



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

Witness)      Steven Gullett

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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, Mountain Rural 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, Mountain Rural 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) Steven Gullett**

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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) Mountain Rural's \$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 Mountain Rural 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 Mountain Rural, 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."

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**(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) Steven Gullett**

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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:** Mountain Rural 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. Mountain Rural does not have cable duct for use.

Witness)      Steven Gullett

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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:** Mountain Rural 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) Steven Gullett



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RURAL LOCAL EXCHANGES CARRIERS' RESPONSES TO THE COMMISSION  
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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.**

(b) **The costs recorded in each account include the original cost of poles, anchors, cross arms, guys, and other material, the cost of clearing pole line routes, make-ready costs, engineering, and labor used in the construction of the pole lines. Mountain Rural's utility poles primarily consist of 25 foot (Class 5), 30 foot (Class 4, 5, and 6), 35 foot (Class 4), 40 foot (Class 4), and 45 foot (Class 4) poles. Mountain Rural also has very few 50 – 60 foot poles (Class 2, 3).**

(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) **Steven Gullett**

MOUNTAIN RURAL TELEPHONE COOPERATIVE  
KY PSC DATA REQUEST - POLE DEPRECIATION EXPENSE Questions 6(c)

Account 2411

2021	10,123,327.32
2020	10,026,281.85
2019	9,893,315.56

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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 3411.**

(b) **The accumulated depreciation in each account is calculated on a straight-line basis, in accordance with the Commission's average depreciation schedule.**

(c) **The corresponding plant accounts are Accounts 2411.**

(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) **Steven Gullett**

MOUNTAIN RURAL TELEPHONE COOPERATIVE

KY PSC DATA REQUEST - POLE DEPRECIATION EXPENSE Questions 7(d)

Account 3411

2021 5,231,415.60

2020 4,726,684.52

2019 4,198,204.37

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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) Mountain Rural 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) Mountain Rural 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) Steven Gullett



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:** Mountain Rural 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 Mountain Rural’s system is 5,217. For a breakdown of the poles based on the year they were installed, please see the exhibit provided with this response.

Witness)      Steven Gullett

**Mountain Rural Telephone Cooperative**  
**KY PSC DATA REQUEST - Items 9/10**

<b>Year</b>	<b>Poles Installed</b>
2022	7
2021	64
2020	26
2019	41
2018	40
2017	63
2016	58
2015	42
2014	54
2013	52
2012	129
2011	61
2010	60
2009	122
2008	105
2007	72
2006	92
Pre-2006	4,129
<b>Total</b>	<b>5,217</b>

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

Witness)      Steven Gullett

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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 Mountain Rural's applicable safety and inspection policies for utility poles provided with this response.

Witness)      Steven Gullett

## **SAFETY AWARENESS PROGRAM PLANT**

### **To Comply With the Law**

It is our responsibility to comply with local, state and federal regulations in providing a safe environment for our employees; and to achieve efficient, productive performance of our contracts. The safety program requires the support of company management and employees, defines procedures, assigns responsibilities and provides a means for enforcement.

### **To Promote Efficiency**

Unorganized safety efforts have a direct, negative bearing on overall efficiency. They permit the loss of skilled workers, equipment and materials resulting in lost productivity. When the safety program is standardized, the overall effort is positive.

It is in our company's best interest to comply with the above objectives. We have, therefore, compiled this safety manual and expect all levels of organization, as well as individual employees, to follow these procedures. We have every reason to believe that if we work together on the safety program, the employees and the company will both benefit.

Enclosed you will find a copy of the Operational Safety Rules. Please read this material, and then sign the Employee Safety Acknowledgement sheet.

## **SAFETY PRACTICES**

### **Objective**

To provide the maximum in safety and protection for the employee of the Company and to keep them adequately trained and informed of safe working practices, tools and equipment.

### **Content**

The Board of Trustees recognizing the importance of safe working conditions for the employees of the Company has authorized and directed the General Manager to establish such rules and procedures and to maintain such tools and equipment as necessary to fully implement and enforce the following safe working practices.

#### **A. Hard Hats**

Hard hats shall be worn day or night by all employees when doing work in the open requiring them to climb to a work area or while working under another employee on a pole or ladder.

#### **B. Eye Protection**

Goggles, face shields or other suitable protection shall always be worn whenever there is danger of exposing the eyes to flying particles, acids, caustic substances or any condition hazardous to you or the person in charge.

C. Care and Maintenance of CO Buildings

1. Employee shall wear face protection, apron and gloves when servicing batteries.
2. Smoking is not permitted in any CO.

D. Care and Operation of Motor Vehicle

E. All Company vehicles must be operated in accordance with state and local regulations; and, posted speed limits must be observed at all times.

1. When trailers, poles or loads project beyond the rear of the truck bed, red flags shall be placed at the extreme end of the load or object trailed. All cars and trucks must be equipped with first aid kits, fire extinguishers, and flags in accordance with state and local regulations.
2. Seat belts must be worn at all times by employees operating or riding in Company owned vehicles.

F. Good Housekeeping

Truck beds and compartments shall be kept neat and in a safe condition. Heavy material items should not be stacked so high that placing or removing such items would create a lifting or handling hazard.

G. Poles

Before climbing any pole or structure, an employee shall take every precaution to insure that it is safe to climb and work upon. If the strength of any pole is questioned, it shall be thoroughly tested before being climbed. If the pole is unsafe to climb, it shall be braced or guyed before being climbed.

H. Safety Around Electric Wires

All employees shall wear rubber gloves whenever they see a power line, regardless of voltage, near the working area, which might come in contact with the telephone cable or wires. If a power line has fallen on a telephone line, the power supplier will be notified immediately for removal. All joint use poles should be tested for voltage before climbing the pole.

I. Tools



1. All tools shall be kept in a safe operating condition. Lineman belts and safety strap shall be inspected regularly for wear and replaced when necessary. Climbers shall be maintained according to standard with gaff covers properly installed when not in use.
2. Climbers shall be removed at the foot of the pole.

J. Reporting Accidents and Injuries

Any accident resulting in serious injury or death to an employee or the general public shall be immediately reported to the main office by radio, telephone or in person by the employee who has full knowledge of the incident.

All accidents, regardless of severity, involving employees, should be reported in writing to supervisor as promptly as possible. This report should contain all information pertaining to the accident and shall be the responsibility of the injured or supervisor who is on the job site.

K. Roadway Safety

When performing maintenance or construction work near a roadway or public thruway of any kind, the use of warning flags, signs, cones, lights or flagmen must be used in such a manner as to provide adequate warning to the public that work is being performed in the immediate area.

L. Responsibility

1. The General Manager and Department Heads shall be responsible for carrying out said policy to its fullest extent.
2. Failure of employee to comply with this policy shall be grounds for disciplinary action.

## **Mountain Telephone**

### **Pole Climbing and Rescue**

#### **Purpose**

Before climbing any pole, employees should review the structure to ensure it is safe to climb before any work begins. All employees must work together to ensure that precautions are being taken to avoid accidents any time when climbing structures is necessary to perform work.

If the safety of any pole is in question, it should be thoroughly tested before any employee climbs that pole. If there are any indications that the pole is unsafe for climbing, employees should not climb the pole until it is made safe by bracing, guying, or other means. See below for procedures for testing poles.

Supervisors or employees that neglect to follow these guidelines may be suspended without pay or may be subject to additional disciplinary action by the company, up to and including discharged depending on the seriousness of the action.

#### **Climbing**

Pole climbing is necessary in constructing and maintaining overhead aerial cable systems. The work is not difficult or hazardous if you are careful in selecting, fitting, and maintaining the climbing equipment. You must use sound judgment, use self-discipline, and follow the printed and verbal safety practices that are required in this career field.

The art of pole climbing is like any other art--it takes hard work. When you have mastered the art of climbing, you are about 10 percent efficient in your job. To become 100 percent efficient, you must learn to position yourself on the pole so that you can work at ease and with efficiency.

#### **INSPECTION POLE**

Inspect the pole for unsafe conditions both before and during the climb. Unsafe conditions include such things as rake (leaning of the pole), shell rot, cracks, breaks, knots, woodpecker holes, and foreign attachments to the pole. Inspect the pole for rot in the center, called *heart rot*, by sounding the pole with a hammer (if it sounds solid when hit with a hammer, it is safe). When the pole has been in the ground for a long time, inspect it for *butt rot* by digging down about 6 inches at the base of the pole and drilling a hole partway into the pole base. The shavings from the hole will indicate if the pole is rotted. Plug the hole after completing this test. Remove rocks and other objects that are within 10 feet of the pole to prevent injury if you fall.

Before an employee climbs a pole or works near foreign or metallic objects, a voltage tester must be used to detect any dangerous voltages.

When proper power clearance requirements are not met or where damages to power lines are hanging down into telephone climbing space, do not climb or test. Call your supervisor.



Telephone: (606)743-3121  
Facsimile: (606)743-3635  
Post Office Box 399  
West Liberty, Ky. 41472-0399

## PLANT INSPECTION RECORD

1. Date of Inspection \_\_\_\_\_

2. Inspecting Employee(s) \_\_\_\_\_

3. Exchange and Route Inspected:

4. Deficiencies Found:

5. Corrective Action:



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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, Mountain Rural 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 Mountain Rural (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 Mountain Rural'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) Steven Gullett

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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 Mountain Rural  
and no response is requested.

Witness)      Steven Gullett

24939853

