

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP D/B/A VERIZON WIRELESS AND)	
APC TOWERS FOR ISSUANCE OF A)	CASE NO.
CERTIFICATE OF PUBLIC CONVENIENCE AND)	2024-00019
NECESSITY TO CONSTRUCT A WIRELESS)	
COMMUNICATIONS FACILITY IN THE)	
COMMONWEALTH OF KENTUCKY)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS AND APC TOWERS

Cellco Partnership, d/b/a Version Wireless and APC Towers (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 May 24, 2024. The Commission directs 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 representatives of a public or private corporation or a partnership or association or a

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).

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.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants 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 Joint Applicants fails or refuses to furnish all or part of the requested information, Joint Applicants 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, 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. Please state the address of alternatives sites, if any, considered by Joint Applicants for the construction of the cell tower other than the property owned by Jesse and Kristina Perry.

2. If alternative sites were considered, state whether any of the locations met the radio frequency requirements for the tower and describe the process used to eliminate any locations that met the radio frequency requirements.

3. If alternative site were not considered, explain why alternatives were not considered.

4. Were any alternative locations on the identified site considered? If so, what other locations were considered and why were they not selected? If not, why not?



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

DATED MAY 07 2024

cc: Parties of Record

*Elizabeth Bentz Williams
Clark, Quinn, Moses, Scott, and Grahn, LLP
320 North Meridian Street
Suite 1100
Indianapolis, INDIANA 46204-172

*Russell L. Brown
Clark, Quinn, Moses, Scott, and Grahn, LLP
320 North Meridian Street
Suite 1100
Indianapolis, INDIANA 46204-172

*Cellco Partnership dba Verizon Wireless
One Verizon Way, Mailcode VC53S309D
Basking Ridge, NJ 07920