

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 Duo County's proposed tariff. The RLECs jointly propose amending this section to specifically refer to "section 18.16(2)(d)" to avoid any confusion, and Foothills will adopt Duo County's proposed tariff with such revision.

Witness) Ruth Conley

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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, Foothills 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, Foothills 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) Ruth Conley

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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) Foothills' \$119 per pole survey rate estimate is based upon the per pole survey rate negotiated with the Commonwealth of Kentucky, which was established based upon the market survey rates charged to Foothills for attaching to poles of other pole owners. This rate strikes a reasonable balance as it seeks to ensure security of payment by an attacher, providing some level of security to Foothills, while simultaneously requiring a true-up mechanism in compliance with the Commission's regulations, which ensures that an attacher is only responsible for the actual costs of the survey.

(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

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requests for Pole Attachments must be made in writing by the new Attacher and include payment of the per pole Survey Charge . . .”).

Witness) Ruth Conley

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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: Foothills 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. Foothills does not have cable duct for use.

Witness) Ruth Conley

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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: Foothills 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) **Ruth Conley**

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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 costs of utility poles in service are recorded in Account 2411 and Account 2411.12, which is used to record the cost of utility poles added for fiber to the home.

(b) The costs recorded in each account include the original cost of the poles, cross arms, guys, and other material used in the construction of pole lines. The poles in Foothills' system range from 20 to 60 feet.

(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) Ruth Conley

Foothills Rural Telephone Cooperative
Plant Account Balances
Staff question 6(c)

<u>Account</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>
2411.00 Poles	10,662,528.32	10,881,384.45	11,208,051.47
2411.12 FTTH Poles	3,942,372.27	3,942,372.27	3,942,372.27

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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 is recorded in Account 3100.70 and Account 3101.30, for utility poles added for fiber to the home.

(b) The accumulated depreciation is calculated monthly using the Commission's Average Depreciation Schedule for telecommunications utilities and debited to Account 6561.10 (Depreciation Expense – Plant). Accumulated depreciation is then credited to Accounts 3100.70 and 3101.30.

(c) The corresponding plant accounts are Account 2411 and Account 2411.12.

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

Witness) Ruth Conley

Foothills Rural Telephone Cooperative
Accumulated Depreciation
Staff Inquiry question 7(d)

<u>Account</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>
3100.70 Accumulated Depreciation - 2411 Poles	(7,468,310.19)	(8,000,841.02)	(8,511,794.97)
3101.30 Accumulated Depreciation - 2411.12 FTTH Poles	(2,622,977.84)	(2,843,766.44)	(3,064,555.04)

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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) Foothills has adopted the Commission's average depreciation rates. 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) Foothills is a telecommunications utility that has adopted the Commission's average depreciation rates.

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

Witness) Ruth Conley



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,

A handwritten signature in black ink that reads "Don Mills". The signature is written in a cursive style with a large, sweeping "D" and "M".

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.

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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: Foothills 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 Foothills’ system is 20,822. For a breakdown of the poles based on the year they were installed, please see the table provided with this response.

Witness) **Ruth Conley**

Foothills Rural Telephone Cooperative
Staff Inquiry questions 9/10

Through 2000	16,809
2001	48
2002	97
2003	447
2004	111
2005	95
2006	106
2007	134
2008	83
2009	161
2010	171
2011	257
2012	286
2013	272
2014	128
2015	287
2016	177
2017	485
2018	295
2019	51
2020	115
2021	207
Total	20,822

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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 Foothills' Response to Commission Staff's Request for Information No. 9.

Witness) **Ruth Conley**


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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: Please see Foothills' applicable safety and inspection policies for utility poles provided with this response.

Witness) Ruth Conley

	Foothills Communications Safety Management System	Initial Issue Date	10/15/2018
		Revision Date:	Initial Version
Poles		Revision No.	3
		Next Review Date:	10/15/2022
Authority: Management Personnel		Page:	Page 1 of 4

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 Foothills Communications employees and operations where employees whose work activities may involve working with or around poles. Employees are tasked to identify and report any poles or facilities that they believe may be in need of remedial efforts, including repair or replacement, to their supervisor.

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.
- Foothills Communications shall ensure that pole climbers are inspected by a competent person for the following conditions: Fractured or cracked gaffs or leg irons, lose 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.

Testing Wood Poles

All 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. This testing shall be conducted by a qualified technician.

	Foothills Communications Safety Management System	Initial Issue Date	10/15/2018
		Revision Date:	Initial Version
Poles		Revision No.	3
		Next Review Date:	10/15/2022
Authority: Management Personnel		Page:	Page 2 of 4

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.

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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, Foothills has adopted the Duo County 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 Foothills (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 Foothills' 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) Ruth Conley

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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 Foothills and no response is requested.

Witness) **Ruth Conley**

