

**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 FOR	)	CASE NO. 2023-00308
ISSUANCE OF A CERTIFICATE OF PUBLIC	)	
CONVENIENCE AND NECESSITY TO CONSTRUCT A	)	
WIRELESS COMMUNICATIONS FACILITY IN THE	)	
COMMONWEALTH OF KENTUCKY IN THE COUNTY	)	
OF CASEY		

SITE NAME: HWY 243

\* \* \* \* \*

**MOTION FOR EXTENSION OF TIME  
APPLICATION FOR CERTIFICATE OF PUBLIC  
CONVENIENCE POST ORDER**

1. On March 28, 2024, Cellco Partnership d/b/a Verizon Wireless (Verizon Wireless) and VB BTS II, LLC d/b/a Vertical Bridge (collectively, Joint Applicants) filed an application seeking a Certificate of Public Convenience and Necessity (CPCN) to construct and operate a wireless telecommunications facility. The proposed facility consists of a tower not to exceed 305 feet in height, with attached antennas, to be located at 3180 Minors Branch Road, Gravel Switch, Casey County, Kentucky. The coordinates for the proposed facility are North Latitude 37° 30' 33.53" by West Longitude 84° 57' 23.05".
2. On July 12, 2024 the Kentucky Public Service Commission granted a CPCN to construct a wireless telecommunications facility. The proposed facility consists of a tower not to exceed 305 feet in height, with attached antennas, to be located 3180 Minors Branch Road, Gravel Switch, Casey County, Kentucky. The coordinates for the proposed facility are North Latitude 37° 30' 33.53" by West Longitude 84° 57' 23.05".

3. On July 24, 2024 Co-Applicants filed supplemental information including Approval from the Kentucky Airport Zoning Commission (KACZ) and the FAA Determination of No Hazard in compliance the conditions of the Order.

4. Co-Applicants are submitting a Motion for Extension of Time to commence construction of the wireless communication facility for a period of nine months until April 12, 2026. This extension is to allow additional time to receive the Federal Communications Commission's Environmental Assessment coupled with the restrictions on approved months during which tree removal can be accomplished.

5. Attached hereto as **Exhibit 1** please find an Affidavit of Certification for all information contained in this application.

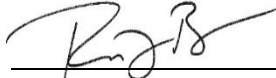
6. All Exhibits to this Application are hereby incorporated by reference as if fully set out as part of the Application.

4. 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

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,



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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](mailto:rbrown@clarkquinnlaw.com)

Attorney for Cellco Partnership d/b/a Verizon Wireless

#### **LIST OF EXHIBITS**

1. Affidavit of Certification

STATE OF INDIANA       )  
                                      ) SS:  
COUNTY OF MARION     )

**AFFIDAVIT OF CERTIFICATION  
COMMONWEALTH OF KENTUCKY  
PUBLIC SERVICE COMMISSION**

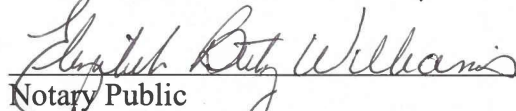
I Russell L. Brown, attorney for Cellco Partnership, d/b/a Verizon Wireless and VB BTS II, LLC (Vertical Bridge) hereby certify that as the person supervising the preparation of this application and all statements and information contained herein are true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry for all information within this application.



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Russell L. Brown  
Attorney, for Cellco Partnership, d/b/a Verizon Wireless  
And VB BTS II, LLC (Vertical Bridge)

STATE OF INDIANA,  
COUNTY OF MARION, SS:

Subscribed and sworn to before me this 29<sup>th</sup> day of April, 2025.



Notary Public

Printed Name of Notary: Elizabeth Bentz Williams

My commission expires: November 18, 2028

My County of Residence: Marion

Commission #: 0639620

