



December 14, 2018

Mrs. S. Bertilia LeBlanc-McKenzie  
General Manager  
Dominica Electricity Services Limited  
18 Castle Street  
Roseau  
**DOMINICA**

**Re: Construction Standards and Safety issues regarding Utility Poles**

Dear Mrs. McKenzie,

In travelling around the island of Dominica, it can be seen that DOMLEC has many poles that are no longer in use by the utility, side by side with new poles, some of which are leaning threateningly as well as many that are abandoned without any infrastructure and moreover, there are those DOMLEC poles that are abandoned, but yet carry telecommunication infrastructure for indefinite periods.

It is the general opinion that DOMLEC installs new poles to replace older poles that are compromised by age and decay. Consequently, if that is the case, then these poles pose a serious safety hazard to life and property. In Dominica we are exposed to tropical storms, hurricanes and earthquakes; any of these could cause the old abandoned poles to randomly fall.

The IRC by its mandate under Act #10 of 2006 Part III - *Powers, Duties and Functions of the Commission, Clause 21(1) (d) and (q) states:*

*The Commission shall:*

21(1) (d) - *“Establish, maintain, review and monitor safety standards for all types of facilities, including hydro facilities, in the electricity sector and shall monitor and enforce compliance with such safety standards.”*

*and*

21(1)(q) - *“take such other actions as the Commission deems necessary to fulfill its duties and functions under this Act or as otherwise necessary to serve the public interest or to fulfill the objectives of other legislation or treaties relating to the electricity sector of the Commonwealth of Dominica.”*



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Furthermore, according to Condition 31(1) of DOMLEC's Transmission, Distribution and Supply License:

*"The Licensee may enter into any arrangement or contract for the joint use of poles with telecommunication service providers so long as such use shall not contravene any other law or violate any safety or, in the sole opinion of the licensee, provide an unsafe working condition for the Licensee's employees...."*

The IRC would also like to stress that its safety concerns also extends to DOMLEC strictly adhering to proper standards in the construction of its distribution and supply network. Poles that are threateningly leaning at angles and not properly guyed also pose a safety hazard to life and property and these should also be addressed.

The IRC trusts that DOMLEC will take the necessary steps to have old poles promptly removed as well as work with the telecommunication service providers in transferring their infrastructure to the new poles and disposing of the old poles. As per the mandate given to the IRC in the Act, DOMLEC should take the necessary steps to ensure that construction of their distribution and supply network adheres to accepted international standards.

Please do not hesitate to contact the IRC, should you require any further information.

Sincerely,

**INDEPENDENT REGULATORY COMMISSION**

**Justinn Kase**  
**Executive Director**