BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: Docket No. 32235: Generic Proceeding to Implement House Bill 168

STAFF'S SECOND SET OF DATA REQUESTS TO APPLICANTS FOR DISBURSEMENTS FROM THE UNIVERSAL ACCESS FUND FOR THE 31st UAF YEAR

TO: ALMA TELEPHONE COMPANY

BLUE RIDGE TELEPHONE COMPANY

BRANTLEY TELEPHONE COMPANY, INC.

BULLOCH COUNTY RURAL TELEPHONE COOPERATIVE, INC.

CAMDEN TELEPHONE & TELEGRAPH CO., INC.

CHICKAMAUGA TELEPHONE CORPORATION

COMSOUTH TELECOMMUNICATIONS, LLC D/B/A HARGRAY

DARIEN TELEPHONE CO., INC.

GLENWOOD TELEPHONE COMPANY

HART TELEPHONE COMPANY

NELSON-BALL GROUND TELEPHONE COMPANY

PEMBROKE TELEPHONE COMPANY, INC.

PINELAND TELEPHONE COOPERATIVE, INC.

PLANT TELEPHONE COMPANY D/B/A TRUVISTA

PLANTERS RURAL TELEPHONE COOPERATIVE, INC.

PROGRESSIVE RURAL TELEPHONE CO-OP, INC.

PUBLIC SERVICE TELEPHONE COMPANY

RINGGOLD TELEPHONE COMPANY

TRENTON TELEPHONE COMPANY

WAVERLY HALL TELEPHONE, LLC

COMES NOW the Georgia Public Service Commission Staff ("Staff") and, pursuant to the authority vested in it by the Georgia Public Service Commission (Commission) pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by the Company or its designated representatives. Responses must be filed in accordance with the Commission's Alternative eFile procedures.

Please file responses with the Commission by 4:00 PM on March 18, 2026 and also please provide a copy of those responses to the GPSC Staff Auditor (vic@hurlbertcpa.com).

DEFINITIONS

As may be used in this document:

1. "Company" refers to the utility and its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of said Company.

2. The term "you" and "your" refer to the "Company."

3. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

4. The term "document" or "documentation" shall have the broadest possible meaning under applicable law. "Document" or "documentation" means every writing or record of every type and description that is in the possession, custody or control of the Company including, but not limited to, correspondence, memoranda, e-mails, drafts, workpapers, summaries, stenographic or handwritten notes, studies, notices, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" or "documentation" further

includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, chart projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

5. The term "referring or relating to" means consisting of, containing mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

6. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would not otherwise be brought within their scope.

7. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

8. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.

9. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

a) the type of document (e.g., letter, memorandum, etc.);
b) the date of the document; the title or label of the document;
c) the Bates number or other identifier used to number the document for use in litigation; the identity of the originator;
d) the identity of each person to whom it was sent;
e) the identity of each person to whom a copy or copies were sent;

f) a summary of the contents of the document;

g) the name and last known address of each person who presently has possession, custody or control of the document;

h) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

10. "Identify" or "identifying" or "identification" when used in reference to a communication should be read to include information regarding the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to requests to conform to available information including such information as first comes available to the Respondent after the answers are hereto filed.

b) The answers provided should first restate the question asked and also identify the person(s) supplying the information.

c) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.

d) As used herein the term "document" includes, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written

comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

STAFF'S SECOND SET OF DATA REQUESTS
TO APPLICANTS FOR DISBURSEMENTS
FROM THE UNIVERSAL ACCESS FUND
FOR THE 31st UAF YEAR
Docket No. 32235

STF 2-1 Does the telephone company provide broadband, or is it provided through an affiliate?

STF 2-2 How are broadband costs handled?

STF 2-3 Does the telephone company have broadband transmission costs to the internet service provider ("ISP")?

STF 2-4 How are broadband transmission costs handled?

STF 2-5 Does the telephone company provide voice and/or data lines to the ISP?

STF 2-6 How are the voice and/or data line costs to the ISP handled?

STF 2-7 Does the telephone company provide consumer broadband-only loop ("CBOL") lines?

STF 2-8 How are the CBOL costs handled?

STF 2-9 Is the telephone company an ISP?

STF 2-10 What are the total broadband costs ending 6/30/2025 for the telephone company?

STF 2-11 Of the total broadband costs, how much of the cost is total company, interstate, and intrastate as filed in the UAF application request?

CERTIFICATE OF SERVICE

I, Leon Bowles, hereby certify that the foregoing Second Set of Data Requests in Docket No. 32235 was served upon all parties of record listed below by depositing same in the United States mail with sufficient postage thereon to ensure delivery.

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GEORGIA PUBLIC SERVICE COMMISSION
*Ms. Sallie Tanner
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So certified this the 16th day of February 2026.

Leon Bowles/s_____
Leon Bowles

* denotes electronic delivery