

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

In the Matter of:

THE APPLICATION OF)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS)
AND VB BTS II, LLC D/B/A VERTICAL BRIDGE,)
LLC FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO. 2023-00111
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF PULASKI)

SITE NAME: NW SOMERSET

* * * * *

**RESPONSE TO SECOND REQUEST FOR INFORMATION TO APPLICATION FOR
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
FOR CONSTRUCTION OF A WIRELESS COMMUNICATIONS FACILITY**

Public Service Commission (PSC) Staff’s Request:

1. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(1)(1). Provide the original documents obtained from the Pulaski County Property Valuation Administrator (PVA) which Verizon Wireless relied upon to create the list of adjacent property owners entitled to notification.

Please note, updated responses are denoted in red.

Cellco Partnership, d/b/a Verizon Wireless and VB BTS II, LLC d/b/a Vertical Bridge (“Co-Applicants”), submitted an application requesting a Certificate of Public Convenience and Necessity to construct a Wireless Communications Facility in the Commonwealth of Kentucky in the County of Pulaski on May 24, 2023:

There were nine (9) notices sent to surrounding property owners on April 7, 2023 and three (3) notices were sent on May 30, 2023; to date ten (10) notice green cards have been

returned, one (1) of the mailed notice envelope has been returned and according to USPS Tracking, one (1) mailed notice was delivered, but no green card returned. Therefore, there are no notices unaccounted for.

A. **Exhibit 1** includes the notice list accompanied by screenshots from of each property record including parcel number and mailing address. This was conducted by our offices on July 5, 2023 utilizing the Pulaski County PVA. All ownerships and addresses were verified as unchanged.

B. Attached hereto as **Exhibit 2** please find an Affidavit of Certification for all information contained in this application.


C. All Exhibits to this Application are hereby incorporated by reference as if fully set out as part of the Application.

D. All responses and requests associated with this Application may be directed to:

Russell L. Brown
Clark, Quinn, Moses, Scott & Grahn, LLP
320 North Meridian Street, Suite 1100
Indianapolis, IN 46204
Phone: (317) 637-1321
FAX: (317) 687-2344
Email: rbrown@clarkquinnlaw.com
Attorney for Cellco Partnership d/b/a Verizon Wireless

WHEREFORE, Co-Applicants respectfully request that the PSC accept the foregoing Application for filing, and having met the requirements of KRS §§278.020(1), 278.650, and 278.665 and all applicable rules and regulations of the PSC, grant a Certificate of Public Convenience and Necessity to construct and operate the WCF at the location set forth herein.

Respectfully submitted,



Russell L. Brown

Clark, Quinn, Moses, Scott & Grahn, LLP
320 North Meridian Street, Suite 1100
Indianapolis, IN 46204
Phone: (317) 637-1321 / FAX: (317) 687-2344
Email: rbrown@clarkquinnlaw.com
Attorney for Cellco Partnership d/b/a Verizon Wireless

DATED JULY 6, 2023

Case No. 2023-00111

LIST OF EXHIBITS

1. Notification List with PVA documentation
2. Affidavit of Certification

Notification List

Parcel Number 06-2-0-25
 McGlothlin, Danny
 1659 W Hwy 80
 Somerset, KY 42503

Kentucky UNRIVALLED SPIRIT Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-2-0-25
 Account # 42038
 Tax District Pulaski County (11)
 Millage Rate
 Location Address
 Legal Description 36.6 AC HWY 2227
(Note: Not to be used on legal documents.)
 Acres/Lot 36.600
 Property Usage FARM (F)
 Neighborhood FAIR
 Homestead No

Owners

[MCGLOTHLIN DANNY](#)
 1650 W HWY 80
 SOMERSET KY 42503

Valuation


Land

Buildings


Sales

Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
2/16/2010	\$87,000			850	478	Unqualified - Close Relative Sales	MCGLOTHLIN DANNY J & LANNIEL TRUST	MCGLOTHLIN DANNY

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[TW Tools](#)
 606-679-1812
 Chief Deputy

Parcel Number 06-2-0-25.1
 McGlothlin, Danny
 1659 W Hwy 80
 Somerset, KY 42503

Kentucky UNRIVALLED SPIRIT Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-2-0-25.1
 Account # 26373
 Tax District Pulaski County (11)
 Millage Rate
 Location Address
 Legal Description 100X550 N HWY 27
(Note: Not to be used on legal documents.)
 Acres/Lot 55.000000
 Property Usage RESIDENTIAL (R)
 Neighborhood FAIR
 Homestead No

Owners

[MCGLOTHLIN DANNY](#)
 1650 W HWY 80
 SOMERSET KY 42503

Valuation


Land

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
2/16/2010	\$2,000			850	478	Unqualified - Close Relative Sales	MCGLOTHLIN DANNY & LANDRETH	MCGLOTHLIN DANNY

Sales are not entered after March 31st of each year

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST




Property Valuation Administrator

Parcel Number 060-2-025.2

KJS Properties, LLC

1344 Hwy 3091

Somerset, KY 42503

 Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-2-0-25.2
Account # 39489
Tax District Somerset Cross Section (21)
Millage Rate
Location Address 1.69 AC N HWY 27
Legal Description (Note: Not to be used on legal documents.)
Acres/Lot 1.690
Property Usage COMMERCIAL (C)
Neighborhood FAIR
Homestead No

Owners

KJS PROPERTIES LLC
1344 HWY 3091
SOMERSET KY 42503

Valuation

Land

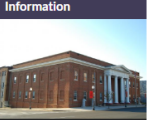

Buildings

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
3/29/2013	\$5,000			896	663	Unqualified - + \$40,000 Consideration	SWEARINGEN KENNETH & JIL E	KJS PROPERTIES LLC
1/1/1900	\$0			626	443	Qualified		SWEARINGEN KENNETH & JIL E

Sales are not entered after March 31st of each year

Information



Pulaski County, KY
100 North Main St
P.O. Box 110
Somerset, KY 42502
Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[TW Todd](#)
606-679-1812

Chief Deputy
[Sherry Tomlinson](#)
606-679-1812

Parcel Number 060-2-0-35.2


Trimble, Timothy A. and Joey M. and

Ellis, Jeffrey Lee

c/o Timothy Trimble

119 Lewis Brown Drive

Somerset, KY 42503

 Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-2-0-35.2
Account # 33210
Tax District Pulaski County (11)
Millage Rate
Location Address 40 AC N HWY 27
Legal Description (Note: Not to be used on legal documents.)
Acres/Lot 40.000
Property Usage FARM (F)
Neighborhood FAIR
Homestead No

Owners

TRIMBLE TIMOTHY A & JOEY M & JEFFREY LEE ELLIS
C/O TIMOTHY TRIMBLE
119 LEWIS BROWN DR
SOMERSET KY 42503

Valuation

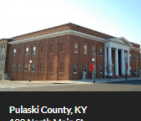
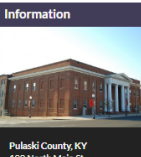
Land

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
1/1/1900	\$0			744	482	Qualified		TRIMBLE TIMOTHY A & JOEY M & JEFFREY LEE ELLIS

Sales are not entered after March 31st of each year

Information



Pulaski County, KY
100 North Main St
P.O. Box 110
Somerset, KY 42502
Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[TW Todd](#)
606-679-1812

Parcel Number 060-2-0-35.1
 Heavenly 1, LLC & Heavenly 2, LLC
 99 Lancaster Street
 Stanford, KY 40484

Kentucky UNBLENDED SERVICE Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-2-0-35.1
 Account # 4616
 Tax District Pulaski County (11)
 Millage Rate
 Location Address N HWY 27
 Legal Description 20 AC N HWY 27
(Note: Not to be used on legal documents.)
 Acres/Lot 20.000
 Property Usage FARM (F)
 Neighborhood FAIR
 Homestead No

Owners

[HEAVENLY 1 LLC & HEAVENLY 2 LLC](#)
 99 LANCASTER ST
 STANFORD KY 40484


Valuation

Land


Sales

Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
12/24/2012	\$822,000			893	109	Unqualified - Sale price applies to more than one property	CORRELL WARD & KIRK	HEAVENLY 1 LLC & HEAVENLY 2 LLC
4/21/2010	\$20,000			853	490	Qualified	CORRELL WARD	CORRELL WARD & KIRK

Information



Pulaski County, KY
 100 North Main St
 PO Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[T.W. Todd](#)
 606-679-1812

Parcel Number 060-0-0-04
 City of Somerset
 104 College Street
 Somerset, KY 42501

Kentucky UNBLENDED SERVICE Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-0-0-04
 Account # 48601
 Tax District Somerset Cross Section (21)
 Millage Rate
 Location Address 40 AC HWY 2227
 Legal Description (Note: Not to be used on legal documents.)
 Acres/Lot 59.000
 Property Usage CITY EXEMPT PROPERTY (CITY)
 Neighborhood FAIR
 Homestead No

Owners

[CITY OF SOMERSET](#)
 104 COLLEGE ST
 SOMERSET KY 42501

Valuation

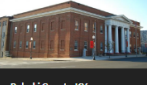
Land

Yard Items


Sales

Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
4/7/2005	\$1,300,000			759	001	Unqualified - Exempt Property/Gov Agency/Exempt	CORRELL WARD & REGINA	CITY OF SOMERSET
12/7/1998	\$80,000			632	103	Unqualified - Partial Sales	CORRELL WARD & KIRK & ROLAND	CORRELL WARD & REGINA
12/31/1997	\$635,585			613	57	Unqualified - Transfers include corporate mergers and property purchased by relocation companies	CUMBERLAND LAKE SHELL INC	CORRELL WARD & KIRK & ROLAND
12/1/1997	\$0			613	57	Qualified	ROLAN NEW	CUMBERLAND LAKE SHELL INC
8/27/1996	\$300,000			587	175	Qualified	NEW ROLAND	ROLAN NEW
7/26/1996	\$300,000			16	21	Qualified	CORRELL JESS & BOYD PRATHER	NEW ROLAND

Information



Pulaski County, KY
 100 North Main St
 PO Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[T.W. Todd](#)
 606-679-1812

Chief Deputy
[Sherry Tomlison](#)
 606-679-1812

Announcements

[How to use the Beason site - view Demo Videos](#)

Parcel Number 060-0-0-04
 Turpen, Elizabeth L.
 PO Box 12
 Nancy, KY 42544

Kentucky UNRAVELED SPIRIT Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-0-0-04.1
 Account # 18582
 Tax District Pulaski County (11)
 Millage Rate
 Location Address
 Legal Description 1 AC HWY 2227- THE PAWN SHOP
 (Note: Not to be used on legal documents.)
 Acres/Lot 1.000
 Property Usage COMMERCIAL (C)
 Neighborhood BETTER
 Homestead No

Owners

TURPEN ELIZABETH L
 PO BOX 12
 NANCY KY 42544

Valuation

Land

Buildings


Yard Items

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
1/2/1900	\$80,000			632	103	Qualified		TURPEN ELIZABETH L

Sales are not entered after March 31st of each year.

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
 T.W. Todd
 606-679-1812
 Chief Deputy
 Sherry Tomlinson

Parcel Number 060-1-1-03
 Dykes, Stephen A.
 1201 Shopville Road
 Somerset, KY 42503

Kentucky UNRAVELED SPIRIT Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-1-1-03
 Account # 15748
 Tax District Pulaski County (11)
 Millage Rate
 Location Address
 Legal Description 2.8 AC HWY 2227 PAWN SHOP
 (Note: Not to be used on legal documents.)
 Acres/Lot 2.800
 Property Usage RESIDENTIAL (R)
 Neighborhood FAIR
 Homestead No

Owners

DYKES STEPHEN A
 1201 SHOPVILLE RD
 SOMERSET KY 42503

Valuation

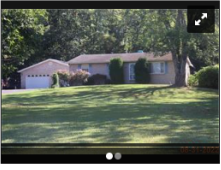
Land

Buildings


Sales

Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
8/6/2013	\$130,000			902	550	Unqualified - Close Relative Sales	JONES CORINE	DYKES STEPHEN A
1/1/1900	\$0			301	175	Qualified		JONES CORINE

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
 T.W. Todd
 606-679-1812

Parcel Number 060-1-1-04.2
 Boggs, Odella Lafon & Sandra GA
 407 Poinsettia Avenue
 Titusville, FL 32796

Kentucky UNRAVELED SPYRY Pulaski County, KY PVA Log In Search search_

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-1-1-04.2
 Account # 28394
 Tax District Pulaski County (11)
 Millage Rate
 Location Address
 Legal Description 13.28 AC TR 3 HWY 2227
 (Note: Not to be used on legal documents)
 Acres/Lot 13.280
 Property Usage FARM (F)
 Neighborhood FAIR
 Homestead No

Owners

BOGGS ODELLA LAFON & SANDRA GA
 407 POINSETTIA AVE
 TITUSVILLE FL 32796

Valuation

Land

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
10/16/2002	\$20,000			708	412	Qualified	RILDA GIRDLER	BOGGS ODELLA LAFON & SANDRA GA

Sales are not entered after March 31st of each year


Recent Sales in Area

Sale date range:
 From: 07/05/2020 To: 07/05/2023

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[TW Todd](#)
 606-679-1812
 Chief Deputy
[Sherry Tomlinson](#)
 606-679-1812

Parcel 060-1-1-02
 Warner Fertilizer Co., Inc.
 PO Box 796
 Somerset, KY 42502

Kentucky UNRAVELED SPYRY Pulaski County, KY PVA Log In Search search_

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 060-1-1-02
 Account # 30716
 Tax District Pulaski County (11)
 Millage Rate
 Location Address
 Legal Description 26 AC HWY 2227 - WARNER FERTILIZER
 (Note: Not to be used on legal documents)
 Acres/Lot 26.000
 Property Usage COMMERCIAL (C)
 Neighborhood UNK
 Homestead No

Owners

[WARNER FERTILIZER CO INC](#)
 PO BOX 796
 SOMERSET KY 42502

Valuation

Land


Buildings

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
1/1/1900	\$0			347	233	Qualified		WARNER FERTILIZER CO INC

Sales are not entered after March 31st of each year

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[TW Todd](#)
 606-679-1812
 Chief Deputy

Parcel Number 048-7-1-01.2
 Humble, Richard G. & Sandra A.
 84 Friendship Drive
 Somerset, KY 42503

Kentucky UNBROKEN SPIRIT Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 048-7-1-01.2
 Account # 28572
 Tax District Pulaski County (11)
 Millage Rate
 Location Address 1.06 AC N HWY 27
 Legal Description (Note: Not to be used on legal documents.)
 Acres/Lot 1.060
 Property Usage RESIDENTIAL (R)
 Neighborhood FAIR
 Homestead No

Owners

[HUMBLE RICHARD G & SANDRA A](#)
 84 FRIENDSHIP DR
 SOMERSET KY 42503

Valuation


Land

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
3/11/2004	\$3,000			810	543	Qualified		HUMBLE RICHARD G & SANDRA A

Sales are not entered after March 31st of each year

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[T.W. Todd](#)

Parcel Number 048-7-1-01.1
 Humble, Richard G. & Sandra A.
 84 Friendship Drive
 Somerset, KY 42503

Kentucky UNBROKEN SPIRIT Pulaski County, KY PVA Log In Search search...

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 048-7-1-01.1
 Account # 22523
 Tax District Pulaski County (11)
 Millage Rate
 Location Address 3.79 AC W STILLWATER RD
 Legal Description (Note: Not to be used on legal documents.)
 Acres/Lot 3.790
 Property Usage RESIDENTIAL (R)
 Neighborhood FAIR
 Homestead No

Owners

[HUMBLE RICHARD G & SANDRA A](#)
 84 FRIENDSHIP DR
 SOMERSET KY 42503

Valuation


Land

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
3/11/2004	\$5,000			810	543	Qualified		HUMBLE RICHARD G & SANDRA A

Sales are not entered after March 31st of each year

Information

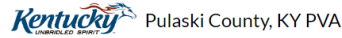


Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
[T.W. Todd](#)

Parcel Number 048-8-0-04
 Swearingen, Kenny
 1344 HWY 3091
 Somerset, KY 42503



Log In Search search_

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 048-8-0-04
 Account # 36687
 Tax District Pulaski County (11)
 Millage Rate
 Location Address 17 AC HWY 3091
 Legal Description (Note: Not to be used on legal documents.)
 Acres/Lot 17.000
 Property Usage FARM (F)
 Neighborhood FAIR
 Homestead No

Owners

[SWEARINGEN KENNY](#)
 1344 HWY 3091
 SOMERSET KY 42503

Valuation

Land

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
10/30/1998	\$8,000			626	443	Unqualified - Close Relative Sales	SWEARINGEN JUANITA	SWEARINGEN KENNY
5/1/1986	\$0			448	366	Qualified	MADELINE HARNESS	SWEARINGEN JUANITA

Sales are not entered after March 31st of each year.


Recent Sales in Area

Sale date range:
 From: 07/05/2020 To: 07/05/2023

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST

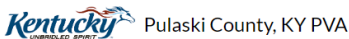


Property Valuation Administrator
 TW Todd
 606-679-1812
 Chief Deputy
 Sherry Tomlinson
 606-679-1812

Announcements

[How to use the Reason site - view Demo Videos](#)

Parcel Number 048-8-0-03.1
 Swearingen, Kenny
 1344 HWY 3091
 Somerset, KY 42503



Log In Search search_

Layers Map Search Results **Report** Sales Search Sales List Sales Results Home Tax Estimator

Summary

Parcel Number 048-8-0-03.1
 Account # 12103
 Tax District Pulaski County (11)
 Millage Rate
 Location Address 14 AC HWY 3091
 Legal Description (Note: Not to be used on legal documents.)
 Acres/Lot 14.000
 Property Usage FARM (F)
 Neighborhood FAIR
 Homestead No

Owners

SWEARINGEN KENNETH & JIL E
 1344 HWY 3091
 SOMERSET KY 42503

Valuation

Land

Sales


Sale Date	Sale Price	Instrument	Instrument Number	Deed Book	Deed Page	Sale Qualification	Grantor	Grantee
7/2/2001	\$25,000			685	271	Unqualified - Close Relative Sales	HARNNESS MADELINE & J SWEARINGEN	SWEARINGEN KENNETH & JIL E
5/1/1986	\$0			448	295	Qualified	LESTER SWEARINGEN	HARNNESS MADELINE & J SWEARINGEN

Sales are not entered after March 31st of each year.


Recent Sales in Area

Sale date range:
 From: 07/05/2020 To: 07/05/2023

Information



Pulaski County, KY
 100 North Main St
 P.O. Box 110
 Somerset, KY 42502
 Monday - Friday 8:00am - 4:00pm EST



Property Valuation Administrator
 TW Todd
 606-679-1812
 Chief Deputy
 Sherry Tomlinson
 606-679-1812

Announcements

[How to use the Reason site - view Demo Videos](#)

