

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP D/B/A VERIZON WIRELESS AND)	
VB BTS II, LLC D/B/A VERTICAL BRIDGE FOR)	
ISSUANCE OF A CERTIFICATE OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY TO)	2024-00160
CONSTRUCT A WIRELESS COMMUNICATIONS)	
FACILITY IN THE COMMONWEALTH OF)	
KENTUCKY IN THE COUNTY OF TAYLOR)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS AND VB BTS II, LLC D/B/A
VERTICAL BRIDGE

Cellco Partnership d/b/a Verizon Wireless (Verizon Wireless) and VB BTS II, LLC d/b/a Vertical Bridge (Vertical Bridge) (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 October 25, 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

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.

Joint Applicants shall make timely amendment to any prior response if 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 Joint Applicants fail or refuse 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. Explain why The Towers, LLC d/b/a Vertical Bridge is being substituted for VB BTS II, LLC d/b/a Vertical Bridge. Provide all supporting documentation for the explanation.

2. Confirm that VB BTS II, LLC d/b/a Vertical Bridge is no longer a Joint Applicant. If not confirmed, explain why not.

3. Explain whether The Towers, LLC d/b/a Vertical Bridge is a separate registered legal entity from VB BTS II, LLC d/b/a Vertical Bridge. Provide all supporting documentation for the explanation.

4. Explain whether The Towers, LLC d/b/a Vertical Bridge is a separate registered legal entity from The Towers, LLC. Provide all supporting documentation for the explanation.

5. Provide updated site surveys using the new entity for this site.

6. Confirm that all leases and easements reflect The Towers, LLC as a party. If not confirmed, explain and provide any necessary documentation.

7. Confirm that all permits for the project reflect, The Towers, LLC as a party. If not confirmed, explain and provide any necessary documentation.



Linda C. Bridwell, PE
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Public Service Commission
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DATED OCT 10 2024

cc: Parties of Record

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