

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**ELECTRONIC INVESTIGATION OF THE)
PROPOSED POLE ATTACHMENT TARIFFS OF) CASE NO. 2022-00107
RURAL LOCAL EXCHANGE CARRIERS)**

**RLECs’ JOINT RESPONSE TO COMMISSION STAFF’S
THIRD REQUEST FOR INFORMATION**

Ballard Rural Telephone Cooperative Corporation; Brandenburg Telephone Company;
Duo County Telephone Cooperative Corporation, Inc.; Foothills Rural Telephone Cooperative
Corporation, Inc.; Gearheart Communications Company, Inc.; Highland Telephone Cooperative,
Inc.; Logan Telephone Cooperative, Inc. dba LTC Connect; Mountain Rural Telephone
Cooperative Corporation; North Central Telephone Cooperative, Inc.; Peoples Rural Telephone
Cooperative Corporation, Inc.; South Central Rural Telecommunications Cooperative, Inc.;
Thacker-Grigsby Telephone Company, Incorporated; and West Kentucky Rural Telephone
Cooperative Corporation, Inc. (each an “RLEC” and collectively, the “RLECs”), by counsel, file
their Joint Response to the Commission Staff’s Third Request for Information, issued in the above-
captioned case on June 23, 2022.

FILED: July 7, 2022

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

RLECS' JOINT RESPONSE TO COMMISSION STAFF'S
THIRD REQUEST FOR INFORMATION

REQUEST NO. 1: For all the RLECs that require prepayment of survey fees, explain whether it would refund the difference if the actual cost of the survey were less than the Attachment Customer's prepayment. If so, identify the section of the tariff stating that. If not, explain why not.

RESPONSE: Yes; in the event actual survey costs are less than a survey prepayment, the difference would be refunded. Please refer to Section 18.18 ("Final invoice") of the tariff, which mirrors the Commission's regulation (807 KAR 5:015 Sec. 4(6)(a)(1)) pertaining to survey cost final invoicing. The RLECs understand the regulation (and therefore the tariff) to require a true-up of actual costs versus estimated costs in connection with final invoicing for the survey. Please also refer to the RLECs responses to Commission Staff First Requests for Information No. 2(a).

Witness: Randy Grogan, Ballard Rural Telephone Cooperative Corporation
Allison Willoughby, Brandenburg Telephone Company
Mark Henry, Duo County Telephone Cooperative Corporation, Inc.
Ruth Conley, Foothills Rural Telephone Cooperative Corporation, Inc.
James Campbell, Gearheart Communications Company, Inc.
G.M. Patterson, Highland Telephone Company, Inc.
Gregory A. Hale, Logan Telephone Cooperative, Inc. dba LTC Connect
Steven Gullett, Mountain Rural Telephone Cooperative Corporation
Troy Davis, North Central Telephone Cooperative, Inc.
Keith Gabbard, Peoples Rural Telephone Cooperative Corporation, Inc.
Jeff Eaton, South Central Rural Telecommunications Cooperative, Inc.
Kimberly Jones, Thacker-Grigsby Telephone Company, Inc.
Trevor Bonnstetter, West Kentucky Rural Telephone Cooperative Corporation, Inc.

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REQUEST NO. 2: For Brandenburg Telephone only: Refer to Brandenburg Telephone's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 5.

- a. Provide support for the 86 percent overhead cost.
- b. Brandenburg's calculation seems to be based off a request to survey a single pole.

Explain whether it is typical for an attachment application to only include one pole. If not, provide the number of poles typically included in an application and revise the estimated per pole survey calculation accordingly.

RESPONSE:

- a. See attached Exhibit 3-2(a).
- b. **In the Company's experience, there is no such thing as a "typical" attachment application. In 2020, for example, Comcast was the only entity of record to have submitted a pole attachment request to the Company. Comcast's request was to attach to 66 poles, and the actual engineering survey costs billed (inclusive of all overheads and vehicles) was \$12,300. Based upon that application, the per pole survey cost would equate to \$186.36 per pole. Because of the infrequency of attachment requests made to the Company, however, and as a consequence of the true-up obligation imposed by the regulation (and mirrored in the tariff), the Company believes the estimated survey prepayment fee contained in its proposed tariff is reasonable and should be approved.**

Witness: Allison T. Willoughby, General Manager

Brandenburg's Response to PSC No. 3-2
Witness: Allison T. Willoughby
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Brandenburg Telephone Co.
Overhead Analysis for the April 2022 payroll period

Employees	Gross Wages	P/R Taxes	Medical Insurance	Other Benefits	Estimated Retirement	Accrued Bonus	4 Week	
							TO/Vacatio	Total Benefits
Total April P/R Costs	45,248.38	3,461.27	14,682.40	209.00	9,920.00	5,220.62	5,704.00	39,197.29
							P/R Overhead %	86.63%

This P/R Overhead % does not include the cost of the vehicles usage which is estimated at \$4.35 per hour per employee

The P/R Overhead % does not include any administrative costs or any fixed asset costs or energy costs etc.

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REQUEST NO. 3: For Duo County only: Refer to Duo County's response to Commission Staff's First Request for Information (Staff's First Request), Item 3. Duo County's calculation seems to be based off a request to survey a single pole. Explain whether it is typical for an attachment application to only include one pole. If not, provide the number of poles typically included in an application and revise the estimated per pole survey calculation accordingly.

RESPONSE: In the Company's experience, there is no such thing as a "typical" attachment application. However, the Company notes that Windstream and cable companies in the Company's territory usually do submit single-pole attachment requests. (In these cases, the lines would be intersecting with a Company route, but not paralleling it.) And although the Company has also received occasional attachment requests for more than a single pole, such requests are not common and certainly not "typical." In multiple pole attachment application scenarios, the Company would anticipate using a contractor for such work.

Assuming an eight (8) pole attachment application is worked by the contractor, the Company's current estimate would be as follows:

1. Engineering work is performed at an hourly contract rate of \$64.
2. Travel time to/from the survey site would take approximately two (2) hours per application:

In the Company's service area it takes an hour of travel time, approximately 55 miles from Jamestown to Jabez or Cumberland County, KY. Return travel is also required. Total travel time is equal to 2 hours. 2 hours x \$64 engineering hourly rate = \$128.00 total.

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In addition to travel time, the survey must also be performed. Assuming this takes approximately 30 minutes of work per pole and 8 poles in the survey, the total survey time would be 4 hours (.5 hours x 8 poles = 4 hours). Those 4 hours at \$64/hour equate to \$256 in survey hourly costs. (4 x \$64.00 = \$256.00)

Travel time cost of \$128.00 plus survey time cost of \$256.00 equals total contractor time cost of \$384. By dividing this \$384 by 8 poles, the per pole total contractor time cost would be \$48.00 per pole. ($\$384.00 / 8 = \48.00)

3. In addition, the contractor would invoice the Company for vehicle depreciation incurred in connection with the travel for the survey. When the tariff was filed, the contractor charged the IRS rate of \$0.59 per mile, which is the rate the Company used to determine its survey fee for the purposes of the tariff. It is anticipated that the contractor will increase the rate for mileage consistent with the IRS's recent mileage increase effective July 1, 2022.

This rate is then applied to the 110 mile round trip, which is based on the average mileage (55 miles one-way) to the average pole in our service area. $110 \text{ miles} \times \$0.59 = \$64.90$ in mileage expense per application.

4. Thus, the estimated total contractor labor and vehicle expense would be:

Travel hourly rate:	\$128
Survey hourly rate:	\$256
Mileage expense:	<u>\$64.90</u>
TOTAL COST:	\$448.90 per application

5. The Company would then include a 15% contingency component to cover potential travel delays due to road construction, etc., additional work (time) needed at the pole, and any time needed to coordinate with the proposed attachers, etc.

At 15% of the total cost identified above, the contingency component would equate to \$67.34 per application. ($15\% \times \$448.90 = \67.34)

This creates a grand total estimated survey cost of \$516.24.

Total Cost:	\$448.90
15% Contingency:	<u>\$67.34</u>

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GRAND TOTAL COST: \$516.24

By dividing this Grand Total Cost by 8 poles, the resulting per pole cost would be \$64.53. ($\$516.24 / 8 = \64.53)

Because of the infrequency of attachment requests made to the Company, however, and as a consequence of the true-up obligation imposed by the regulation (and mirrored in the tariff), the Company believes the estimated survey prepayment fee contained in its proposed tariff is reasonable and should be approved.

Witness: Mark Henry, VP Operations

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REQUEST NO. 4: For Duo County only: Refer to Duo County's tariff, PSC KY No. 2A, Original Page 18-28. Explain whether the Attachment Customer will be refunded any difference if the actual costs of the survey work is less than the Attachment Customer's prepayment.

RESPONSE: Duo County understands the regulation and its tariff to require a true-up of survey costs when a final invoice is rendered. Please see the response to Request No. 1, above.

Witness: Mark Henry, VP Operations

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REQUEST NO. 5: For Foothills Telephone only: Refer to Foothills Telephone's response to Staff's Second Request, Item 7.

a. Provide the actual per pole survey costs Foothills Telephone has incurred in relation to the Kentucky Wired Network, including any supporting documentation.

b. Provide the invoices that were used to develop the uniform per pole survey estimate for the Kentucky Wired Network.

RESPONSE:

a. **Although the Company did not separately track expenses associated with pole survey work for KentuckyWired (as it was not required under the KentuckyWired agreement), the Company reviewed its internal documentation associated with the KentuckyWired work orders and, to the best of its ability, attempted to classify those invoices as survey-related, based on the date of the work performed and the descriptions of work performed. The results of that proxy analysis are attached as Exhibit 3-5(a).**

b. **The Company is unable to locate these invoices, which were reviewed several years ago, prior to the Commission's initial proposal to promulgate a new pole attachment regulation.**

Witness: Ruth Conley, CEO/GM

Foothills Rural Telephone Cooperative Corporation
 KY Wired - Pole Survey Costs

WO	Invoice	Inspection	Mileage	Total
2016-909	In House Engineering			\$ 7,105.24
2016-916	17-1443	\$ 4,000.00	\$ 778.25	\$ 4,778.25
2016-916	17-1574	\$ 6,000.00	\$ 689.42	\$ 6,689.42
2016-916	17-1668	\$ 1,100.00	\$ 94.16	\$ 1,194.16
2016-916	17-1815	\$ 1,000.00	\$ 115.56	\$ 1,115.56
2017-911	17-1360	\$ 2,000.00	\$ 1,007.94	\$ 3,007.94
2017-917	17-1358	\$ 1,000.00	\$ 165.33	\$ 1,165.33
2017-917	17-1448	\$ 2,600.00	\$ 381.85	\$ 2,981.85
				<u>\$ 28,037.76</u>
			<u>No. poles</u>	<u>Cost per Pole</u>
			160	\$ 175.24

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REQUEST NO. 6: For Gearheart Communications only: Refer to Gearheart Communication's response to Staff's Second Request, Item 8.

a. Provide the actual per pole survey costs Gearheart Communications has incurred in relation to the Kentucky Wired Network, including any supporting documentation.

b. Provide the invoices that were used to develop the uniform per pole survey estimate for the Kentucky Wired Network.

RESPONSE:

a. **The Company has received a single attachment request from KentuckyWired. That request was for attachment to 18 poles. The entire project, including surveys, was performed under a work order, and survey costs were not separately identified.**

b. **The Company is unable to locate these invoices, which were reviewed several years ago, prior to the Commission's initial proposal to promulgate a new pole attachment regulation.**

Witness: James Campbell, Chief Financial Officer

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REQUEST NO. 7 For Highland Telephone only: Refer to Highland Telephone's response to Staff's First Request, Item 3(a). Highland Telephone's calculation seems to be based off a request to survey a single pole. Explain whether it is typical for an attachment application to only include one pole. If not, provide the number of poles typically included in an application and revise the estimated per pole survey calculation accordingly.

RESPONSE: In the Company's experience, there is no such thing as a "typical" attachment application. The Company has received attachment applications ranging from 2 service poles to 50 main line poles; it cannot recall receiving an attachment application for a single pole. Nevertheless, and for purposes of clarity, the Company's component costs (as provided in response to Commission Staff's Second Request for Information No. 9 and First Request for Information No. 3(a)) for its proposed pre-attachment survey are provided on a per pole basis.

Because of the infrequency of attachment requests made to the Company, and as a consequence of the true-up obligation imposed by the regulation (and mirrored in the tariff), the Company believes the estimated survey prepayment fee contained in its proposed tariff is reasonable and should be approved.

Witness: G.M. Patterson, General Manager

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REQUEST NO. 8: For Highland Telephone only: Refer to Highland Telephone's response to Staff's Second Request, Item 9(a). Provide a breakdown of the hourly rate by hour wage and overhead, including support for how the overhead was calculated.

RESPONSE:

Stakeman's Hourly Rate	\$ 37.11
Benefits/Ins/Taxes Hourly Rate (overhead)	\$ 27.72
Vehicle/Supplies/Tools Hourly Rate (overhead)	<u>\$ 10.56</u>
Total Loaded Hourly Labor Rate:	\$ 75.39

The Total Loaded Hourly Labor Rate is calculated using a number of factors, including hourly wage for position as outlined in the CWA Union contract, apportionment of direct expenses based on a 2080 hour work year, and allocation of indirect expense to work orders based on total hours worked for the given period (tools/supplies/etc.). The work order allocation is calculated through the Company's GL software platform.

Witness: G.M. Patterson, General Manager

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REQUEST NO. 9: For Mountain Telephone only: Refer to Mountain Telephone's response to Staff's Second Request, Item 11.

a. Provide the actual per pole survey costs Mountain Telephone has incurred in relation to the Kentucky Wired Network, including any supporting documentation.

b. Provide the invoices that were used to develop the uniform per pole survey estimate for the Kentucky Wired Network.

RESPONSE:

a. **Because KentuckyWired has made no attachment requests to the Company, there are no such pole survey costs to report. KentuckyWired has leased existing fibers from the Company.**

b. **The Company is unable to locate these invoices, which were reviewed several years ago, prior to the Commission's initial proposal to promulgate a new pole attachment regulation.**

Witness: Steven Gullett, Plant Manager

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REQUEST NO. 10: For North Central Telephone only: Refer to North Central Telephone's response to Staff's First Request, Item 3. North Central Telephone's calculation seems to be based off a request to survey a single pole. Explain whether it is typical for an attachment application to only include one pole. If not, provide the number of poles typically included in an application and revise the estimated per pole survey calculation accordingly.

RESPONSE: In the Company's experience, there is no such thing as a "typical" attachment application. The Company has no recollection or records of recent pole attachment applications. Based purely on recollection, the Company believes that it may have received some single-pole joint use requests from an electric utility.

Witness: Troy Davis, Engineering Manager

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REQUEST NO. 11: For North Central Telephone only: Refer to North Central Telephone's response to Staff's Second Request, Item 12. Provide support for the 87 percent overhead cost.

RESPONSE: The carrying charge was calculated by tabulating the single month base salary and overheads for fifteen employees assigned to the cable and engineering departments:

	<u>Wages</u>	<u>Payroll Tax</u>	<u>401K Match</u>	<u>R and S</u>	<u>Accrued Leave</u>	<u>Medical Ben.</u>	<u>Insurance Ben.</u>	<u>Concession</u>	<u>Total Benefits</u>
April, 2022	\$70,707.48	\$ 5,409.12	\$4,242.45	\$8,060.65	\$10,745.37	\$28,339.64	\$1,440.60	\$3,422.20	\$ 61,660.03
Benefits	\$61,660.03								
Overhead Rate	87.20%								

Witness: Troy Davis, Engineering Manager

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REQUEST NO. 12: For Peoples Telephone only: Refer to Peoples Telephone's response to Staff's Second Request, Item 13.

a. Provide the actual per pole survey costs Peoples Telephone has incurred in relation to the Kentucky Wired Network, including any supporting documentation.

b. Provide the invoices that were used to develop the uniform per pole survey estimate for the Kentucky Wired Network.

RESPONSE:

a. **Because KentuckyWired has made no attachment requests to the Company, there are no such pole survey costs to report. KentuckyWired has leased existing fibers from the Company.**

b. **The Company is unable to locate these invoices, which were reviewed several years ago, prior to the Commission's initial proposal to promulgate a new pole attachment regulation.**

Witness: Keith Gabbard, CEO

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REQUEST NO. 13: For South Central Telephone only: Refer to South Central Telephone's response to Staff's First Request, Item 3. South Central Telephone's calculation seems to be based off a request to survey a single pole. Explain whether it is typical for an attachment application to only include one pole. If not, provide the number of poles typically included in an application and revise the estimated per pole survey calculation accordingly.

RESPONSE: In the Company's experience, there is no such thing as a "typical" attachment application. The Company only has a record of one attachment application, and that request was for 122 poles. The survey field work took approximately two weeks to complete. Using the estimated survey rate previously provided, the per pole rate for that single application equates to \$42.70.

	Rate	Hours	Total
Travel/survey engineer	\$ 45.11	80	\$3,608.80
FEMA vehicle rate	\$ 20.00	80	<u>\$1,600.00</u>
			\$5,208.80
		Per	
	122 poles	pole	\$ 42.70

The Company notes that the request occurred prior to the time any regulations were promulgated, and attachment requests in its territory had not historically been common in any event. Consequently, its estimate of costs associated with this one request do not include consideration of overhead expense, and the calculation above should not be relied upon as a representative example of anticipated survey cost for an attacher.

Instead, because of the infrequency of attachment requests made to the Company, and as a consequence of the true-up obligation imposed by the regulation (and mirrored in

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the tariff), the Company believes the estimated survey prepayment fee contained in its proposed tariff is reasonable and should be approved.

Witness: Jeff Eaton, General Manager

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REQUEST NO. 14: For Thacker-Grigsby Telephone only: Refer to Thacker-Grigsby Telephone's response to Staff's Second Request, Item 15.

- a. Provide the actual per pole survey costs Thacker-Grigsby Telephone has incurred in relation to the Kentucky Wired Network, including any supporting documentation.
- b. Provide the invoices that were used to develop the uniform per pole survey estimate for the Kentucky Wired Network.

RESPONSE:

a. **The Company was not required or expected to track time spent specifically on surveys during 2017 when KentuckyWired sought access to the Company's poles. The entire project, including surveys, was performed under a work order, and survey costs were not separately identified. However, the Company has, to the best of its ability, attempted to reconstruct activities to provide this response. The Company pulled time reports charged by two of its employees who worked together on the KY Wired project before it was billable to a work order as construction. The Company concluded that the workhours associated with the period in advance of actual make ready work was a reasonable approximation of the pre-construction / survey work performed for KentuckyWired. This methodology yielded 536.5 hours of engineering labor at blended labor rate of \$41.49 for a total of \$22,261 for surveying 197 poles, or \$113 per pole. (Notably, the Company's ability to perform this analysis was facilitated entirely by the coincidental fact that the portion of the work that would be characterized as construction began at the beginning of calendar month.)**

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b. The Company is unable to locate these invoices, which were reviewed several years ago, prior to the Commission's initial proposal to promulgate a new pole attachment regulation.

Witness: Kimberly Jones, Accounting Supervisor

25406634.2

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I, Randy C. Grogan, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

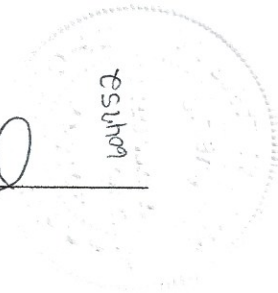
Randy C. Grogan
Randy C. Grogan
CEO/General Manager
Ballard Rural Telephone Cooperative Corporation

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF BALLARD)

SUBSCRIBED AND SWORN TO before me on this the 1st day of July, 2022.

My commission expires: 07/29/22


Haren Buford
Notary Public



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I, Ruth Conley, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

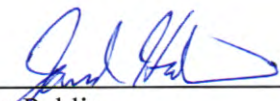


Ruth Conley
CEO/GM
Foothills Rural County Telephone Cooperative
Corporation, Inc.

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF JOHNSON)

SUBSCRIBED AND SWORN TO before me on this the 1 day of July, 2022.

My commission expires: 3-5-2026



Notary Public

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I, James Campbell, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.


James Campbell
Chief Financial Officer
Gearheart Communications Company, Inc.

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF FLOYD)

SUBSCRIBED AND SWORN TO before me on this the 30th day of June, 2022.

My commission expires: 10/19/2023


Notary Public



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I, G. M. Patterson, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

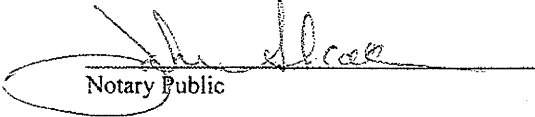
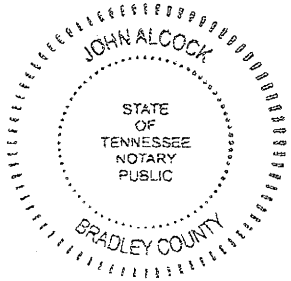


G.M. Patterson
General Manager/CEO
Highland Telephone Cooperative, Inc.

STATE OF TENNESSEE)
) ss:
COUNTY OF MORGAN)

SUBSCRIBED AND SWORN TO before me on this the 30 day of June, 2022.

My commission expires: 24 August 2022

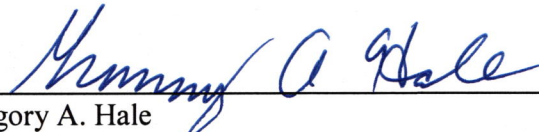


Notary Public

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TO THE COMMISSION STAFF'S
THIRD REQUESTS FOR INFORMATION

I, Gregory A. Hale, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



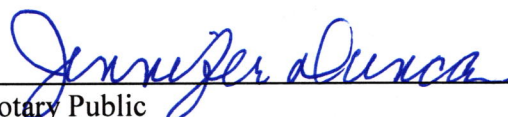
Gregory A. Hale
General Manager
Logan Telephone Cooperative, Inc.
dba LTC Connect

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF LOGAN)

SUBSCRIBED AND SWORN TO before me on this the 30 day of June 2022.

My commission expires: 9/26/24

KYNP15167

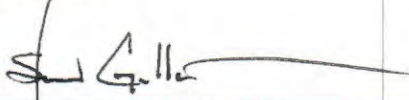


Notary Public

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

RURAL LOCAL EXCHANGE CARRIERS' JOINT RESPONSES
TO THE COMMISSION STAFF'S
THIRD REQUESTS FOR INFORMATION

I, Steven Gullett, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

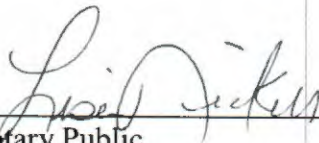


Steven Gullett
Plant Manager
Mountain Rural Telephone Cooperative
Corporation

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF MORGAN)

SUBSCRIBED AND SWORN TO before me on this the 5th day of July, 2022.

My commission expires: 03/31/2026



Notary Public



ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

RURAL LOCAL EXCHANGE CARRIERS' JOINT RESPONSES
TO THE COMMISSION STAFF'S
THIRD REQUESTS FOR INFORMATION

I, Troy Davis, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



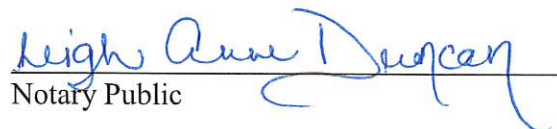
Troy Davis
Engineering Manager
North Central Telephone Cooperative, Inc.

STATE OF TENNESSEE)
) ss:
COUNTY OF MACON)

SUBSCRIBED AND SWORN TO before me on this the 30 day of June 2022.

My commission expires: 5/13/24





Notary Public

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

RURAL LOCAL EXCHANGE CARRIERS' JOINT RESPONSES
TO THE COMMISSION STAFF'S
THIRD REQUESTS FOR INFORMATION

I, Keith Gabbard, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Keith Gabbard
CEO
Peoples Rural Telephone Cooperative
Corporation, Inc.

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF JACKSON)

SUBSCRIBED AND SWORN TO before me on this the 30th day of June, 2022.
My commission expires: 5/18/2024



Notary Public

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

RURAL LOCAL EXCHANGE CARRIERS' JOINT RESPONSES
TO THE COMMISSION STAFF'S
THIRD REQUESTS FOR INFORMATION

I, Jeff Eaton, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Jeff Eaton
General Manager
South Central Rural Telecommunications
Cooperative, Inc.

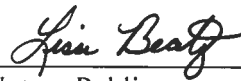
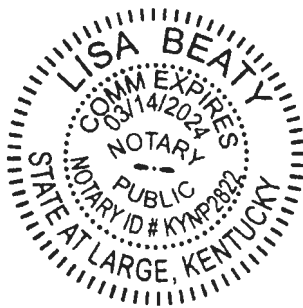
COMMONWEALTH OF KENTUCKY)

) ss:

COUNTY OF BARREN)

SUBSCRIBED AND SWORN TO before me on this the 1st day of July, 2022.

My commission expires: 3/14/2024



Notary Public

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

RURAL LOCAL EXCHANGE CARRIERS' JOINT RESPONSES
TO THE COMMISSION STAFF'S
THIRD REQUESTS FOR INFORMATION

I, Kimberly Jones, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Kimberly Jones
Accounting Supervisor
Thacker-Grigsby Telephone Company,
Incorporated

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF KNOTT)

SUBSCRIBED AND SWORN TO before me on this the 30th day of June, 2022.

My commission expires: 10/26/2024



Notary Public

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

RURAL LOCAL EXCHANGE CARRIERS' JOINT RESPONSES
TO THE COMMISSION STAFF'S
THIRD REQUESTS FOR INFORMATION

I, Trevor Bonnstetter, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

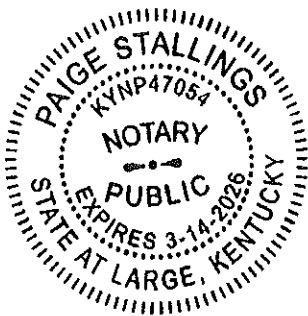


Trevor Bonnstetter
CEO
West Kentucky Rural Telephone Cooperative
Corporation, Inc.

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF GRAVES)

SUBSCRIBED AND SWORN TO before me on this the 5 day of 07, 2022.

My commission expires: 03/14/2026


Notary Public