

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 FOR ISSUANCE OF A CERTIFICATE)	
OF PUBLIC CONVENIENCE AND NECESSITY)	CASE NO.
TO CONSTRUCT A WIRELESS)	2021-00398
COMMUNICATIONS FACILITY IN THE)	
COMMONWEALTH OF KENTUCKY IN THE)	
COUNTY OF GRAYSON)	

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

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility (AT&T Mobility) and Tillman Infrastructure LLC (Tillman), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 14, 2022. The Commission directs AT&T Mobility and Tillman 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.

AT&T Mobility and Tillman shall make timely amendment to any prior response if AT&T Mobility and Tillman obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which AT&T Mobility and Tillman fail or refuse to furnish all or part of the requested information, AT&T Mobility and Tillman shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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 and Tillman 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 why AT&T Mobility and Tillman are unable to move the proposed tower within the property boundaries of the proposed location. Provide all supporting documentation for the explanation.

2. Describe AT&T Mobility's and Tillman's efforts to collocate on existing structures. Provide all supporting documentation for the response.

3. Describe AT&T Mobility's and Tillman's consideration of alternative construction locations, including any analysis performed. Provide all supporting documentation for the response.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED AUG 31 2022

cc: Parties of Record

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