

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 SECOND REQUEST FOR INFORMATION  
TO BELL SOUTH 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 June 2, 2022. The Commission directs AT&T Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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 response to Commission Staff's First Request for Information, (Staff's First Request), Item 3. Explain how the inclusion of a link with pole attachment rates in the tariff and amending the rates by amending the amounts on the linked website complies with KRS 278.180 and 807 KAR 5:011.

2. Refer to AT&T Kentucky's response to Staff's First Request, Item 6. Explain whether AT&T Kentucky would charge new attachers for the cost to replace "red-tagged

pole[s]” as that term is used in 807 KAR 5:015. If not, explain why the tariff should not be amended to specifically include that exception to avoid confusion.

3. Refer to AT&T Kentucky’s response to Staff’s First Request, Item 11. Explain whether Account 2411 and 2411.1C includes only the capitalized costs for poles owned or controlled by AT&T Kentucky or whether it includes costs related to poles owned by others, e.g. costs for AT&T Kentucky’s fixtures to poles owned by others.

4. Refer to AT&T Kentucky’s response to Staff’s First Request, Items 13 and 14. Explain whether AT&T Kentucky contends that the useful life of 27 years for poles used to calculate the depreciation rate reflects the actual average service lives of its poles given the age of many of its poles reflected in Item 14.

5. Refer to AT&T Kentucky’s response to Staff’s First Request, Item 10.

a. Describe any deficiencies that would cause a pole to be identified for replacement.

b. If a pole deficiency is identified that requires a pole to be replaced, explain the process for replacing the pole in detail and how long each step typically takes from the time a deficiency is first identified to the time the pole is replaced.

c. If a deficiency is identified but AT&T Kentucky’s engineering team determines that the deficiency does not require the pole to be replaced, explain how the deficiency is documented and monitored in the future.

d. State whether AT&T Kentucky performs any systematic, periodic inspections of its poles beyond inspecting poles when a technician is on sight for another reason. If so, explain that inspection process in detail. If not, explain why AT&T Kentucky does perform such inspections.

e. Explain whether and, if so, how AT&T Kentucky tracks the age and condition of its poles and makes determinations regarding when poles need to be replaced.

6. Identify the total number of poles AT&T Kentucky has replaced in Kentucky in each of the last ten years.

7. Provide an estimate of the average cost to perform a make-ready pole replacement, and explain each basis for your response.

8. Other than identifying specific defective poles through inspections that require replacement, state whether you have a policy or practice of replacing poles in a circuit on a periodic basis or as they reach the end of their useful lives and, if so, describe that policy or practice in detail, including how and when (e.g., how far in advance) such replacements are identified or included in your projected capital spending budget.

9. Describe your recent efforts, if any, to reduce the number of above-ground transmission and distribution lines and identify the number of poles that have been eliminated in your system in each of the last ten years because the electric lines previously attached to those poles were placed underground.

10. Provide any current joint use agreements.



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DATED MAY 19 2022

cc: Parties of Record

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