## 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	)	2023-00116
COMMUNICATIONS FACILITY IN THE	)	
COMMONWEALTH OF KENTUCKY IN THE	)	
COUNTY OF MONTGOMERY	)	

## COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO NEW CINGULAR WIRELESS PCS, LLC, D/B/A AT&T MOBILITY AND VB 500 II, LLC

New Cingular Wireless PCS, LLC, a Delaware limited liability company, d/b/a AT&T Mobility (AT&T Mobility) and VB 500 II, LLC, (VB 500 II) a Delaware limited liability company, 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 30, 2023. The Commission directs AT&T Mobility and VB 500 II to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> 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

<sup>&</sup>lt;sup>1</sup> 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).

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 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 VB 500 II shall make timely amendment to any prior response if AT&T Mobility and VB 500 II 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 VB 500 II fail or refuse to furnish all or part of the requested information, AT&T Mobility and VB 500 II shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

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 VB 500 II 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)(I)(1). Also refer to the response to Commission Staff's First Request for Information, specifically the last

sentence on page 1, which states "A returned signed green card or returned undeliverable letter for one landowner has not yet been received, despite being dispatched on the even

date of the filling of the within application." Provide all updated information pertaining to

the status of this outstanding notice. This is a continuing request.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED \_ JUN 09 2023

cc: Parties of Record

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