

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

**RESPONSES OF CINCINNATI BELL TELEPHONE COMPANY LLC d/b/a
ALTA FIBER TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S
INITIAL REQUESTS FOR INFORMATION**

For its Responses to the initial Requests for Information submitted by the Kentucky Broadband and Cable Association (“KCBA”) on April 21, 2022, altafiber states as follows:

OBJECTIONS

1. altafiber objects to the KCBA’s definition of “Poles” because altafiber does not have an electric distribution network. altafiber’s response will address telephone poles that it owns in Kentucky.

2. altafiber objects to the KCBA’s instruction to furnish *all* information that is known or available to it with respect to a particular data request as overly broad and burdensome. altafiber will supply information sufficient to answer the Requests for Information.

RESPONSES TO REQUESTS FOR INFORMATION

1-1. Identify the number or percentage of Your poles that are currently red-tagged.

RESPONSE: altafiber’s working definition of “red-tagged” means poles that have been determined to be unsafe to climb and to which a red tag has been affixed. These poles are not the same as those that would be deemed “red-tagged” under the regulatory definition contained in the Commission’s rules. Altafiber currently has 7 red-tagged poles in Kentucky. Altafiber currently has 42 poles in Kentucky that have been designated for replacement and which would fall under the Commission’s definition of “red tagged.”

RESPONDENT: Tamika L. Green
Senior Director – OSP Planning and Engineering

1-2. Provide data related to the number of Your Poles that are anticipated to be red-tagged in the next five years.

RESPONSE: altfiber has made no projection of anticipated future red-tagged poles. The number of poles that were red-tagged as dangerous over the past five years was 202. The number of poles that were designated for replacement over the last five years was 929.

RESPONDENT: Tamika L. Green
Senior Director – OSP Planning and Engineering

1-3. Explain how You will determine if a pole is red-tagged.

RESPONSE: altafiber safety policy requires technicians to visually inspect and test the integrity of poles 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.”

a. Explain what You will do when You are notified of a red-tagged pole.

RESPONSE: When notified of a red-tagged pole by an altafiber Field Technician, an Engineer will initiate a work order to replace the pole. If the pole has electric attachments, a request is submitted to the applicable electric utility via SPANS for it to replace the pole. If altafiber is notified of a red-tagged pole by an external source, a field survey crew is sent to confirm the status and if confirmed will forward the details to an Engineer who will initiate the work order for Construction to replace the pole, unless there are also electric attachments on the pole, in which case the electric utility is contacted as described above.

b. Explain how an attacher can determine and assess whether or not a pole is or will be red tagged.

RESPONSE: A pole that has been red-tagged will have a red tag affixed to it. If a pole has been designated for replacement but not red-tagged as dangerous, that will be reported in the results of the pre-license survey.

RESPONDENT: Tamika L. Green
Senior Director – OSP Planning and Engineering

1-4. Explain the cost basis for Your “10% markup to direct costs” for “all work performed by the Telephone Company or by its authorized representatives in connection with the furnishing of pole accommodations as covered by this tariff” including “pre-license survey, make-ready work, and inspection and removal of attachee’s communications facilities.” Response at 3.

RESPONSE: altafiber objects to the assumption in this Request that a cost basis is required for the 10% markup.

- a. Explain and provide data related to how “[t]he 10% markup provision represents an allocation of overhead expenses,” including the overhead expenses You incur for the “pre-license survey, make-ready work, and inspection and removal of attachee’s communications facilities.”

RESPONSE: The Commission determined that a 10% markup was reasonable in Administrative Case No. 251-4.

- b. Explain how these costs are not recovered in the annual rental rate.

RESPONSE: The annual rental rate recovers administrative costs associated with the capital investment in poles, not the administrative costs associated with tasks related to managing third-party attachments.

RESPONDENT: Tom Laswell
Senior Manager – Mobility & Wireless Real Estate

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

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.

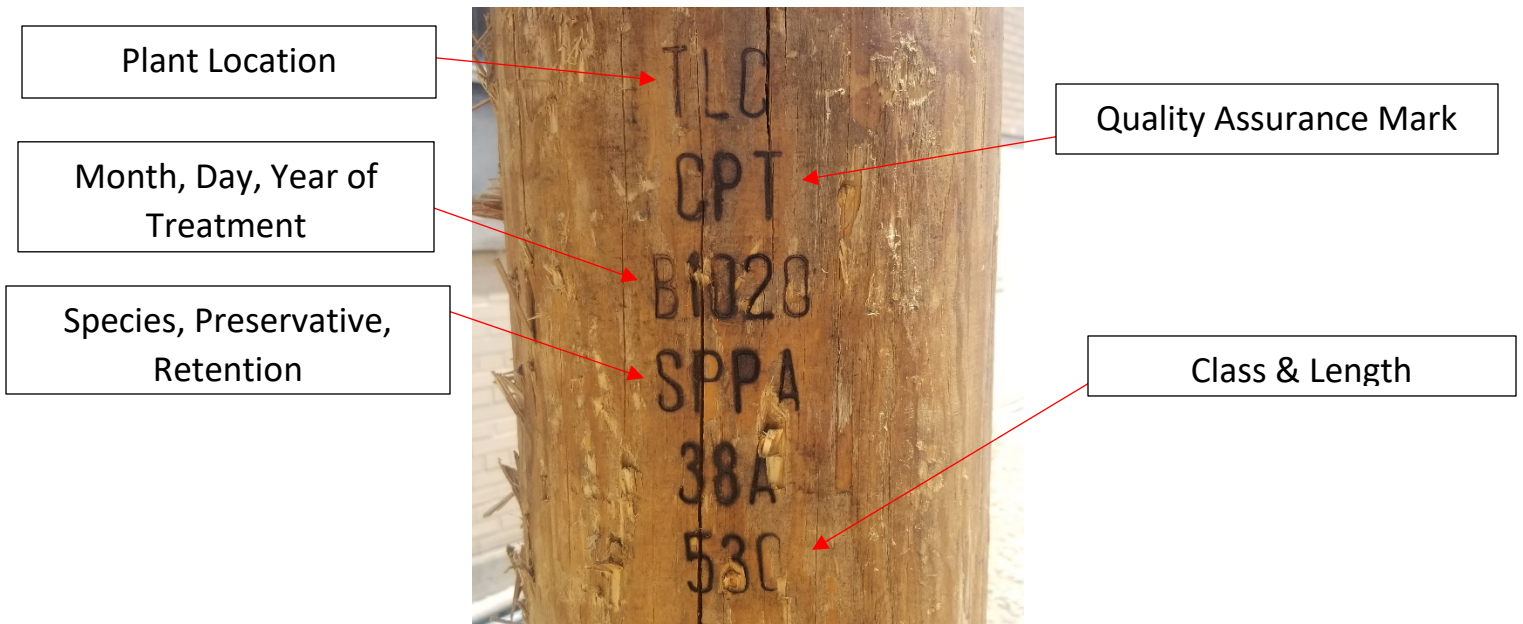
For this lesson you will need:

- 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 universal code 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 (feet)	Groundline distance from Butt (feet)	Minimum Circumference of 6 feet from Butt (inches)						
		31.0	29.0	27.0	25.0	23.0	21.0	
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.
2. 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. The general rule to 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?

1. 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? _____
4. You are visually inspecting a 60', class 5, pole set in firm ground and the brand is 8' 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 hollow or decaying pole will give off a dull, hollow, 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 than 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

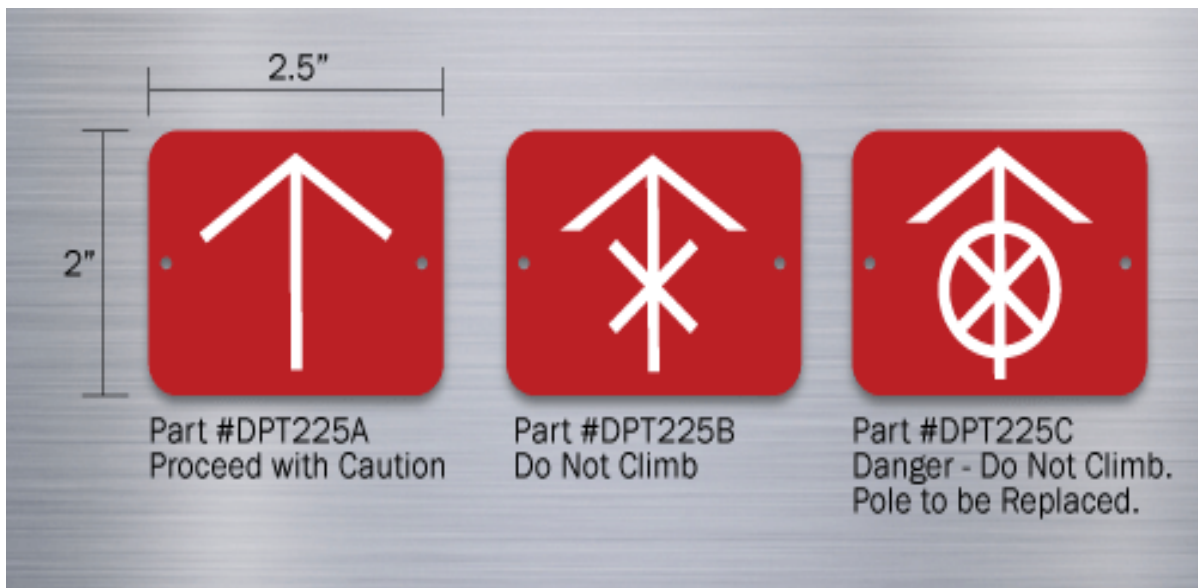
When visually inspecting poles it is important to watch for situations where testing, or performing work, on a pole will create an unbalanced load. An unbalanced load is defined as any load on a pole, 150 pounds or more, that is not counterbalanced. It is dangerous as even a sound pole could fall if 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 each side of the pole so it will be noticed regardless of the direction it is approached.



PERFORMANCE 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

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.

- 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 aials, 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