

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF VB BTS II, LLC	)	
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC	)	
CONVENIENCE AND NECESSITY TO	)	CASE NO.
CONSTRUCT A WIRELESS COMMUNICATIONS	)	2024-00014
FACILITY IN THE COMMONWEALTH OF	)	
KENTUCKY	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO VB BTS II, LLC

VB BTS II, LLC (Vertical Bridge), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 6, 2024. The Commission directs Vertical Bridge 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 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

---

<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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Vertical Bridge shall make timely amendment to any prior response if Vertical Bridge 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 Vertical Bridge fails or refuses to furnish all or part of the requested information, Vertical Bridge 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, Vertical Bridge 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). Provide all updated information pertaining to the status of a signed U.S. Postal Service Form 3811, otherwise known as "signed green cards," or a copy of the notice reflecting that the certified mail was returned to Vertical Bridge as undelivered by the U.S. Postal Service for Green County Judge/Executive John H. Frank. This request is continuing and should

be updated in a supplemental filing until the signed green card or undelivered notice is returned to Vertical Bridge.

2. Provide all updated information pertaining to the status of a signed U.S. Postal Service Form 3811, otherwise known as “signed green cards,” or a copy of the notice reflecting that the certified mail was returned to Vertical Bridge as undelivered by the U.S. Postal Service for adjoining property owners Jeffrey R. Vanarsdale, James Wesley Adkins, and David Marcum. This request is continuing and should be updated in a supplemental filing until the signed green cards or undelivered notices are returned to Vertical Bridge.



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

DATED   FEB 26 2024  

cc: Parties of Record

\*Brandon Whinery  
Vertical Bridge REIT, LLC  
750 Park of Commerce Drive  
Suite 200  
Boca Raton, FLORIDA 33487

\*Erin Connolly  
Baker, Donelson Bearman, Caldwell, & Berkowitz,  
3414 Peachtree Road NE  
Monarch Plaza, Suite 1500  
Atlanta, GEORGIA 30326

\*Emily Smith  
TeleCAD Wireless  
1961 Northpoint Blvd  
Hixson, TENNESSEE 37343