

May 31, 2018

LOS ANGELES CITY COUNCIL
200 N. Spring Street
Los Angeles, CA 90012

SUBJECT: Street Damage Restoration Fee Increase (Council Files 15-0600-S22, 14-1571)

Dear Honorable Council Members:

Charter Communications, known by its SPECTRUM brand of products and services, is writing to respectfully oppose the changes proposed to the City of Los Angeles Street Damage Restoration Fee (SDRF).

The proposed drastic changes warrant thorough deliberation and the opportunity for input from affected industries. In the past, the City has taken just such a collaborative approach in similar circumstances with much success.

The following elements we would change of the current proposal are of particular concern:

- **Width of Influence:** This provision expands the applicability of the SDRF to 5ft in each direction of an excavation. SDRF should continue to be applied to the excavation area only. Bureau of Street Services did not factor in Bureau of Engineering's S-477 into its study. S-477 requires a higher standard of backfill material and T-cuts in order to prevent future failures. S-477 will also require larger surface areas to be repaved. Therefore, applying SDRF to the width of influence would be duplicative based on the new Standard.
- **Concrete Streets Provision:** Bureau of Street Services does not have the jurisdiction to set conditions for street excavations. That jurisdiction should be under the purview of Bureau of Engineering, which issues utility permits. Council should remove the provision from the proposal that would require full slab replacement for excavations in concrete streets and instead instruct Bureau of Engineering to develop a standard for concrete street excavations similar to Asphalt Streets (S-477).
- **Age Exemption in Place:** We ask that the SDRF exemption for streets past their useful life remain in place. Companies should not have to pay a fee for excavating streets that have a useful life of zero years. The fee should continue to be commensurate with the age and condition of the street.
- **Phase In:** As proposed, Bureau of Street Services would increase SDRF approximately 1,300 percent in two months. The cost increases largely will be passed through to new businesses and homeowners. Phasing in the fee over multiple years would allow industry to rate base costs and inform customers about pending cost increases so they can factor those costs into their projects.



Dan Deutsch
AVP, SoCal North Field Operations

We look forward to working together to address the City's needs without overburdening our residential and business customers.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Deutsch", written over a white background.

Dan Deutsch
Area Vice President, Field Operations
CHARTER COMMUNICATIONS
550 Continental Boulevard
El Segundo, CA 90245

cc:

Mayor Eric Garcetti
Members, Los Angeles City Council
President Kevin James, Board of Public Works Commission