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March 2, 2018

VIA ELECTRONIC FILING

Hon. David Jones, Chairman
c/o Sharla Dillon
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: Docket No. 18-00013, *Application of West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative for a Certificate of Public Convenience and Necessity to Provide Intrastate Telecommunications Services Statewide*

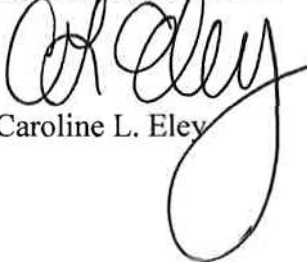
Dear Chairman Jones:

Attached for filing please find a response of West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative (the "Applicant") to TPUC's Request for Information in the above-captioned matter. This filing supplements the Applicant's application for certificate of convenience and necessity to provide intrastate telecommunications services in Tennessee statewide, filed on January 26, 2018 with TPUC.

As required, an original of this filing, along with four (4) hard copies, will follow. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me or Melvin Malone.

Very truly yours,

BUTLER SNOW LLP



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**WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORATION, INC.
d/b/a
WEST KENTUCKY & TENNESSEE TELECOMMUNICATIONS COOPERATIVE
DOCKET NO. 18-00013
RESPONSE TO REQUEST FOR INFORMATION
OF THE
TENNESSEE PUBLIC UTILITY COMMISSION**

Responsible Witnesses: Trevor Bonnstetter

Question 1:

No surety bond or irrevocable letter of credit was included with the Application. Is the company requesting exemption from the bond/letter of credit requirement set forth in T.C.A. § 65-4-125(j)?

Response:

Yes; the Applicant is requesting exemption from the bond or letter of credit requirement under T.C.A. § 65-4-125(j) as the Applicant owns and operates equipment facilities in Tennessee with a value of more than five million dollars (\$5,000,000).

Question 2:

Has West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative registered its Competing Local Exchange Carrier as a separate business entity with the Tennessee Secretary of State's Office?

Response:

West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative has not registered with the Tennessee Secretary of State's Office, as permitted by T. C. A. § 65-29-128, which provides that any corporation organized on a nonprofit or a cooperative basis for the purpose of supplying telephone service and owning or operating telephone service lines in a state adjacent to this state shall be permitted to construct or acquire extensions of such lines and to transact business in Tennessee without complying with any statute of Tennessee pertaining to the qualification of foreign corporations for the transaction of business in Tennessee.

Question 3:

Will West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative be providing services using an assumed name?

Response:

Yes. The Applicant will use its assumed name "West Kentucky & Tennessee Telecommunications Cooperative."

Question 4:

What business name will the Applicant use if it offers service outside the current service area of West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative?

Response:

The Applicant will use its same name: West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative.

Question 5:

Does West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a West Kentucky & Tennessee Telecommunications Cooperative make available to its members any public financial information? If so, please provide the information that is made available to cooperative members. Furthermore, please explain the rationale and justification for filing the previous financial information as confidential.

Response:

The Applicant provides audited financial information to its members at meetings. Such information is commercially and competitively sensitive, and the Applicant desires for it to remain confidential and proprietary to the general public, which includes current and potential competitors. Members of a cooperative are by statute distinct and separate from the general public.

Question 6:

How will Applicant determine the annual Statement of Gross Receipts and Computation of Inspection Fee as provided in T.C.A. § 65-4-303?

Response:

The Applicant will determine its annual Statement of Gross Receipts and Computation of Inspection Fees by incorporating the CLEC area's revenues into its annual filing. Any tax related, non-regulated operations will be rolled into the Applicant's annual statement.