

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

In the Matter of:

THE APPLICATION OF)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS)
AND APC TOWERS IV, LLC FOR ISSUANCE) CASE NO. 2024-00019
OF A CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY TO CONSTRUCT A WIRELESS)
COMMUNICATIONS FACILITY IN THE)
COMMONWEALTH OF KENTUCKY IN THE COUNTY)
OF GRAVES)

SITE NAME: SEDALIA

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**RESPONSE TO PSC STAFF’S, MAY 7, 2024, FIRST REQUEST FOR
INFORMATION REGARDING CO-APPLICANTS REQUEST FOR CERTIFICATE OF
PUBLIC CONVENIENCE AND NECESSITY FOR CONSTRUCTION OF A
WIRELESS COMMUNICATIONS FACILITY**

Public Service Commission (PSC) Staff’s Request:

1. Please state the address of alternatives sites, if any, considered by Joint Applicants for the construction of the cell tower other than the property owned by Jesse and Kristina Perry.

Response by Emily Gonzalez TeleCAD Wireless Site Design.

Five (5) potential site locations within and one-mile radius of the proposed tower were pursued with the following results:

- a. Malcolm T & Naomi Jetton: 4656 State Route 339 E, Sedalia, KY 42079 / 36.634186, -88.565674 – No Response/Not interested. The Jetton family owns a total of 11 parcels on the north side of the road (380.89) and 1 parcel just east of the subject property (59.61 acres). See **Exhibit 1** attached.

- b. Robert E & Angela Coltharp: 3191 State Route 339 E, Mayfield, KY 42066 / 36.641035,-88.566375 – No Response/Not interested.
- c. Donald Coltharp: 5628 State Route 339, Farmington, KY 42040 / 36.629552, -88.546296 – Interested but this candidate did not satisfy the Radio Frequency coverage objectives (Please see 2.a. below).
- d. Bobby W & Donna K Galloway: 217 Eagle Rd, Sedalia, KY 42079 / 36.633520,-88.548785 – No Response/Not interested.
- e. Larry Whitlow: 560 Eagle Rd, Sedalia, KY 42079-9528 / 36.629908, -88.571370 – Candidate did not respond for several months after initial contact. At the time this candidate indicated interest the due diligence and contractual agreements for the preferred candidate had been initiated.

2. If alternative sites were considered, state whether any of the locations met the radio frequency requirements for the tower and describe the process used to eliminate any locations that met the radio frequency requirements.

Response by Jared Sharp, Radio Frequency Engineer, Verizon Wireless.

- a. There were (2) candidates presented, and initially both were deemed viable. Both candidates were Raw Land and within the Search ring to assist with Verizon's Gap coverage along Hwy-97, Hwy-339, Hwy-564, & near Sedalia. This subject parcel was chosen because of the increased signal coverage it provided for the Gap Coverage described along the area's traveled highways as well as Sedalia (Increased signal coverage also known as RSRP: Reference

Signal Received Power). From an RF perspective the chosen site would provide better service to a designated geographic area and therefore is the preferred site.

3. If alternative sites were not considered, explain why alternatives were not considered.

Response by Jared Sharp, Radio Frequency Engineer, Verizon Wireless.

An alternative was considered, as detailed in #2 above.

4. Were any alternative locations on the identified site considered? If so, what other locations were considered and why were they not selected? If not, why not?

Response by Matt Bates, Director, Telecad Wireless Site Design, Inc.

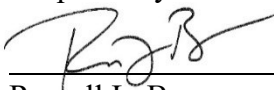
- a. In regards to the subject property, the entire parcel was considered.
 - i. The property is traversed north and south by a water source (creek), therefore this area was discounted due to potential environmental impacts.
 - ii. The remaining areas of the parcel offered the east or west sides of the property.
 - iii. From the remaining area of the parcel that a tower could be located, the landowner designated the location. Based on what the owner would allow on the subject property and rejections or non-responses from the surrounding landowners, this was our only reasonable path forward.
 - iv. As shown on the site development plans, the location maximized the distance to any residence. If the location for the tower was west of the creek, the tower would have been approximately 400' away from the home on the property. The tower as currently proposed on the east side of the creek is approximately 700' from the nearest residence.

- v. There are only 3 residential structures within a ½ mile radius of this tower (one of which is owner of the subject property).
5. Each response has been answered on behalf of the entity and the responses are true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry. Attached hereto as **Exhibit 2** 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.
7. All responses and requests associated with this Application may be directed to:

Russell L. Brown
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320 North Meridian Street, Suite 1100
Indianapolis, IN 46204
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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 May 7, 2024, PSC request.

Respectfully submitted,



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DATED MAY 22, 2024

Case No. 2024-00019

LIST OF EXHIBITS

1. Map of Site and Jetton properties
2. Affidavit of Certification

MAP OF SITE WITH JETTON PROPERTY MARKED

