

Small Cell Streetlight Pole Condition Considerations for Mobile Carriers

Purpose: To clarify the roles and responsibilities of the City of San José (City) and Mobile Carrier partners (Carriers) in evaluating and addressing site-specific streetlight conditions during the pre-design, pre-construction, and post-construction phases of the small cell deployment.

The City streetlight infrastructure is provided “as is” in the public-private partnership agreements, which state, “CITY makes no representations or warranties regarding the suitability, condition or fitness of any PROPERTY or LICENSED AREA for the installation, maintenance or use of an ANTENNA FACILITY” and “[i]t is COMPANY’s election to install and maintain each ANTENNA FACILITY at the applicable PROPERTY and COMPANY does so solely at its own risk” (Master Lease Agreement, Section F).

The City remains committed to providing speed and predictability for small cell permitting while maintaining consistent requirements across all Carriers and property developers performing work in the public right of way, including improvements to entire circuits and streetlight poles if existing conditions are found to be deficient.

By following the suggestions below, Carriers and their vendors can assess potential costs—and integrate these costs into business decisions—*before* committing to a site for reservation or construction design.

Pre-Design Site Considerations:

While Radio Access Network (RAN) needs often define the best location for a network, assessment of constructability *before* design begins supports selecting a site based on the downstream costs and implementation constraints of each potential site.

Carriers and their vendors should consider the following potential costs and site constraints during the field investigation and circuit analysis at each site:

- Visually evaluate the condition of the existing pull box adjacent to the pole:
 - Determine whether the pull box needs replacement.
 - Determine if the existing pull box lid must be replaced with a theft-deterrent lid.
 - Consider the costs of replacing the pull box and the theft-deterrent lid.
- Upon opening a pull box:
 - Take a photograph.
 - Determine if the conduit bends meet specification.
 - If not, consider the cost of bringing the conduit up to specification.

Pre-Design Site Considerations (continued):

- Visit the site at night for a burn test:
 - Ensure all lights are on and functioning at night.
 - If a light is not on, consider the additional cost of repairing any lights that are out on the circuit.

- Visually evaluate the base of the pole for rust and deterioration:
 - At least three threads of the bolt must be visible above the nut for the bolts to be deemed secure.
 - If there is considerable rust or deterioration on the pole or bolts, consider the additional cost to replace the pole.

- Visually evaluate the paint on the pole:
 - If paint is aged, has multiple layers, or appears uneven, consider the potential cost of abating lead paint vs. the cost of replacing the pole.

- Determine the potential service point for the circuit (i.e. service cabinet, PG&E and CSJ underground service boxes):
 - Note any potential upgrades or replacements and their impact on cost.

- Determine whether the site has an effective ground path back to the point of service to understand the cost of potential repairs necessary on the circuit:
 - Determine if the existing overhead service drop will meet PG&E vertical clearance requirements or need relocation.
 - Determine if the existing or relocated overhead service drop would interfere with CSJ maintenance functions after relocation:
 - The relocated overhead service drop must provide 3ft radial clearance from the street light mast arm.
 - Consider the following mitigations and costs to relocate the service drop:
 - Reroute to nearby pole (wood pole or streetlight) for service and RAN needs.
 - Change wire angle to ensure 3ft radial clearance for maintenance bucket.
 - Convert existing overhead service to new underground service per CSJ standards.
 - Propose a mitigation that meets CSJ standards for City approval.

Pre-Construction Site Considerations:

The City will collaborate with Carriers to assess the current conditions of each site through records research and field inspections, including a circuit analysis. This includes dedicated City resources to accompany carriers and their vendors during site visits and to sign and attest to the existing site conditions that can be safely ascertained pre-construction.

If a site or circuit is deficient, the carrier has the following three (3) options:

1. Move forward with the permit and construction and accept and acknowledge:
 - a. The risk of bringing the foundation and circuit up to code for safe operation; and,
 - b. Once the circuit is touched, the carrier is responsible to bring it up to code and satisfactory complete Functional Testing, per CSJ standard specifications Section 86-2.14C.

The CSJ standard specifications include, but are not limited to:

- A functional test for each new or modified lighting system and electrical installation work shall consist of not less than 5 days, continuous, satisfactory operation.
- If unsatisfactory performance of the system develops, the condition shall be corrected by the Carrier, at their expense, and the test shall be repeated until the 5 days, continuous, satisfactory operation is obtained.

2. Document the existing site or circuit deficiencies and report them to the Department of Transportation (DOT), noting the location as a small cell related site, for repair by DOT before construction begins.

NOTE: All requests for DOT repair enter the citywide queue and are addressed on a first come, first served basis. The City cannot guarantee a timeline for completion of such repairs. This is consistent policy with all developers required to perform work in the public right-of-way. For example, for knockdown sites the current estimated timeline to replace is 6 to 9 months.

3. Select a different location that still meets Radio Access Network requirements but does not have the same constructability issues.

Post-Construction:

In the case of a streetlight knockdown or other maintenance issue impacting the operation of leased license area for small cell equipment, the City, at its option, may utilize third-party electrician firms through DOT to accelerate and complete maintenance repairs faster than the then-current service levels.

Once an accelerated repair service is secured, the Carrier must prepare a new permit (based on the original permit) to reinstall small cell equipment and make any adjustments unique to the new construction related to the impacts of the knockdown or other post-construction issue. Carriers may abandon the site, at their option, and submit for a new site on a separate circuit, which the City will process as a new pole reservation and new permit.

Whenever possible, City staff will coordinate with Carriers and their vendors to utilize open permits that may not have been closed yet to expedite maintenance repairs as well as pursue a maintenance permit to enable Carriers to more readily access, adjust, and maintain their equipment in the field.

General site access notifications per the Master Lease Agreement include:

- City must provide 15-day notice (Master Lease Agreement, Section 1.G.)
- Carriers are to provide 48-hour notice (Master Lease Agreement, Section 1.B.)