

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP D/B/A VERIZON WIRELESS AND)	
VB BTS II, LLC D/B/A VERTICAL BRIDGE FOR)	
ISSUANCE OF A CERTIFICATE OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY TO)	2024-00163
CONSTRUCT A WIRELESS COMMUNICATIONS)	
FACILITY IN THE COMMONWEALTH OF)	
KENTUCKY IN THE COUNTY OF MARSHALL)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
AND VB BTS II, LLC D/B/A VERTICAL BRIDGE

Cellco Partnership d/b/a Verizon Wireless and VB BTS II, LLC d/b/a Vertical Bridge (collectively, Joint Applicants) pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 17, 2024. The Commission directs the Joint Applicants 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

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).

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.

The Joint Applicants shall make timely amendment to any prior response if the Joint Applicants obtain 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 the Joint Applicants fail or refuses to furnish all or part of the requested information, the Joint Applicants shall provide a written explanation of the specific grounds for their 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, the Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Explain whether Vertical Bridge VBTS, LLC. is a separate registered entity from VB BTS II, LLC D/B/A Vertical Bridge. Provide all supporting documentation for the explanation.

2. Explain whether Vertical Bridge VBTS, LLC. is a separate registered entity from The Towers, LLC. Provide all supporting documentation for the explanation.

3. Explain why VB BTS II, LLC D/B/A Vertical Bridge was listed as a co-applicant in the application filed on June 17, 2024, if the Omnibus Agreement of May 9, 2023, specifies the assignment of the site in question to The Towers, LLC.

4. Explain why a site survey and the Global Positioning System (GPS) observation dated October 30, 2023, and site surveys dated December 11, 2023, and December 15, 2023, were done for Vertical Bridge VBTS LLC if the Omnibus Agreement of May 9, 2023, indicates the assignment of the site in question to The Towers, LLC.

5. Assuming Vertical Bridge VBTS, LLC. is a separate registered entity from The Towers, LLC. Explain why Vertical Bridge VBTS LLC should not be required to be a co-applicant.



Linda C. Bridwell, PE
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Public Service Commission
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DATED AUG 30 2024

cc: Parties of Record

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