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Illinois Permitting Webinar: Pole Attachments & Fixed Wireless Permits

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Agenda

- Introduction and Purpose
- Pole Attachments
- Fixed Wireless Permits
  - Tower Construction
  - Small Cell
- Questions and Open Discussion

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Welcome!

Please type your name, role, and organization in the chat.

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Webinar Progress

All webinars will be held at every Wednesday, 11 am – 12 pm CT.

Tentative schedule of topics, subject to change:

- Sept 16 | BEAD Grantee Orientation Part 1 ✓
- Sept 23 | BEAD Grantee Orientation Part 2 ✓
- Sept 30 | Complying with Illinois Requirements ✓
- Oct 7 | Complying with Federal BEAD Requirements ✓
- Oct 14 | Disbursement Approach & Fixed Amount Subawards (FASA) ✓
- Oct 21 | Permitting Part 1 – Right-of-Way and Railroad Permits ✓
- Oct 28 | Permitting Part 2 – Pole Attachments & Fixed Wireless Permits **Today!**
- Nov 4 | Environmental & Historic Preservation Webinar 1
- Nov 11| Environmental & Historic Preservation Webinar 2
- Nov 18 | Environmental & Historic Preservation Webinar 3

Registration Link: https://registration.extension.illinois.edu/start/bead-orientation-webinars-1

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Latest Updates

- Initial requirements were due October 16 at 5 pm CT:
  - **Communicate with your Assistant Grants Managers** for requested updates or to align on timeline for completing the initial requirements
  - **Share via email:**
    1. Updated budget (as applicable), aligning with award shared by Devon Braunstein on Sept 4, 2026 (if received an update then)
    2. Programmatic Risk Assessment (PRA) & NEPA Questionnaire
    3. Protecting the BEAD Program from Defaults Certification
  - **Complete via online form:**
    1. FY27 Internal Control Questionnaire (ICQ), available in GATA portal

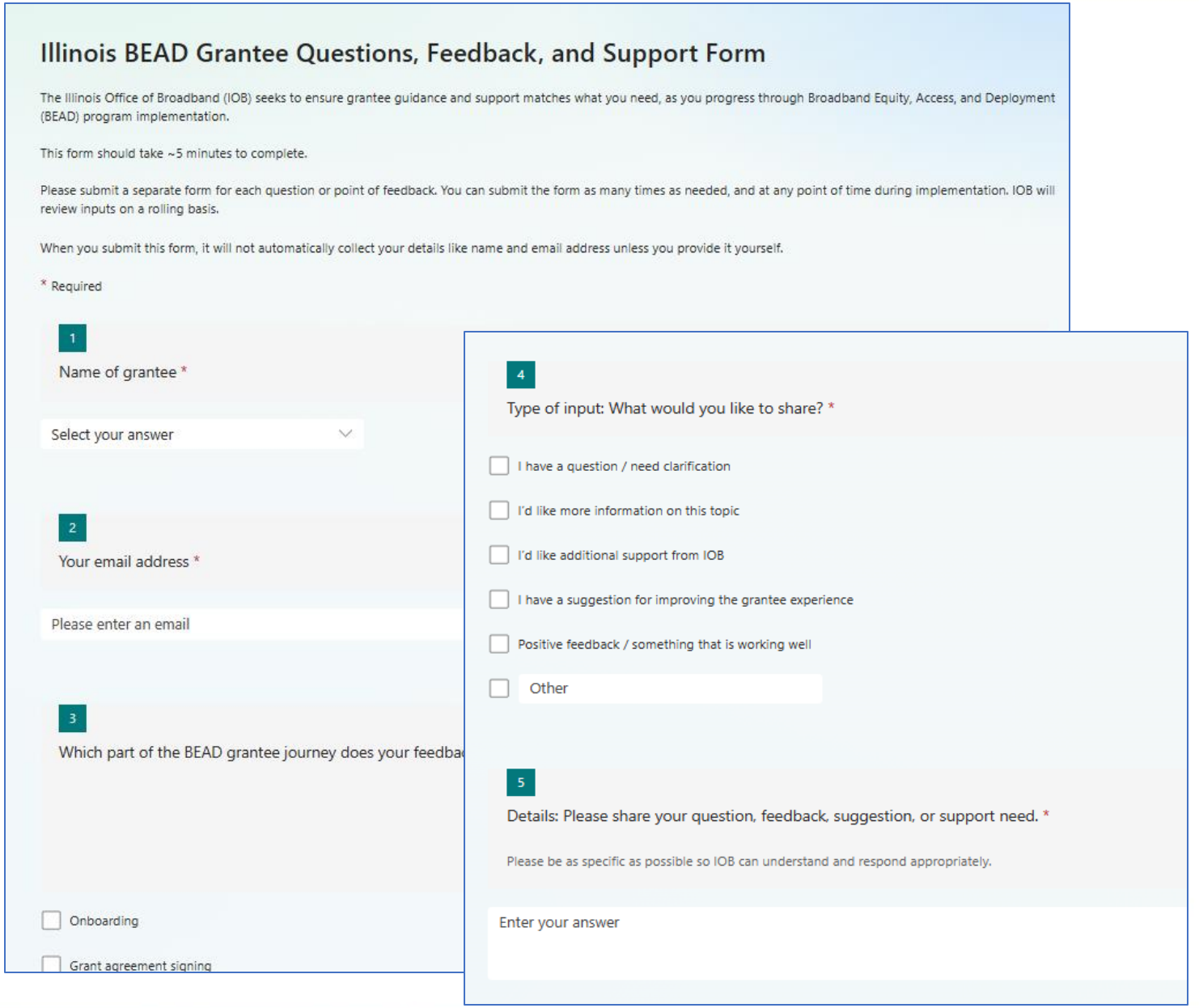
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Feedback

Complete the Feedback form!

Takes <5 minutes to complete, and helps IOB ensure we're best addressing your questions and needs

[Take the short survey]

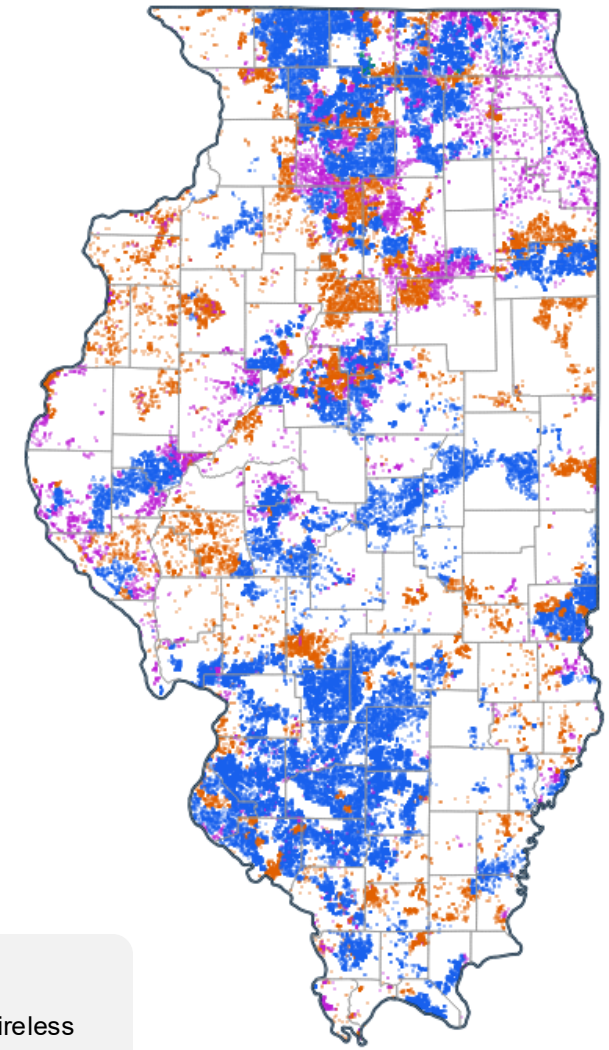


Purpose of Today's Webinar

- Provide a high-level overview of pole attachments and permits for fixed wireless deployment in Illinois

- Determine how to leverage the Illinois Office of Broadband's permitting tools for successful deployments

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Illinois was allocated $1.04B to connect 142,000+ locations

$831M

BEAD outlay for grantees

$5,830

Average federal cost per location

$500M

Total match amount from internet service providers

~142K

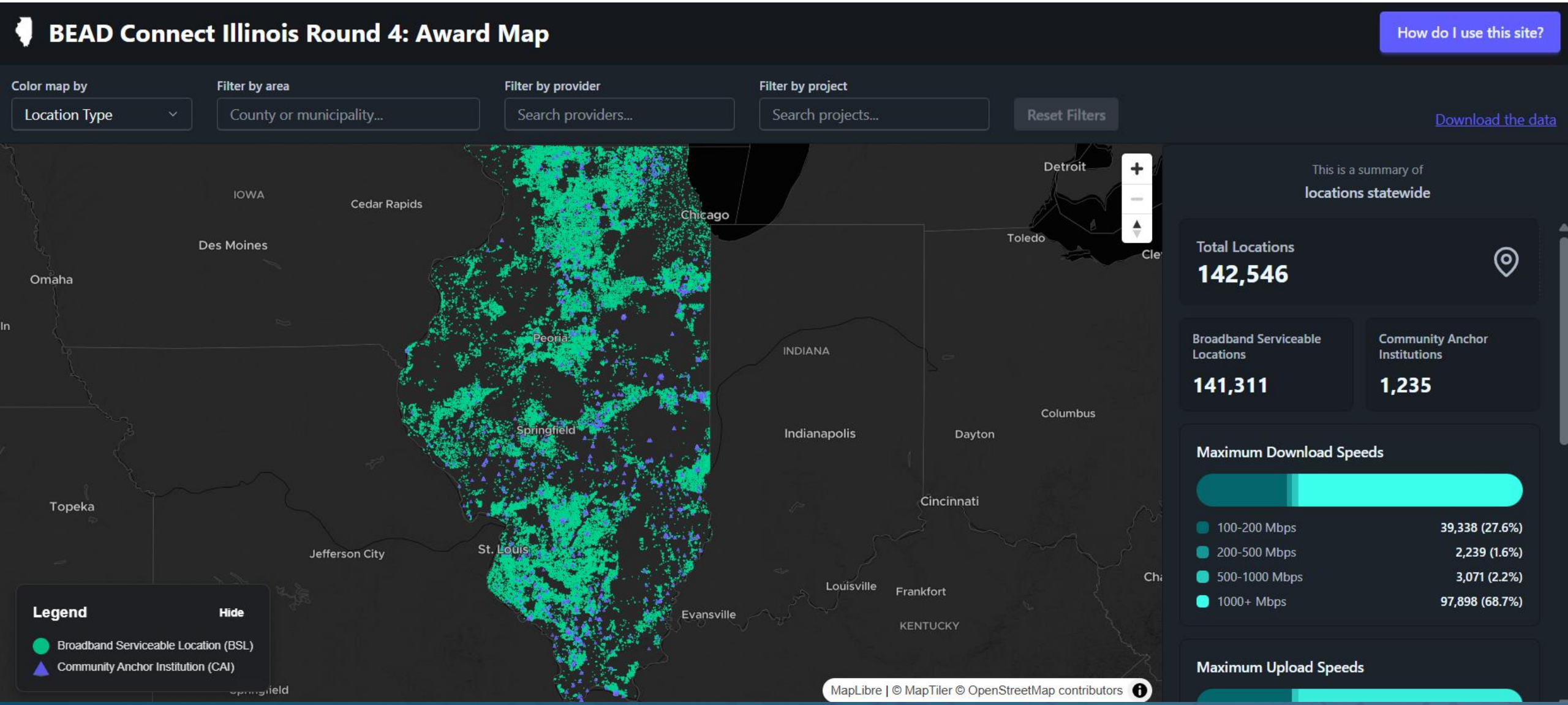
Locations covered through BEAD

- 141,311 households and businesses
- 1,235 Community Anchor Institutions

Over $1.5B

Total investment in Illinois broadband

View Awards at IllinoisBEAD.org



Meet the IOB Permitting Team



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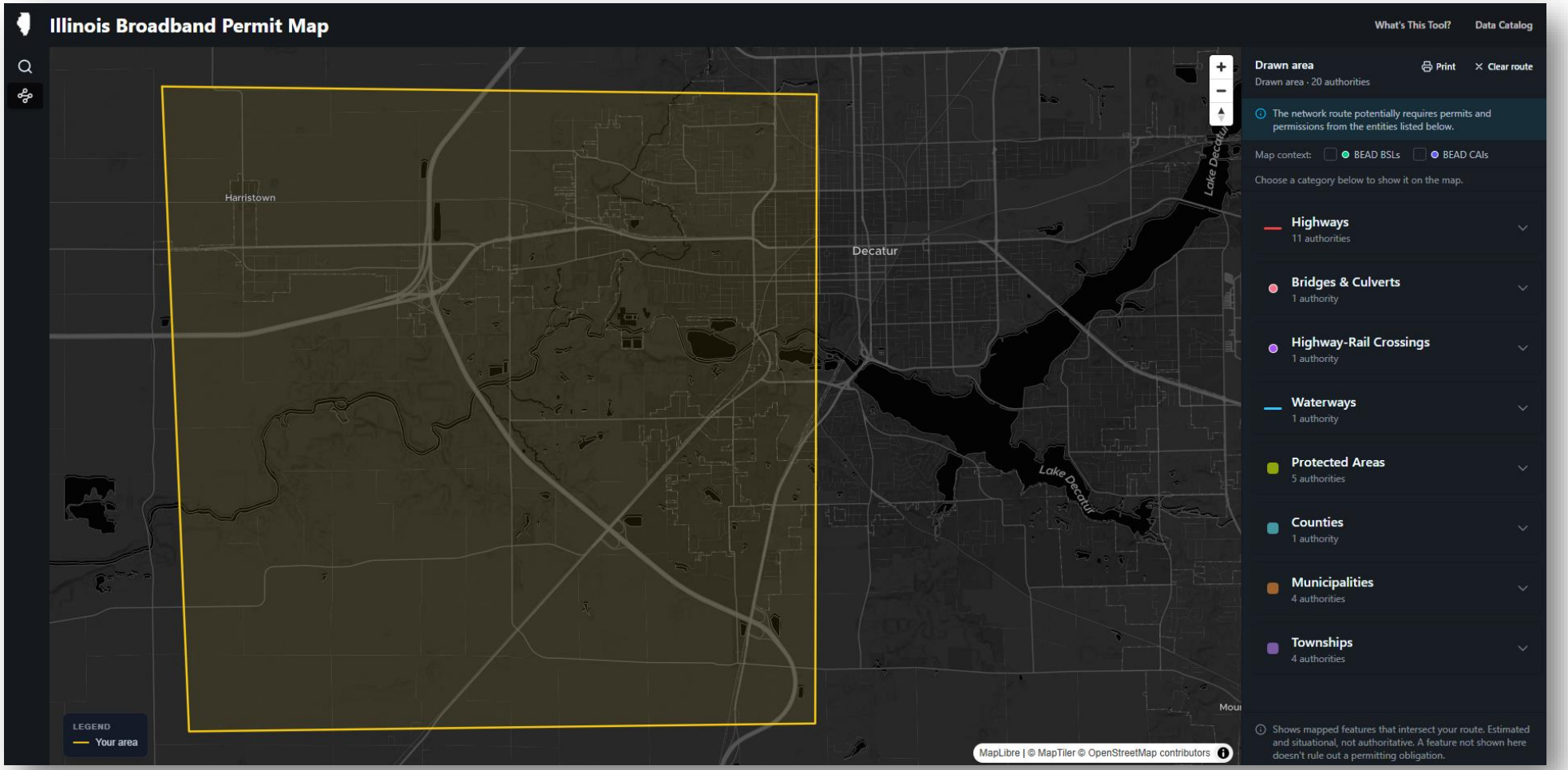
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Permit Resources Updates

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Broadband Permit Map – Analyze Mode



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Pole Attachments

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Pole Attachments Overview

Pole attachments allow broadband providers to use existing utility poles to deploy wired broadband infrastructure.

This process requires coordination with pole owners, compliance with state and federal rules, make-ready work, and permitting.



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Definitions & Stakeholders

Key Definitions

- **Pole Attachment Agreement:** A formal agreement that allows a broadband provider (attacher) to place equipment such as, fiber, strand, or wireless attachments on a utility-owned pole.
- **Joint Use Agreement:** A reciprocal agreement between two infrastructure owners, who both need access to each other's poles.
- **Make Ready Work:** The construction work required to prepare or replace a pole to accommodate new attachments

Stakeholders



Pole Owners

- Electric utilities (ComEd, Ameren, co-ops)
- Telephone companies
- Municipalities



Pole Attachers

- Fiber or cable broadband providers



Local Gov't & Counties

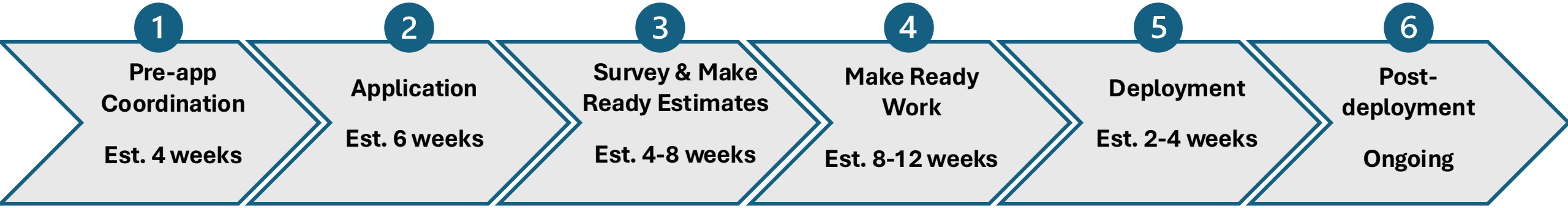
- Issue right-of-way permits for deployment on public ROW



Landowners

- Grant easements for private right-of-way access

Pole Attachment Process



- Determine pole ownership
- Contact key stakeholders (pole owners and local officials)
- Negotiate easements and acquire ROW permits

- Submit completed applications to pole owner(s)
- Pay required application fees
- Confirm timelines

- Conduct detailed site walks and surveys
- Align on necessary make ready costs and pole replacements

- Perform required make ready work
- Replace necessary poles

- Verify the completion of make ready work
- Install infrastructure in line with PAA or JUA terms

- Document as-built conditions and coordinate inspections
- Pay ongoing fees as outlined in PAA or maintain poles as outlined in JUA

Pole Regulations and Oversight

Illinois Commerce Commission (ICC)	Federal Communications Commission (FCC)
Regulates most pole attachments for broadband in Illinois, except telecom attachments to utility poles not owned by cooperatives or municipalities. Provides oversight for rates, terms, and dispute resolution for those attachments.	Regulates telecommunications and broadband attachments to utility poles in states that have not "reverse preempted." Provides national standards and timelines. Illinois is a reverse preemption state with the exception of certain telecom attachments.

Providers may consult with the ICC regarding jurisdiction over the type of pole attachments and potential disputes.

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Disputes

ICC Consumer Services Division

- Informal Inquiries / Dispute Assistance, this is where you start if you want an informal resolution before filing a formal complaint
- https://icc.illinois.gov/consumers

ICC Chief Clerk's Office

- Formal Complaints / Filings. All formal pole-attachment disputes must be filed through the Chief Clerk.
- https://icc.illinois.gov/home/chief-clerk-office

ICC Formal Complaint Portal

- Direct link to file a formal complaint electronically.
- https://icc.illinois.gov/complaints

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Best Practices for Permit Applications

1. Engage early	• Complete a site walkout as soon as possible to evaluate pole conditions and potential barriers to deployment. • Request that a representative from the pole owner join the walk out.
2. Stay organized	• Maintain regular check-in meetings with pole owners for updates on PAA/JUA review, make ready progress, and deployment progress. • Maintain progress trackers.
3. Be a strong community partner	• Notify communities of upcoming work via signage, public postings and community meetings. • Provide a point of contact for project questions.

Relevant Statute

Statute	Description
83 Illinois Administrative Code Part 315 – Pole Attachment Rates, Terms, and Conditions	Governs CATV, electric utilities, and telecommunications carriers for pole attachment rates, make-ready, inspections, indemnification, and procedures. This is the primary Illinois rule for pole attachments.
FCC Pole Attachment Rules (47 U.S.C. § 224)	Gives broadband providers a federal right to access utility-owned poles at fair, regulated rates, which keeps deployment costs predictable. Relevant in cases where a state is not reverse preempted.
IDOT Utility Accommodation Rules (92 Ill. Admin. Code Part 530)	Ensures that any utility work within state-controlled right-of-way is coordinated, permitted, and constructed safely. Providers must follow these requirements when placing or relocating poles, attachments, or fiber along state highways to avoid delays, conflicts with transportation projects, or non-compliance issues.

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Overview: Permits for Fixed Wireless Deployment

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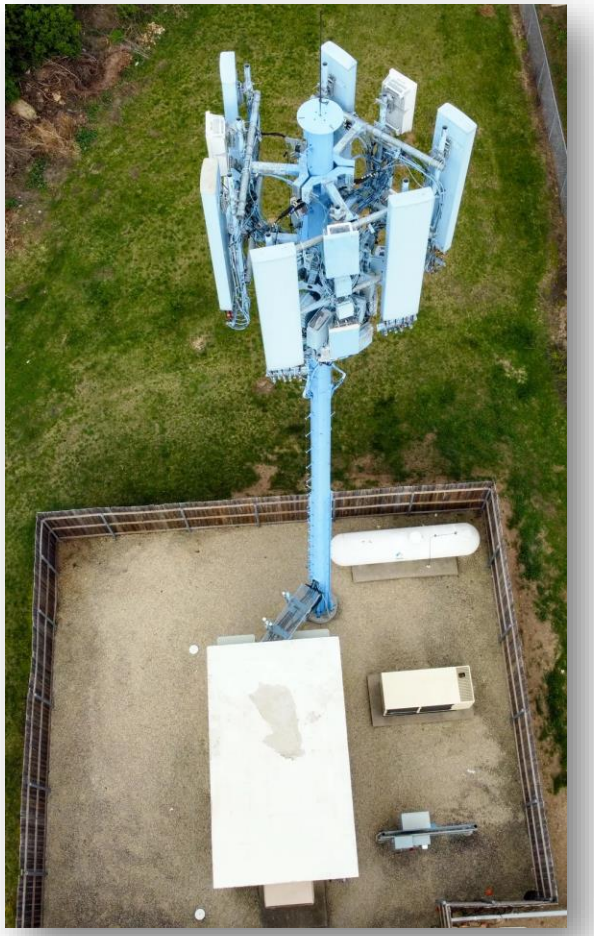
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Fixed Wireless Overview

Fixed Wireless (FW) infrastructure relies on radio frequencies, leveraging licensed or unlicensed spectrum, to transmit broadband service to a home, business, or other institution.

Fixed wireless infrastructure generally requires two types of permits or agreements:

- Collocation Agreements
- New Tower Construction Permits
- Small Cell Facility Permits



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Definitions

- **Backhaul:** Connection from the tower or wireless site to the core network (fiber, microwave, or hybrid).
- **Collocation:** Mounting or installing antenna facilities on existing structures, such as towers.
- **Small Cell Facilities:** Wireless facilities that are mounted on structures measuring <50 ft in height and/or facilities that do not drastically change the height of the structures on which they are mounted.
- **Structures:** Poles, towers, base stations, or other structures on which wireless facilities are installed
- **Towers:** Telecom or cell towers – freestanding structure built for the purpose of hosting wireless facilities.



Example of a small cell wireless facility mounted on a roof

Best Practices for Permit Applications

1. Collocate when possible	• Collocating on existing structures may reduce costs and speed deployment timelines.
2. Identify structures or potential sites early	• Structures may require coordination between private or public landowners and multiple departments and units of local government. Identify sites early to kick off coordination efforts across stakeholders
3. Build for resiliency	• Conduct soil surveys and resiliency surveys to ensure facilities can withstand severe Illinois weather (wind, heavy storms, ice, freezing temperatures, etc.)

Relevant Statute

Statute	Description
Small Wireless Facilities Deployment Act **50 ILCS 840/**	Illinois statue that streamlines permitting for small wireless facilities in municipal ROW; sets fee caps and timelines.
County Code – Authority to regulate certain telecommunications facilities **5 ILCS 5/5-12001**	Outlines a county's authority to regulate telecommunications facilities and structures.

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Fixed Wireless Permitting: Tower Construction

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Tower Construction Permits

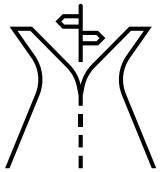
A tower construction permit authorizes a wireless provider to build a (tele)communications tower.



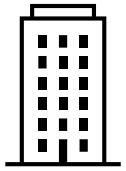
Stakeholders



Fixed Wireless Providers
Apply for permits to construct new communications towers



County Departments
Issue tower permits on unincorporated county land. Often through the Zoning Department. If info is not available online, contact the County Engineer or County Clerk.



Municipal Departments
Issue tower permits on incorporated municipal land. Often through the Zoning or Buildings Department.

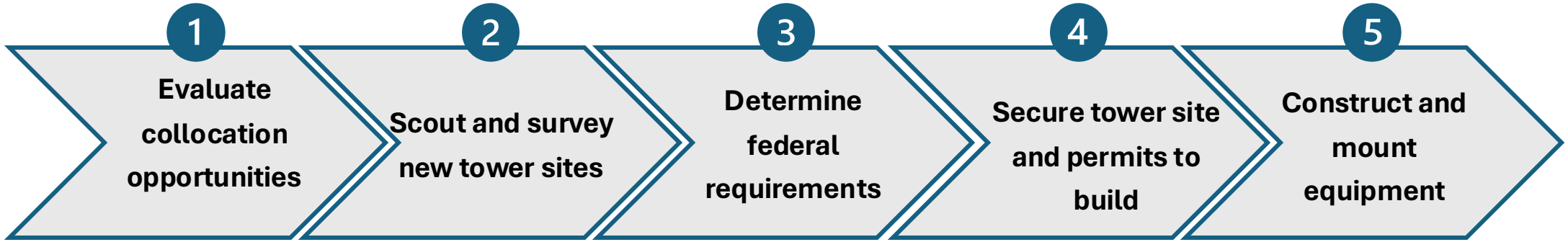


Federal Communications Commission (FCC)
Operates the Antenna Structure Registration (ASR) system and sets environmental review standards



Federal Aviation Administration (FAA)
Regulates and issues permits for structures over 200 ft

Tower Construction Process



- Identify structures for collocation, including towers, roofs, and other structures.
- Determine if a new tower is the most efficient, cost-effective path.

- Identify potential tower site
- Conduct soil and ground surveys
- Initiate a conversation with landowners

- If tower will be over 200 ft, initiate permitting with the FAA
- Determine and initiate FCC environmental and antenna site requirements

- Secure a site through purchase or durable contract or lease agreement
- Execute tower construction permit

- Construct tower in line with local permits
- Mount antenna facilities

Tower Resiliency

- Tower construction standards are outlined in the International Building Code, Section 3108
- Towers in Illinois must withstand high wind speeds, extreme temperatures, and snowy and icy conditions
- Resiliency measures should be documented and outlined in application permits



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Tower Construction Permit Applications

Specific permitting requirements differ across counties and municipalities, but there are core materials that providers are typically expected to submit:

- Completed permit application, including site selection information
- Construction drawings/engineering signed by a licensed engineer, including aesthetic details
- Completed EHP documentation for BEAD
- Insurance, COI, bond or cash guarantee
- Copies of notices sent to nearby property owners
- ROW permits
- FAA or FCC approval



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Fixed Wireless Permitting: Small Cell

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Small Cell Facility Permits

Small wireless facilities that use low-power antennas mounted on municipal infrastructure, such as utility poles, streetlights, and traffic signals.

Often also require ROW access permits.

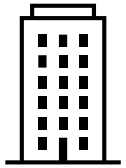


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Stakeholders



Fixed Wireless Providers
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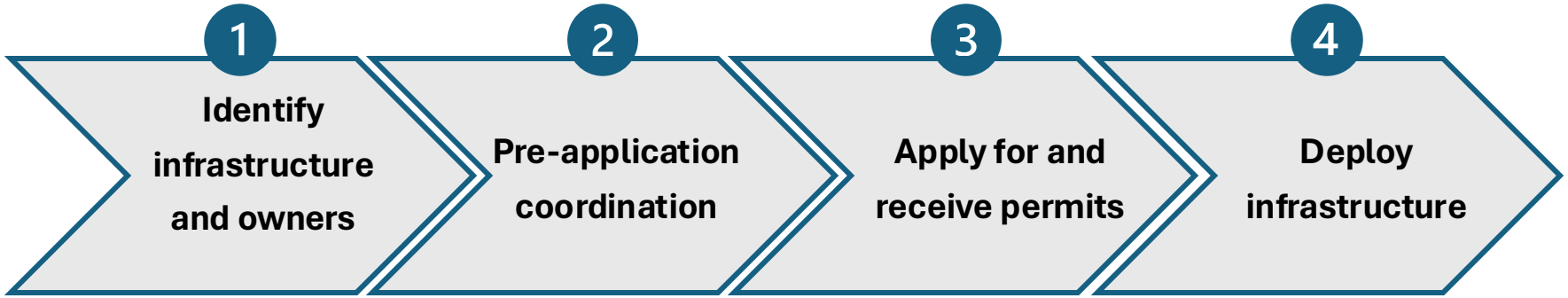


Municipal Departments
Issue small cell permits within municipal boundaries. Requires coordination between Public Works, Buildings, and/or Zoning.



Infrastructure Owner
Facilities may be mounted on utility poles, streetlights, private buildings, public buildings, or other infrastructure.

Small Cell Facilities Process



- Identify structures small cell installation, including poles, roofs, lights, and other structures.
- Initiate conversations with infrastructure owners

- Gather application/ permit requirements from permitting departments (Public Works, Buildings, or Zoning)
- Design network

- Apply for and receive permits.
- Coordinate traffic plans, make ready plans, and other necessary prep.

- Notify the community of upcoming construction.
- Deploy infrastructure in line with permit requirements.

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Resources & Next Steps

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IOB Permitting Resources

Ready to dive in to permitting?

Permitting Resource Hub	Supportive Services
• Broadband in Illinois Starter Guide • Permitting Directory • Permitting Roundtable Guide • Permit Map • “What Good Looks Like” for Permitting	Introductions to Permitting Stakeholders Technical Assistance One-on-One Problem Solving Co-host a Permitting Roundtable

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Upcoming Webinars

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Registration Link: https://registration.extension.illinois.edu/start/bead-orientation-webinars-1

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Resources

BEAD Grantee Resource Hub: dceo.illinois.gov/broadband/bead/bead-grantee-resource-hub

Resources Available:

- Federal Requirements
  - Pre-Award Expenses & Request Letter Template
  - Matching Funds and In-Kind Contributions
  - Build America, Buy America (BABA)
  - Letter of Credit Guidance
  - Performance Measures Testing
  - Fixed Amount Subaward Milestones, Required Documentation, and Disbursement Process
- State Requirements
  - Grant Accountability and Transparency Act (GATA)
  - Illinois Works
  - Prevailing Wage
  - Business Enterprise Program (BEP)
  - Quarterly Reporting *(coming soon)*
- Permitting
  - Permitting Resources, including:
    - Broadband in Illinois Starter Guide
    - Illinois Broadband Permitting Directory
    - Guide to Hosting Permitting Round Tables
    - Illinois Broadband Permitting Map
- *What Good Looks Like* Guides

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Get in Touch!

General questions?

Email broadband@illinois.gov

Sign up to receive our newsletter:

https://bit.ly/IOBnewsletter

Find all our links:

https://bit.ly/m/IllinoisBroadband

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Q&A

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