COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF TOWER ACCESS GROUP, LLC FOR ISSUANCE OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT AND OPERATE AN ADDITIONAL WIRELESS COMMUNICATIONS FACILITY ON THE CAMPUS OF EASTERN KENTUCKY UNIVERSITY AT 320 MADISON AVENUE, RICHMOND, MADISON COUNTY, KENTUCKY

CASE NO. 2015-00145

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<u>COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO</u> <u>TOWER ACCESS GROUP, LLC</u>

Tower Access Group, LLC ("TAG"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information. The information requested herein is due within 14 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the guestions 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 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. TAG shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which TAG fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure 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 filing a document containing personal information, TAG shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to TAG's Application, page 5, paragraph 12, which lists the coordinates for the proposed construction site as North Latitude 37° 44' 29" by West Longitude 84° 17' 41". Also refer to Exhibit F to the Application, Federal Aviation Administration ("FAA") Determination of No Hazard to Air Navigation, which lists the coordinates for the proposed construction site as North Latitude 37° 43' 52.06" by West Longitude 84° 17' 52.57"; and Federal Communications Commission ("FCC") Antenna Structure Registration, which lists the coordinates for the proposed construction site as North Latitude 37° 43' 52.06" by West North Latitude 37° 43' 52.1" by West Longitude 84° 17' 52.6".

a. State which coordinates are the correct coordinates for the proposed construction site.

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b. If the correct coordinates for the proposed construction site are other than that listed in the Application, provide an amended Application containing the correct coordinates.

c. If the correct coordinates for the proposed construction site are other than those listed in the FAA Determination of No Hazard to Air Navigation and a revised FAA determination is required, provide a revised FAA Determination containing the correct coordinates.

d. If the correct coordinates for the proposed construction site are other than those listed in the FCC Antenna Structure Registration and a revised FCC registration is required, provide a revised FCC Antenna Structure Registration containing the correct coordinates.

Ill for JD

Jeff Derouen Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40601

DATED JUN 1 7 2015

cc: Parties of Record

*Honorable W. Brent Rice Attorney At Law McBrayer, McGinnis, Leslie and Kirkland, PLLC 201 East Main Street Suite 1000 Lexington, KENTUCKY 40507