

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY RSA #3 CELLULAR	)	
GENERAL PARTNERSHIP FOR APPROVAL TO	)	
CONSTRUCT AND OPERATE A NEW CELL	)	CASE NO.
FACILITY TO PROVIDE CELLULAR RADIO	)	2019-00045
SERVICE (WAX) IN RURAL SERVICE AREA #3	)	
(GRAYSON COUNTY) OF THE COMMONWEALTH	)	
OF KENTUCKY	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO KENTUCKY RSA #3 CELLULAR GENERAL PARTNERSHIP

Kentucky RSA #3 Cellular General Partnership (Kentucky RSA #3), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and three copies of the following information. The information requested herein is due on or before August 2, 2019. Responses to requests for information in paper medium 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 the 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.

Kentucky RSA #3 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 Kentucky RSA #3 fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 filing a paper containing personal information, Kentucky RSA #3 shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Edmonson County Water District's (Edmonson District) comments that were filed into the pending case, in which Edmondson District states that it has no objections to the proposed tower as long as no permanent structures are built on Edmonson District's property or existing easements. Provide a response to Edmonson District's comments, and specifically explain whether Kentucky RSA #3 intends to build the proposed tower or any permanent structure on Edmonson District's property or existing easements.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED     **JUL 18 2019**    

cc: Parties of Record

\*Felix Sharpe  
Dinsmore & Shohl, LLP  
101 South Fifth Street  
Suite 2500  
Louisville, KENTUCKY 40202

\*Kentucky RSA #3 Cellular General Partnership,  
2902 Ring Road  
P. O. Box 5012  
 Elizabethtown, KY 42701

\*Honorable John E Selent  
Attorney at Law  
Dinsmore & Shohl, LLP  
101 South Fifth Street  
Suite 2500  
Louisville, KENTUCKY 40202