

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

**Defendant.**

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***ERRATUM TO ALABAMA POWER COMPANY'S ANSWER AND AFFIRMATIVE DEFENSES TO AT&T'S POLE ATTACHMENT COMPLAINT***

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July 15, 2019

## PUBLIC VERSION

1. Defendant Alabama Power Company (“Alabama Power”) filed its answer and affirmative defenses in this case on June 21, 2019. The evidentiary submission accompanying the answer included, among other things, a declaration of Wilfred Arnett.<sup>1</sup> Subsequent to June 21, 2019, Mr. Arnett discovered an error in his calculations of Alabama Power’s annual carrying charge rate, as set forth in the attached Correction to Declaration of Wilfred Arnett.<sup>2</sup>

2. Mr. Arnett’s corrections impact only pp. 10 and 15 of his declaration, as well as Exhibit E-11 to his declaration.

3. Based on Mr. Arnett’s corrections, the last two sentences of the third bullet point of the Executive Summary in Alabama Power’s answer should be revised as follows:

### Original

Alabama Power’s carrying cost of joint use poles is \$[REDACTED]/pole higher than the carrying cost of non-joint use poles. AT&T’s per pole cost contribution under the joint use agreement does not even cover this incremental cost to Alabama Power.

### Revised

Alabama Power’s carrying cost of joint use poles is \$[REDACTED]/pole higher than the carrying cost of non-joint use poles. AT&T’s per pole cost contribution under the joint use agreement barely even covers this incremental cost to Alabama Power.

4. The \$[REDACTED] figure in the original version should have been \$[REDACTED], anyway, per Mr. Arnett’s original declaration.<sup>3</sup> The inversion of numbers was an error on the part of undersigned counsel.

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<sup>1</sup> See Ex. E to Alabama Power Answer and Affirmative Defenses at APC000148 (Declaration of Wilfred Arnett, June 19, 2019).

<sup>2</sup> See Ex. E Correction at Bates No. APC000529-APC000532 (Corrected Declaration of Wilfred Arnett, July 15, 2019).

<sup>3</sup> See Ex. E to Alabama Power Answer and Affirmative Defenses at APC000157, -162 (Declaration of Wilfred Arnett, June 19, 2019).

**PUBLIC VERSION**

Dated: July 15, 2019

Respectfully submitted,

/s/ Eric B. Langley

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**PUBLIC VERSION**

**RULE 1.721(m) VERIFICATION**

I, Eric B. Langley, as signatory to this submission, verify that I have read the foregoing submission and, to the best of my knowledge, information, and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law; and that it is not interposed for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of the proceeding.

/s/ Eric B. Langley

**PUBLIC VERSION**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of July 2019, a true and correct copy of the Public Version of *Erratum* to Alabama Power Company's Answer and Affirmative Defenses to AT&T's Pole Attachment Complaint was filed with the Commission via ECFS (Confidential Version filed via hard copy) and was served on the following (service method indicated):

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/s/ Eric B. Langley  
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