

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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AUG 27 2007
PUBLIC SERVICE
COMMISSION

APPLICATION OF ALLTEL)
COMMUNICATIONS, INC.)
FOR A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY)
TO CONSTRUCT A CELL SITE)
AT 14305 OLD U.S. ROUTE 23)
SITUATED ON THE DIVIDING RIDGE)
BETWEEN NEW U.S. 23 AND)
OLD U.S. 23 NORTH OF SAVAGE)
BRANCH IN BOYD COUNTY,)
KENTUCKY)
(NEAL CELLULAR TOWER SITE))

Case No. 2007-00305

THE APPLICATION OF CELLCO)
PARTNERSHIP D/B/A VERIZON WIRELESS)
FOR ISSUANCE OF A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY)
TO CONSTRUCT A WIRELESS)
COMMUNICATIONS FACILITY AT 8215)
SAVAGE BRANCH, CATLETTSBURG,)
KENTUCKY IN THE WIRELESS)
COMMUNICATIONS LICENSE AREA IN THE)
COMMONWEALTH OF KENTUCKY IN THE)
COUNTY OF BOYD)

Case No. 2007-00309

Site Name: Savage Branch

Response of Alltel Communications, Inc to
Staff Data Request Dated July 30, 2007

Alltel Communications, Inc. for its Response to the Staff's Request that it address
the possibility of consolidating its facilities with the proposed Savage Branch facilities of
Cellco Partnership d/b/a/ Verizon Wireless states:

1. Alltel's Neal facility is required to in-fill a limited area in its coverage in eastern Boyd County. Specifically, Alltel seeks to extend coverage along U.S. Route 23, Mayo Trail, and to provide in-building penetration to the Marathon Petroleum Refinery and neighboring homes and buildings.

2. In designing and locating the Neal site Alltel, and in integrating the site's coverage into its existing and planned network, Alltel sought to meet its service objectives without creating overlaps.

3. Because of the topography of the area and the limited service objectives of the Neal facility, Alltel determined the best coverage would be provided by site close to the target area using a relatively short tower (185 feet). Verizon's proposed Savage Branch facility is located west of and hence further from the area to be served by the Neal facility and uses a 300+ foot tower. The locations of the two proposed facilities and Alltel's target area are illustrated on Exhibit 1 to this Response.

4. Co-location of Alltel's facilities onto Verizon's proposed Savage Branch tower will not permit Alltel to meet its service objectives. Placement of Alltel's antennae on the proposed Savage Branch tower with a radiation center of 275 will prevent in-building penetration to Mayo Trail and parts of the Marathon Petroleum refinery. To meet these objectives using the proposed Savage Branch tower Alltel would be required to place its antennae at over 300 feet. Alltel believes that placing its antennae on the Savage Branch tower at the height necessary to meet its service objectives would interfere with Verizon's use of its own tower. Attached as Exhibit 2 is a August 22, 2007 letter from Raeleen Matlock and accompanying plots addressing these issues.

5. The Neal site originally was scheduled for completion in 2006. Requiring that Alltel's facilities be placed on Verizon's Savage Branch tower would further delay the extension and improvement of coverage. Verizon's co-location requirements are extensive and in Alltel's experience can take nine months to complete. The resulting lost revenues and costs could total several hundred thousand dollars. In addition, Alltel's customers would be deprived of the service improvements for that period.

Wherefore, Alltel Communications, Inc. respectfully requests that its application to construct the Neal wireless facility be granted.

Dated this 27th day of August, 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', written over a horizontal line. The signature is stylized and somewhat cursive.

Mark R. Overstreet
STITES & HARBISON
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
Telephone: 502-223-3477
COUNSEL FOR: ALLTEL, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the Response of Alltel Communications, Inc to Staff Data Request Dated July 30, 2007 was served via United States Postal Service, First Class Mail, postage prepaid, upon:

David A. Pike
Pike Legal Group, PLLC
Suite 6
1578 Highway 44 East
Shepherdsville, Kentucky 40165-0369

this the 27th day of August, 2007.

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', written over a horizontal line. The signature is stylized and cursive.

Mark R. Overstreet

TH018:0TH16:15926.1:FRANKFORT





August 22, 2007

Raeleen Matlock
Alltel Communications, Inc.
One Allied Drive B2 F03-A
Little Rock, AR 72202

RE: Alltel Proposed Neal Site (PSC Case No. 2007-0039)

Dear Public Service Commission,

This correspondence is to specify the objectives of the proposed Alltel "Neal" tower, PSC Case No. 2007-00305 and the issues associated to the proposed Verizon "Savage Branch" tower, case No. 2007-00309. Alltel's objectives for the proposed "Neal" site are to; extend coverage along US Route 23, Mayo Trail, and to provide in-building penetration to the Marathon Ashland Petroleum Refinery and neighboring homes and buildings.

The "line of sight" characteristic of Alltel's proposed tower location and the higher elevation satisfies Alltel's coverage objectives with a tower of only 182 feet. The location for the proposed Verizon tower will require 300+ feet to obtain the same objectives.

At the Verizon location with a radiation center of 275 feet, the projected propagations show that the terrain will prevent an adequate signal from getting to the east. This will prevent in-building penetration to the Mayo Trail Road, and parts of the refinery.

The Alltel "Neal" site was a 2006 site that has been in the site development process for over a year. The network needs this site to be completed within the next few months to maintain a reasonable schedule.

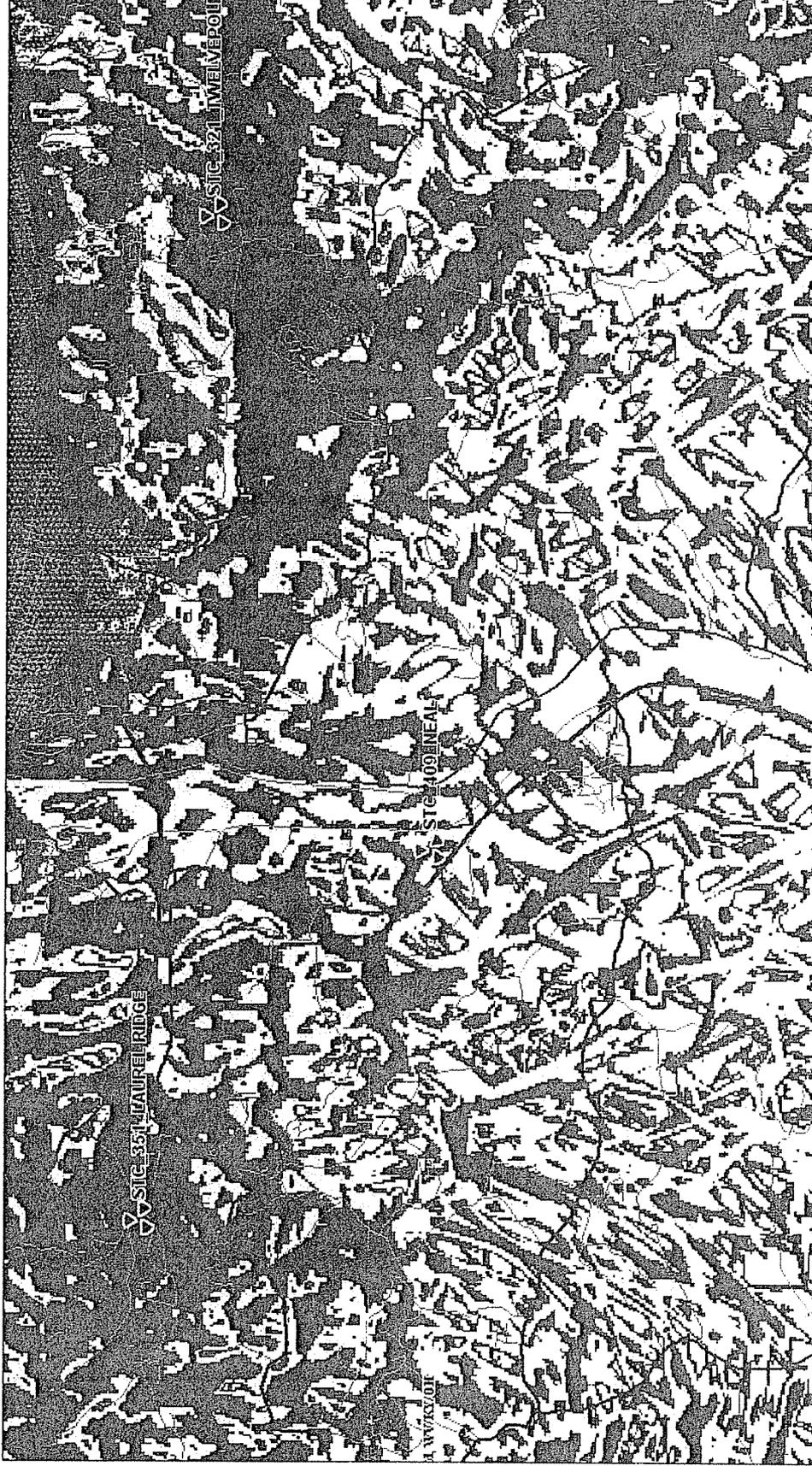
In conclusion, Verizon's proposed "Savage Branch" tower location will not provide the needed coverage objectives as outlined by the purpose of the proposed Alltel "Neal" site.

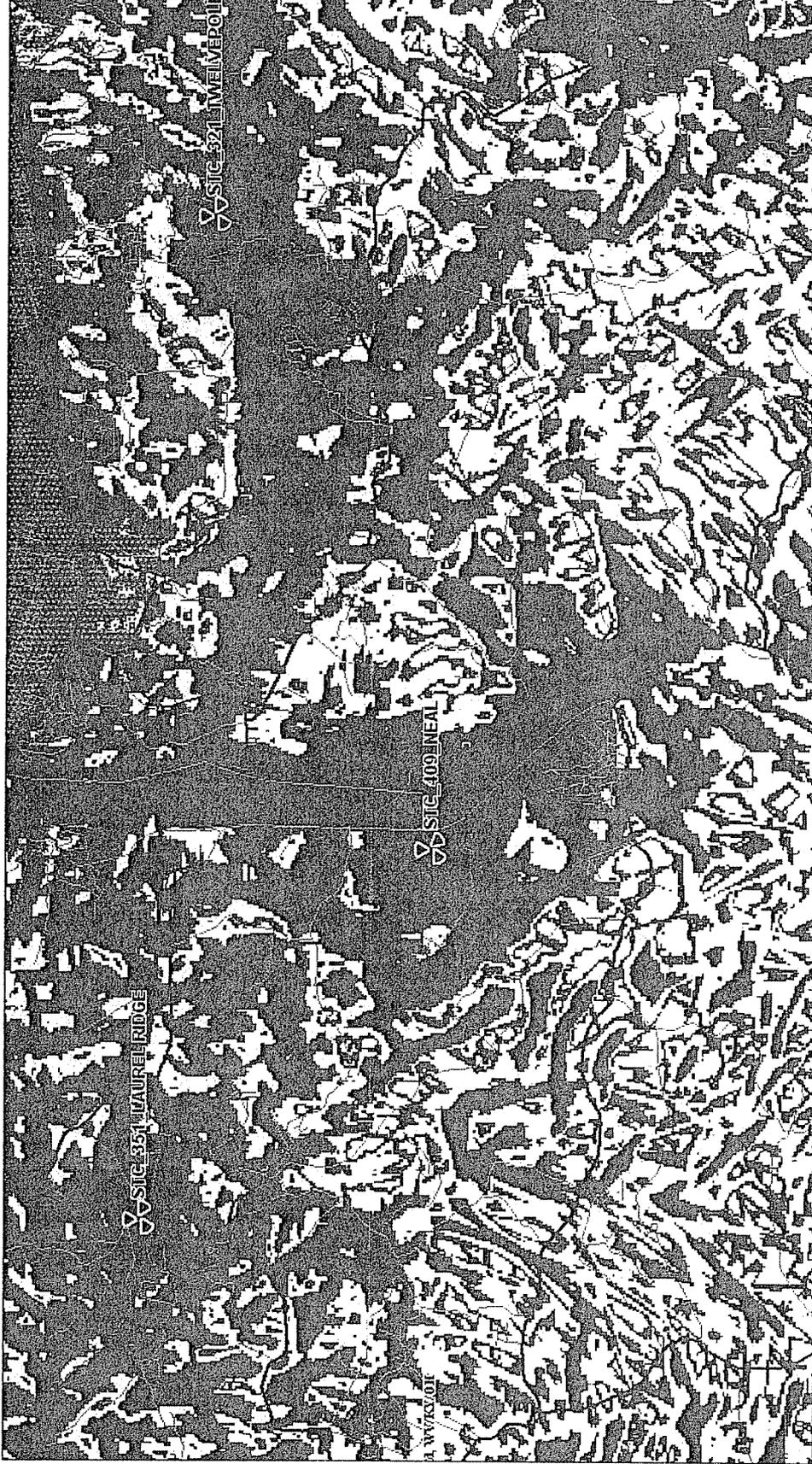
With highest regards,

A handwritten signature in cursive script that reads "Raeleen Matlock".

Raeleen Matlock
RF Engineer
Alltel Communications, Inc.

Before Neal Field Strength





Neal-Sprint's Loc Field Str.

