## Exhibit 16

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

The Petition of the Kentucky Cable	)			
Telecommunications Association for	)			
a Declaratory Order that the	)	Case N	ο.	2012-00544
Commission Has Jurisdiction to	)			
Regulate the Pole Attachment Rates,	)			
Terms, and Conditions of Cooperative	s )	)		
That Purchase Electricity from	)			
the Tennessee Valley Authority	)			

## DEPOSITION FOR PETITIONER

\*\*\* \*\*\* \*\*\*

DEPONENT: WARREN RAMSEY, CR 30.02(6) Designee of

Warren Rural Electric Cooperative Corporation

TAKEN: MARCH 13, 2015

REPORTER: THERESA R. REID

Copyright, Video Court Reporting Services, Inc., 2015.

Permission to reproduce in any manner, including sending this file electronically, is hereby granted to COUNSEL and Co-Counsel only.

Page 2 This deposition, under oath, of Warren Ramsey was 1 taken by me, Theresa R. Reid, Notary Public, on March 13, 2 2015, beginning at approximately 8:18 a.m., Central 3 Standard Time, at Bowling Green Country Club, 251 Beech 4 Bend Road, Bowling Green, Kentucky 42101. Said examination 5 was taken pursuant to Notice, for purposes of discovery, 6 and as provided by the Kentucky Rules of Civil Procedure. 7 8 9 APPEARANCES 10 11 FOR PETITIONER: GARDNER F. GILLESPIE, ESQ. SHEPPARD MULLIN RICHTER & 12 HAMPTON, LLP 13 1300 I STREET NW 11TH FLOOR EAST 14 WASHINGTON, DC 20005 MARC A. LOVELL, ESQ. 15 HARLIN PARKER 16 17 519 EAST TENTH STREET P.O. BOX 390 18 BOWLING GREEN, KY 42102 19 20 21 FOR RESPONDENT: EDWARD T. DEPP, ESQ. DINSMORE & SHOHL, LLP 22 23 101 SOUTH FIFTH STREET 24 SUITE 2500 LOUISVILLE, KY 40202 25

Page 36

- Q. Is there any reference to pole attachment revenues in this report?
  - A. Indirectly, yes.
  - Q. What do you mean by that?
- A. On page three of the copy of the report, the report for fiscal year ended June 30, 2013, under revenue and expense statement, section operating revenue, the line entitled rent from electric property, that's the line on which all of our rents would be aggregated under.
- Q. So, this is -- That line aggregates rents including pole attachment rents?
- 12 A. Yes.

1

2

3

4

5

6

7

9

1.0

11

- 13 Q. As well as other rents?
- 14 A. Yes.
- Q. Is there anyplace in this report that the amount of pole attachment revenue is disaggregated?
- 17 A. Not to my knowledge.
- Q. Okay. Is there any line in this report that contains the expenses that Warren incurs in attaching to -let's say the expenses that Warren pays to AT&T or that it nets with respect to AT&T's pole rates charged to Warren?
- MR. DEPP: Objection to the form of that.
- Q. Do you understand the question?
- 24 A. It might help if you rephrase it.
- 25 Q. All right. So, I think we've established that

	Page 40
1	WARREN RAMSEY
2	ERRATA PAGE
3	(may or may not be requested)
4	PAGE LINE REASON
5	
6	
7	
8	
9	
10	
11 12 13 14 15 16 17 18 118	I HAVE READ THE FOREGOING PAGES, AND THE STATEMENTS CONTAINED THEREIN (SUBJECT TO CORRECTIONS, ADDITIONS, AND DELETIONS CONTAINED IN THE ADDENDUM ANNEXED HERETO, IF ANY), AND THEY ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.  WARREN RAMSEY  WARREN RAMSEY  WARREN RAMSEY  (Date)  (Date)  (State) Ky  MY COMMISSION EXPIRES: 2-12-19
21	RETURN WITHIN 30 DAYS TO:
22 23 24 25	Video Court Reporting Services, Inc. 734 West Main Street, Suite 100 Louisville, Kentucky 40202 502.561.9988 Voice 502.561.9080 Fax E-mail: depo@vcrslou.com

Page 41

STATE OF KENTUCKY SS COUNTY OF JEFFERSON

I, THERESA R. REID, Notary Public in and for the Commonwealth of Kentucky, State at Large, hereby certify that the foregoing deposition was taken at the time and place stated in the caption; that the appearances are as set forth in the caption; that prior to giving the testimony the witness was first duly sworn by me; that said testimony was reported by mechanical means by me, and thereafter transcribed under my personal direction and supervision; and that said typewritten transcript is a true, accurate, and complete transcript to the best of my ability and understanding; and that there was a request that the witness read and sign the deposition.

I further certify that I am not related by blood or marriage to any of the parties hereto and that I have no interest in the outcome of the captioned matter.

My Commission as a Notary Public expires February 17, 2016.

Given under my hand this \_\_\_\_\_ day of 2015, at Louisville, Jefferson County, Kentucky.

> THERESA R. REID NOTARY PUBLIC, STATE-AT-LARGE, KY

1

2

3

4

5

6

7

8

9

10

11

12

1.3

14

15

16

17

18

19

20

21

22

23