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

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PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF ALLTEL)
COMMUNICATIONS, INC. FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO)
CONSTRUCT A CELL SITE AT 14305 OLD U.S.)
ROUTE 23 SITUATED ON THE DIVIDING RIDGE)
BETWEEN NEW U.S. 23 AND OLD U.S. 23 NORTH)
OF SAVAGE BRANCH IN BOYD COUNTY,)
KENTUCKY)
(NEAL CELLULAR TOWER SITE))

CASE NO.
2007-00305

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 8215 SAVAGE)
BRANCH, CATLETTSBURG, KENTUCKY IN THE)
WIRELESS COMMUNICATIONS LICENSE AREA IN)
THE COMMONWEALTH OF KENTUCKY IN THE)
COUNTY OF BOYD)

CASE NO.
2007-00309

SITE NAME: SAVAGE BRANCH

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

Comes Cellco Partnership, d/b/a Verizon Wireless ("Verizon Wireless"), by counsel, and hereby moves the Kentucky Public Service Commission ("PSC") to grant a Certificate of Public Convenience and Necessity ("CPCN") forthwith for the "Savage Branch" site proposed in Case Number 2007-00309 based upon the following facts and circumstances:

1. Verizon Wireless has met all filing requirements applicable to this proceeding as prescribed by the Kentucky Revised Statutes and the Kentucky

Administrative Regulations, including public notice as prescribed by said statutes and regulations by certified mail, by newspaper publication and by posted signs.

2. Verizon Wireless has timely filed its Response to the Commission Staff Data Request dated July 30, 2007. In its Response, Verizon Wireless stated its conclusion that the proposed Alltel Communications, Inc. "Neal" site will not accommodate the wireless communications service objectives that Verizon Wireless seeks to address with construction of the "Savage Branch" site.

3. Verizon Wireless has received and reviewed the Response of Alltel Communications, Inc. to Staff Data Request Dated July 30, 2007, which Response states Alltel's conclusion that the Verizon Wireless "Savage Branch" site will not accommodate the wireless communications service objectives for Alltel Communications, Inc.

4. Based upon the Responses filed by the applicants in the subject cases, it appears that the separate facilities proposed by the applicants are designed to serve unique service objectives that do not lend themselves to a single-facility co-location alternative to the separate facilities proposed.

5. To date, and subsequent to such notification of potentially interested parties, no request for intervention or other expression of public opposition has been filed with the PSC in case number 2007-00309 in reference to Verizon Wireless' proposed "Savage Branch" site.

6. The Verizon Wireless "Savage Branch" application that is the subject of case number 2007-00309 was originally filed with the PSC on July 18, 2007, and has been pending before the PSC for 41 days as of the date of this Motion.

7. The proposed Verizon Wireless "Savage Branch" wireless communications facility is a vital element of the Verizon Wireless' wireless communications network and is necessary to provide service to wireless service users in Boyd County, Kentucky to meet an immediate service need.

WHEREFORE, the Verizon Wireless, by counsel, moves the PSC to grant a CPCN for the Verizon Wireless "Savage Branch" site forthwith and without public hearing in accordance with the terms of the Application that is the subject of PSC case number 2007-00309.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response was mailed, postage prepaid, to Mark R. Overstreet, Stites & Harbison, P. O. Box 634, Frankfort, KY 40602-0634 on this the 29th day of August, 2007.



David A. Pike
Attorney for Cellco Partnership
d/b/a Verizon Wireless