BRIGGS LAW OFFICE, PSC

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TODD R. BRIGGS
also admitted in Colorado

October 24, 2014

RECEIVED OCT 8 0 2014

PUBLIC SERVICE COMMISSION

VIA USPS CERTIFIED MAIL; RETURN RECEIPT REQUESTED

Manuel and Mary Moore 1430 East Williams Drive Ashland, KY 41102

RE: Kentucky Public Service Commission Case Number: 2014-00337

Dear Manuel and Mary Moore,

The Kentucky Public Service Commission has forwarded your letter dated October 8, 2014 in regards to New Cingular Wireless PCS, LLC d/b/a AT&T Mobility and SBA Towers V, LLC's application to construct a wireless communications facility at 7810 U.S. Route 60, Ashland, Kentucky.

Section 706 of the Telecommunications Act of 1996 directed the Federal Communications Commission (FCC) to encourage deployment of advanced telecommunications capability to all Americans on a reasonable and timely basis. The FCC has also furthered the intentions of Congress by repeatedly emphasizing the importance of wireless emergency 911 services for the greater public safety. The daily average of 911 calls made using wireless services has steadily increased with a continuing trend as numbers of wireless subscribers are increasing. Moreover, federal, state and local public safety authorities routinely rely on wireless network infrastructure to deploy wireless communication equipment necessary for essential emergency services and supporting homeland security.

New Cingular Wireless PCS, LLC, as holder of the wireless license in this area, is required by the FCC to adequately provide wireless coverage throughout this license area. We take this

responsibility seriously by annually spending millions of dollars throughout the Commonwealth of Kentucky in support of this requirement. The selection of the location for our infrastructure is based upon radio frequency analysis of our existing and planned network capabilities which includes existing coverage and capacity within this license area.

I am also including a letter from a Professional Engineer with Sabre Industries that explains in the unlikely event of the tower collapse that the tower is designed to "fold over" onto the lower portion of itself and would result in the collapse being within a radius equal to 50 feet.

Please feel free to contact me with any questions.

Sincerely,

Todd R. Briggs

Counsel for New Cingular Wireless PCS, LLC

MR LAN

d/b/a AT&T Mobility

SBA Towers V, LLC

Cc: Executive Director, Kentucky Public Service Commission

Enclosure



April 28, 2014

Mauricio Agredo SBA Communications Corporation 5900 Broken Sound Parkway NW Boca Raton, FL 33487-2797

RE: Proposed 195' Self-supporting tower for KY15745-S_Rockdale 2, KY

Dear Mauricio Agredo,

Upon receipt of order, we propose to design and supply the above referenced tower for a Basic Wind Speed of 90 mph with no ice and 30 mph with 3/4" radial ice, Structure Class II, Exposure Category C, and Topographic Category 1, in accordance with the Telecommunications Industry Association Standard ANSI/TIA-222-G, "Structural Standard for Antenna Supporting Structures and Antennas".

When designed according to this standard, the wind pressures and steel strength capacities include several safety factors, resulting in an overall minimum safety factor of 25%. Therefore, it is highly unlikely that the tower will fail structurally in a wind event where the design wind speed is exceeded within the range of the built-in safety factors.

Should the wind speed increase beyond the capacity of the built-in safety factors, to the point of failure of one or more structural elements, the most likely location of the failure would be within one or more of the tower members in the upper portion. This would result in a buckling failure mode, where the loaded member would bend beyond its elastic limit (beyond the point where the member would return to its original shape upon removal of the wind load).

Therefore, it is likely that the overall effect of such an extreme wind event would be localized buckling of a tower section. Assuming that the wind pressure profile is similar to that used to design the tower, the tower is most likely to buckle at the location of the highest combined stress ratio in the upper portion of the tower. This would result in the portion of the tower above the failure location "folding over" onto the portion of the tower below the failure location. *Please note that this letter only applies to the above referenced tower designed and manufactured by Sabre Towers & Poles*. In the unlikely event of total separation, this, in turn, would result in collapse within a radius equal to 50 feet.

Sincerely,

Amy R. Herbst, P.E. Senior Design Engineer