

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF NEW CINGULAR WIRELESS)	
PCS, LLC AND SBA TOWERS V, LLC)	
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY TO CONSTRUCT)	
A WIRELESS COMMUNICATIONS FACILITY AT)	CASE NO.
7810 U.S. ROUTE 60, ASHLAND)	2014-00337
BOYD COUNTY, KENTUCKY, 41102)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NEW CINGULAR WIRELESS PSC, LLC

New Cingular Wireless PCS, LLC ("New Cingular"), pursuant to 807 KAR 5:001, is to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 30, 2014. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

New Cingular shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which New Cingular fails or refuses to furnish all or part of the requested information, New Cingular shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to page 2 of the Application and to the Site Development Plan and Survey attached as Exhibit B of the Application, both of which list the coordinates for the proposed facility as North Latitude 38° 25' 13.268" by West Longitude 82° 42' 7.596". Refer also to the Geotechnical Engineering Report attached as Exhibit E to the Application which lists the coordinates for the proposed facility as North Latitude 38° 25' 12.83" by West Longitude 82° 42' 8.17", and the Site Specific Obstruction Evaluation Report attached as Exhibit G to the Application which lists the coordinates for the proposed facility as North Latitude 38° 25' 13.62" by West Longitude 82° 42' 7.60".

a. Given that there are substantive differences in the coordinates listed in the application for the location of the proposed facility, state the correct coordinates for the location of the proposed facility.

b. State whether or not the differences in the coordinates for the Geotechnical Engineering Report and the Site Specific Obstruction Evaluation report will materially impact the evaluation of the safety or functionality of the proposed tower.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED DEC 10 2014

cc: Parties of Record

Todd R Briggs
Briggs Law Office, PSC
4965 U.S. Highway 42
Suite 1000
Louisville, KENTUCKY 40222