

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP D/B/A VERIZON WIRELESS FOR)	
ISSUANCE OF A CERTIFICATE OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY TO)	2022-00332
CONSTRUCT A WIRELESS COMMUNICATIONS)	
FACILITY IN THE COMMONWEALTH OF)	
KENTUCKY IN THE COUNTY OF EDMONSON)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless (Verizon Wireless), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on March 10, 2023. The Commission directs Verizon Wireless to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

Verizon Wireless shall make timely amendment to any prior response if Verizon Wireless obtains information that indicates the response was incorrect or incomplete when made or, though correct when made, is now incorrect or incomplete in any material respect.

For any request to which Verizon Wireless fails or refuses to furnish all or part of the requested information, Verizon Wireless shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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. When filing a paper containing personal information, Verizon Wireless 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 Verizon Wireless's response to Commission Staff's First Request for Information (Verizon Wireless's response to Staff's First Request), Items 1–3 and 6–

7.² Also refer to 807 KAR 5:001, Section 4(12)(d)(2)(a). Provide the name of the witness or witnesses responsible for responding to each of Verizon Wireless's responses in Verizon Wireless's response to Staff's First Request.

2. Refer to Verizon Wireless's response to Staff's First Request, Items 1–3 and 6–7. Also refer to 807 KAR 5:001E, Section 4(12)(d)(2)(b). Provide an answer signed under oath for each response to Verizon Wireless's response to Staff's First Request, 1–3 and 6–7, or alternatively, a signed certification of the preparer or person supervising the preparation of the response on behalf of the person that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry for each response to Verizon Wireless's response to Staff's First Request, 1–3 and 6–7.

3. Refer to Verizon Wireless's response to Staff's First Request, Item 1. State when ownership of parcel 043-00-00-040.01 was transferred to Julie Skaggs Reep.

4. Refer to Verizon Wireless's response to Staff's First Request, Item 2. Confirm whether Verizon Wireless verified, using the records of the Edmonson County property valuation administrator, that all property owners within 500 feet of the proposed tower and identified by Mark E. Patterson on March 2, 2022, were still the record property owners as of October 4, 2022. If Verizon Wireless cannot make such confirmation, provide the names and addresses of all record property owners within 500 feet of the proposed tower as of October 4, 2022.

² The automatic numbering in the word processing application skipped Items 4 and 5. Without accounting for subparts, there were a total of five requests for information, and Verizon Wireless numbered their responses 1–5. These requests refer to the numeration in Commission Staff's First Request for Information and thus omit Items 4 and 5.

5. Refer to Verizon Wireless's response to Staff's First Request, Item 3. Confirm that the two signs posted on October 3, 2022, remained posted for at least two weeks after Verizon Wireless's application was filed on October 6, 2022.



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Public Service Commission
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DATED FEB 24 2023

cc: Parties of Record

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