

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC INVESTIGATION OF THE |) | CASE NO. |
| PROPOSED POLE ATTACHMENT TARIFFS OF |) | 2022-00108 |
| INCUMBENT LOCAL EXCHANGE CARRIERS |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CINCINNATI BELL TELEPHONE COMPANY, LLC

Cincinnati Bell Telephone Company, LLC (Cincinnati Bell), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on May 5, 2022. The Commission directs Cincinnati Bell to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Cincinnati Bell shall make timely amendment to any prior response if Cincinnati Bell obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Cincinnati Bell fails or refuses to furnish all or part of the requested information, Cincinnati Bell shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Cincinnati Bell shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 3rd Revised Page 13, 2.3.1 (C). Please identify the types of property where attachment of "communications facilities" would impair the right of Cincinnati Bell or joint users to continue their occupancy.

2. Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 3rd Revised Page 18, 2.3.3 (E).

- a. State whether the repeated text on lines 7–8 is a typographical error.

b. Describe the acts necessary under Kentucky law for Cincinnati Bell to perfect a security interest in the property of an attachee.

3. Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 3rd Revised Page 22, 2.4.1(B).

a. Explain what standards Cincinnati Bell would apply when determining the amount of security an attachee would be required to provide and when the attachee would be required to provide it.

b. Explain how the proposed language ensures that the requirement will be applied in a nondiscriminatory manner.

c. Identify the fees that the security contemplated by section 2.4.1(B) is intended to secure the payment of.

d. Identify the work performed that the security contemplated by section 2.4.1(B) is intended to secure the payment of.

4. Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 2nd Revised Page 31, 2.6.1 – Pole Attachment (A). Explain why Cincinnati Bell's proposed tariff does not include a per pole estimate of survey costs as Cincinnati Bell appears to require prepayment of survey costs.

5. Explain how Cincinnati Bell's tariff addresses charges, if any, for make ready cost for poles that are not a red tagged poles that are replaced with a new utility pole to accommodate the new attachee's attachment, and identify where in the tariff that issue is addressed.

6. a. Identify each account and subaccount in which the costs of utility poles in service are recorded.

b. Provide a narrative description of the costs that are recorded in each such account, including a description of the type and vintage of poles for which costs are recorded in the account (e.g., wood poles placed in service in 2005) and a description of other plant, if any, for which costs are recorded in the account.

c. Provide an Excel spreadsheet with formulas, columns, and rows unprotected and fully accessible showing the plant in service balance of each such account at the end of each of the last five fiscal years.

7. a. Identify each account and subaccount in which accumulated depreciation for poles in service is recorded.

b. Provide a narrative description of how the accumulated depreciation in each such account is calculated.

c. Identify the corresponding plant account or accounts for each account in which accumulated depreciation for poles is recorded.

d. Provide an Excel spreadsheet with formulas, columns, and rows unprotected and fully accessible showing the balance of each such account at the end of each of the last five fiscal years.

8. a. Identify the depreciation rates currently used to calculate depreciation expense for each account containing utility pole costs.

b. Identify the useful lives of the poles used to calculate each such depreciation rate.

9. Identify the total number of poles owned or controlled by Cincinnati Bell, and provide a breakdown of those poles based on the year they were installed.

10. Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in Cincinnati Bell's system, and provide a copy of any such plan or policy that has been memorialized in writing.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED APR 21 2022

cc: Parties of Record

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