

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)	2022-00211
COMMUNICATIONS FACILITY IN THE)	
COMMONWEALTH OF KENTUCKY IN THE)	
COUNTY OF CLINTON)	

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

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility, PCS (AT&T Mobility), and Harmoni Towers LLC (Harmoni Towers), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on June 23, 2023. The Commission directs AT&T Mobility and Harmoni Towers 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 Harmoni Towers shall make timely amendment to any prior response if AT&T Mobility and Harmoni Towers 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 AT&T Mobility and Harmoni Towers fail or refuse to furnish all or part of the requested information, AT&T Mobility and Harmoni Towers 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 and Harmoni Towers shall, in accordance with 807 KAR 5:001E, 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 the application filed on July 13, 2022. Provide all documentation, including the original

documents obtained from the Clinton County Property Valuation Administrator (PVA) that AT&T Mobility and Harmoni Towers relied upon to create the list of adjacent property owners entitled to notification.

2. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(l)(1). Also refer to the application filed on July 13, 2022. Provide all signed United States Postal Service Form 3811, otherwise known as "signed green cards," which were not included in the original application and that correspond to the notice list in Exhibit J, Exhibit K, and referenced on page 6, paragraph 22 of the application.


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

DATED JUN 05 2023

cc: Parties of Record

Case No. 2022-00211

*Christopher Shouse
Attorney
Pike Legal Group PLLC
1578 Highway 44 East, Suite 6
P. O. Box 369
Shepherdsville, KENTUCKY 40165-0369

*Honorable David A Pike
Attorney at Law
Pike Legal Group PLLC
1578 Highway 44 East, Suite 6
P. O. Box 369
Shepherdsville, KENTUCKY 40165-0369

*New Cingular Wireless PCS, LLC dba AT&T
1010 N St Mary's Street, 9th Floor
San Antonio, TX 78215