

**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)	CASE NO. 2024-00020
OF A CERTIFICATE OF PUBLIC CONVENIENCE AND)	
NECESSITY TO CONSTRUCT A WIRELESS)	
COMMUNICATIONS FACILITY IN THE)	
COMMONWEALTH OF KENTUCKY IN THE COUNTY)	
OF MARSHALL)	

SITE NAME: DRAFFENVILLE NORTH

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**RESPONSE TO PSC APRIL 19, 2024, FIRST REQUEST FOR INFORMATION TO
CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS AND TOWERCO 2013, LLC**

Public Service Commission (PSC) Staff’s Request:

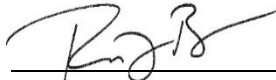
1. For each of the following documents, clarify and explain the inconsistencies on the final height of the proposed lightning arrestor attached at the top of the 250-foot-tall tower.
 - a. Co-Applicants have confirmed that the proposed construction height of the tower is 250 feet and the lightning arrestor is 5 feet, for a total height of 255 feet.
 - b. The application, detailed site plan, and Geotechnical Report indicate the proposed 250 foot tower and 5 foot lightning arrestor, for a total height of 255 feet and is correct.
 - c. The approval letter from the Federal Aviation Administration and the Kentucky Airport Zoning Commission approves the total height of the tower at 260 feet. However, the tower will be constructed at the 255 feet height approved by PSC and as indicated on the application and site plans. The FAA will be notified upon the tower stack that the height changed from 260’ to 255’ in a 7460-2 submittal.

- d. The notice to adjoining property owners of the proposed construction, the notice to the Marshall County judge executive of the proposed construction, and the legal notice published in the Tribune Courier of the proposed construction, list the height of the lightning arrestor at 15 feet, for a total height of 265 feet. Again, the correct height is a 250 foot tower with a 5 foot lightning arrestor for a total height of 255 feet. This was a typo. Because the correct height is less than what was indicated in these mailed and published notices, new notice, should not be required, as it would if the height increased.
2. Attached hereto as **Exhibit 1** please find an Affidavit of Certification for all information contained in this application.
3. 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
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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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LIST OF EXHIBITS

1 Affidavit of Certification

