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**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

PUBLIC SERVICE  
COMMISSION

In the Matter of:

THE APPLICATION OF	)	
SKYWAY TOWERS, LLC	)	
AND KENTUCKY RSA NO. 1 PARTNERSHIP	)	
d/b/a VERIZON WIRELESS	)	
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC	)	CASE NO.: 2016-00390
CONVENIENCE AND NECESSITY TO CONSTRUCT	)	
A WIRELESS COMMUNICATIONS FACILITY	)	
IN THE COMMONWEALTH OF KENTUCKY	)	
IN THE COUNTY OF CALLOWAY	)	

SITE NAME: BLOOD RIVER

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**MOTION TO AMEND  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY  
(TO EXTEND TIME TO COMMENCE CONSTRUCTION)**

Come Skyway Towers, LLC, a Delaware limited liability company, and Kentucky RSA No. 1 Partnership, a Delaware General Partnership, d/b/a Verizon Wireless ("Applicants"), by counsel, and moves the Kentucky Public Service Commission ("PSC") to amend its Order granting a Certificate of Public Convenience and Necessity ("CPCN") to Applicants for the construction and operation of a wireless telecommunications facility to extend the time to exercise the authority granted therein.

In support of this motion, Applicants submit the following information:

1. On April 6, 2017 the PSC issued a CPCN for the construction and operation of a wireless telecommunications facility to be located at Derek Trail in Murray, KY (36°35'54.27" North latitude, 88°09'40.12" West longitude).

2. Pursuant to KRS § 278.020(1), Applicants are required to exercise said CPCN “within one (1) year from the grant thereof, exclusive of any delay due to the ... failure to obtain any necessary grant or consent(.)”

3. The facility has not yet been constructed, and Applicants will not be able to exercise the CPCN in advance of the April 6, 2018 expiration date because of potential adverse effects on the critical habitat for the Indiana bat and northern long-eared bat and associated restrictions in accordance with the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) that limit timeframes for necessary tree and vegetation clearance that must occur prior to construction of the facility.

4. Accordingly, to permit adequate time to schedule and complete tree and vegetation clearance within non-restricted timeframes and to mobilize construction assets, Applicants request extension of the time to exercise the CPCN through April 6, 2019.

5. Applicants state that the requested extension is warranted to allow sufficient time for Applicants to clear the relevant portion of the site property of trees and vegetation during such timeframes wherein the critical habitat for the Indiana bat and northern long-eared bat will not be impacted, which clearance is necessary prior to construction of the facility, and to schedule and complete construction of the subject facility.

6. There were no intervenors in opposition to the application in the PSC proceedings in this case.

7. Applicants state that the requested extension is necessary to effectuate the CPCN and to provide adequate utility service in the subject area.

8. Upon information and belief, Applicants state that the requested extension shall not cause undue hardship to any affected persons or parties.

WHEREFORE, Applicants, by counsel, move the PSC to amend its Order in the within case dated April 6, 2017, to prescribe an extension of the time for Verizon Wireless to exercise the authority granted therein up to and including April 6, 2018.

Respectfully submitted,

A handwritten signature in blue ink that reads "David A. Pike". The signature is written in a cursive style and is positioned above a horizontal line.

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