COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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THE APPLICATION OF)	
ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP, D/B/A VERIZON WIRELESS AND		
TOWERCO 2013, LLC FOR ISSUANCE OF A) CASE NO. 2023-0038	32
CERTIFICATE OF PUBLIC CONVENIENCE AND)	
NECESSITY TO CONSTRUCT A WIRELESS)	
COMMUNICATIONS FACILITY IN THE)	
COMMONWEALTH OF KENTUCKY		

SITE NAME: ETNA

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RESPONSE TO PSC FEBRUARY 9, 2024 RESPONSE TO FIRST REQUEST FOR INFORMATION TO CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS AND TOWERCO 2013, LLC

Public Service Commission (PSC) Staff's Request:

1. Provide a copy of the signed U.S. Postal Service Form 3811, otherwise known as "signed green card," or a copy of the notice that the certified mail was returned to Joint Applicants as undelivered by the U.S. Postal Service for Leslie Bray. This request Case No. 2023-00382 is continuing and should be updated in a supplemental filing until all signed green cards and undelivered notices are returned to Joint Applicants.

Response:

Co-Applicants have sent certified notices to every person who, according to the records of the County Property Valuation Administrator, owns property which is within 500 feet of the proposed tower or contiguous to the site property, by certified mail, return receipt requested, of the proposed construction, including Leslie Bray, 233 Leslie Bray Road, Eubank, KY 42567.

Each notified property owner was provided with a map of the location of the proposed

construction, the PSC docket number for this application, the address of the PSC, and

informed of his or her right to request intervention.

A. Please find attached as Exhibit 1 the returned certified mail from attempted

mailing for Leslie Bray.

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

Response as being timely and responsively filed in response to the February 9, 2024, 2024, PSC

request.

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

LIST OF EXHIBITS

- Returned Certified Mail for Leslie Bray Affidavit of Certification 1.
- 2.

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

CERTIFIED MAIL®



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RETURN TO SENDER UNCLAIMED UNABLE TO FORWARD

UNI 42559872339 MANUAL PROC REQ *1612-02149-22-39

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.

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 10th day of February, 2024.

Notary Public

Printed Name of Notary: Elizabeth Bentz Williams

My commission expires: November 18, 2028

My County of Residence: Marion

Commission #: <u>0639620</u>