

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY CABLE TELECOMMUNICATIONS)	
ASSOCIATION)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2003-00056
)	
JACKSON PURCHASE ENERGY CORPORATION)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION

Pursuant to 807 KAR 5:001, Commission Staff requests that Kentucky Cable Telecommunications Association (KCTA) file the original and four copies of the following information within 10 days of the date of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. Explain in detail the method used by the CATV operators to report new pole attachments to Jackson Purchase Energy Corporation (Jackson Purchase), including the frequency of reporting. Provide a copy of a report with all supporting documentation. If the

CATV operators have not been reporting new pole attachments, explain in detail why the pole attachments were not reported as required by the tariff.

2. Refer to the complaint, page 6. KCTA states, In reliance on these historical understandings, as well as explicit language in the CATV Pole Attachment Order, both JPEC and the Cable Companies have interpreted pole attachment to mean only a cable company's occupation of one foot of usable pole space, irrespective of whatever additional ancillary equipment is attached to the pole. Provide a copy of the citation from the CATV Pole Attachment Order containing the explicit language as referenced.

3. Provide a schedule from each of the CATV operators detailing each installation of a pole attachment from 1990 to the present.

4. Explain in detail the changes that have occurred with respect to the equipment used to provide cable service in 1990 as compared to the equipment used today.

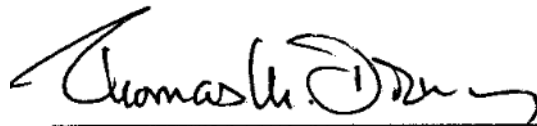
5. Does KCTA agree that the CATV operators owe some amount to Jackson Purchase for unreported pole attachments? If yes, what amount does KCTA believe is owed? If no, explain why they do not.

6. Refer to the complaint, exhibit B, tab 4, page 2, paragraph 4. Jackson Purchase references provisions in the tariff requiring CATV operators to provide proof of insurance and post a payment bond. Jackson Purchase further states that these items have not been provided by the CATV operators.

a. Explain in detail the steps the CATV operators have taken to comply with these provisions of the tariff. Include copies of all correspondence and supporting documentation.

b. Since the effective date of the current tariff, have the CATV operators provided proof of insurance or posted a payment bond? If yes, provide the most recent date of compliance, related correspondence, and supporting documents.

7. Explain in detail all efforts made by KCTA and the CATV operators to resolve this dispute. Provide a timeline of the events leading up to the filing of the complaint.



Thomas M. Dorman
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

DATED: June 3, 2003

cc: Parties of Record