

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 AMENDMENTS TO 807 KAR 5:015

AT&T Kentucky (AT&T) hereby submits its comments in response to the proposed amendments to 807 KAR 5:015 filed in this matter by various stakeholders on December 10, 2024.

AT&T believes that rather than completely tossing the emergency regulations, as the Companies; proposals would do, the Commission should instead continue to work towards targeted improvements which will speed up the pole attachment process and thus help accelerate broadband deployment.

Enhanced One touch make ready as proposed by LG&E, KU and Kentucky Power (the companies) must be rejected

AT&T continues to oppose this rule modification because of its possible deleterious effects on the overall safety and reliability of our communications networks. It is far from clear that attaching entities will have anything but their own interests in mind when working in the communications space.

Retaining the distinction between simple and complex make ready is critical.

1. Eliminating this distinction for the communications space would force attachers to use contractors for all their work, potentially shifting the responsibility for many delays solely onto the new attachers along with the possible issue of contractor shortages.
2. The differentiation between simple and complex make-ready is crucial for protecting communication cables and equipment from damage and preventing service outages. AT&T opposes allowing anyone to complete complex make-ready on any AT&T attachment to protect the integrity of the network and avoid service interruptions.

Dated: December 30, 2024

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "John T. Tyler", is positioned above the printed name.

John T. Tyler