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October 20, 2020

RECEIVED

Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

OCT 21 2020

PUBLIC SERVICE
COMMISSION

Re: Case No. 2020-00215

To Whom It May Concern:

Dear Chairman Schmitt, Commissioner Matthews, and Commissioner Chandler:

I am writing on behalf of the Kentucky Broadband and Cable Association (KBCA), a consortium of broadband providers that have collectively invested billions of dollars in private-risk capital to build networks that offer Gigabit internet service to more than 80% of all households across the Commonwealth. We would like to thank the Public Service Commission (PSC) for its efforts to advance rural broadband deployment in the state and for allowing KBCA to offer additional perspective as the PSC works to address issues regarding Kenegy Corp.'s October 8, 2020 filing in Case #2020-00215.

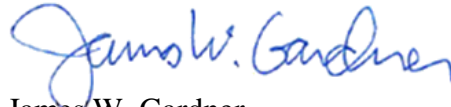
As noted by Kenegy Corp. in the above-referenced filing, despite making great strides, cable broadband providers continue to face on-going hurdles in our efforts to expand broadband deployment in certain portions of rural Kentucky. Excessive and disproportionate costs and inefficient permitting processes related to attaching to utility poles represent our greatest obstacle.

KBCA believes the PSC has a unique opportunity to accelerate broadband growth in Kentucky's rural communities by establishing pole attachment regulations that address critical cost-impediments to rural buildouts, including equitable pole replacement cost allocations, make-ready processes, and timetables for attaching broadband lines to utility poles. For these reasons, KBCA believes it would be prudent to reject Kenegy's waiver petition, as recommended in the Association's comments from October 2, 2020, until clear, consistent and equitable pole attachment rules are enacted.

KBCA looks forward to being a constructive partner in working with the Commission and other interested stakeholders to address these critical issues in the ongoing pole attachment regulation setting process. Our members are firmly committed to advancing rural broadband deployment

and believe that an opportunity exists to expand service to tens of thousands more unserved homes and businesses across Kentucky. The Commission's pole attachment regulation process is a key part of that solution.

Very truly yours,
STURGILL, TURNER, BARKER & MOLONEY, PLLC



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