

**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.: 2022-00116
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF MCCREARY)

SITE NAME: PINE KNOT RELO

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**APPLICANTS' SUPPLEMENTAL RESPONSE
TO COMMISSION STAFF'S SECOND DATA REQUEST**

New Cingular Wireless PCS, LLC, a Delaware limited liability company, d/b/a AT&T Mobility ("AT&T") and Tillman Infrastructure LLC, a Delaware limited liability company (collectively "Applicants"), by counsel, make this Supplemental Response to the Kentucky Public Service Commission Staff's Second Request for Information to New Cingular Wireless PCS, LLC d/b/a AT&T Mobility and Tillman Infrastructure dated July 28, 2023. The aforesaid filing supplements Applicants' Response to Commission Staff's Second Data Request dated August 7, 2023 ("August 7, 2023 Response"). Applicants respectfully state, as follows:

1. As noted in their August 7, 2023 Response, the McCreary County Property Valuation Administrator ("PVA") records identified the owner of an adjoining parcel (Parcel

#: 140-00-00-042.01) as the Pine Knot Cemetery, but did not provide a mailing address. While preparing their August 7, 2023 Response, Applicants identified an entity listed on the Kentucky Secretary of State website as the “Pine Knot Cemetery Association, Inc.” (see August 7, 2023 Response, **Exhibit J-3**). Accordingly, Applicants sent notice of the proposal to the address of the Pine Knot Cemetery Association, Inc. last known registered agent and agreed to update the record when a signed green card was received or returned as undelivered.

2. Applicants recently received the returned signed green card for the notice letter sent to the Pine Knot Cemetery Association, Inc. registered agent, and a copy of that document is attached as **Exhibit J-4**. As shown on the returned signed green card, notice of this proposal was received by the Pine Knot Cemetery Association, Inc.’s registered agent on August 7, 2023. Having submitted all signed or returned undelivered green cards, Applicants’ have fully complied with the Commission Staff’s Data Requests.

3. An Affidavit certifying that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry has been signed by the attorney supervising the preparation of the response on behalf of Applicants’ and is included as **Exhibit 1**.

WHEREFORE, there being no ground for denial of the subject application and substantial evidence in support of the requested CPCN, Applicants respectfully request the Kentucky Public Service Commission:

- (a) Accept this Response for filing;
- (b) Issue a Certificate of Public Convenience and Necessity to construct and operate the WCF at the location set forth herein without further delay; and
- (c) Grant Applicants any other relief to which they are entitled.

Respectfully submitted,



David A. Pike
and

F. Keith Brown

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Attorneys for Applicants

LIST OF EXHIBITS

- 1 - Affidavit of Certification
- J-4 - Returned Green Card for the Pine Knot Cemetery Association, Inc

EXHIBIT 1
AFFIDAVIT OF CERTIFICATION

**AFFIDAVIT OF CERTIFICATION
COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
CASE #: 2022-00116**

I, F. Keith Brown, attorney for 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 (“Applicants”), do hereby certify that I am the person supervising the preparation the Supplemental Response to the Kentucky Public Service Commission Staff’s Second Request for Information on behalf Applicants and that this response is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Further the affiant sayeth naught.

Affiant:

J. Keith Brown

Date: Sept. 15, 2023

State of Kentucky

County of Bullitt

AFFIANT ACKNOWLEDGEMENT

On this, the 15 day of September 2023 before me, the subscriber, a Notary Public in and for the above state, personally appeared to me F. Keith Brown and in due form of law, acknowledged, subscribed, and swore that he executed this instrument as his voluntary act and deed.

In testimony whereof, I have hereunto set my hand and affixed my seal in said County and State on the day and year last above written.

My commission expires on: December 4, 2024.

[Signature]

Notary Public, State at Large

KYNP19462



EXHIBIT J-4
RETURNED GREEN CARD FOR THE PINE KNOT CEMETERY
ASSOCIATION, INC.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

VERNON GILREATH
 262 SHADY ACRES RD 6268 S. HWY 1651
 PINE KNOT, KY 42635



9590 9402 7926 2305 8886 48

2. Article Number (Transfer from service label)

7022 3330 0000 3636 3049

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Vernon Gilreath Agent
 Addressed

B. Received by (Printed Name)

Vernon Gilreath Agent
 Addressed

C. Date of Delivery

8-7-23

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Restricted Delivery
- Priority Mail Express®