

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

RURAL LOCAL EXCHANGES CARRIERS' RESPONSES TO THE COMMISSION
STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 1: Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18- 15, 3. Payments, b. Payment of Make Ready Estimates. Explain what "<subsection (2)(b)(4) of this section>" refers to.

RESPONSE: The reference "<subsection 2(b)(4) of this section>" is a clerical error; the correct reference is to section 18.16(2)(d) of the proposed tariff. The RLECs jointly propose amending this section to specifically refer to "section 18.16(2)(d)" to avoid any confusion.

Witness) Mark Henry

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REQUEST NO. 2: Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18- 18 indicating that "[t]he make-ready cost, if any, for a pole that is not a red tagged pole to be replaced with a new Pole to accommodate the new Attacher's attachment shall be charged the Company's cost in accordance with the Company's tariff or a special contract regarding pole attachments between the Company and the new Attacher."

- a. Identify where the treatment of such make-ready costs is addressed in the tariff.
- b. Explain in detail who is responsible for such make-ready costs pursuant to the terms and conditions of the tariff.

RESPONSE: (a) **The treatment of make-ready costs is addressed throughout Sections 18.16, 18.17, and 18.18 of the tariff. Consistent with the procedures required by 807 KAR 5:015, Duo County will provide invoices for estimated survey costs and estimated make-ready costs. Subsequently, as is required by 807 KAR 5:015 § 4(6), if the final costs are different than the estimated costs, Duo County will send a Final Invoice that includes a true-up to "the actual survey costs incurred" and the "actual make ready costs." 807 KAR 5:015 § 4(6)(a)(1)-(2). Consistent with 807 KAR 5:015 § 4(6) and the Commission's Statement of Consideration implementing 807 KAR 5:015, the tariff specifically provides that a new Attacher "shall be charged the Company's cost."**

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(b) Consistent with 807 KAR 5:015 § 4(6), the Commission's Statement of Consideration implementing 807 KAR 5:015, the language of the tariff, and the Commission's historical precedent, an Attacher is responsible for the make-ready costs as it is the entity causing the cost. The Attacher will be "charged the Company's cost."

Witness) Mark Henry

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REQUEST NO. 3: Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page
18- 28.

- a. Provide support for the per pole survey fee for your system.
- b. Explain whether the per pole survey fee is intended to be an estimate of the survey costs that will be trued up in a final bill.
- c. Identify the tariff language that indicates when the per pole survey fee must be paid.

RESPONSE: (a) A spreadsheet documenting a computation of Duo County's per pole survey fee for Duo County's system is attached to this response.

(b) Yes. Pursuant to 807 KAR 5:015 § 4(2)(b)(6)(b), "If a utility's tariff requires prepayment of survey costs, the utility shall include a per pole estimate of costs in the utility's tariff and the payment of estimated costs shall satisfy any requirement that survey costs be prepaid." Pursuant to 807 KAR 5:015 § 4(6), a utility is required to send a "detailed, itemized final invoice of the actual survey charges incurred if the survey costs for an application differ from an estimate previously paid for the survey work."

(c) Section 18.16(1)(a) of the tariff requires that the per pole Survey Charge be paid by the Attacher when submitting an Application requesting new attachments. ("All requests for Pole Attachments must be made in writing by the new Attacher and include payment of the per pole Survey Charge . . .").

Witness) Mark Henry

DUO COUNTY TELEPHONE COOPERATIVE, INC.
KY PSC DATA REQUEST - ITEM 3

	Labor rate	hours	total
Travel	\$ 64.00	3	\$192.00
mileage	\$ 0.59	110	\$ 64.35
Contingency		15%	<u>\$ 51.27</u>
Pole survey rate			\$307.62

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REQUEST NO. 4: Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18- 28. Also refer to South Central Telephone's current tariff, PSC KY Tariff No. 4, Section 17, Original Sheet No. 16, 17.17 Rental Rate. Explain why the \$2.43 per linear foot of cable duct charge currently in South Central Telephone's tariff is not included in Duo County's proposed tariff.

RESPONSE: Duo County does not have knowledge or information sufficient to form a response to Request No. 4 as it appears to be directed exclusively to South Central Telephone. Duo County does not have cable duct for use.

Witness) Mark Henry

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REQUEST NO. 5: Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18- 28. Explain why the rates for West Kentucky Rural Telephone Cooperative Corporation, Inc. will only be developed upon request.

RESPONSE: Duo County does not have knowledge or information sufficient to form a response to Request No. 5 as it appears to be directed exclusively to West Kentucky Rural Telephone Cooperative Corporation, Inc.

Witness) Mark Henry

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
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RURAL LOCAL EXCHANGES CARRIERS' RESPONSES TO THE COMMISSION
STAFF'S FIRST REQUESTS FOR INFORMATION

REQUEST NO. 6:

- 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 and a description other plant, if any, for which costs are recorded in the account.
- c. Provide a spreadsheet showing the plant in service balance of each such account at the end of each of the last three fiscal years.

RESPONSE: (a) The cost of utility poles placed in service prior to 1988 are recorded in Account 2411.1, and the cost of utility poles placed in service after 1987 are recorded in Account 2411.2.

(b) The costs recorded in each account include the original cost of poles, cross arms, guys, and other material used in the construction of pole lines. Please see the spreadsheet provided herewith for a breakdown of the type and vintage of poles in Duo's system, which primarily range from 25 foot (Class 5) poles to 40 foot (Class 4) poles.

(c) Please see the spreadsheet showing the plant in service balance of each such account at the end of each of the last three fiscal years attached to this response.

Witness) Mark Henry

<u>Asset</u>	<u>Asset Description</u>	<u>Capitalized Date</u>
POLE LINE-PRE 1988		
10FP25-6	25-6 DUO POLE/CODE 10	1/1/1985
10FP30-2	30-2 DUO POLE/CODE 10	1/1/1979
10FP30-4A	30-4 DUO POLE/CODE 10	1/1/1985
10FP35-6A	35-6 DUO POLE/CODE 10	1/1/1985
10FP35-7	35-7 DUO POLE/CODE 10	1/1/1979
10FP40-4A	40-4 DUO POLE/CODE 10	1/1/1985
10FP45-4A	45-4 DUO POLE/CODE 10	1/1/1979
11FP35-6	35-6 DUO POLE/CODE 11	1/1/1985
11FP40-4A	40-4 DUO POLE/CODE 11	1/1/1985
11FP45-5	45-5 DUO POLE/CODE 11	1/1/1979
11FP50-3A	50-3 DUO POLE/CODE 11	1/1/1985
12FP35-6	35-6 DUO POLE/CODE 12	1/1/1979
12FP40-4A	40-4 DUO POLE/CODE 12	1/1/1979
12FP45-4A	45-4 DUO POLE/CODE 12	1/1/1985
12FP45-5A	45-5 DUO POLE/CODE 12	1/1/1979
12FP50-2	50-2 DUO POLE/CODE 12	1/1/1969
12FP50-3A	50-3 DUO POLE/CODE 12	1/1/1985
14FP25-6	25-6 DUO POLE/CODE 14	1/1/1985
14FP30-4A	30-4 DUO POLE/CODE 14	1/1/1979
14FP35-6	35-6 DUO POLE/CODE 14	1/1/1979
14FP40-4A	40-4 DUO POLE/CODE 14	1/1/1979
19FP25-5A	25-5 DUO POLE/CODE 19	1/1/1979
19FP25-6	25-6 DUO POLE/CODE 19	1/1/1985
19FP30-2	30-2 DUO POLE/CODE 19	1/1/1979
19FP35-6	35-6 DUO POLE/CODE 19	1/1/1979
20-5	20FT POLE CLASS 5	1/1/1979
20-6	20FT POLE CLASS 6	1/1/1979
20-7	20FT POLE CLASS 7	1/1/1979
20-9	20FT POLE CLASS 9	1/1/1979
22FP35-6	35-6 DUO POLE/CODE 22	1/1/1979
23FP25-6	25-6 DUO POLE/CODE 23	1/1/1979
25-1	25FT POLE CLASS 1	1/1/1979
25-10	25FT POLE CLASS 10	1/1/1979
25-3	25FT POLE CLASS 3	1/1/1979
25-4A	25FT POLE CLASS 4	1/1/1979
25-5A	25FT POLE CLASS 5	1/1/1985
25-6A	25FT POLE CLASS 6	1/1/1985
25-7A	25FT POLE CLASS 7	1/1/1985
25-9A	25FT POLE CLASS 9	1/1/1985
25FP25-6	25-6 DUO POLE/CODE 25	1/1/1979
25FP30-4	30-4 DUO POLE/CODE 25	1/1/1979
25FP35-6	35-6 DUO POLE/CODE 25	1/1/1985
25FP35-7	35-7 DUO POLE/CODE 25	1/1/1979
25FP40-4A	40-4 DUO POLE/CODE 25	1/1/1979
25FP45-4	45-4 DUO POLE/CODE 25	1/1/1985

<u>Asset</u>	<u>Asset Description</u>	<u>Capitalized Date</u>
25FP45-5A	45-5 DUO POLE/CODE 25	1/1/1987
25FP50-4	50-4 DUO POLE/CODE 25	1/1/1973
25FP55-4	55-4 DUO POLE/CODE 25	1/1/1973
30-2A	30 POLE CLASS 2	1/1/1985
30-3A	30 POLE CLASS 3	1/1/1979
30-4A	30 POLE CLASS 4	1/1/1987
30-5A	30 POLE CLASS 5	1/1/1987
30-6A	30 POLE CLASS 6	1/1/1986
30-7A	30 POLE CLASS 7	1/1/1985
30-9	30 POLE CLASS 9	1/1/1980
35-2A	35 POLE CLASS 2	1/1/1985
35-4A	35 POLE CLASS 4	1/1/1985
35-5A	35 POLE CLASS 5	1/1/1985
35-6A	35 POLE CLASS 6	1/1/1986
35-7	35 POLE CLASS 7	1/1/1985
40-2A	40 POLE CLASS 2	1/1/1982
40-3A	40 POLE CLASS 3	1/1/1985
40-4A	40 POLE CLASS 4	1/1/1985
40-5A	40 POLE CLASS 5	1/1/1985
40-6A	40 POLE CLASS 6	1/1/1979
45-1A	45 POLE CLASS 1	1/1/1985
45-3A	45 POLE CLASS 3	1/1/1979
45-3A	45 POLE CLASS 3	1/1/1979
45-4A	45 POLE CLASS 4	1/1/1985
45-5A	45 POLE CLASS 5	1/1/1979
50-2	50 POLE CLASS 2	1/1/1979
50-3A	50 POLE CLASS 3	1/1/1979
55-3	55 POLE CLASS 3	1/1/1979
60-1	60 POLE CLASS 1	1/1/1972
65-2	65 POLE CLASS 2	1/1/1985

<u>Asset</u>	<u>Asset Description</u>	<u>Capitalized Date</u>
POLE LINE-POST 1987		
09FP35-3	35-3 DUO POLE/CODE 09	1/1/1997
10FP30-4	30-4 DUO POLE/CODE 10	1/1/1994
10FP35-1	35-1 DUO POLE/CODE 10	12/1/1996
10FP35-3	35-3 DUO POLE/CODE 10	2/1/2003
10FP40-1	40-1 DUO POLE/CODE 10	1/1/1998
10FP40-4	40-4 DUO POLE/CODE 10	10/1/2004
10FP45-4	45-4 DUO POLE/CODE 10	12/1/1999
11FP35-3	35-3 DUO POLE/CODE 11	8/1/2000
11FP40-2	40-2 DUO POLE/CODE 11	1/1/1997
11FP40-4	40-4 DUO POLE/CODE 11	8/1/1994
11FP45-1	45-1 DUO POLE/CODE 11	12/1/1996
11FP45-4	45-4 DUO POLE/CODE 11	3/1/1999
11FP50-3	50-3 DUO POLE/CODE 11	1/1/2001
11FP55-3	55-3 DUO POLE/CODE 11	1/1/1990
12FP35-1	35-1 DUO POLE/CODE 12	2/1/2003
12FP35-3	35-3 DUO POLE/CODE 12	2/1/2003
12FP40-2	40-2 DUO POLE/CODE 12	12/1/1996
12FP40-4	40-4 DUO POLE/CODE 12	3/1/1997
12FP45-1	45-1 DUO POLE/CODE 12	9/22/2008
12FP45-2	45-2 DUO POLE/CODE 12	1/1/1990
12FP45-4	45-4 DUO POLE/CODE 12	3/1/1997
12FP45-5	45-5 DUO POLE/CODE 12	1/1/2001
12FP50-3	50-3 DUO POLE/CODE 12	1/1/1990
12FP55-3	55-3 DUO POLE/CODE 12	1/1/1990
14FP30-4	30-4 DUO POLE/CODE 14	11/1/1992
14FP35-1	35-1 DUO POLE/CODE 14	12/1/1996
14FP35-3	35-3 DUO POLE/CODE 14	1/1/1997
14FP40-2	40-2 DUO POLE/CODE 14	1/1/1998
14FP40-4	40-4 DUO POLE/CODE 14	6/1/2003
14FP45-4	45-4 DUO POLE/CODE 14	1/1/1990
14FP45-5	45-5 DUO POLE/CODE 14	4/1/1992
14FP50-3	50-3 DUO POLE/CODE 14	4/1/1999
15FP30-1	30-1 DUO POLE/CODE 15	12/1/1996
15FP35-3	35-3 DUO POLE/CODE 15	1/1/1997
15FP40-1	40-1 DUO POLE/CODE 15	3/1/1997
15FP40-2	40-2 DUO POLE/CODE 15	3/1/1997
15FP40-4	40-4 DUO POLE/CODE 15	1/1/1997
15FP45-1	45-1 DUO POLE/CODE 15	3/1/1997
19FP30-4	30-4 DUO POLE/CODE 19	1/1/1992
19FP35-3	35-3 DUO POLE/CODE 19	8/1/2002
19FP40-4	40-4 DUO POLE/CODE 19	9/1/1998
20FP35-1	35-1 DUO POLE/CODE 20	9/1/2004
20FP45-5	45-5 DUO POLE/CODE 20	1/1/2000
25-4	25FT POLE CLASS 4	1/1/1992
25-5	25FT POLE CLASS 5	8/1/1994

<u>Asset</u>	<u>Asset Description</u>	<u>Capitalized Date</u>
25-7	25FT POLE CLASS 7	7/1/1996
25-9	25FT POLE CLASS 9	8/1/2001
25FP35-3	35-3 DUO POLE/CODE 25	5/1/2004
25FP40-4	40-4 DUO POLE/CODE 25	1/1/1995
25FP45-5	45-5 DUO POLE/CODE 25	7/1/1993
27FP40-4	40-4 DUO POLE/CODE 27	2/1/1996
27FP45-4	45-4 DUO POLE/CODE 27	2/1/1996
30-1	30 POLE CLASS 1	5/1/2004
30-2	30 POLE CLASS 2	11/1/2002
30-3	30 POLE CLASS 3	9/1/2004
30-4	30 POLE CLASS 4	10/1/1994
30-5	30 POLE CLASS 5	2/1/2004
30-6	30 POLE CLASS 6	9/1/2004
30-7	30 POLE CLASS 7	1/1/2001
35-1	35 POLE CLASS 1	10/1/2002
35-2	35 POLE CLASS 2	1/1/1991
35-3	35 POLE CLASS 3	5/1/2004
35-4	35 POLE CLASS 4	8/1/2004
35-5	35 POLE CLASS 5	5/1/2004
35-6	35 POLE CLASS 6	1/1/1991
40-1	40 POLE CLASS 1	10/1/2002
40-2	40 POLE CLASS 2	6/1/1998
40-3	40 POLE CLASS 3	9/1/2004
40-4	40 POLE CLASS 4	6/1/2003
40-5	40 POLE CLASS 5	4/1/2003
45-1	45 POLE CLASS 1	6/1/1998
45-3	45 POLE CLASS 3	5/1/2004
45-4	45 POLE CLASS 4	12/1/1999
45-5	45 POLE CLASS 5	5/1/2003
50-1	50 POLE CLASS 1	5/1/2003
50-3	50 POLE CLASS 3	5/1/2004
65-1	65 POLE CLASS 1	1/1/1997
70-1	70 POLE CLASS 1	1/1/1997

Duo County Telephone Cooperative Corporation, Inc.

Account #	Account Description	Depreciation Rate	12/31/2019 Balance	12/31/2020 Balance	12/31/2021 Balance
2411.1	Pole Line-Pre 1988	8.9%	\$257,973.09	\$252,579.27	\$248,429.72
3102.411	Depreciation Reserve-Pole Line-Pre 1988		(\$257,973.09)	(\$252,579.27)	(\$246,754.36)
	Net Book		\$0.00	\$0.00	\$1,675.36
2411.2	Pole Line - Post 1987	5.6%	\$4,368,544.85	\$4,505,771.62	\$4,795,532.86
3102.412	Depreciation Reserve-Pole Line-Post 1987		(\$3,296,787.91)	(\$3,518,510.29)	(\$3,729,248.86)
	Net Book		\$1,071,756.94	\$987,261.33	\$1,066,284.00

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REQUEST NO. 7:

- 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 a spreadsheet showing the balance of each such account at the end of each of the last three fiscal years.

RESPONSE: (a) Accumulated depreciation for poles in service is recorded in Account 3102.411 and Account 3102.412.

(b) The accumulated depreciation is calculated by taking the prior month's ending balance plus the current month's ending balance divided by two and then multiplied by the depreciation rate. The calculated amount is divided by 12, which equals the current month's depreciation.

(c) The corresponding plant accounts are Accounts 2411.1 for poles placed in service pre-1988 and Account 2411.2 for poles placed in service post-1987.

(d) Please see the spreadsheet provided in response to Commission Staff Response No. 6(c) for the balance of each depreciation account at the end of the last three fiscal years.

Witness) Mark Henry

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REQUEST NO. 8:

a. Identify the depreciation rates currently used to calculate depreciation expense for each account containing utility pole costs.

b. Identify the case in which each such depreciation rate was set.

c. Identify the useful lives of the poles used to calculate each such depreciation rate.

RESPONSE: (a) Duo County has adopted the Commission's average depreciation rate. The post-1988 depreciation rate for Poles (Account 2411) is 5.6%. Please see the Commission's average depreciation schedule last provided for use by telecommunications utilities attached to this response.

(b) Duo County is a telecommunications utility that has adopted the Commission's average depreciation rates. Duo County's depreciation rates were last reviewed and its rates approved in Case No. 2014-00315.

(c) In accordance with the Commission's average depreciation schedule, the useful life of the poles used to calculate the depreciation is 26.0 years.

Witness) Mark Henry



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY. 40602
(502) 564-3940

October 2, 1997

TO: All Incumbent Local Exchange Telephone Utilities ("LEC") under the jurisdiction of the Public Service Commission of Kentucky who are eligible to consider the Commission's 1997 Average Depreciation Schedule.

RE: 1997 Average Depreciation Schedule

Gentlemen:

As you are aware, 807 KAR 5:064, Section 8, of the Commission's Regulations specifies that the Commission issue a proposed Average Depreciation Schedule for consideration by all LEC's who do not normally perform their own depreciation studies. Our records indicate that your utility is eligible to accept the 1997 Average Schedule which has been accepted by the Commission and is attached for your consideration.

This schedule is based upon utilizing the Straight-Line Method, Broad Group Procedure, and the Whole Life Technique to arrive at Average Service Life and Average Net Salvage Parameters. If your utility chooses to accept this schedule, the effective booking date will be January 1, 1998. If you choose to reject this schedule you have the option of either retaining your existing depreciation rates and waiting for the next average schedule to be issued, or conducting your own depreciation study according to the guidelines set out in the subject regulation.


For those LEC's choosing to accept this schedule, the depreciation rates for each account/subaccount will remain in effect for at least three years (e.g., you will only be allowed to accept a schedule one time in any three-year period). Moreover, no depreciation rate for any of your accounts/subaccounts may be higher than those specified in the schedule. You may, however, choose to use depreciation rates for individual accounts/subaccounts which are lower than those shown on the schedule. You are also required to separate your accounts/subaccounts to correspond to those indicated on the schedule.

Please notify this office, in writing, of your decision to either accept or reject the proposed schedule by November 14, 1997. Further, if you accept this schedule, you must provide a summary statement showing each of your plant accounts/subaccounts, the gross investment and reserve for each, and the resulting annual expense accrual for

each category. Investments and reserve amounts should be based upon your most currently available information.

Should you have any questions relative to this matter, please contact Wayne Bates of our Engineering Division at (502) 564-3940, Ext. 416.

Sincerely,



Don Mills
Executive Director

Attachments

cc: ALLTEL Kentucky, Inc.
Ballard Rural Telephone Cooperative Corporation, Inc.
Brandenburg Telephone Company, Inc.
Duo County Telephone Cooperative Corporation, Inc.
Foothills Rural Telephone Cooperative Corporation, Inc.
Harold Telephone Company, Inc.
Highland Telephone Cooperative, Inc.
Leslie County Telephone Company, Inc.
Lewisport Telephone Company, Inc.
Logan Telephone Cooperative, Inc.
Mountain Rural Telephone Corporation
North Central Telephone Cooperative, Inc.
Peoples Rural Telephone Cooperative Corporation, Inc.
Salem Telephone Company
South Central Rural Telephone Cooperative Corporation, Inc.
Thacker-Grigsby Telephone Company, Inc.
West Kentucky Rural Telephone Cooperative Corporation, Inc.

1997 AVERAGE DEPRECIATION SCHEDULE

Account Number	Plant Category	Average Service Life (Years)	Average Net Salvage (%)	Depreciation Rate (%)
2112.0	Motor Vehicles			
2112.1	Motor Vehicles - Light	7.0	15.0	12.1
2112.2	Motor Vehicles - Heavy	8.4	15.0	10.1
2116.0	Special Vehicles and Other Work Equipment	13.0	3.0	7.5
2121.0	Buildings	38.0	-1.0	2.7
2122.0	Furniture	10.8	6.0	8.7
2123.0	Office Equipment			
2123.1	Office Support Equipment	12.0	10.0	7.5
2123.2	Official Communications Equipment	6.0	10.0	15.0
2124.0	General Purpose Computers	5.9	7.0	15.8
2211.0	Analog Electronic Switching	8.1	5.0	11.7
2212.0	Digital Electronic Switching	13.0	3.0	7.5
2215.0	Electromechanical Switching			
2215.1	Step By Step	7.0	-10.0	15.7
2215.2	Crossbar	5.0	-10.0	22.0

1997 AVERAGE DEPRECIATION SCHEDULE

Account Number	Plant Category	Average Service Life (Years)	Average Net Salvage (%)	Depreciation Rate (%)
2220.0	Operator Systems	9.8	4.0	9.8
2231.0	Radio Systems	11.0	0.0	9.1
2232.0	Circuit Equipment			
2232.1	Analog	10.0	0.0	10.0
2232.2	Digital	8.0	5.0	11.9
2311.0	Station Apparatus	6.4	4.0	15.0
2341.0	Large PBX	6.0	-3.0	17.2
2351.0	Public Telephone	0.0	0.0	0.0
2362.0	Other Terminal Equipment	6.0	5.0	15.8
2411.0	Poles	26.0	-45.0	5.6
2421.0	Aerial Cable			
2421.1	Metallic	17.0	-13.0	6.6
2421.2	Fiber	22.0	-13.0	5.1
2422.0	Underground Cable			
2422.1	Metallic	25.0	-25.0	5.0
2422.2	Fiber	22.0	-10.0	5.0
2423.0	Buried Cable			

1997 AVERAGE DEPRECIATION SCHEDULE

Account Number	Plant Category	Average Service Life (Years)	Average Net Salvage (%)	Depreciation Rate (%)
2423.1	Metallic	20.0	-10.0	5.5
2423.2	Fiber	20.0	-2.0	5.1
2424.0	Submarine Cable	27.0	-1.0	3.7
2426.0	Intra-Building Network Cable			
2426.1	Metallic	20.0	-1.0	5.1
2426.2	Fiber	20.0	-1.0	5.1
2431.0	Aerial Wire	14.0	-31.0	9.4
2441.0	Conduit Systems	50.0	-8.0	2.2

Rates accepted by the Public Service Commission of Kentucky for use on and after January 1, 1998.

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
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RURAL LOCAL EXCHANGES CARRIERS' RESPONSES TO THE COMMISSION
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REQUEST NO. 9: Identify the total number of distribution poles in your system, and provide a breakdown of those poles based on the year they were installed.

RESPONSE: Duo County does not have “distribution poles” or “transmission poles,” which are terms specific to the electric industry. The total number of poles currently in service in Duo County’s system is 5,622. For a breakdown of the poles based on the year they were installed, please see the exhibit provided with this response.

Witness) Mark Henry

Duo Broadband Poles

Year Placed	Sum of Poles
1955	1
1957	2
1958	4
1959	1
1967	1
1968	1
1969	1
1970	8
1971	2
1972	22
1973	15
1974	4
1975	2
1977	1
1978	6
1979	538
1980	6
1981	1
1982	5
1983	11
1984	8
1985	197
1986	1
1987	8
1988	17
1989	55
1990	74
1991	22
1992	144
1993	20
1994	72
1995	66
1996	89
1997	405
1998	103
1999	79
2000	50
2001	34
2002	224
2003	65
2004	280
2005	59
2006	51

Year Placed	Sum of Poles
2007	114
2008	94
2009	211
2010	135
2011	50
2012	33
2013	22
2014	587
2015	139
2016	435
2017	253
2018	212
2019	151
2020	115
2021	215
2022	101

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REQUEST NO. 10: Identify the total number of transmission poles in your system, and provide a breakdown of those poles based on the year they were installed.

RESPONSE: Please see Duo County's Response to Commission Staff's Request for Information No. 9.

Witness) Mark Henry


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REQUEST NO. 11: Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in your system, and provide a copy of any such plan or policy that has been memorialized in writing.

RESPONSE: Duo County's policies regarding inspections of its poles are contained within Duo County's safety manual. The portions of Duo County's safety manual regarding inspection of poles is provided with this response.

Witness) Mark Henry

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Purpose

The purpose of this procedure is to provide employees with important information regarding safe work practices while being around, near or working off of poles

Scope


This document applies to Duo County Telecom employees and operations where employees whose work activities may involve working with or around poles.

Materials Handling and Storage

When working with poles in piles or stacks, work shall be performed from the ends of the poles as much as possible, and precautions shall be taken for the safety of employees at the other end of the pole. During pole hauling operations, all loads shall be secured to prevent displacement. Lights, reflectors and/or flags shall be displayed on the end and sides of the load as necessary. In the case of hoisting machinery equipped with a positive stop load holding device, it shall be permissible for the operator to leave his position at the controls (while a load is suspended) for the sole purpose of assisting in positioning the load prior to landing it. Prior to unloading steel, poles, cross arms, and similar material, the load shall be thoroughly examined to ascertain that the load has not shifted, that binders or stakes have not broken, and that the load is not otherwise hazardous to employees.

Pole Climbers

- Pole climbers may not be used if the gaffs are less than 1 ¼ inches in length as measured on the underside of the gaff. The gaffs of pole climbers shall be covered with safety caps when not being used for their intended use.
- Duo County Telecom shall ensure that pole climbers are inspected by a competent person for the following conditions: Fractured or cracked gaffs or leg irons, loose or dull gaffs, broken straps or buckles. If any of these conditions exist, the defect shall be corrected before the climbers are used.
- Pole climbers shall be inspected as required in 1910.268 (g)(3) before each day's use and a gaff cut-out test performed at least weekly when in use.
- Pole climbers may not be worn when:
 - Working in trees (specifically designed tree climbers shall be used for tree climbing),
 - Working on ladders
 - Working in an aerial lift
 - Driving a vehicle
 - Walking on rocky, hard, frozen, brushy or hilly terrain.

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Testing Wood Poles

Unless temporary guys or braces are attached, the following poles shall be tested in accordance with paragraph (n)(3) of 1910.268 and determined to be safe before employees are permitted to climb them.

- Dead-end poles, except properly braced or guyed "Y" or "T" cable junction poles,
- Straight line poles which are not storm guyed and where adjacent span lengths exceed 165 feet,
- Poles at which there is a downward change in grade and which are not guyed or braced corner poles or cable junction poles,
- Poles which support only Telecom drop wire
- Poles which carry less than ten communication line wires. On joint use poles, one power line wire shall be considered as two communication wires for purposes of 1610.268 paragraph (n)(2)(v).

Methods for Testing Wood Poles

One of the following methods or an equivalent method shall be used for testing wood poles:


- Rap the pole sharply with a hammer weighing about 3 pounds, starting near the ground line and continuing upwards circumferentially around the pole to a height of approximately 6 feet. The hammer will produce a clear sound and rebound sharply when striking sound wood. Decay pockets will be indicated by a dull sound and/or a less pronounced hammer rebound. When decay pockets are indicated, the pole shall be considered unsafe. Also, prod the pole as near the ground line as possible using a pole prod or a screwdriver with a blade at least 5 inches long. If substantial decay is encountered, the pole shall be considered unsafe.
- Apply a horizontal force to the pole and attempt to rock it back and forth in a direction perpendicular to the line. Caution shall be exercised to avoid causing power wires to swing together. The force may be applied either by pushing with a pike pole or pulling with a rope. If the pole cracks during the test, it shall be considered unsafe.

Encountering Unsafe Poles or Structures

- Poles or structures determined to be unsafe by test or observation may not be climbed until made safe by guying, bracing or other adequate means. Poles determined to be unsafe to climb shall, until they are made safe, be tagged in a conspicuous place to alert and warn all employees of the unsafe condition.

Testing Requirements for Cable Suspension Strand

- Before attaching a splicing platform to a cable suspension strand, the strand shall be tested and determined to have strength sufficient to support the weight of the platform and the employee. Where the strand crosses above power wires or railroad tracks it may not be tested but shall be inspected in accordance with paragraph (n)(6) of 1910.268.
- The following method or an equivalent method shall be used for testing the strength of the strand:
 - A rope, at least three-eighths inch in diameter, shall be thrown over the strand. On joint lines, the rope shall be passed over the strand using tree pruner handles or a wire raising tool.
 - If two employees are present, both shall grip the double rope and slowly transfer their entire weight to the rope and attempt to raise themselves off the ground.
 - If only one employee is present, one end of the rope which has been passed over the strand shall be tied to the bumper of the truck, or other equally secure anchorage.
 - The employee then shall grasp the other end of the rope and attempt to raise himself off the ground.

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Inspection of Strand

Where strand passes over electric power wires or railroad tracks, it shall be inspected from an elevated working position at each pole supporting the span in question. The strand may not be used to support any splicing platform, scaffold or cable car, if any of the following conditions exist:

- Corrosion so that no galvanizing can be detected
- One or more wires of the strand are broken
- Worn spots
- Burn marks such as those caused by contact with electric power wires.

Installing and Removing Wire and Cable


Before installing or removing wire or cable, the pole or structure shall be guyed, braced, or otherwise supported, as necessary, to prevent failure of the pole or structure.

Avoiding Contact with Energized Power Conductors or Equipment

When cranes, derricks, or other mechanized equipment are used for setting, moving, or removing poles, all necessary precautions shall be taken to avoid contact with energized power conductors or equipment.

Handling Poles Near Energized Power Conductors – Contracted by KU/LG&E and South KY RECC

- Joint use poles may not be set, moved, or removed where the nominal voltage of open electrical power conductors exceeds 34.5kV phase to phase (20kV to ground).
- Poles that are to be placed, moved or removed during heavy rains, sleet or wet snow in joint lines carrying more than 8.7kV phase to phase voltage (5kV to ground) shall be guarded or otherwise prevented from direct contact with overhead energized power conductors.
- In joint lines where the power voltage is greater than 750 volts but less than 34.5kV phase to phase (20 kV to ground), wet poles being placed, moved or removed shall be insulated with either a rubber insulating blanket, a fiberglass box guide, or equivalent protective equipment.
- In joint lines where the power voltage is greater than 8.7 kV phase to phase (5kV to ground) but less than 34.5kV phase to phase (20 kV to ground), dry poles being placed, moved, or removed shall be insulated with either a rubber insulating blanket, a fiberglass box guide, or equivalent protective equipment.
- Where wet or dry poles are being removed, insulation of the pole is not required if the pole is cut off 2 feet or more below the lowest power wire and also cut off near the ground line.
- Insulating gloves shall be worn when handling the pole with either hands or tools, when there exists a possibility that the pole may contact a power conductor. Where the voltage to ground of the power conductor exceeds 15kV to ground, Class II gloves (as defined in ANSI J6.6-1971) shall be used. For voltages not exceeding 15kV to ground, insulating gloves shall have a breakdown voltage of at least 17kV.
- The guard or insulating material used to protect the pole shall meet the appropriate 3 minute proof test voltage requirements contained in the ANSI J6.4-1971.
- When there exists a possibility of contact between the pole or the vehicle-mounted equipment used to handle the pole, and an energized power conductor, the following precautions shall be observed:
- When on the vehicle which carries the derrick, avoid all contact with the ground, with persons standing on the ground, and with all grounded objects such as guys, tree limbs, or metal sign posts. To the extent feasible, remain on the vehicle as long as the possibility of contact exists.

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Working Position on Poles

- Climbing and working are prohibited above the level of the lowest electric power conductor on the pole (exclusive of vertical runs and street light wiring), except:
 - Where communications facilities are attached above the electric power conductors, and a rigid fixed barrier is installed between the electric power facility and the communications facility, or
 - Where the electric power conductors are cabled secondary service drops carrying less than 300 volts to ground and are attached 40 inches or more below the communications conductors or cables


Fall Protection

Fall protection is required whenever employees are potentially exposed to falls from heights of six feet or greater to lower levels. This includes work near and around excavations. Use of guard rails, safety net, or personal fall arrest systems should be used when the standard methods of protection are not feasible or a greater hazard would be created.

Fall protection equipment will meet the requirements of applicable ANSI, ASTM or OSHA requirements. When purchasing equipment and raw materials for use in fall protection systems all applicable ANSI and ASTM requirements should be met.

The following are minimum standards for Duo County Telecom employee personal fall protection systems:

- All D-rings must be a minimum of 2¼ inches (inside diameter).
- All snap hooks shall not allow pressure to be applied to the gate in the opening direction.
- No pelican hooks on lanyards should be used as a primary connection.
- Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials.
- Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to interfacing parts of the system.
- D-rings and snap hooks shall have a minimum tensile strength of 5,000 pounds.
- D-rings and snap hooks shall be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.
- Snap hooks shall be sized to be compatible with the member to which they are connected to prevent unintentional disengagement of the snap hook. Only a locking type snap hook designed and used to prevent disengagement of the snap hook by the contact of the snap hook keeper by the connected member shall be used.
- Horizontal lifelines shall be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.
- Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds. Where vertical lifelines are used, each employee shall be attached to a separate lifeline.
- Lifelines shall be protected against being cut or abraded.

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- Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet or less shall be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Self-retracting lifelines and lanyards which do not limit free fall distance to 2 feet or less, rip stitch lanyards, and tearing and deforming lanyards shall be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached, or shall be designed, installed, and used as part of a complete personal fall arrest system which maintains a safety factor of at least two and under the supervision of a qualified person.
- Systems used by an employee having a combined person and tool weight in excess of 310 pounds shall be modified to provide proper protection for such heavier loads.
- The attachment point of the body harness shall be located in the center of the wearer’s back near shoulder level, or above the wearer’s head, except when climbing.
- Body harnesses and components shall be used only for employee protection and not to hoist materials.
- Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.
- Provide for prompt rescue of employees in the event of a fall or assure that employees are able to rescue themselves.
- Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.
- Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists unless prior approval is obtained from a competent person.
- If and when a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

Training

Employees receive training pertaining to the recognition and elimination of fall hazards. A training program shall be provided for each employee who might be exposed to fall hazards. Training shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to follow to minimize these hazards.

The employee will be trained in the use and operation of fall arrest systems, inspections and maintenance procedures.

Retraining – Retraining shall be provided when the following are noted:

- Deficiencies in training,
- Workplace changes

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REQUEST NO. 12:

a. Explain how filing a tariff that simply incorporates another utility's tariff by reference complies with 807 KAR 5:015, Section 3; KRS 278.160; and KRS 278.180.

b. If Duo County amended its tariff, would that constitute an amendment of the tariffs of every utility that incorporated it by reference, or would each utility have to file a subsequent amendment?

RESPONSE: (a) Pursuant to longstanding Commission practice, the RLECs have adopted Duo County's tariff since at least 1999, and such adoption has been consistently approved by the Commission. This longstanding practice is also consistent with practice at the federal level, where Duo County (along with the other RLECs who have adopted the Duo Tariff) has adopted the NECA, JSI, and/or Moss Adams Tariffs.

(b) Consistent with historical practice of the RLEC's adoption of the Duo County Access tariff, it is anticipated that amendments applicable to all RLECs would constitute an amendment of the tariffs of every utility that incorporated it by reference, and any utility-specific rate sheets or information, including exceptions to such information, would be reflected in the amended filing for the specific utility.

Witness) Mark Henry

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REQUEST NO. 13: For Ballard Rural Telephone Cooperative Corporation, Inc. only:

Describe the timetable for decommissioning and removing your current poles.

RESPONSE: Commission Staff's Request No. 13 is not directed to Duo County and
no response is requested.

Witness) Mark Henry

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