

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC JOINT APPLICATION OF |) | |
| WINDSTREAM PARENT, INC.; WINDSTREAM |) | |
| HOLDINGS II, LLC; WINDSTREAM KENTUCKY |) | CASE NO. |
| EAST, LLC; AND WINDSTREAM KENTUCKY |) | 2024-00183 |
| WEST LLC; AND UNITI GROUP INC.; FOR |) | |
| APPROVAL OF A TRANSFER OF CONTROL |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO WINDSTREAM PARENT, INC.; WINDSTREAM HOLDINGS II, LLC; WINDSTREAM
KENTUCKY EAST, LLC; WINDSTREAM KENTUCKY WEST, LLC;
AND UNITI GROUP INC.

Windstream Parent, Inc. (Parent); Windstream Holdings II, LLC; Windstream Kentucky East, LLC; Windstream Kentucky West, LLC; and Uniti Group Inc. (collectively, Joint Applicants), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 26, 2024. The Commission directs Joint Applicants to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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).

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.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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 filing a paper containing personal information, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, page 13 which states: "The Transaction is being proposed to enhance the competitive position of both Uniti and Windstream, and enable both to better serve their customers, because the proposed Transaction will enhance

Parent's ability to effectively leverage the companies' respective assets, expertise and competencies than either company could do alone." Explain in greater detail, with examples if necessary, how the Parent could leverage the companies' assets better than if the companies did so alone.

2. Refer to the Application, page 14 which states: "combining both companies under a common umbrella removes undue uncertainty around renewal of the lease agreements between Windstream and Uniti, which will allow continued access to the Uniti network by Windstream in serving its last-mile and other customers." Explain what type of uncertainty could be around renewal of the lease agreements between Windstream and Uniti.

3. Refer to the Application, pages 14 and 15 which state: "Applicants currently estimate that Parent will be able to expand last-mile [fiber-to-the-home] (FTTH) buildout by up to one million additional locations nationally relative to what the companies would undertake individually absent the merger." Provide the number of locations in Kentucky, by county, if possible, to which Joint Applicants estimate they will expand the last-mile FTTH.

4. Refer to the Application, page 15 which states: "Access to Windstream's existing network assets, meanwhile, will enable Uniti to expedite its current long-term buildout plans by an estimated four years by enabling Uniti to leverage existing Windstream assets rather than engaging in duplicative construction." Explain which primary business of Uniti, Uniti Leasing, or Uniti Fiber, will be enabled to expedite its current long-term build out plans.

5. Confirm that the transaction proposed in this proceeding, if approved, will not affect the ability for customers to attach to the poles owned or controlled by Windstream Kentucky East, LLC, and Windstream Kentucky West, LLC. If not confirmed, explain why.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED JUL 11 2024

cc: Parties of Record

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