

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

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PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF)
CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO.:2005-00304
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY AT)
11392 LEXINGTON ROAD)
LANCASTER, KENTUCKY 40444)
IN THE WIRELESS COMMUNICATIONS LICENSE AREA)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF GARRARD)

SITE NAME: WHITE OAK

* * * * *

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

Cellco Partnership, a Delaware General Partnership, 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 concern was received by the PSC by Mr. Harvey Brumfield on July 28, 2005.

3. The PSC, by letter dated August 10, 2005 (letter from Executive Director, Beth O'Donnell) requested that Applicant submit a written response to Mr. Brumfield, which response was provided to Mr. Brumfield on or about August 12, 2005. A copy of such response was filed with the PSC on August 15, 2005.

4. The PSC's August 10, 2005 letter informed Mr. Brumfield of the necessity to request intervention or hearing on the Application in writing if intervention or hearing is desired, and that if no such request is received by the PSC within 30 days of the August 10, 2005 letter, the PSC will presume satisfaction of concerns raised.

5. More than 30 days have passed since the date of the PSC's letter, and the Application has been before the PSC for 56 days as of the date of this Motion without any written request for intervention or hearing on this matter.

6. The Wireless Communications Facility 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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