

July 26, 2023

The Honorable Pat Ryan  
U.S. House of Representatives  
1030 Longworth House Office Building  
Washington, DC 20515

Dear Congressman Ryan,

USTelecom received your letter dated July 20, 2023, and appreciates the opportunity to share information regarding legacy lead-sheathed telecommunications cables. USTelecom is proud to represent the U.S. telecommunications industry, which has connected people, businesses, communities, and first responders for more than 100 years while supporting our nation's economy and critical infrastructure needs. Our members take the health and safety of the communities in which we live and operate and of our workers very seriously. We understand your commitment to and concern for the communities you represent in New York, and we are committed to working with you and your staff to address the issues you raise.

Lead-sheathed cables were introduced in the 1880s to protect interior wires from exposure to the elements because lead was viewed as stable and does not rust. Placement of lead-sheathed telecommunications cables started to be phased out in the 1950s with the emergence of more advanced coatings such as plastic and a transition to fiber optic cable. While much of this historical telecom infrastructure has been updated, some of these older lines are still in use today, as they are in other parts of the nation's infrastructure such as the power grid and railway systems. They connect critical services, including 911, fire alarms, and other central monitoring stations.

Individual companies manage the locations of company network infrastructure, including telecom cables. It is important to note that legacy lead-sheathed cables make up only a small part of these networks. As our member companies work hard to address and better understand the issues you raised, we are faced with the fact that certain records are more than a century old and have transitioned from paper to film to more modern formats across various predecessor companies. Given these circumstances, manual review may be necessary. We must ensure we have all the correct data, which will take time.

Importantly, these cables are not in our consumers' homes and are generally in locations that minimize the potential for public contact, whether underground, underwater, or suspended on telephone poles. Indeed, the presence of lead in the environment does not equate to exposure. It is our understanding that when not disturbed, the likelihood of exposure to lead from these cables is low. Risks associated with potential contact are also mitigated by the nature of the material as well as coatings and conduits surrounding them. While we have not seen evidence

that these cables pose a public health concern, several of our member companies initiated their own testing at locations identified in the *Wall Street Journal's* story, including those in your district, to better understand the potential impact to their employees and the communities they serve. Our industry is committed to engaging constructively with the U.S. Environmental Protection Agency on this matter, including sharing testing data.

As to next steps, many considerations go into determining whether legacy lead-sheathed telecom cables should be removed or left in place, including the safety of workers who must handle the cables, potential impacts on the environment, the age and composition of the cables, their geographic location, service requirements, and infrastructure demands, among others. The *Wall Street Journal's* own reporting on this issue indicated experts are divided on whether or not removing the cables is the right approach. We will work diligently both to pursue the facts, and to coordinate closely with regulators and local authorities to make appropriate determinations regarding where and whether removal best serves public health and safety.

Our member companies prioritize worker safety, including the lineworkers noted in your letter, through policies and procedures based on applicable laws and regulations. As a part of those efforts, our member companies provide training, personal protective equipment or other equipment, and a means to report safety-related incidents and concerns to internal compliance teams. Additionally, member companies who employ the vast majority of those who work in our industry provide at no cost voluntary testing to employees who may work around lead.

Finally, it is important to note that we have not seen, nor have regulators identified, evidence that legacy lead-sheathed telecom cables are the cause of a public health issue. Further, we have been unable to confirm the information reported by the *Wall Street Journal* because, despite repeated requests, we have not been given access to the data underlying their conclusions. Such data would help inform our collective consideration of the questions raised by their reporting. We need to gather the facts and act accordingly.

Thank you for the opportunity to share this information. Again, we take the health and safety of the communities in which we live and operate very seriously and are committed to following the science in further evaluation of these issues. We look forward to continuing to engage with you and your staff on these important matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Spalter", with a stylized flourish extending from the end.

Jonathan Spalter