

COMMONWEALTH OF KENTUCKY
BEFORE THE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF POLE) CASE NO.
ATTACHMENTS) 2023-00416

RESPONSE TO COMMISSION'S ORDER

Pursuant to Commission Order released December 14th, 2023, in the above referenced case, South Central Rural Telecommunications Cooperative, Inc. (SCRTC) is not aware of any topic that needs to be discussed at the scheduled January 5th, 2024, informal conference.

SCRTC appreciates the challenges the commission is facing to balance the need for broadband deployment in the Commonwealth with the expectations of the pole owners. A year ago, the commission conducted an intensive process to develop the current pole attachment regulations and SCRTC spent considerable time and resources developing and defending its tariff to comply with commission regulations, including exhaustive responses to interrogatories from both the commission and industry representatives. Such participation and the costs associated with doing so disproportionately disadvantage small companies like SCRTC. Should the commission decide to undertake another proceeding in this matter, we ask that they consider relieving Kentucky entities with small numbers of poles from mandatory participation in order to avoid undue expense on members or customers.

Despite having approximately 17,500 poles, SCRTC has had few attachment requests and to its knowledge has had no complaints regarding its responsiveness to requesting attachers. We ask that small companies like SCRTC not be subjected to

the high cost imposed on them by large national companies with substantial resources who continue to press their disagreements with properly developed regulations.

Respectfully submitted,

/s/ Bobby H. Richardson

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