

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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 BELLSOUTH TELECOMMUNICATIONS, LLC d/b/a AT&T KENTUCKY

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky (AT&T Kentucky), 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 AT&T Kentucky 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.

AT&T Kentucky shall make timely amendment to any prior response if AT&T Kentucky 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 AT&T Kentucky fails or refuses to furnish all or part of the requested information, AT&T Kentucky 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, AT&T Kentucky 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 AT&T Kentucky's proposed tariff, PSC KY No. 2A, Original Page 40, A5.13.3 A. Please confirm \$5.52 per foot of usable space is an annual rate.
2. Refer to AT&T Kentucky's proposed tariff, PSC KY No. 2A, Original Page 42, A5.13.4 2.2. With reference to the final sentence, please explain what "does not apply in the reverse pre-emption state of Kentucky."
3. Refer to AT&T Kentucky's proposed tariff, PSC KY No. 2A, Original Page 66, 18.1 – Recurring Rates and One-Time Fees Subject to Applicable Laws, Regulations,

Rules, and Commission Orders. Explain why the rates have not been included in the proposed tariff.

4. Refer to AT&T Kentucky's proposed tariff, PSC KY No. 2A, Original Page 66, 18.2.1 – Unauthorized Attachments. Explain the rationale and justification for charging back rent, including interest, up to five times the annual rent per attachment for each unauthorized attachment.

5. Refer to AT&T Kentucky's proposed tariff, PSC KY No. 2A, Original Page 66, 18.4 – Late Fees.

a. Explain the reasoning and justification for charging interest at 1.5 percent per month instead of establishing a late payment charge.

b. Explain whether the interest charges on any balance that remains unpaid would be simple or compound interest.

c. Explain why 807 KAR 5:006, Section 9(3)(h), which states that a late payment charge may be assessed only once on a bill for rendered services, would not apply to the interest charge.

6. Explain how AT&T Kentucky'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 attacher's attachment, and identify where in the tariff that issue is addressed.

7. Explain why the pro-rata payment in Section 9 of AT&T Kentucky's proposed service agreement is discretionary; identify and explain what criteria AT&T Kentucky would apply to determine whether a new attacher would be required to make such a payment, e.g. would it always be required if the conditions discussed therein are

met; and explain how the pro-rata payment will be applied in a non-discriminatory manner if it is discretionary.

8. Explain what standards AT&T Kentucky would apply when determining what security would be reasonable pursuant to Section 27.1 of AT&T Kentucky's proposed service agreement, and explain how the requirement will be applied in a non-discriminatory manner.

9. Explain whether the dispute resolution provisions in Section 29 of AT&T Kentucky's proposed service agreement would limit the Commission's authority to address disputes within the Commission's jurisdiction.

10. Explain whether a dispute over the scope or estimated cost of make-ready would be considered a billing dispute pursuant to Section 29.4 of AT&T Kentucky's proposed service agreement, and if so, explain the effect of such a dispute on the 14 day window for paying estimated make ready costs.

11. 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 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.

12. 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.

13. 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.

14. Identify the total number of poles owned or controlled by AT&T Kentucky, and provide a breakdown of those poles based on the year they were installed.

15. Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in AT&T Kentucky'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

Case No. 2022-00108

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