

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP D/B/A VERIZON WIRELESS AND)	
SOUTHERN TOWERS BTS, LP FOR ISSUANCE)	
OF A CERTIFICATE OF PUBLIC CONVENIENCE)	CASE NO.
AND NECESSITY TO CONSTRUCT A WIRELESS)	2023-00337
COMMUNICATIONS FACILITY IN THE)	
COMMONWEALTH OF KENTUCKY IN THE)	
COUNTY OF CALLOWAY)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP DBA VERIZON WIRELESS

Cellco Partnership, dba Verizon Wireless (Verizon Wireless), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 25, 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 or complete 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 KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(l)(1). Provide all updated information pertaining to the status of a signed U.S. Postal Service Form 3811, otherwise known as "signed green cards," or a copy of the notice reflecting that the certified mail was returned to Verizon Wireless as undelivered for the six remaining unaccounted notices to the below landowners. This request is continuing and should be

updated in a supplemental filing until all signed green cards and undelivered notices are returned to Verizon Wireless.

- a. Leslie, Aileen and Danny M.
- b. Johnston, Darren
- c. Ransey, Carlos D. & Noraa U.
- d. Edmonson, Randall & Christy
- e. Lax, Anthony Neil and Lax, April Leigh

2. Refer to the Application, Exhibit K, which lists Robert O. Waters III and Amanda Colon as adjoining property owners. Provide a copy of the notice sent to Robert O. Waters III and Amanda Colon and a copy of the U.S. Postal Service Certified Mail Receipt.

3. Provide a copy of the signed U.S. Postal Service Form 3811, otherwise known as "signed green card," or a copy of the notice that the certified mail was returned to Verizon Wireless as undelivered by the U.S. Postal Service for Robert O. Waters III and Amanda Colon. This request is continuing and should be updated in a supplemental filing until all signed green cards and undelivered notices are returned to Verizon Wireless.



Linda C. Bridwell, PE
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Public Service Commission
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DATED NOV 03 2023

cc: Parties of Record

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