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FILED ELECTRONICALLY

December 28, 2022

Linda Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602

Re: Case No. 2022-00363

Dear Ms. Bridwell:

Pursuant to the order issued on November 16, 2022, by the Kentucky Public Service Commission (“Commission”) in the above-referenced proceeding, this response is submitted on behalf of the following entities:

CSL Kentucky System, LLC (Utility ID 5057240)
Uniti Dark Fiber LLC (Utility IDs 5058360 and 5180040)
Uniti National LLC (Utility IDs 5058070 and 5180020)
Southern Light, LLC (Utility ID 5053410)

Southern Light, LLC and Uniti Dark Fiber LLC

First, while Southern Light, LLC and Uniti Dark Fiber LLC are registered to provide telecommunications services in Kentucky, neither currently owns physical telecommunications assets within the state. At such time when either company constructs or otherwise acquires telecommunications assets in Kentucky, it will comply with all applicable facility maintenance and operational requirements, including utility locate requirements.

CSL Kentucky System, LLC

Second, as outlined in the Commission’s order issued December 19, 2014 in Case No. 2014-00283 granting CSL Kentucky System, LLC operational authority in Kentucky, the telecommunications network assets owned by CSL Kentucky System, LLC are operated and managed by Windstream and its relevant Kentucky subsidiaries (collectively, “Windstream”). Windstream operates these assets pursuant to lease agreements that provide, in part, that Windstream and its relevant subsidiaries will be responsible for complying in all material respects with all federal, state and local regulatory requirements with respect to the standards for the construction, maintenance and operation of the telecommunications assets, including



membership in, if required, and updates to state “One Call” organizations and reporting requirements for network outages. As such, CSL Kentucky System, LLC references and incorporates as applicable the responses filed with this Commission by Windstream, which provides such services on behalf of CSL Kentucky System, LLC in Kentucky.

Uniti National LLC

Finally, with respect to the fiber assets acquired by Uniti National LLC from Windstream in 2020 pursuant to an Asset Purchase Agreement between the two companies, that agreement and associated maintenance agreements likewise provide that Windstream shall provide to Uniti National LLC routine route surveillance, cable locates, “Call Before You Dig” service, encroachment monitoring, patrol of the Fiber Assets, maintenance of sign posts, and other associated maintenance. As such, again, Uniti National LLC references and incorporates as applicable the responses filed with this Commission by Windstream, which provides such services in Kentucky on behalf of Uniti National LLC.

Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey R. Strenkowski".

Jeffrey R. Strenkowski
Vice President and Deputy General Counsel
CSL Kentucky System, LLC
Southern Light, LLC
Uniti Dark Fiber LLC
Uniti National LLC
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