

**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                 )**

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

Logan Telephone Cooperative, Inc. dba LTC Connect ("LTC" or the "Company") by counsel, files its responses to the Commission Staff's First Requests for Information, issued in the above-captioned case on April 21, 2022.

**FILED: May 5, 2022**

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

Witness)      Gregory A. Hale

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
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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, LTC 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, LTC 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) Gregory A. Hale**

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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 LTC's per pole survey fee for LTC'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) Gregory A. Hale

**LOGAN TELEPHONE COOPERATIVE  
 KY PSC DATA REQUEST - ITEM 3**

		<u>Rate</u>	<u>Qty</u>	<u>Total</u>	
Line 1	Field vist/mapping - Hourly Rate	\$ 65.10	8	\$520.80	excludes contractor expenses
Line 2	Per Pole - Hourly Rate	\$ 65.10	0.5	\$ 32.55	
Line 3	No. of poles - Line 2	\$ 32.55	10	\$325.50	Assume 10 poles
Line 4	Total			\$846.30	Line 1 + Line 3
	Per Pole Rate		10	\$ 84.63	Line 4 / 10 poles

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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:** LTC 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.

Witness)      **Gregory A. Hale**

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
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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:** LTC 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)      Gregory A. Hale



ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
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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 are recorded in Account 2411.**

(b) **The costs recorded in Account 2411 includes the costs of utility poles, and also includes other plant such as anchors, guy ground connectors, guy guards, and pole markers. The Account includes 20 to 40 foot poles that were placed in service prior to 2020. For a description of the type of poles currently in service, please see the chart attached to this response.**

(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) **Mary Jo Vanover**

**KY PSC Request Response**

**Case No. 2022-00107**

**Logan Telephone Cooperative, Inc. dba LTC Connect**

**Staff Inquiry 6(b)**

<b>ASSET #</b>	<b>ASSET DESCRIPTION</b>	<b>GROUP #</b>	<b>GROUP NAME</b>	<b>QTY</b>	<b>INSTALLATION YEAR</b>
20-7	20' POLE CLASS 7	871	LOGAN	3	Various
25-5	25' POLE CLASS 5	748	MUHLENBURG CO	1	Various
25-5	25' POLE CLASS 5	748	LOGAN	7	Various
25-6	25' POLE CLASS 6	871	LOGAN	1	Various
25-7	25' POLE CLASS 7	748	MUHLENBURG CO	1	Various
25-7	25' POLE CLASS 7	871	LOGAN	5	Various
25-9	25' POLE CLASS 9	871	LOGAN	1	Various
30-5	30' POLE CLASS 5	748	MUHLENBURG CO	8	Various
30-5	30' POLE CLASS 5	871	LOGAN	27	Various
30-5	30' POLE CLASS 5	910	TODD	1	Various
30-6	30' POLE CLASS 6	748	MUHLENBURG CO	1	Various
30-6	30' POLE CLASS 6	871	LOGAN	4	Various
35-5	35' POLE CLASS 5	871	LOGAN	4	Various
35-6	35' POLE CLASS 6	871	LOGAN	1	Various
40-3	40' POLE CLASS 3	748	MUHLENBURG CO	1	Various
40-4	40' POLE CLASS 4	871	LOGAN	1	Various

**KY PSC Request Response**  
**Case No. 2022-00107**  
**Logan Telephone Cooperative, Inc. dba LTC Connect**  
**Staff Inquiry 6(c)**

**GL account 2411**

Balance year ending 2019:           \$ 257,288.48

Balance year ending 2020:           \$ 121,653.01

Balance year ending 2021:           \$ 121,656.58

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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 3100.2411.

(b) The accumulated depreciation is calculated using composite group depreciation methodology by applying the approved depreciation rate to the entire pole asset group.

(c) The corresponding plant account is Account 2411.

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

Witness) Mary Jo Vanover

**KY PSC Request Response**  
**Case No. 2022-00107**  
**Logan Telephone Cooperative, Inc. dba LTC Connect**  
**Staff Inquiry 7(d)**

**GL account 3100.2411**

Balance year ending 2019:           \$ (96,607.58)

Balance year ending 2020:         \$ (1,636.69)

Balance year ending 2021:         \$ (8,412.44)

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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) LTC 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) LTC 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) Mary Jo Vanover



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, slightly slanted style.

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:** LTC 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 LTC’s system is 67. Please also see the attachment provided in response to Commission Staff Request No. 6(b).

The following table provides a breakdown of poles currently in service by the year they were installed. LTC does not have specific dates for poles placed before 2005 as specific dates for individual poles were lost when LTC migrated to new accounting software in 2005.

<b>Number of Poles</b>	<b>Date Placed</b>
32	Added Prior to 2005
1	2006
2	2007
2	2008
4	2009
1	2017
25	2019

Witness)      Gregory A. Hale

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
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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 LTC's Response to Commission Staff's Request for Information No. 9.

Witness)      Gregory A. Hale

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
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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 LTC's applicable inspection policies for utility poles provided with this response.

Witness)      Gregory A. Hale

Logan Telephone Cooperative

## **Subject: Plant and Equipment Policy**

### **Purpose**

To establish a policy detailing preventative maintenance procedures of the Logan Telephone outside plant, central office equipment, vehicles and utility owned buildings.

#### A. Outside Plant

All buried outside plant facilities shall be inspected, as preventative maintenance, in a three (3) year cycle. The Logan Telephone plant will be divided into three sections, with one section being specified for inspection a year. Section one (1) will include the exchanges of Auburn and Adairville, section two (2) will include the exchanges of Lewisburg and Dunmor, section three (3) will include the exchanges of Rochester and Logansport. The inspection shall be recorded on an Outside Plant Condition Report or similar form approved by Logan Telephone, prior to inspection. A copy of all inspection reports shall be kept by the plant manager.

Buried facilities, both copper and fiber optic, will be inspected for damaged or missing housings such as pedestals, marker posts and hand holes. It will also include proper identification of facility owner and plant identification, such as serving area, route and individual facility number. All minor maintenance will be corrected the day the facility is inspected, if the issue requires more extensive repair it shall be brought to the attention of Logan Telephone management for remediation.

Preventative maintenance of Logan Telephone plant will be conducted daily as well. All Logan Telephone staff are encouraged, during daily operations, to observe and correct minor maintenance issues and report more extensive maintenance issues to Logan Telephone management for remediation.

#### B. Central Office

All Central Office structures shall be inspected and receive scheduled preventative maintenance on a quarterly basis, to include plumbing, lighting, electrical, and physical structure. In addition, all fan tray filters, ladders, first aid supplies, and eye wash stations shall be inspected / maintained quarterly. Climate control facilities, fire extinguishers, and backup battery strings shall be inspected annually by contracted specialists with preventative maintenance performed as needed. Halon fire suppression systems shall be tested and maintained bi-annually by an outside specialist.

Additional inspection and maintenance of all Central Office facilities shall also be performed on an ongoing basis. Central Office staff are encouraged to correct minor maintenance issues as they occur or are observed, and to report more extensive maintenance issues to management for resolution as needed. All inspections shall be recorded on the Central Office Maintenance Report, a copy of all inspections shall be kept by the network manager.

C. Vehicles

All Logan Telephone vehicles shall be inspected monthly as a preventative maintenance measure to ensure safe operation of the fleet. All assigned vehicles will be inspected by that employee as directed by Logan Telephone management. Fleet type vehicles, those vehicles not assigned to a specific employee, will have an employee assigned to the vehicle by the human resource manager. All inspections shall be recorded on a Vehicle Condition Report, a copy of all inspections shall be kept by the human resource manager.

D. Buildings

The Logan Telephone office at 10725 Bowling Green Road and warehouse facilities at 6983 Friendship road in Auburn KY shall be inspected and receive scheduled preventative maintenance on a quarterly basis, to include plumbing, lighting, electrical, and physical structure. Climate control facilities, fire extinguishers and fire suppression systems shall be tested and maintained at least annual by an outside specialist. Preventative maintenance of the building shall also be performed on a daily basis. All Logan Telephone staff are encouraged, during daily operations, to observe and correct minor maintenance issues and report more extensive maintenance issues to Logan Telephone management for remediation. All inspection reports both internally or from contract labor shall be kept by the plant manager or other members of management as directed by the GM.



Logan Telephone Cooperative

## **Subject: Systems Inspection Policy**

### **Purpose**

To establish a policy detailing inspection procedures for Aerial and Underground plant, utility provided station equipment, utility owned buildings and utility owned or leased construction equipment.

#### A. Aerial Plant

Aerial plant shall be inspected, at minimum, every (2) years. Aerial plant inspections shall cover, electrical hazards, proper clearance and separation of facilities, climbing safety and vegetation management. Logan Telephone staff are encouraged, during daily operations, to observe and correct minor maintenance issues.

At the direction of Logan Telephone the inspector(s) shall provide a detail of each location on an Aerial Plant Condition Report or similar form approved by Logan Telephone, prior to the inspection. Any hazards shall be brought to the attention of Logan Telephone management for remediation. Climbing Safety can be covered in a class room setting, sign in sheets, copies of tests and other appropriate material will be kept on file. A copy of all inspection reports shall be kept by the plant manager.

#### B. Underground Plant

Underground Plant shall be inspected annually for the presents of dangerous atmosphere, safe working conditions and proper separation from other underground facilities. Inspection shall be conducted at the direction of Logan Telephone and recorded on an Underground Plant Condition Report or similar form approved by Logan Telephone prior to inspection. Any hazards shall be brought to the attention of Logan Telephone management for remediation. Confined Space training can be covered in a class room setting, sign in sheets, copies of tests and other appropriate material will be kept on file. A copy of all inspection reports shall be kept by the plant manager.

#### C. Utility Provided Station Equipment

A visual inspection of station equipment, NID (Network Interface Device) or other utility provided equipment shall occur when directed to and working at the customer's premises. Inspection shall include connections for external electrical hazards, damaged equipment or wiring, safe location of equipment and appropriate protection from lightning. Any hazards shall be addressed while on site, or brought to the attention of Logan Telephone management for remediation. A description of any findings shall be recorded on the appropriate service order or trouble ticket.

D. Utility Buildings

Logan Telephone owned building shall be inspected annually for compliance with safety codes. All records of inspections shall be kept on file at Logan Telephone and available upon request.

E. Construction/Heavy Equipment

All Logan Telephone construction or heavy equipment owned or leased shall be inspected, at minimum, quarterly for wear, operational hazards or defects. Logan Telephone staff are encouraged, during daily operations, to observe and correct minor maintenance issues. Any hazards or defects shall be brought to the attention of Logan Telephone management for remediation. The inspection shall be recorded on a Heavy Equipment Condition Report or similar form approved by Logan Telephone, prior to inspection. A copy of all inspection reports shall be kept by the plant manager.

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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, LTC 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 LTC (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 LTC'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) Gregory A. Hale

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
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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 LTC and no response is requested.

Witness)      Gregory A. Hale

24939824



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

VERIFICATION

I, Mary Jo Vanover, 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.

Mary Jo Vanover

Name: Mary Jo Vanover

Title: Controller

COMMONWEALTH OF KENTUCKY )

) ss:

COUNTY OF LOGAN )

SUBSCRIBED AND SWORN TO before me on this the 3rd day of May, 2022.

My commission expires: 9/26/24

[Signature]  
Notary Public #566729

