

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF POLE  
ATTACHMENTS

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)

Case No.  
2023-00416

**AT&T'S COMMENTS IN RESPONSE TO PROPOSED EMERGENCY AMENDMENTS  
TO 807 KAR 5:015**

AT&T Kentucky (AT&T) hereby submits its comments in response to the Commission's Order dated February 3, 2025.

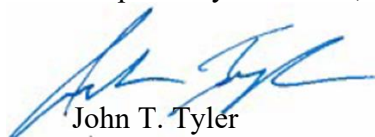
**Section 4 Paragraphs 5, 6 - Re: New Attacher Submission of Surveys and Pole Loading Analyses**

AT&T respectfully suggests the Commission rectify the inconsistency found in Section 4, between Paragraphs 5 and 6 in the Rules, by allowing a utility to request that new attachers submit surveys or pole loading analyses as filing requirements in new applications. Specifically, although Paragraph 6 allows for submission of a survey or pole loading analysis by the attacher, Paragraph 5 states that "[a] utility shall not require a new attacher to submit a survey for pole loading analysis as a filing requirement for an application."

As a practical matter, allowing a utility to require such documentation streamlines the process and adds operational efficiencies by incorporating into the application front-end-loaded information thereby negating the need for additional time and resource consuming field visits for each application. Therefore, AT&T suggests an edit to Section 4, Paragraph 5 as follows: "A utility may request that a new attacher submit a survey or pole loading analysis as a filing requirement for an application."

Dated: February 12, 2025

Respectfully submitted,



John T. Tyler