission to attach to these Poles. Attacher is responsible for obtaining all required permissions from the owners to install on these non-CenterPoint Poles. CenterPoint will identify Pole ownership during the Site License Application Process; ownership cannot be determined in the field.

CenterPoint reserves the right to inspect any communication attachments in relation to its installations and equipment on Foreign Poles, if, such inspection is permitted by the third-party Pole owner.

See Section 8 for Inspection.
SECTION 16. Communication Attachments in Transmission ROW

Third-party communication attachments are only allowed in the Transmission ROW where there is existing Distribution System underbuilt. Any proposed third-party communication attachments requested on CenterPoint’s Transmission poles, without Distribution System underbuilt are outside of the scope of Section 224, and must be subject to a separately negotiated commercial agreement.

For Transmission poles with Distribution underbuilt, where there are no previous attachments on the pole, the first attachment shall always be placed at the lowest position that complies with the greater clearance requirements specified by the NESC, CenterPoint, or State and/or County regulations. In such cases, subsequent communication attachment shall be made at the previous attachments and be as low as possible to maintain required clearances from supply and communication facilities.

Attachments to CenterPoint’s Transmission poles must be hanged with stainless steel band.
SECTION 17. Communication Attachments on Streetlight Poles

CenterPoint will consider attachment to Distribution Poles with streetlights on them subject to the same criteria that would be applied for requests to attach to other Distribution Poles, pursuant to Section 6.

Any proposed third-party communication attachments requested on CenterPoint’s metal streetlight Poles, without Distribution System are outside of the scope of Section 224, and are therefore not permitted.

All attachments requests are subject to review for safety, reliability, engineering practice, and capacity concerns.

Reference: Distribution Standard 08-600.
SECTION 18. General Construction and Safety Considerations

CenterPoint's Service Standards can be found online at this link: http://www.centerpointenergy.com/staticfiles/CenterPoint/Common/SiteAssets/doc/106816ServiceStandards.com. These specifications are intended to provide useful references for attaching companies during the design and construction phases and ongoing maintenance of their communication plant attached to CenterPoint's Poles.

As stated in the Introduction of these Guidelines, the information provided herein is intended to be used in conjunction with the National Electrical Safety Code (NESC), and does not in any way supersede or replace the NESC. The NESC should always be followed when making clearance determinations with regard to communication cable installations.

In all situations, it is the continuing responsibility of attaching companies to be familiar with, and adhere to, the NESC during the installation, maintenance and related activities involving their facilities attached to CenterPoint's Poles.
SECTION 19. Identification Guidelines for Communications Cables

While there are numerous designations for identification hardware, for the sake of simplicity, such hardware is referred to in these Guidelines as "tags" and the process of physical identification is referred to as "tagging."

To facilitate CenterPoint's notification to attaching companies during routine maintenance and in emergency situations, all communications cables on CenterPoint's Poles must be identified with tags showing at least one of the following identifiers:

1. The attaching company's generally recognized business name
2. An identifying company logo
3. An emergency telephone number
4. Other mutually agreed upon identifying symbol

Effective January 1, 2012, attaching companies must tag all new cable installations at every Pole to ensure adequate identification. Cables existing as of January 1, 2012, should be tagged during ongoing maintenance activities. Likewise, cable plant acquired during purchases of other attaching companies' systems should be tagged during ongoing maintenance activities.

Cables should be tagged at the time of installation. Attaching companies should make tagging an ongoing effort, and work toward complete tagging of all existing cables not previously tagged. Identification tags should be secured so as to remain permanently affixed to the attaching company's cable, and must:

- Be resistant to fading from the effects of weather, chemicals, etc.;
- Be generally consistent in appearance for a given attaching company throughout CenterPoint's service area;
- Have a typeface that is legible to an observer from ground level; and
- Avoid the use of sharp edges and corners (if constructed of metal) to prevent injury to personnel and damage to cables.

NOTE: For Attachers proposing Wireless Telecommunications Attachments to CenterPoint's Poles, all of the foregoing tagging requirements are applicable.
SECTION 20. Pole Maintenance Identifiers

CenterPoint attempts to identify and mark Poles that should not be climbed. CenterPoint Poles may be treated with chemical wood preservatives. Several types of metal tags and flags are used to identify the condition of CenterPoint's Poles. In all situations, it is the responsibility of any persons having valid reason to climb CenterPoint's Poles in performance of their job to first satisfy themselves as to the structural integrity of Poles prior to climbing.