

**Batching Guidance for TCNS and E106 Submissions Under the  
Positive Train Control Program Comment  
Revised December 19, 2014**

Pursuant to Section VII.A of the Program Comment to Tailor the Federal Communications Commission's Section 106 Review for Undertakings Involving the Construction of Positive Train Control Wayside Poles and Infrastructure (Program Comment), railroads are expected to adhere to the following guidelines in submitting filings that include multiple PTC wayside poles and infrastructure into the Commission's TCNS and E106 systems:

1. Under Section VII of the Program Comment, all PTC wayside poles and infrastructure are to be submitted through TCNS and E106, including those that are excluded from review under Section V.
2. Poles shall be grouped into filings on the same basis in TCNS and in E106.
3. Each filing shall be limited to a single county.
4. The total number of poles that each railroad may submit in any two-week period, whether in a single filing or multiple filings, is limited to:
  - a. No more than 100 non-excluded poles; and
  - b. No more than 200 poles total (counting both excluded and non-excluded poles).
5. When submitting only poles and infrastructure that are excluded from review under Section V of the Program Comment, the railroad should check the applicable box in TCNS. Although excluded poles may be included in the same filing with poles that are subject to review or may be filed separately, the FCC encourages railroads to submit batches of PTC wayside poles that are either fully excluded or fully non-excluded, rather than mixed batches. The railroad must indicate in the description field whether a filing that is not fully excluded from review includes only non-excluded poles and infrastructure, or both non-excluded and excluded poles and infrastructure. The description field must also state the number of poles that are included in the filing.
6. The railroad shall attach a map and overlay containing the information specified in Section VII.A of the Program Comment. For poles that are subject to review, this information includes the locations of the poles and infrastructure (both on the map and in a separate document by latitude/longitude), an overlay of documented historic properties within  $\frac{1}{4}$  mile, topographical and other relevant background information, any alternative locations and minimization or mitigation strategies considered, and the proposed heights and types of infrastructure and installation techniques, including photographs. The railroad shall also include the locations of relevant base stations and information about the source of fill material.
7. For excluded poles and infrastructure, the map and associated information shall include the pole locations and the basis for excluding each pole.
8. The map shall be at a scale, or expandable by the user to a scale, of at least 1:24,000 so that the SHPO or Tribal Nation can assess the location of each proposed pole and its surrounding relevant environment. Railroads are encouraged to provide maps in an interactive format for the benefit of those SHPOs and Tribal Nations that have the capability to use interactive features. Formats that are preferred by many SHPOs and Tribal Nations include Google Earth and USGS topographical maps. Railroads should be responsive to reasonable requests from SHPOs and Tribal Nations during the 30-day review period for maps in alternate formats.

9. The poles on any map shall be numbered consecutively from north to south or from east to west. The numbering in any filing or on any map need not begin with 1 if another numbering system better suits the railroad's recordkeeping, but the numbering shall be consecutive within any submitted map.
10. A map may cover more than one county and the same map can be attached to multiple filings. For instance, a railroad may prepare a map for an entire subdivision that includes 60 poles in 5 counties. The poles would be numbered 1-60 (or other consecutive numbering) from north to south or from east to west. This map could then be attached to five separate filings (one for each county) that may all be submitted into TCNS and E106 at the same time (provided the limits on total poles submitted within a two-week period are not exceeded).