

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

In the Matter of:

THE APPLICATION OF)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS)
AND TOWERCO 2013, LLC)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO. 2023-00311
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF BRECKINRIDGE)

SITE NAME: MCDANIELS

* * * * *

**RESPONSE TO STAFF’S FIRST REQUEST FOR INFORMATION TO APPLICATION
FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
FOR CONSTRUCTION OF A WIRELESS COMMUNICATIONS FACILITY**

Cellco Partnership, d/b/a Verizon Wireless and Wireless and TowerCo 2013, LLC (“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 Breckinridge on October 25, 2023.

In support of this Application, Applicant respectfully provides and states the following updated information in response to Public Service Commission (PSC) Staff’s First Request for information dated November 22, 2023. **Responses are denoted in red:**

1. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(1)(1). Provide all updated information pertaining to the status of a signed U.S. Postal Service Form 3811, otherwise known as “signed green cards,” or a copy of the notice reflecting that the certified mail was returned to Verizon Wireless as undelivered for the unaccounted-for

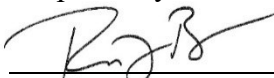
notice to “Singer, Martin.” This request is continuing and should be updated in a supplemental filing.

- A. Notice was originally sent to Martin Singer on October 4, 2023, tracking Number 9589071052701403363249. After the Request for additional information from the Commission was received on November 22, 2023, a second notice was mailed November 29, 2023, tracking number 9589071052701403362778. The U.S. Postal Service Form 3811 (signed green card) was received from the second mailing on December 12, 2023 and attached as **Exhibit 1**. There are no unaccountable notices.
- B. **Exhibit 2** 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 December 12, 2023

Case No. 2023-00311

LIST OF EXHIBITS

1. Notice Document with Returned Green Card for Singer, Martin
2. Affidavit of Certification



Russell L. Brown
Attorney at Law
rbrown@clarkquinnlaw.com

320 N. Meridian St., Ste. 1100
Indianapolis, IN 46204
(317) 637-1321 main
(317) 687-2344 fax

November 29, 2023

**Notice of Proposed Construction of
Wireless Communications Facility
Site Name: McDaniels**

Cellco Partnership, d/b/a Verizon Wireless is filing an application with the Kentucky Public Service Commission ("PSC") to construct a new wireless communications facility at 9879 KY-259, McDaniels, Kentucky 40152. (North Latitude: (37° 37' 9.08", West Longitude 86° 26' 17.30"). The proposed facility will include a 295-foot tall antenna tower, plus a 10-foot lightning arrester and related ground facilities. This facility is needed to provide improved coverage for wireless communications in the area.

This notice is being sent to you because the County Property Valuation Administrator's records indicate that you may own property that is within a 500' radius of the proposed tower site or contiguous to the property on which the tower is to be constructed. You have a right to submit testimony to the Kentucky Public Service Commission ("PSC"), either in writing or to request intervention in the PSC's proceedings on the application. You may contact the PSC for additional information concerning this matter at: Kentucky Public Service Commission, Executive Director, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602. Please refer to docket number 2023-00311 in any correspondence sent in connection with this matter.

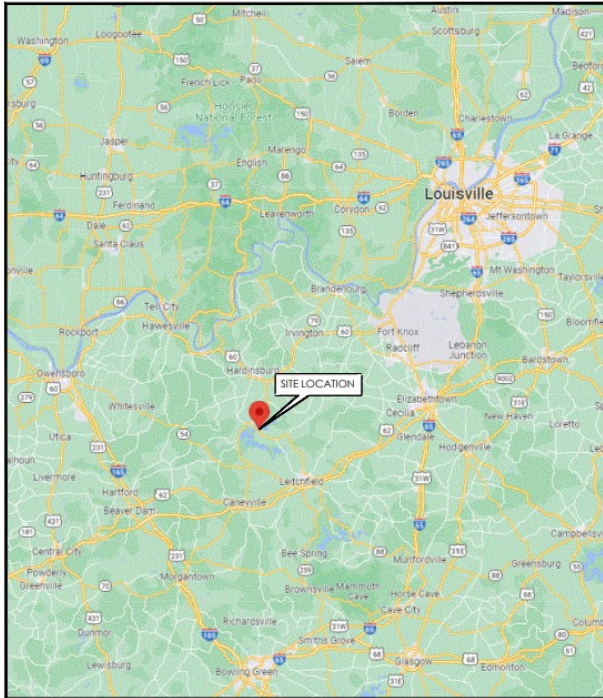
We have attached a map showing the site location for the proposed tower. Applicant's radio frequency engineers assisted in selecting the proposed site for the facility, and they have determined it is the proper location and elevation needed to provide quality service to wireless customers in the area. Please feel free to contact us at 317-637-1321 if you have any comments or questions about this proposal.

Sincerely,
Russell L. Brown

Attorney for Applicant
RLB/mnw
enclosure

Site Location Map

VICINITY MAP



LOCATION MAP



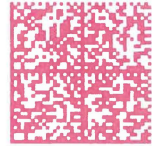
ClarkQuinn
Clark, Quinn, Moses, Scott & Grahn, LLP

CERTIFIED MAIL



9589 0710 5270 1403 3627 78

FIRST-CLASS



US POSTAGE IMIPITNEY BOWES



ZIP 46204 \$ 008.53⁰
02 7H
0006035028 NOV 29 2023

SINGER MARTIN G
505 HINTON HILLS LOOP
HARDINSBURG, KY 40143

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Place the 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:

505 HINTON HILLS LOOP
HARDINSBURG, KY 40143



9590 9402 8463 3186 7607 05

2. Article Number (Transfer from service label)

9589 0710 5270 1403 3627 78

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Agent
 Addressee
X *Martin Singer*

B. Received by (Printed Name)

Martin Singer

C. Date of Delivery

11-4

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
- Insured Mail
- Mail Restricted Delivery (00)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

Domestic Return Receipt

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 do hereby certify that as the person supervising the preparation of this application that the 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.

[Signature]

 Russell L. Brown
 Attorney, for Cellco Partnership, d/b/a Verizon Wireless

STATE OF INDIANA,
 COUNTY OF MARION, SS:

Subscribed and sworn to before me this 12th day of *September*, 2023.

[Signature]

 Notary Public
 Printed Name of Notary: Elizabeth Bentz Williams
 My commission expires: November 18, 2028
 My County of Residence: Marion
 Commission #: 0639620

