

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE	)	CASE NO.
PROPOSED POLE ATTACHMENT TARIFFS OF	)	2022-00107
RURAL LOCAL EXCHANGE CARRIERS	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO RURAL LOCAL EXCHANGE CARRIERS

Ballard Rural Telephone Cooperative Corporation, Inc.; Brandenburg Telephone Company, Inc. (Brandenburg Telephone); Duo County Telephone Cooperative Corporation, Inc. (Duo County); Foothills Rural Telephone Cooperative Corporation, Inc. (Foothills Telephone); Gearheart Communications Company, Inc. (Gearheart Communications); Highland Telephone Cooperative, Inc. (Highland Telephone); Logan Telephone Cooperative, Inc. dba LTC Connect (Logan Telephone); Mountain Rural Telephone Cooperative Corporation (Mountain Telephone); North Central Telephone Cooperative, Inc. (North Central Telephone); Peoples Rural Telephone Cooperative Corporation, Inc. (Peoples Telephone); South Central Rural Telecommunications Cooperative, Inc. (South Central Telephone); and Thacker Grigsby Telephone Company, Incorporated (Thacker Grigsby) (collectively, the RLECs), pursuant to 807 KAR 5:001, are each to separately file with the Commission an electronic version of the following information. The information requested is due on June 2, 2022. The Commission directs

RLECs to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

RLECs shall make timely amendment to any prior response if RLECs obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which RLECs fails or refuses to furnish all or part of the requested information, RLECs shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

filing a paper containing personal information, RLECs shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Describe your recent efforts, if any, to reduce the number of above ground lines, and identify the number of poles that have been eliminated in your system in each of the last ten years because the lines previously attached to those poles were placed underground.

2. Other than identifying specific defective poles through inspections that require replacement, state whether you have a policy or practice of replacing poles on a periodic basis or as they reach the end of their useful lives and, if so, describe that policy or practice in detail, including how and when (e.g. how far in advance) such replacements are identified or included in your projected capital spending budget.

3. Describe in detail the process you use to budget for future capital expenditures, including when you first develop a preliminary capital spending budget for a particular year (e.g. three years in advance, five years in advance, etc.), how you determine the amounts to include in the preliminary capital budget, the level of specificity included in any preliminary budget, and each step that is taken in the process to get from any preliminary budget to a final capital spending budget for a particular year.

4. Provide any current joint use agreements.

5. For Brandenburg Telephone only: Refer to Brandenburg Telephone's response to Commission Staff's First Request for Information to the Rural Local Exchange Carriers (Staff's First Request), Item 3(a), regarding the per pole survey fee.

a. Explain and provide detailed supporting calculations for how the hourly rate of \$62.31 was derived.

b. Provide support for the assertion that a field survey takes two hours per pole and the office/mapping takes one hour per pole.

c. Explain how the truck depreciation rate of \$0.59 per mile was determined.

d. Provide support for using 65 miles per pole in the truck depreciation calculation.

6. For Duo County only: Refer to Duo County Telephone's response to Staff's First Request, Item 3(a) regarding the per pole survey fee.

a. Explain and provide detailed supporting calculations for how the hourly rate of \$64 was derived.

b. Provide support for the assertion that travel would take three hours per pole.

c. Explain how the mileage rate of \$0.59 per mile was determined.

d. Provide support for using 110 miles per pole in the mileage calculation.

e. Provide support for the 15 percent contingency component of the fee and explain what would be covered by it.

7. For Foothills Telephone only: Refer to Foothills Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain the circumstances under which the per pole survey fee estimate of \$119 was negotiated with the Commonwealth of Kentucky.

b. Explain why Foothills Telephone is relying on market survey rates of other entities and not developing an estimate based on its own unique circumstances.

c. Explain whether Foothills Telephone has any other support for the \$119 per pole survey fee estimate other than it was the rate negotiated with the Commonwealth of Kentucky based upon market survey rates of other entities. If so, provide additional support for the \$119. If not, provide the information Foothills Telephone relied upon to arrive at the \$119 amount.

8. For Gearheart Communications only: Refer to Gearheart Communications' response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain the circumstances under which the per pole survey fee estimate of \$119 was negotiated with the Commonwealth of Kentucky.

b. Explain why Gearheart Communications is relying on market survey rates of other entities and not developing an estimate based on its own unique circumstances.

c. Explain whether Gearheart Communications has any other support for the \$119 per pole survey fee estimate other than it was the rate negotiated with the Commonwealth of Kentucky based upon market survey rates of other entities. If so, provide additional support for the \$119. If not, provide the information Gearheart Communications relied upon to arrive at the \$119 amount.

9. For Highland Telephone only: Refer to Highland Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain and provide detailed supporting calculations for how the hourly rate of \$75.29 was derived.

b. Provide support for the assertion that a field survey takes two hours per pole and the office/mapping takes 0.5 hours per pole.

10. For Logan Telephone only: Refer to Logan Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Provide a narrative description of how the per pole rate of \$84.63 was derived.

b. Explain and provide detailed supporting calculations for how the hourly rate of \$65.10 was derived.

c. Provide support for the assertion that the field visit/mapping takes eight hours and the per pole takes 0.5 hours.

d. Explain whether the same employees perform the functions included on Lines 1 and 2.

e. As the per pole rate on Line 2 is \$32.55, explain why this is not the amount included in the tariff for the per pole estimated survey costs.

11. For Mountain Telephone only: Refer to Mountain Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain the circumstances under which the per pole survey fee estimate of \$119 was negotiated with the Commonwealth of Kentucky.

b. Explain why Mountain Telephone is relying on market survey rates of other entities and not developing an estimate based on its own unique circumstances.

c. Explain whether Mountain Telephone has any other support for the \$119 per pole survey fee estimate other than it was the rate negotiated with the Commonwealth of Kentucky based upon market survey rates of other entities. If so,

provide additional support for the \$119. If not, provide the information Mountain Telephone relied upon to arrive at the \$119 amount.

12. For North Central Telephone only: Refer to North Central Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain and provide detailed supporting calculations for how the per pole labor rates of \$62 and \$20 were derived.

b. Provide support for the assertion that travel would take 2.5 hours, mapping/EST would take one hour, per pole would take 0.5 hours, and FEMA vehicle rate would take 2.5 hours.

13. For Peoples Telephone only: Refer to People's Telephone response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain the circumstances under which the per pole survey fee estimate of \$119 was negotiated with the Commonwealth of Kentucky.

b. Explain why Peoples Telephone is relying on market survey rates of other entities and not developing an estimate based on its own unique circumstances.

c. Explain whether People's Telephone has any other support for the \$119 per pole survey fee estimate other than it was the rate negotiated with the Commonwealth of Kentucky based upon market survey rates of other entities. If so, provide additional support for the \$119. If not, provide the information People's Telephone relied upon to arrive at the \$119 amount.

14. For South Central Telephone only: Refer to South Central Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain and provide detailed supporting calculations of how the per pole labor rates of \$45.11 and \$20 were derived.

b. Provide support for the assertion that the travel and FEMA vehicle rate take 2.5 hours per pole.

15. For Thacker-Grigsby Telephone only: Refer to Thacker Grigsby Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain the circumstances under which the per pole survey fee estimate of \$119 was negotiated with the Commonwealth of Kentucky.

b. Explain why Thacker Grigsby Telephone is relying on market survey rates of other entities and not developing an estimate based on its own unique circumstances.

c. Explain whether Thacker Grigsby Telephone has any other support for the \$119 per pole survey fee estimate other than it was the rate negotiated with the Commonwealth of Kentucky based upon market survey rates of other entities. If so, provide additional support for the \$119. If not, provide the information Thacker Grigsby Telephone relied upon to arrive at the \$119 amount.



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DATED   MAY 19 2022  

cc: Parties of Record



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