

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

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Internet Address: <http://www.dps.state.ny.us>

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January 20, 2009

Mark W. Earley
Chief Electrical Engineer
National Fire Protection Association
1 Batterymarch Park
Quincy, MA 02169-7471

Dear Mr. Earley,

The New York State Public Service Commission has been considering the grounding and bonding matters presented by a communications utility's fiber-to-the premises service. We carefully reviewed the National Electrical Code and conclude the code is ambiguous as to the appropriate treatment of this technology.

We urge the National Fire Protective Association to clarify future editions of the code to more clearly address these technologies so as to provide the authorities having jurisdiction better direction for ensuring safe installations.

We are particularly concerned as to the absence of direction in Articles 770, 800, and 820 regarding the appropriate treatment of purely "interior" coaxial cables and coaxial cables with a minimal external appearance, but which still "enter" and are "attached" to the building for purpose of connecting with the FTTP service. We remain concerned as to the implications for the systems with which FTTP ultimately connects including the shielded coaxial cables and associated equipment as may be typically installed within a premise and its walls. Despite the protections afforded by the insulating fiber optic cable drop wire, the coaxial cable still appears to be subject to many of the same hazards which the code, the accompanying handbook, and actual experience suggest may be present, including leakage currents, induced currents, power surges, potential differences in voltage, and short circuits.

The Commission's ongoing proceeding, Case 08-V-0835, may provide additional insight into the issues and events that shape our view that the code would benefit from additional clarification relative to FTTP services and related systems and equipment. You are invited to review that material at our public website (<http://www.dps.state.ny.us/08V0835.htm>).

Thank you for your attention to this continuing concern.

Sincerely,

A handwritten signature in black ink that reads "Peter McGowan". The signature is written in a cursive style with a large initial "P" and "M".

Peter McGowan