

**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  
SUPPLEMENTAL REQUESTS FOR INFORMATION**

For its Responses to the Supplemental Requests for Information submitted by the Kentucky Broadband and Cable Association (“KCBA”) on May 19, 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**

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.

**RESPONSE:** If a pole has been designated for replacement without having been visibly marked, the new attacher will be notified in the response to the pole attachment application.

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

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.

**RESPONSE:** Poles that have been deemed unsafe, as described in 807 KAR 5:015(10)(a), will have a physical red tag affixed to the pole. altafiber does not proactively predict the replacement of a pole, as described in 807 KAR 5:015(10)(b). Poles which have been designated for replacement unrelated to safety or the request of the new attachment, as described in 807 KAR 5:015(10)(c), will have the proposed location of the new pole marked in the field with a wood stake and the letter “P” spray painted on the ground using white paint.

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

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

**RESPONSE:** 0.7 hours.

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

2-4. If there is any 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,” identify it. *See* Response to KBCA RFI 1-4.

**RESPONSE:**           altafiber incurs administrative costs to process and manage third party attachment requests that are not included in the amount billed by the contractors who perform the physical work. The mark-up is necessary to recover these administrative costs. The markup was approved by the Commission in Administrative Case No. 251-4 and the process for managing third-party attachments has not changed over time.

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

2-5. Explain the basis for Your proposed requirement that an attacher pay the entire cost of replacing a pole that is not red-tagged, including all economic basis for this requirement.

**RESPONSE:** If the pole is not currently flagged as a safety hazard or otherwise designated for replacement, it is deemed sufficient to support the existing infrastructure and business needs. Therefore, the need to replace the pole is solely to accommodate the new attachment and the attacher is the sole cost-causer of the pole replacement.

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

2-6. Explain Your accounting treatment of a non-red-tagged pole that is replaced with a new pole paid for by an attacher.

**RESPONSE:** altafiber retires the pole being replaced and capitalizes the new pole being installed. The payment from the attacher is recorded as a credit to the capital spend recorded to install the new pole.

**DENT:** Tom Paolucci  
Controller – E&C

2-7. Explain whether or not You receive any financial or other benefit as a result of an attacher paying to replace an existing pole with a new pole so that it may attach.

**RESPONSE:**           altafiber receives no financial benefit because it replaces the pole at cost.

**RESPONDENT:**       Tom Paolucci  
                                  Controller – E&C





**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 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 \_\_\_\_\_