

**KENTUCKY PUBLIC SERVICE COMMISSION**

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In the Matter of: )  
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ELECTRONIC INVESTIGATION OF THE ) CASE NO. 2022-00107  
PROPOSED POLE ATTACHMENT )  
TARIFFS OF RURAL LOCAL EXCHANGE )  
CARRIERS )  
)  
)  

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The Kentucky Broadband and Cable Association and its members<sup>1</sup> (“KBCA”), pursuant to the Commission’s March 30, 2022, Order, respectfully submits these Supplemental Requests For Information (“RFI”) to Ballard Rural Telephone Cooperative Corporation (“Ballard”), Brandenburg Telephone Company Inc. (“Brandenburg”), Logan Telephone Cooperative, Inc. d/b/a/ LTC Connect (“Logan”), South Central Rural Telecommunications Cooperative, Inc. (“South Central”), and Thacker-Grigsby Telephone Company, Incorporated (“Thacker-Grigsby”), in accordance with the following Definitions and Instructions.

**DEFINITIONS**

1. The terms “You,” “Your,” and “the Company” refer individually to each of the Rural Local Exchange Carriers (“RLECs”) stated above.
2. The term “KBCA” refers to the Kentucky Broadband and Cable Association.
3. The term “Commission” refers to the Kentucky Public Service Commission.
4. The term “Poles” refers to utility poles in Your electric distribution network in Kentucky that You own or control.

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<sup>1</sup> The KBCA’s members are Access Cable, Armstrong, C&W Cable, Charter Communications, Comcast, Inter Mountain Cable, Lycom Communications, Mediacom, Suddenlink, and TVS Cable. Kentucky Broadband & Cable Association, Our Members, *available at* <https://www.kybroadband.org/members>.

5. The term “Proposed Tariff” refers to the tariffs issued by each RLEC on February 28, 2022, in connection with this proceeding.

6. The term “Response” means the response of each RLEC to KBCA’s Initial Requests For Information, filed individually with the Commission on May 5, 2022.

7. All capitalized terms not defined herein shall have the meanings given to them under the Proposed Tariff.

### **INSTRUCTIONS**

1. Each RLEC must respond individually to these Supplemental Requests for Information, and provide the requested data. If a response is identical for one or more RLECs, specify the RLECs to which the response applies.

2. In answering these Supplemental Requests for Information, please furnish all information that is known or available to You, regardless of whether the information is possessed directly by You or Your agents, employees, representatives, or investigators, or by Your attorneys or their agents, employees, representatives, or investigators.

3. Please identify at the end of Your response to each Supplemental Request for Information the person or persons most knowledgeable about such response and the person or persons responsible for the preparation of such response.

4. If any information responsive to these Supplemental Requests for Information is withheld, identify the Requests as to which such information is withheld and the reason(s) for withholding it.

5. For any information that You claim is unavailable, state why it is unavailable. If You cannot respond to the Supplemental Request for Information precisely as it is stated,

provide any information that is available and is responsive to the Request at a level of detail different from that specified herein.

6. KBCA requests that You produce all documents referenced in any response or that You referenced, reviewed, or relied upon to respond to any Supplemental Request for Information.

### **SUPPLEMENTAL REQUESTS FOR INFORMATION**

2-1. Explain how a new attacher would determine whether a pole was “[d]esignated for replacement within two (2) years of the date of its actual replacement for any reason unrelated to a new attacher’s request for attachment,” as stated in 807 KAR 5:015 Section 1(10)(b), if the pole was not visibly marked with a colored tag or other indication of replacement.

2-2. State whether You will visibly mark “Red-tagged poles,” as that term is defined in 807 KAR 5:015, with colored tags or in some other manner. If You will mark the poles with colored tags, state which colors You will use, and what those colors signify.

2-3. Identify the average amount of time You spend per pole on a pre-construction survey.

2-4. Provide any data related to Your contention that “[r]emoving ‘teeth’ from the tariff dis-incentivizes compliance and is unreasonable from financial, technical, and operational perspectives,” as stated in Your Response to KBCA’s RFI 1-6.

2-5. ***To Brandenburg only:*** Identify the amount of money, in dollars, of the portion of Your “survey fee estimate” that is included to provide You with “reasonable security” as opposed to the portion that is an estimate of the cost of the survey itself. *See* Response to KBCA RFI 1-7.

Dated: May 19, 2022

Respectfully submitted,

/s/ 

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