

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NEW)	
CINGULAR WIRELESS PCS, LLC, D/B/A AT&T)	
MOBILITY AND TILLMAN INFRASTRUCTURE)	
LLC FOR ISSUANCE OF A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY TO)	2023-00296
CONSTRUCT A WIRELESS COMMUNICATIONS)	
FACILITY IN THE COMMONWEALTH OF)	
KENTUCKY IN THE COUNTY OF HARLAN)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T MOBILITY, PCS

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility, PCS (AT&T Mobility), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 27, 2023. The Commission directs AT&T Mobility to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

AT&T Mobility shall make timely amendment to any prior response if AT&T Mobility obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which AT&T Mobility fails or refuses to furnish all or part of the requested information, AT&T Mobility shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, AT&T Mobility shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(l)(1). Also refer to AT&T Mobility's response to Commission Staff's First Request for Information, Item 2. Provide all updated information pertaining to the status of a signed United States Postal Service Form 3811, otherwise known as "signed green cards," or a copy of the notice

reflecting that the certified mail was returned to AT&T Mobility as undelivered for the six remaining unaccounted notices to landowners:

- a. Malibu Enterprises, LLC;
- b. Goins, George Russell;
- c. Goins, Jennifer G & Payton Aimee;
- d. Johnson, Hobert & Frankie;
- e. Johnson, Dennis C; and
- f. Vanwinkle, Willard & Bessie.

This is a continuing request.

2. Provide a copy of any notice sent to Joe & Marjorie Grieshop, including, but not limited to, a copy of the U.S. Postal Service Certified Mail Receipt.

3. Provide a copy of the signed United States Postal Service Form 3811, otherwise known as "signed green card," or a copy of the notice that the certified mail was returned to AT&T Mobility as undelivered by the United States Postal Service for Joe & Marjorie Grieshop. This data request is continuing and should be updated in a supplemental filing until all signed green cards and undelivered notices are returned to AT&T Mobility.

4. Provide the United States Postal Service tracking number delivery status of notice mailed to Danny Smallwood at 1485 Hwy 1084 Baxter, KY 40806.

Nancy V. ... for

Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 06 2023

cc: Parties of Record

Case No. 2023-00296

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