

**KENTUCKY PUBLIC SERVICE COMMISSION**

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In the Matter of: )  
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ELECTRONIC INVESTIGATION OF THE ) CASE NO. 2022-00108  
PROPOSED POLE ATTACHMENT )  
TARIFFS OF INCUMBENT 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 initial Requests For Information (“RFIs”) to Cincinnati Bell Telephone Company LLC d/b/a Altafiber, in accordance with the following Definitions and Instructions.

**DEFINITIONS**

1. The terms “You,” “Your,” and “the Company” refer to Cincinnati Bell Telephone Company LLC d/b/a Altafiber (“Altafiber”).
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.
5. The term “Proposed Tariff” refers to the tariff issued February 28, 2022, by Ted Heckmann, Assistant Secretary and Senior Director, Regulatory Affairs, in connection with this proceeding.

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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>.

6. The term “Response” means the Response To Objections Of The Kentucky Broadband And Cable Association, filed with the Commission on April 14, 2022.

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

### **INSTRUCTIONS**

1. In answering these 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.

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

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

4. For any information that You claim is unavailable, state why it is unavailable. If You cannot respond to the 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.

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

### **REQUESTS FOR INFORMATION**

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

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

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

- a. Explain what You will do when You are notified of a red-tagged pole.
- b. Explain how an attacher can determine and assess whether or not a pole is or will be red tagged.

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.

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

Dated: April 21, 2022

Respectfully submitted,



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*Counsel for KBCA*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 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/  \_\_\_\_\_