COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)CASE NO.PROPOSED POLE ATTACHMENT TARIFFS OF)2022-00108INCUMBENT LOCAL EXCHANGE CARRIERS)

RESPONSES OF CINCINNATI BELL TELEPHONE COMPANY LLC d/b/a/ ALTAFIBER TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

1. Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 3rd Revised Page 13, 2.3.1

(C). Please identify the types of property where attachment of "communications facilities" would

impair the right of Cincinnati Bell or joint users to continue their occupancy.

<u>RESPONSE</u>: Section 2.3.1(C) (which has been in effect since 1995 and altafiber has not proposed to change) could apply to any situation where altafiber's right to occupy another party's property is limited or restricted (e.g., easements, licenses, leases, restrictive deed covenants) where the addition of the attachment would violate the use or occupancy restrictions imposed by the property owner and would subject altafiber to forfeiture of its right to occupy such property.

<u>RESPONDENT</u>: Tamika L. Green Senior Director – OSP Planning and Engineering Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 3rd Revised Page 18, 2.3.3
 (E).

a. State whether the repeated text on lines 7–8 is a typographical error.

<u>RESPONSE</u>: Yes

b. Describe the acts necessary under Kentucky law for Cincinnati Bell to perfect a security interest in the property of an attachee.

RESPONSE: Perfection of a security interest is governed by KRS §§ 355.9-308 through 355.9-316. The necessary acts would depend upon the particular situation, but could include filings with state or local authorities and/or possession of the property.

RESPONDENT: Kevin Mann Regulatory Manager, Government Relations

3. Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 3rd Revised Page 22, 2.4.1(B).

a. Explain what standards Cincinnati Bell would apply when determining the amount of security an attacher would be required to provide and the when the attacher would be required to provide it.

RESPONSE: While § 2.4.1(B) has been in effect since 1995 and altafiber has not proposed to change it, it has not been invoked in recent memory. If altafiber conducts a credit check on a potential attacher and receives unacceptable results, it could elect to require an amount of security to reasonably assure payment of any amounts which may become due.

b. Explain how the proposed language ensures that the requirement will be

applied in a nondiscriminatory manner.

RESPONSE: The tariff language (which has been in effect since 1995 and altafiber does not propose to change) does not address discrimination directly, however, altafiber is subject to a general duty to provide nondiscriminatory access to poles without stating so specifically in each tariff section.

c. Identify the fees that the security contemplated by section 2.4.1(B) is

intended to secure the payment of.

<u>RESPONSE</u>: As stated in § 2.4.1(B), the security could cover any fees due under the tariff or charges for work performed for the benefit of the attachee.

d. Identify the work performed that the security contemplated by section

2.4.1(B) is intended to secure the payment of.

<u>RESPONSE</u>: Work performed could include pre-license surveys, make ready work or removal of attachments.

<u>RESPONDENT</u>: Tom Laswell Senior Manager – Mobility & Wireless Real Estate 4. Refer to Cincinnati Bell's proposed tariff, PSCK No. 1, 2nd Revised Page

31, 2.6.1 - Pole Attachment (A). Explain why Cincinnati Bell's proposed tariff does not include a

per pole estimate of survey costs as Cincinnati Bell appears to require prepayment of survey costs.

RESPONSE: The pathways application form, which is used by all attachers to initiate attachment requests, and is readily available on altafiber's website states that the application fee necessary to conduct a survey is \$25 per pole or \$50 per manhole with a \$250 minimum.

RESPONDENT: Tom Laswell Senior Manager – Mobility & Wireless Real Estate 5. Explain how Cincinnati Bell's tariff addresses charges, if any, for make ready cost for poles that are not a red tagged poles that are replaced with a new utility pole to accommodate the new attacher's attachment, and identify where in the tariff that issue is addressed.

<u>RESPONSE</u>: Section 2.6.1(D) states that altafiber will advise the attachee in writing of the estimated make-ready charges. Make-ready work is defined in § 2.1 as all work to accommodate additional facilities on a pole, which would include the cost of replacing any poles.

RESPONDENT: Tom Laswell Senior Manager – Mobility & Wireless Real Estate 6. a. Identify each account and subaccount in which the costs of utility poles in service are recorded.

<u>RESPONSE</u>:

<u>Account</u>	<u>Category</u>	Description
2411.0000	Fixed Asset	Poles - Regulated
6411.1100	Pole Expense	Pole Expense - Salary & Wages
6411.1200	Pole Expense	Pole Expense - Benefits
6411.1300	Pole Expense	Pole Expense - Rents
6411.1900	Pole Expense	Pole Expense - Other Expenses
		Pole Expense - Tree Trimming & Brush Cutting - Salary
6411.2100	Pole Expense	& Wages
		Pole Expense - Tree Trimming & Brush Cutting -
6411.2200	Pole Expense	Benefits
6411.2300	Pole Expense	Pole Expense - Tree Trimming & Brush Cutting - Rents
		Pole Expense - Tree Trimming & Brush Cutting - Other
6411.2900	Pole Expense	Expenses
	<u>RESPONDENT</u> :	Tom Paolucci
		Controller – E&C

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 (e.g., wood poles placed in service in 2005) and a description other plant, if any, for

which costs are recorded in the account.

<u>RESPONSE</u>: Account 2411 includes the original cost of poles, crossarms, guys, and other material used in construction of pole lines and shall include the cost of towers when not associated with buildings. It includes the cost of clearing pole line routes and tree trimming but excludes the cost of maintenance of previous clearings. It also includes the cost of permits and privileges and rights of way for construction of pole line plant.

Account 6411 includes expenses associated with poles. It includes the cost of (a) routine inspection and maintenance of pole line plant, (b) maintenance of pole line plant in the course of clearing trouble, (c) maintaining right of way for pole lines, and (d) other maintenance of such plant not chargeable to other subsidiary record categories of this account. It also includes amounts which are reimbursements for maintenance of pole line plant rented to or from other telephone companies. This account also includes the cost of rearrangements and changes incurred while working on pole line plant. It includes the cost of changes in location and of changes in type of items in good condition. It also includes

the cost of trimming and cutting trees and underbrush in order to maintain previous clearances, securing permits for such work, disposing of brush, etc., including such work along non-owned pole lines. It includes such work where contact with trees or brush has caused low insulation but no physical damage to the plant.

c. Provide an Excel spreadsheet with formulas, columns, and rows unprotected and fully accessible showing the plant in service balance of each such account at the end of each of the last five fiscal years.

<u>Account</u>	<u>Dec-21</u>	<u>Dec-20</u>	<u>Dec-19</u>	<u>Dec-18</u>	<u>Dec-17</u>
2411.0000	28,876,367	27,370,588	26,137,511	25,660,823	25,103,146
6411.1100	224,537	319,842	250,101	66,739	57,179
6411.1200	53,584	75,625	60,639	15,538	19,292
6411.1300	93,050	117,591	637,492	366,793	370,962
6411.1900	410,300	348,527	343,045	226,771	293,342
6411.2100	3,920	18,714	15,248	9,792	14,010
6411.2200	1,087	4,474	3,852	2,385	4,692
6411.2300	-	-	-	-	-
6411.2900	117,302	83,788	79,146	96,444	5,773

RESPONSE:

RESPONDENT :	Tom Paoluo	cci
	Controllar	\mathbf{F}

Controller – E&C

7. a. Identify each account and subaccount in which accumulated depreciation for poles in service is recorded.

<u>RESPONSE</u>:

<u>Account</u>	Category	Description
	Accumulated	Poles - Regulated - Depreciation
3100.4110	Depreciation	Reserve

b. Provide a narrative description of how the accumulated depreciation in each

such account is calculated.

<u>RESPONSE</u>: Poles are depreciated using the group method, which develops a depreciation rate based on the average useful life of the poles, rather than for each individual pole as would be utilized under the unit method. The estimated life of the group changes as the composition of the asset group, their related lives, and the Net Book Value ratio changes. The estimated life of the group is based on historical experience with similar assets, as well as taking into account anticipated changes.

c. Identify the corresponding plant account or accounts for each account in

which accumulated depreciation for poles is recorded.

RESPONSE: Account 2411 - Poles

d. Provide an Excel spreadsheet with formulas, columns, and rows

unprotected and fully accessible showing the balance of each such account at the end of each of

the last five fiscal years.

<u>RESPONSE</u>:

Account	<u>Dec-21</u>	<u>Dec-20</u>	<u>Dec-19</u>	<u>Dec-18</u>	<u>Dec-17</u>
3100.4110	239,815	18,208,384	17,774,044	17,339,603	16,989,047

<u>RESPONDENT</u>: Tom Paolucci Controller – E&C 8.a. Identify the depreciation rates currently used to calculate depreciation expense for each account containing utility pole costs.

RESPONSE: 8.2%

b. Identify the useful lives of the poles used to calculate each such depreciation

rate.

RESPONSE: 29 years

<u>RESPONDENT</u>:

Tom Paolucci Controller – E&C 9. Identify the total number of poles owned or controlled by Cincinnati Bell, and provide a breakdown of those poles based on the year they were installed. **RESPONSE:**

Year	Poles	1948	158	1985	581
1900	1	1949	137	1986	611
1902	1	1950	323	1987	516
1904	1	1951	387	1988	554
1905	1	1952	406	1989	676
1908	2	1953	435	1990	574
1912	6	1954	458	1991	567
1917	1	1955	440	1992	499
1918	1	1956	400	1993	734
1920	1	1957	506	1994	870
1921	4	1958	398	1995	583
1922	1	1959	520	1996	901
1923	5	1960	1444	1997	607
1924	4	1961	951	1998	753
1925	11	1962	910	1999	669
1926	37	1963	1181	2000	593
1927	22	1964	820	2001	704
1928	57	1965	880	2002	577
1929	94	1966	814	2003	631
1930	231	1967	971	2004	407
1931	68	1968	1103	2005	560
1932	79	1969	1524	2006	488
1933	61	1970	1479	2007	418
1934	68	1971	1583	2008	448
1935	109	1972	1187	2009	292
1936	43	1973	1611	2010	335
1937	115	1974	1127	2011	191
1938	86	1975	909	2012	257
1939	82	1976	815	2013	152
1940	67	1977	675	2014	175
1941	82	1978	611	2015	290
1942	74	1979	632	2016	253
1943	74	1980	548	2017	260
1944	55	1981	492	2018	464
1945	107	1982	486	2019	377
1946	118	1983	507	2020	366
1947	155	1984	589	2021	258
				Total	48532

<u>RESPONDENT</u>: Tom Paolucci, Controller – E&C

10. Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in Cincinnati Bell's system, and provide a copy of any such plan or policy that has been memorialized in writing.

<u>RESPONSE</u>: Company safety policy requires technicians to visually inspect and test the integrity of poles using one of the methods below, prior to climbing or placing a ladder on them. See Lesson 10 in the attached Field Ops training document for Pole Climbing (pages 68-78). If the pole is determined to be defective, the technician is to affix a red tag to the pole to alert other technicians of the safety hazard and report the pole to Engineering. In addition, Core Risk sends the attached Pole Warning Letter to all known attachers on altafiber poles to make them aware of their responsibility to confirm the safety of the pole prior to attaching to or accessing a pole. Any notifications of dangerous poles identified by an existing attacher are reported through a common application, SPANS, with a reason type of "Danger Pole."

<u>RESPONDENT</u>: Tamika L. Green Senior Director – OSP Planning and Engineering

VERIFICATION

COMMONWEALTH OF KENTUCKY) COUNTY OF CAMPBELL

Kevin Mann, Regulatory Manager, Government Relations, being duly sworn, states that he has read the foregoing Response of Cincinnati Bell Telephone Company LLC d/b/a altafiber to the Commission Staff's First Request for Information and that the information contained therein is a true and correct copy of the information provided to him by employees of altafiber knowledgeable of the particular subject matter, after reasonable inquiry, and, therefore the things set forth therein are true and correct to the best of his knowledge, information and belief formed after a reasonable inquiry as of the date set forth below.

10- plan Kevin Mann

The foregoing Verification was signed, acknowledged and sworn to before me this 5th day of May, 2022, by Kevin Mann in his capacity as Regulatory Manager, Government Relations for Cincinnati Bell Telephone Company LLC d/b/a altafiber.

JESSICIA L. MUDD, NOTARY C STATE AT LARGE **KENTUCKY** MY COMMISSION EXPIREM **NOVEMBER 4, 2023** ID# 634872

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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2022, I electronically filed the foregoing document using the Kentucky Public Service Commission's electronic system for filing, which sent notice of filing to counsel of record.

/s/ Douglas E. Hart

SAFE

POLE

CLIMBING

SAFETY POLE CLIMBING PAGE 1

LESSON 10

CHECKING for PHYSICAL HAZARDS and POLE CONDITION

In this lesson you will learn the correct way to:

- Visually inspect a pole
- Make a pike pole and/or hand line test on a pole
- Make a prod and sounding test on a pole
- Determine the correct action based on the results of your pole tests

When finished you will be required to safely and properly demonstrate these skills.

For this lesson you will need:

- Proper personal safety gear
- Work gloves
- Pike pole
- Hand line
- Lineman's hammer
- 5" or 6" screw driver

POLE BRAND MARK and What it MEANS

All utility poles have a "brand mark" on them. This is not the manufacturer's name, but is a specific <u>universal code</u> that contains the:

- Manufacturer / supplier's code or trademark
- Processing plant location and year of treatment
- Species of tree the pole was made from
- Size and Class of the pole



The brand mark also helps determine the correct depth of set on the pole. The location of the brand allows you to verify the depth of set before testing and climbing.

Length of Pole	Groundline distance from Butt	Mini	mum (Circum	feren	ce of 6	feet	
(feet)	(feet)	fro	m But	t		(inches)		
20	4.0	31.0	29.0	27.0	25.0	23.0	21.0	
25	5.0	33.5	31.5	29.5	27.5	25.5	23.0	
30	5.5	36.5	34.0	32.0	29.5	27.5	25.0	
35	6.0	39.0	36.5	34.0	31.5	29.0	27.0	
40	6.0	41.0	38.5	36.0	33.5	31.0	28.5	
45	6.5	43.0	40.5	37.5	35.0	32.5	30.0	
50	7.0	45.0	42.0	39.0	36.5	34.0		
55	7.5	46.5	43.5	40.5	38.0			
60	8.0	48.0	45.0	42.0	39.0			
65	8.5	49.5	46.5	43.5	40.5			
70	9.0	51.0	48.0	45.0	41.5			
75	9.5	52.5	49.0	46.0				
80	10.0	54.0	50.5	47.0				
85	10.5	55.0	51.5	48.0				
90	11.0	56.0	53.0	49.0				
95	11.0	57.0	54.0					
100	11.0	58.5	54.0					

To compute Butt Diameter Divide Circumference by 3.15

- 1. For example, the brand mark on all poles 50', or less, will be 10' from the bottom of the pole. So, if you are about to visually inspect a 40', class 5, pole you could expect to find the brand approximately 4' above the ground line for a properly set pole.
- Another example, the brand mark on a 35', class 5, and pole is also 10' from the bottom of the pole. So you could expect to find the brand approximately 4' above the ground line for a properly set pole.

There will be many different size and class poles in the field. <u>The general rule to</u> remember is that all poles, 50' and shorter, have the brand 10' from the bottom. All poles 55' and taller, have the brand 14' from the bottom. If in doubt refer to the chart for specific details.

Practice Exercise

Answer the following questions?

 You are visually inspecting a 35', class 5, pole set in firm ground, and the brand is 3' above ground line.

How deep is this pole set? ____

Is it safe to climb based on this depth?

2. You are visually inspecting a 20', class 7, pole set in solid rock, and the brand is 8' above the ground line. How deep is this pole set?

Is it safe to climb based on this depth?

- 3. You are visually inspecting an 80', class 45, pole set in solid rock, and the brand is 6' above the ground line. How deep is this pole set?
 Is it safe to climb based on this depth?
- 5. What are the two most important things you can learn from the brand mark on a pole?
- 6. On poles 50' or less, how far from the bottom is the brand mark?
- 7. On poles 55' or less, how far from the bottom is the brand mark?

Check your answers on the next page.

Practice Exercise Answers

- 1. Depth = 7' safe to climb
- 2. Depth = 2' unsafe to climb
- 3. Depth = 8' safe to climb
- 4. Depth = 6' unsafe to climb
- 5. Determines the age of the pole and the depth of set
- 6. 10'
- 7. 14'

VISUAL INSPECTION of POLES

You must exercise caution and stay alert anytime you are climbing poles and there are hazards on or around the pole. Some hazards you can correct (nails and posters on poles, debris around the base, missing or bent pole steps can be replaced), but many cannot be corrected (woodpecker poles, pole/shell rot, street signs). You must also be able to determine if the hazards identified are such that the pole should NOT be climbed. The important thing is to visually inspect a pole looking for the following:

- Excessive lean (rot or unbalanced load)
- Insufficient depth setting
- Collision damage (auto or truck)
- Fungus growth
- Termites or carpenter ants
- Bent, missing, or loose pole steps (replace)
- Large weather cracks
- Woodpecker holes
- Debris around the base of pole
- Foreign attachments (traffic signs, line guys)
- Obstructions (on pole or near pole affecting your climbing space)
- Ice on pole
- Power hazards
- Lightning or fire damage
- Shell rot and flaking

In addition to visually inspecting a pole, there are methods to test the integrity of a pole for problems you cannot see.

- Pike pole test
- Hand line test
- Prod and sounding test
- Boring test

Some pole conditions allow performing these tests, other circumstances will not, you must be able to determine when, and which method, is suitable for the existing conditions.

PIKE POLE TEST

The pike pole test is made with a 12 foot pike pole or two six foot extension poles with a pike fitting in the end. You will insert the tip into the pole about 12' above the ground line and gently rock the pole back and forth while watch the ground line and listening for any popping or cracking sounds. A good pole will provide a fairly stiff resistance and not make any popping and cracking sounds.

Do NOT use this test if there is a possibility that damage to property, contact between power lines and with telco plant, or any other hazardous event may occur if the pole broke. Use good common sense.



HANDLINE TEST

The hand line test generally performs the same function and can be a substitute if you do not have a pike pole fitting. In this test you will use your hand line instead of a pike pole. You must run the hand line around the pole and flip it up to approximately 12' above the ground line. Once again, gently rock the pole back and forth while watching the ground line and listening for popping and cracking sounds. Do not wrap the hand line around your hand while rocking the pole.

Do NOT use this test if there is a possibility that damage to property, contact between power lines and with telco plant, or any other hazardous even may occur if the pole broke. Use good common sense.



PROD and SOUND TEST

The prod test enables you to check the condition of the pole at or below the ground line with a 5" or 6" screwdriver. The most likely area of decay is from the ground line to 12" below. So to properly perform the prod test, you must remove dirt from around the base of the pole. Once that has been exposed, you can use the screwdriver to prod the pole. Hold the screwdriver with the blade vertical and pointed down to the pole at a 45 degree angle. Poke into the exposed wood watching for soft areas where the screwdriver penetrates the surface. Do this every 2" around the pole. Decayed wood will appear as a soft, spongy area.



The sounding test is done with a lineman's hammer. This test is performed on the exposed portion of the pole. Using a hammer, strike the pole sharply and squarely, beginning at the ground level and working around the pole. Once all the way around the pole, move up 12"-15" and repeat the procedure. Continue this procedure to as high a point as you can comfortably reach. A hallow or decaying pole will give off a dull, hallow, soft, sound, where a good pole will sound very solid, and the hammer will rebound noticeably.

This test and the prod test are used in conjunction with each other when it is unsafe to perform the pike and/or hand line test.



BORING TEST

The boring test is made by boring a hole where internal decay is suspected, using a special bit. The test is done by examining the chips from the bore and the quality of the wood inside the bore. Once this procedure has been performed a special plug must be fitted back into the pole to prevent future rot.

We do not support the tools or the training for boring a pole for testing purposes. When necessary, CBT will hire an outside contractor to test and treat poles in a large geographic area.

WHEN to TEST POLES

The following conditions always require more than a visual test for the quality of the pole:

- A dead end pole with no visible later or end support
- Any pole that is set on higher ground that the adjacent poles
- Pole at the end of unusually long spans (greater than 165')
- Drop wire lift poles
- Poles that have nothing more than a few drop wires attached.

PERFORMANCE CHECK

Once you feel you have the process mastered, ask the instructor to review your performance

- 1. Perform the pike pole test
- 2. Perform the hand line test
- 3. Perform the prod test
- 4. Perform the sound test

UNBALANCED LOADS on POLES

When visually inspecting poles it is important to watch for situations where testing, or performing work, on a pole will create an unbalanced load. An unbalanced load is defined as any load on a pole, 150 pounds or more, that is not counterbalanced. It is dangerous as even a sound pole could fall if the unbalanced load becomes too heavy.

The following are examples of situations that cause unbalanced loads:

- A dead end pole that is unguyed
- A corner pole that is unguyed
- A drop wire run that takes an unbalanced turn (for example, six drops go to a pole and two go straight ahead while four pull to one side)

HANDLING DEFECTIVE POLES

Poles that are tested and found to be defective should be tagged with either a "B" or "C" defective pole tag. The "B" tag identifies a defect that does not make the pole unclimbable, while the "C" tag identifies the pole as "dangerous – DO NOT climb". As a rule the arrow on the tags should point in the direction of the defect originally identified. The tag should be placed on <u>each</u> side of the pole so it will be noticed regardless of the direction it is approached.



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PERFOMANCE CHECK

Answer the following eight questions and turn the test in to the instructor.

- 1. You are visually inspecting a 50'. Class 5 pole. The brand mark is six feet from the ground line. The pole line is:
 - A. Set 8' deep and safe to climb
 - B. Set 8' deep and unsafe to climb
 - C. Set 4' deep and safe to climb
 - D. Set 4' deep and unsafe to climb
 - E. None of the above
- 2. You are visually inspecting a 55'. Class 2 pole. The brand mark is six feet from the ground line. The pole line is:
 - A. Set 8' deep and safe to climb
 - B. Set 8' deep and unsafe to climb
 - C. Set 4' deep and safe to climb
 - D. Set 4' deep and unsafe to climb
 - E. None of the above
- 3. The four methods to test a pole to verify that it is safe to climb are:
 - A. Pike, sound, prod, and strength test
 - B. Cutout, prod, hand line, and sound test
 - C. Pike, cutout, prod, and brand test
 - D. Sound, brand, prod, and honing test
 - E. None of the above
- 4. What would you do if you found a loose, bent, or missing pole step during a visual inspection?
 - A. Report it to your supervisor
 - B. Use a ladder to perform your work
 - C. Climb the pole using gaffs
 - D. Replace the pole step
 - E. None of the above

- 5. An unbalanced load refers to what?
 - A. Electric current which exceeds the fuse or breaker limits
 - B. A weighted object on a pole of 150 pounds or more
 - C. A force exerted on a pole of 150 pounds or more that is not counter balanced
 - D. Alternating currents of different potentials
 - E. None of the above
- 6. The "C" pole tag is used to mark poles that are:
 - A. In a dangerous defective condition and need immediate replacement
 - B. Jointly used and have no brand mark
 - C. Raked or set at an angle
 - D. Not reinforced with self-support cable
 - E. Defective, but not in need of immediate replacement
- 7. What five conditions always require poles to be tested?
 - A. Dead end pole with no lateral support
 - B. Jointly used and have less than three guys
 - C. Jointly used corner or junction poles
 - D. Pole with spans exceeding 165 feet
 - E. Where there is a downward change in grade with no lateral support
 - F. Drop wire clearance poles
 - G. Where the pole is carrying a small number of telco and power lines
- 8. Which of the following are considered a climbing hazard?
 - A. Pole rotted or broken at the base
 - B. Shell rot or excessive termite damage
 - C. Loose, missing, or bent pole steps
 - D. Electrical hazards aloft
 - E. Hinged windows standing open on the climbing space
 - F. Debris at the base of the pole
 - G. Clothesline or antenna attach to the pole

When finished turn your answer sheet in to the instructor



Cincinnati Bell Inc. 221 E. Fourth St. P.O. Box 2301 Cincinnati, OH 45202-2301

WARNING

RE: Utility Pole Attachments

Our records indicate that you are currently attaching to one or more Cincinnati Bell or Hawaiian Telcom utility poles. Please notify all of your employees that work on or around Cincinnati Bell or Hawaiian Telcom utility poles that they must inspect all utility poles before they begin their work.

This notice provides some basic utility pole inspection, attachment and climbing safety guidelines:

1. Do Not Climb any utility pole marked or tagged as unsafe.

2. No work aloft shall be started unless your employee is satisfied that the utility pole line structure has adequate strength to support the load resulting from working aloft, and the load which will result from the intended work operations.

3. All utility poles must be visually examined before any work operation is begun which involves climbing the utility pole, placing a ladder against the utility pole or stand, or hanging an aerial platform. Visual examination must check for, among other things, the following conditions:

- Any unexplained leaning of a utility pole.

- Insufficient depth of setting. The depth of setting can usually be checked by reference to the brand that is present at a distance of ten feet (measured to the bottom of the brand) from the butt of the utility poles 50 ft. or less, and 14 ft. on utility poles 55 ft. or more.

- Evidence of collision damage.

- Presence of fungus growth in cracks or protruding from the utility pole surface, or on areas near ground line where the wood appears water-soaked in contrast to surrounding wood. These symptoms usually indicate a condition of advanced decay in the interior of the utility pole.



Cincinnati Bell Inc. 221 E. Fourth St. P.O. Box 2301 Cincinnati, OH 45202-2301

- Presence of termite or carpenter ant infestation, evidenced by mud channels or debris in the cracks, wood dust at the base of the utility pole, or movement of ants when the utility pole is struck with a hammer.

- Bent, loose, or missing utility pole steps.

- Wide seasoning cracks which could result in loosening of utility pole steps and present a climbing hazard.

- Evidence of compression wood indicated by short horizontal cracks along one side of the surface of the utility pole, or by curling wood away from the utility pole surface.

- Presence and distribution of large knots, excessive knot clusters, climber gaff splinters, unauthorized signs, nails aerials, and interfering tree growth.

- Presence of large stones, ground irregularities, and debris at the base of the utility pole.

- Presence of conduits, ungrounded street light fixtures, broken ground wires, or other electrical hazards. Test with voltage tester.

- Broken wires in adjacent span.
- Excessively tight or excessively slack drop or line wires on one side of the utility pole.

- Contact or insufficient separation between telephone and power wires or other plant on the utility pole, or in the span or spans adjacent to the utility pole.

- Woodpecker holes.
- Evidence of lightning or fire damage.
- Ice on the utility pole surface or utility pole steps.
- Shell rot decay on cedar utility poles.

Any utility pole found to be unsafe and not marked or tagged, should be immediately marked with a tag intended for marking utility poles that are in a dangerous condition. (These tags can be provided by Cincinnati Bell or Hawaiian Telcom at cost or your use of a universal warning tag is acceptable)

If a utility pole is found to be unsafe, list utility pole number and street address and notify:



Cincinnati Bell Inc. 221 E. Fourth St. P.O. Box 2301 Cincinnati, OH 45202-2301

Cincinnati Bell, Inc. Room 103-1060 Utility Pole Notification PO Box 2301 Cincinnati, OH 45201-2301