

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP, D/B/A VERIZON WIRELESS AND)	
TOWERCO 2013, LLC FOR ISSUANCE OF A)	
CERTIFICATE OF PUBLIC CONVENIENCE AND)	CASE NO.
NECESSITY TO CONSTRUCT A WIRELESS)	2024-00020
COMMUNICATIONS FACILITY IN THE)	
COMMONWEALTH OF KENTUCKY IN THE)	
COUNTY OF MARSHALL)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS AND TOWERCO 2013, LLC

Cellco Partnership, d/b/a Verizon Wireless and TowerCo 2013, LLC. (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 April 30, 2024. The Commission directs the 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 the Joint Applicants 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 the Joint Applicants fail or refuse to furnish all or part of the requested information, the 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, the 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. For each of the following documents, clarify and explain the inconsistencies on the final height of the proposed lightning arrestor attached at the top of the 250-foot-tall tower. If any of the differences are the result of an error, do the Joint Applicants anticipate correcting the error? If so, explain. If not, explain why not.

a. The application,² detailed site plan,³ and Geotechnical Report⁴ list the height of the lightening arrestor at five feet, for a total height of 255 feet.

b. The approval letter from the Federal Aviation Administration⁵ and the Kentucky Airport Zoning Commission⁶ list the total height of the tower at 260 feet.

c. The notice to adjoining property owners of the proposed construction,⁷ the notice to the Marshall County judge executive of the proposed construction,⁸ and the legal notice published in the Tribune Courier of the proposed construction,⁹ list the height of the lightening arrestor at 15 feet, for a total height of 265 feet.

2. Provide a copy of the Kentucky Airport Zoning Commission approval letter.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED APR 19 2024

cc: Parties of Record

² Application (filed Apr. 4, 2024) at 3.

³ Application at 74.

⁴ Application at 123.

⁵ Application at 112.

⁶ Application at 121.

⁷ Application at 158.

⁸ Application at 171.

⁹ Application at 176.

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