

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

In the Matter of:

THE APPLICATION OF)
NEW CINGULAR WIRELESS PCS, LLC,)
A DELAWARE LIMITED LIABILITY COMPANY,)
D/B/A AT&T MOBILITY)
AND TILLMAN INFRASTRUCTURE LLC, A DELAWARE)
LIMITED LIABILITY COMPANY)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO.: 2021-00398
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF GRAYSON)

SITE NAME: FALLING BRANCH

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**MOTION TO STAY PROCEEDING FOR SIXTY (“60”) DAYS TO EVALUATE
ALTERNATIVE SITES**

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility and Tillman Infrastructure LLC (“Applicants”), by counsel, hereby make a Motion to Stay this Proceeding for Sixty (“60”) Days to Evaluate Alternative Sites. Applicants are prepared to undertake additional due diligence in such period to determine whether an alternative tower site location further from the Interveners’ residence is feasible and available to resolve AT&T Mobility’s significant gap in coverage in the area.

Applicants’ Motion contemplates a Stay would postpone any obligation to respond to any pending Public Service Commission Post-Hearing Data Requests or

to submit Post-Hearing Briefs during the 60-day period. This Motion further contemplates that Interveners would have no obligation to file any Post-Hearing Brief in the period of a Stay.

In addition, Applicants reserve the right to subsequently move for a further Stay of proceedings for good cause shown if they can demonstrate to the Public Service Commission that progress is being made toward selection of an alternative tower site location and/or that Applicants are awaiting a decision by another government agency in regard to a potential new tower site.

WHEREFORE, Applicants request the Public Service Commission stay the within proceeding for all purposes for a period of 60 days.

. Applicants further request any other relief to which they are entitled.

Respectfully submitted,

David A. Pike

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and

F. Keith Brown

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of August, 2023, a true and accurate copy of the foregoing was electronically filed with the PSC and sent by U.S. Postal Service first class mail, postage prepaid, to the Interveners at the following address:

Roger and Janelle Nicolai
2663 Blue Bird Road
Falls of Rough, Kentucky 40119

Respectfully submitted,

David A. Pike

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