

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

In the Matter of:

THE APPLICATION OF)
SKYWAY TOWERS LLC AND)
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO.: 2023-00074
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF CARROLL)

SITE NAME: LOCUST

* * * * *

APPLICANTS' SUPPLEMENTAL RESPONSE TO DATA REQUEST

Skyway Towers, LLC, a Delaware limited liability company, and Cellco Partnership, a Delaware General Partnership d/b/a Verizon Wireless (“Applicants”), by counsel, hereby make this Supplemental Response to the Kentucky Public Service Commission Staff’s (“Commission Staff”) First Request for Information to Verizon Wireless Partnership d/b/a Verizon Wireless dated March 30, 2023 (“Data Request”). Applicants respectfully state, as follows:

Applicants previously filed a Response to Commission Staff’s Data Request on April 14, 2023, wherein Applicants provided signed green cards for all but one of the landowners (parcel #: 06-12) required to receive notice of the proposed Wireless Communications Facility pursuant to 807 KAR 5:063 Section 1(1)(l). Thereafter, Applicants received a returned mailing form United States Postal Service for the landowner of parcel #: 06-12 that was marked as undeliverable. A copy of the undelivered mailing is attached as **Exhibit J-2**. The addressee on the undelivered mailing matched

exactly the landowner information shown on the PVA records for the parcel in question. A copy of the PVA record for that parcel is attached at **Exhibit J-3**.

Despite Applicants' compliance with the requirements of 807 KAR 5:063 Section 1(1)(l), Applicants searched for a viable alternative address for the landowner after receiving the returned undelivered letter. Despite Applicants' best efforts, a clearly viable alternative mailing address was not identified. Therefore, Applicants have met their obligation to provide notice of the proposal pursuant to 807 KAR 5:063 Section 1(1)(l). Nothing more should be required for Commission Staff to complete their deliberations and issue an Order on the Request Certificate of Public Convenience and Necessity for the within proposal.

Respectfully submitted,



David A. Pike
and

F. Keith Brown

F. Keith Brown
Pike Legal Group, PLLC
1578 Highway 44 East, Suite 6
P. O. Box 369
Shepherdsville, KY 40165-0369
Telephone: (502) 955-4400
Telefax: (502) 543-4410
Email: dpike@pikelegal.com
Attorneys for Applicants

LIST OF EXHIBITS

- J-2 - Returned Undelivered Letter
- J-3 - Carrol County PVA Records for Parcel #: 06-12

EXHIBIT J-2
RETURNED UNDELIVERED LETTER



1578 Highway 44 East, Suite 6
P.O. Box 369
Shepherdsville, KY 40165-0369

5/1



7022 3330 0000 4290 3116

FIRST-CLASS



US POSTAGETM PITNEY BOWES



ZIP 40165
02 7H
0006034260

\$ 008.10⁰⁰
MAR 02 2023

-R-T-S- 40045-RFS-1N

03/21/23

*
R
F
S
*

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
RETURN TO SENDER



3/4



**NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD**

VAC_UTF

4004536061 R003



PLACE STICKER AT TOP OF ENVELOPE TO BE RETURNED TO THE ADDRESSEE. FOLD AT DOTTED LINE.

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:

MANDAKH ENEREL
1086 W PRONG LOCUST RD
MILTON, KY 40045



9590 9402 7926 2305 8788 23

2. Article Number (Transfer from service label)

7022 3330 0000 4290 3116

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee
X

B. Received by (Printed Name)

C. Date of Delivery

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
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

EXHIBIT J-3
CARROL COUNTY PVA RECORDS FOR PARCEL #: 06-12

Summary

Parcel Number 06-12
Account Number 11353
Location Address LOCUST W PRONG 1086
Description HOUSE & 43 ACRES
(Note: Not to be used on legal documents)
Class Farm
Tax District 00 County
Rate Per Hundred 0.99600

[View Map](#)



Owner

Primary Owner
MANDAKH ENEREL
1086 W PRONG LOCUST RD
MILTON, KY 40045

The Carroll County Property Valuation Administrator's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next certified taxroll.

[User Privacy Policy](#)
[GDPR Privacy Notice](#)

[Last Data Upload: 5/24/2023, 5:21:18 PM](#)

Developed by


Version 3.1.10