

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 Highland will adopt Duo County's proposed tariff with such revision.

Witness) G.M. Patterson

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. 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, Highland 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, Highland 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."

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

(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) G.M. Patterson

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. 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) Upon receipt of an attachment request, Highland's engineering team reviews the application for attachment. Two surveyors are sent to the field to verify the attachment height request and requested make-ready. If any discrepancies are identified, these are corrected and information is inputted into Highland's database. If make-ready is required, the engineers are required to draw up the job using RUS units to prepare construction estimates (if needed), on a per pole basis. If any electricity make-ready is identified, the electric utility must be notified. Once survey and proposed make-ready is prepared, the engineering team coordinates with the attacher, and, if needed, the engineers must provide as-builts to the Highland mapping administrator to ensure Highland's mapping database is accurate. For purposes of the per pole survey fee estimate, Highland estimates that labor for each pole (as described above) is 1 hour, with two engineers in the field, and a half hour for office and mapping work. A spreadsheet showing a computation of the per pole survey rate, using Loaded Labor Rates, is provided with this response.

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

(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) G.M. Patterson

Highland Telephone Cooperative, Inc.

**Loaded Labor Rates
Highland Telephone Survey Fee Support**

| Work Type | Loaded Rate | Qty | Total |
|-----------------------|----------------------------|------------|------------------|
| Field Survey (hr) | \$ 75.39 | 2 | \$ 150.78 |
| Office / Mapping (hr) | \$ 75.39 | 0.5 | \$ 37.70 |
| | | | |
| | Survey Costs | | \$ 188.48 |
| | | | |
| | Survey Fee Charged | | <u>\$ 150.00</u> |
| | | | |
| | Current Fee Deficit | | \$ (38.48) |

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

Witness) G.M. Patterson

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. 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: Highland 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) G.M. Patterson

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. 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 in service are recorded in Account 2411.1 for fully depreciated poles, and Accounts 2411.2 and 2411.2BIP are used for poles in service but not fully depreciated. Account 2411.2BIP is used to account for pole costs associated with Highland's stimulus Loan/Grant project that was completed in 2015.

(b) The costs recorded in each account included the cost of the utility pole and the associated hardware, labor, and overhead necessary to install the poles. The poles in each account are various types and range from 20 feet to 65 feet.

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

(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, which includes information for Highland's entire system and information related solely to poles located in Kentucky.**

Witness) **G.M. Patterson**

Highland Telephone Cooperative, Inc.

Utility Pole Plant Accounts

| | | | |
|-----------|---------------------|-------------|-------------------|
| 2019 | | | 3,173,330.00 |
| | SYSTEM | | KENTUCKY |
| 2411.1 | 10,510,381.61 | 0.89 | 2,830,714.56 |
| 2411.2 | 86,689.16 | 0.01 | 23,347.61 |
| 2411.2BIP | <u>1,185,434.53</u> | <u>0.10</u> | <u>319,267.83</u> |
| | 11,782,505.30 | 1.00 | 3,173,330.00 |

| | | | |
|-----------|---------------------|-------------|-------------------|
| 2020 | | | 3,181,899.99 |
| | SYSTEM | | KENTUCKY |
| 2411.1 | 10,510,381.61 | 0.89 | 2,829,358.83 |
| 2411.2 | 123,655.28 | 0.01 | 33,273.33 |
| 2411.2BIP | <u>1,185,434.53</u> | <u>0.10</u> | <u>319,267.83</u> |
| | 11,819,471.42 | 1.00 | 3,181,899.99 |

| | | | |
|-----------|---------------------|-------------|-------------------|
| 2021 | | | 3,186,893.39 |
| | SYSTEM | | KENTUCKY |
| 2411.1 | 10,510,381.61 | 0.89 | 2,822,548.53 |
| 2411.2 | 167,899.12 | 0.01 | 45,077.03 |
| 2411.2BIP | <u>1,185,434.53</u> | <u>0.10</u> | <u>319,267.83</u> |
| | 11,863,715.26 | 1.00 | 3,186,893.39 |

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. 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 Accounts 3100.24111, 3100.24112, 3100.24112BIP.

(b) Accumulated depreciation is calculated utilizing the AS-400 IBM System based on the straight-line method, broad group procedure, and the whole life technique to arrive at an average service life and average net salvage parameters.

(c) The corresponding plant accounts are Account 2411.1 for fully depreciated poles, Account 2411.2 for poles in service not fully depreciated, and Account 2411.2BIP for poles in service not fully depreciated that are associated with Highland's stimulus Loan/Grant project completed in 2015.

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

(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, which includes information for Highland's entire system and information related solely to poles located in Kentucky.

Witness) G.M. Patterson

Highland Telephone Cooperative, Inc.

Utility Pole Depreciation Accounts

| | | | |
|---------------|---------------------|-------------|--------------------|
| 2019 | | | (2,902,745.00) |
| | SYSTEM | | KENTUCKY |
| 3100.24111 | (10,510,381.61) | 0.98 | (2,830,714.77) |
| 3100.24112 | (4,025.50) | 0.00 | (1,084.17) |
| 3100.24112BIP | <u>(263,421.17)</u> | <u>0.02</u> | <u>(70,946.06)</u> |
| | (10,777,828.28) | 1.00 | (2,902,745.00) |

| | | | |
|---------------|---------------------|-------------|--------------------|
| 2020 | | | (2,920,861.00) |
| | SYSTEM | | KENTUCKY |
| 3100.24111 | (10,510,381.61) | 0.97 | (2,829,482.41) |
| 3100.24112 | (9,624.25) | 0.00 | (2,590.93) |
| 3100.24112BIP | <u>(329,810.21)</u> | <u>0.03</u> | <u>(88,787.66)</u> |
| | (10,849,816.07) | 1.00 | (2,920,861.00) |

| | | | |
|---------------|---------------------|-------------|---------------------|
| 2021 | | | (2,934,464.00) |
| | SYSTEM | | KENTUCKY |
| 3100.24111 | (10,510,381.61) | 0.96 | (2,823,353.35) |
| 3100.24112 | (17,427.81) | 0.00 | (4,681.55) |
| 3100.24112BIP | <u>(396,199.25)</u> | <u>0.04</u> | <u>(106,429.10)</u> |
| | (10,924,008.67) | 1.00 | (2,934,464.00) |

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RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

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

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) **Highland 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) **Highland 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 is 26.0 years.**

Witness) **G.M. Patterson**



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, looped "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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RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00107

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

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: Highland 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 Highland’s system that are located in Kentucky is 2,690.

RUS does not require that Highland maintain records regarding date of installation of poles, and poles are depreciated on a group asset basis. Highland replaces poles when they are “red-tagged.”

Witness) G.M. Patterson

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

Witness) **G.M. Patterson**

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. 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: Highland utilizes a two-year inspection rotation with support data for each pole located in Kentucky. Field inspectors utilize the RUS grading system to determine the status of life for each pole. If a pole is determined to require maintenance or replacement, RUS units are used to estimate the labor and material for each pole requiring maintenance or replacement. If any pole is determined to be unsafe, it is immediately replaced. The remaining poles are scheduled for maintenance or replacement and scheduled in accordance with the necessity.

In addition to the rotating bi-annual inspection, outside plant technicians are trained to inspect poles before climbing or performing work on the poles. In a field technician notes a possible issue, the issue is documented and appropriate action taken depending upon the severity of the issue.

A copy of Highland's applicable policies are provided herewith.

Witness) G.M. Patterson

HTC POLE INSPECTION PROCEDURE

- VERIFY OWNERSHIP OF POLE
- (2LB) HAMMER POLE AT GROUND LEVEL IN A CANDY CANE MOTION TO ABOUT 6' UP THE POLE
- TAKE A SCREWDRIVER OR POLE PROP TO INSPECT THE POLE UNDER GROUND LEVEL
- DETERMINE IF THE POLE IS GOOD OR BAD, AND WILL LAST A LEAST ANOTHER 5 YEARS
- DETERMINE THE GRADE OF THE POLE

| Results of Wood Pole Inspection | |
|--|---|
| A | NEW POLE |
| B1 | Pole is in very good condition but not new |
| B2 | Early Stages of decay, pole in good condition |
| B3 | Pole Condition is good (B1 or B2) but defect in equipment (Broke Guy, Faulty Framing, Etc.) |
| C1 | Pole Decay or insect damage at ground line |
| C2 | Severe Woodpecker damage |
| C3 | Hazardous Conditions above ground level (Top of pole rotten, Pole leaning bad, Shell rot, Pole bowed) |
| D1 | A "Reinforceable reject" (Pole split at top) |
| D2 | A "Replacement " is a rejected pole that cannot be rehabilitated |

- IF POLE IS BAD MAKE SURE TO GET ALL UNITS, GPS LOCATION AND RIBBION POLE
- BE SURE TO GPS ALL HTC OWNED POLES. AND UNDER NOTES IN THE GPS BE SURE TO USE CORRECT POLE NUMBER
- AT THE END OF EVERYDAY UPLOAD ALL GPS POINTS, GET WITH SOMEONE WHO CAN PUT THE UPLOADED POINTS IN A CORRECT FOLDER.
- SAVE DALIY WORK BACK TO THE NETWORK EVERYDAY
- COLOR CODE FOR EXCEL SPREAD SHEET

| | | | |
|--------------|------------------------|------------|---------------------|
| POLE CHECKED | CHANGES FOR STELLARMAP | NEEDS WORK | NEEDS WORK /STELLER |
|--------------|------------------------|------------|---------------------|

HIGHLAND TELEPHONE COOPERATIVE
NETWORK OPERATIONS
PREVENTATIVE MAINTENANCE PROGRAM
Form: PMOSP

| HTC Form: PMOSP | | (Outside Plant) | | | | | |
|---------------------|----------------------|-----------------|------------|--------|-----------|--|---|
| ITEM | | FREQUENCY | | | | | |
| | | Monthly | emi Annual | Annual | Bi-Annual | | |
| POLES | | | | | | | |
| | Condition | | | | | | X |
| | Ground/Bond | | | | | | X |
| | Number/ID | | | | | | X |
| STRAND/CABLE | | | | | | | |
| | Condition | | | | | | X |
| | Ground/Bond | | | | | | X |
| | Sag | | | | | | X |
| | Road Clearance | | | | | | X |
| | Violations | | | | | | X |
| GUYS/ANCHORS | | | | | | | |
| | Condition | | | | | | X |
| | Tension | | | | | | X |
| | Guards (as required) | | | | | | X |
| FDH CABINETS | | | | | | | |
| | Condition | | | | | | X |
| | Identification | | | | | | X |
| | Interior | | | | | | X |
| | Grounds | | | | | | X |
| | Locked | | | | | | X |
| RIGHT OF WAY | | | | | | | |
| | Vegetation control | | | | | | X |

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. 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, Highland 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 Highland (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 Highland'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) G.M. Patterson

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. 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 Highland and no response is requested.

Witness) G.M. Patterson

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