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PUBLIC SERVICE COMMISSION

Nancy M. Roche 540 State Route 348 East Symsonia, Kentucky 42082 mailing address: 821 Fatherland Street Nashville, Tennessee 37206

November 16, 2017

Kentucky Public Service Commission **Executive Director** 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky

RE:

CASE NO.: 2017-00368

THE APPLICATION OF NEW CINGULAR WIRELESS PCS, LLC, A DELAWARE LIMITED LIABILITY COMPANY, D/B/A AT&T MOBILITY FOR ISSUANCE OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A WIRELESS COMMUNICATIONS FACILITY IN THE COMMONWEALTH OF KENTUCKY IN THE COUNTY OF GRAVES

SITE NAME: SYMSONIA

Greetings:

Enclosed for filing please find a Reply to Applicant's Response to my Request to Intervene in the above referenced application.

Sincerely,

Nancy M. Roche

Kentucky Public Service Commission Executive Director 211 Sower Boulevard P. O. Box 615 Frankfort, Kentucky 40602

RE:

CASE NO.: 2017-00368

THE APPLICATION OF NEW CINGULAR WIRELESS PCS, LLC, A DELAWARE LIMITED LIABILITY COMPANY, D/B/A AT&T MOBILITY FOR ISSUANCE OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A WIRELESS COMMUNICATIONS FACILITY IN THE COMMONWEALTH OF KENTUCKY IN THE COUNTY OF GRAVES

SITE NAME: SYMSONIA

NANCY M. ROCHE'S REPLY TO APPLICANT'S RESPONSE TO REQUEST TO INTERVENE

Nancy M. Roche replies to New Cingular Wireless PCS, LLC d/b/a AT&T Mobility's

("AT&T") response to her request to intervene in this application.

1. AT&T has misrepresented Ms. Roche's position to intervene by stating that she

does not own residential property in proximity to the proposed cell phone tower. This is

incorrect. Ms. Roche's address at 540 State Route 348 East, Symsonia Kentucky 420982 is a

house in a residential neighborhood. Ms. Roche also owns farmland near the proposed cell

phone tower.

2. Ms. Roche has requested permission to intervene in order to present expert testimony as to the decline in property values this cell phone tower will cause in her neighborhood. Additionally Ms. Roche would ask for the opportunity to examine AT&T's representative Jim Fairchild on the issue of AT&T's attempts to locate the property for the proposed tower referenced in AT&T's Alternative Site Analysis. Ms. Roche argues that it is not her job to demonstrate that another property is available for leasing when applicant's response to the resident's letters to the Public Service Commission shows clearly that AT&T made little effort to find a location for this tower that would not damage the neighborhood.

3. Ms. Roche does not intend to rely on "lay opinion or generalized aesthetic concerns" in her intervention but believes that she and other Symsonia residents should be allowed to present testimony as to the proposed towers negative effect on the their property values as well as to have the ability to question applicant's representatives.

Respectfully submitted,

Nancy M. Roche 540 State Route 348 East Symsonia, Kentucky 42082 615-337-3732 <u>nancy.roche@Vanderbilt.Edu</u> mailing address: 821 Fatherland Street Nashville, Tennessee 37206

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Request to Intervene has been sent by Priority Mail, postage prepaid to David A. Pike, Pike Legal Group, PLLC, 1578 Highway 44 East, Suite 6, P.O. Box 369, Shepherdsville, Kentucky 40165-0369, this the 16th day of November, 2017.

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