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March 11, 2005

VIA OVERNIGHT MAIL

Susan G. Hutcherson
Filings Division Manager, Docket Branch
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602-0615

Re: PSC Case No.: 2005-00059
Motion to Submit For Expedited Decision
Verizon Site Name: Chenault

Dear Susan:

Please accept this letter and the attached Motion to Submit for Expedited Decision Without Public Hearing as an official filing in the above-referenced Public Service Commission action. We have also enclosed six (6) copies and a self-address stamped envelope. Please return a file stamped copy to us upon receipt in the enclosed envelope. If you have any questions or comments concerning this matter, please do not hesitate to contact us.

If you have any questions or comments concerning this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "D Pike", written over a horizontal line.

David A. Pike
Attorney for Cellco Partnership

Enclosures

RECEIVED
MAR 14 2005
PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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) CASE NO.: 2005-00059
KY HWY 34 & CHENAULT BRIDGE ROAD)
LANCASTER, KENTUCKY 40444)
IN THE WIRELESS COMMUNICATIONS LICENSE AREA)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF GARRARD)

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COMMISSION

SITE NAME: CHENAULT

**MOTION TO SUBMIT
FOR EXPEDITED DECISION WITHOUT PUBLIC HEARING**

Cellco Partnership, a Delaware General Partnership d/b/a, d/b/a Verizon Wireless ("Applicant"), by counsel, hereby moves the Kentucky Public Service Commission ("PSC") to grant a Certificate of Public Convenience and Necessity ("CPCN") forthwith in this case, based on the following facts and circumstances:

1. Applicant has met all filing requirements applicable to this proceeding as prescribed by the Kentucky Revised Statutes and the Kentucky Administrative Regulations, including notification by certified mail of persons entitled to notice of the filing of the subject Application for CPCN; by publication as prescribed by the laws and regulations; and by posted signs.
2. To date, and subsequent to such notification of potentially interested parties, no request for intervention has been filed with the PSC in this case. A letter of protest was filed with the Commission by Bluegrass Farms and Woodlands, LLC on

February 15, 2005. Thereafter, on February 22, 2005 the Executive Director, Beth O'Donnell, notified Bluegrass Farms and Woodlands, LLC of the necessity to request, in writing, full intervention with the Commission within ten (10) days. More than ten (10) days has passed and Bluegrass Farms and Woodlands, LLC has not made a request in writing to intervene in this matter.

3. The Application that is the subject of this administrative proceeding was originally filed with the PSC on February 8, 2005, and has been pending before the PSC for 31 days as of the date of this Motion.

4. The Wireless Communications Facility ("WCF") that is the subject of the Application for a CPCN filed in this case is a vital element of the Applicant's wireless communications network, and is necessary to provide service in accordance with the provisions of Applicant's Federal Communications Commission license.

WHEREFORE, the Applicant, by counsel, urges the PSC to grant a CPCN forthwith in accordance with the terms of the Application in this proceeding and without public hearing.

Respectfully submitted,



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