

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

In the matter of:

ELECTRONIC APPLICATION OF EAST KENTUCKY)
NETWORK, LLC D/B/A APPALACHIAN WIRELESS FOR)
THE ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO. 2024-00089
CONVENIENCE AND NECESSITY TO CONSTRUCT A)
TOWER IN MORGAN COUNTY, KENTUCKY)

**RESPONSE OF EAST KENTUCKY NETWORK, LLC D/B/A APPALACHIAN WIRELESS
TO COMMISSION STAFF’S SECOND REQUEST FOR INFORMATION**

East Kentucky Network, LLC d/b/a Appalachian Wireless (“Applicant”), by and through counsel, hereby files this Response to Commission Staff’s First Request for Information filed in the above-styled case.

- 1. Request 1:** *Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1. Also refer to Appalachian Wireless’ Application and response to Commission Staff’s First Request for Information. Provide all documentation, including copies of the original documents obtained from the Morgan County Property Valuation Administration (PVA), that the Applicant relied upon to create the list of adjacent property owners entitled to notification.*

Response: Raina L. Helton, Regulatory Compliance Director, offers the following response on behalf of Applicant. Exhibit 1, attached hereto, includes the information relied upon by Applicant to create the list of adjacent property owners entitled to notification in its original filing, including printouts of the map maintained by the Morgan County Property Valuation Administrator accompanied by the property card for each property. Additionally, please refer to the map attached to Applicant’s original filing as Exhibit 10 which includes a certificate signed and stamped by the licensed surveyor stating, “This map shows the general property line locations and owner information based upon Morgan County PVA data. This map is intended to show the

proposed tower and access road locations relative to the PVA property lines and owners, in accordance with 807 KAR 5:063, Section 1(1)(l).”

2. Exhibit 2, attached hereto, is a signed certification of the person supervising the preparation of this Response.

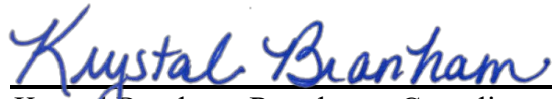
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WHEREFORE, Applicant, having met the requirements of KRS 278.020(1), 278.650, 278.665, and all applicable rules and regulations of the PSC, respectfully requests that the PSC accept the foregoing Application for filing and grant a Certificate of Public Convenience and Necessity to construct and operate the proposed tower.

The foregoing document was prepared by Krystal Branham, Regulatory Compliance Attorney for East Kentucky Network, LLC d/b/a Appalachian Wireless. All related questions or correspondence concerning this filing should be mailed to East Kentucky Network, LLC d/b/a Appalachian Wireless, 101 Technology Trail, Ivel, KY 41642.

Dated this 30th day of September, 2024.

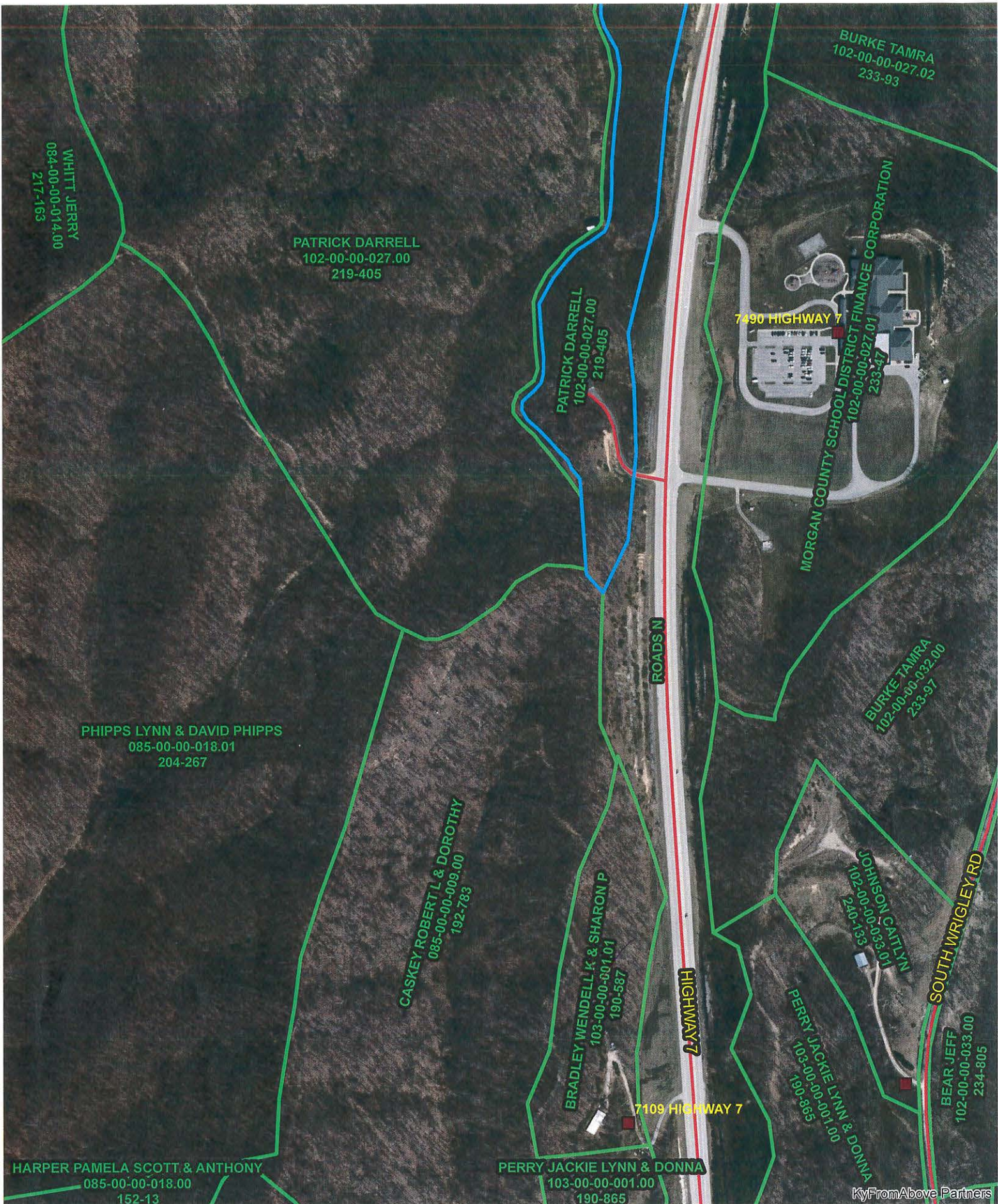
Respectfully submitted,



Krystal Branham, Regulatory Compliance Attorney
East Kentucky Network, LLC
d/b/a Appalachian Wireless

101 Technology Trail
Ivel, KY 41642
Telephone: (606) 477-2355
Facsimile: (606) 339-1363
kbranham@ekn.com

Exhibit 1



KyFromAbove Partners

Darby Franklin, PVA
 450 Prestonsburg Street
 West Liberty, Ky 41472
 Office: 606-743-3349



Morgan County Property Valuation Administration

Print Date: October 27, 2022
 Aerial Date: 2019



Maps to be
 used for
 identification only
 NOT for conveyance
 1 inch = 400 feet



KyFromAbove Partners

Darby Franklin, PVA
450 Prestonsburg Street
West Liberty, Ky 41472
Office: 606-743-3349



Morgan County Property Valuation Administration

Print Date: October 27, 2022
Aerial Date: 2019



Maps to be
used for
identification only
NOT for conveyance
1 inch = 400 feet

Description LAND

Location HWY 7

District 00 County

Class FARM (20)

Deed 219-405

Total Taxable 10,000

Owner PATRICK DARRELL

Building 0

Building Value 0

93 HWY 1002

Year Const

Effective Age

WEST LIBERTY, KY 41472

Subdivision

Block Lot

Date Checked	
Lot Size	0x0
Frontage	0
Acreage	80.000000
Neighborhood	Typical
Road	2 Lane
Topography	Rolling
Flood Hazard	

Checked By	
Lot Size Sq Ft	3484800
Depth	0
Acres Est Ac	
Site Condition	Average
Driveway	Gravel
Shape	

Date Assessed	
Lot Est Actual	
Plat Book	
Source	
Zoning	
Sidewalks	
Drainage	
Land Value	10000

Tenant Houses	0	Barns	0	Silos	0	Grain Bins	0	Fencing	0
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- Electricity
 Gas
 Water
 Sewer

Stalls	0
Bents	0

No Stories	0.00
ResidenceType	
MobHomeType	
Garage/Carport	
Width	0
Story Desc.	
Framing Type	
Roof Type	
Basement Type	
Heat Type	

Avg Height	0
Commercial	
Manufacturer	
Type	
Length	0
Bldg Cond	
Constr. Quality	
Roof Cover	
Basement Size	
Heat Source	

Com2	
Model	
Size	
Area	0
Exterior	
Foundation	
Roof Pitch	
BasementFinish	
Supplemental	

Farm	
Skirting	
Exterior	
Driveway	
Patio/Deck	
Tennis Court	
Pool	
Pool Size	0
AirCond Type	

Living	0
Dining	0
Family	0
Kitchen	0
BedRm	0
FullBaths	0
HalfBaths	0
OtherRm	0
Total	0
Fireplaces	0

SqFeet	
Living	0
Basemt	0
Garage	0
Porch	0
Deck	0
Office	0
Manufacturing	0
Asphalt	0
Concrete	0

- Heat
 Cooling
 Electricity
 Gas
 Water
 Sewer
 Sprinklers
 Fire Alarm
 SpecialImprvmt

Year	Net Taxable	Exemption	Total Taxable	Land	Improvements	Ag Improvements	Land FCV	Imprvmts FCV	Ag Imprvmts FCV	Total FCV
2022	10000	0	10000	10000	0	0	40000	0	0	40000
2021	10000	0	10000	10000	0	0	40000	0	0	40000
2020	10000	0	10000	10000	0	0	40000	0	0	40000

Soil Capability Classification And Valuation					
<i>Class</i>	<i>Acreage</i>	<i>Per Acre</i>	<i>Value/Class</i>	<i>Adjustment</i>	<i>Adj Value</i>
Totals					

CHAIN OF OWNERSHIP			
<i>Name</i>	<i>Deed</i>	<i>Sale Date</i>	<i>Sale Price</i>
PATRICK DARRELL	219-405	11/08/2010	1.00

Property Sketch

Notes

Description SCHOOL BUILDING & LAND

Location WRIGLEY

District 00 County

Class EXEMPT EDUCATIONAL (95)

Owner MORGAN COUNTY SCHOOL DISTRICT FINANCE CORPORATION
PO BOX 489
WEST LIBERTY, KY 41472

Deed 233-47

Total Taxable 12,500,000

Building 0

Building Value 0

Year Const

Effective Age

Subdivision

Block Lot

Date Checked	
Lot Size	0x0
Frontage	0
Acreage	33.739000
Neighborhood	Typical
Road	2 Lane
Topography	Rolling
Flood Hazard	

Checked By	
Lot Size Sq Ft	1469670
Depth	0
Acres Est Ac	
Site Condition	Good
Driveway	
Shape	

Date Assessed	
Lot Est Actual	
Plat Book	
Source	
Zoning	
Sidewalks	
Drainage	
Land Value	250000

Tenant Houses	0	Barns	0	Silos	0	Grain Bins	0	Fencing	0
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- Electricity
 Gas
 Water
 Sewer

Stalls	0
Bents	0

No Stories	0.00
ResidenceType	
MobHomeType	
Garage/Carport	
Width	0
Story Desc.	
Framing Type	
Roof Type	
Basement Type	
Heat Type	

Avg Height	0
Commercial	
Manufacturer	
Type	
Length	0
Bldg Cond	
Constr. Quality	
Roof Cover	
Basement Size	
Heat Source	

Com2	
Model	
Size	
Area	0
Exterior	
Foundation	
Roof Pitch	
BasementFinish	
Supplemental	

Farm	
Skirting	
Exterior	
Driveway	
Patio/Deck	
Tennis Court	
Pool	
Pool Size	0
AirCond Type	

Living	0
Dining	0
Family	0
Kitchen	0
BedRm	0
FullBaths	0
HalfBaths	0
OtherRm	0
Total	0
Fireplaces	0

SqFeet	
Living	0
Basemt	0
Garage	0
Porch	0
Deck	0
Office	0
Manufacturing	0
Asphalt	0
Concrete	0

- Heat
 Cooling
 Electricity
 Gas
 Water
 Sewer
 Sprinklers
 Fire Alarm
 SpecialImprvmt

Year	Net Taxable	Exemption	Total Taxable	Land	Improvements	Ag Improvements	Land FCV	Imprvmts FCV	Ag Imprvmts FCV	Total FCV
2022	0	12500000	12500000	250000	12250000	0	250000	12250000	0	12500000
2021	0	12500000	12500000	250000	12250000	0	250000	12250000	0	12500000
2020	0	12500000	12500000	250000	12250000	0	250000	12250000	0	12500000

Soil Capability Classification And Valuation					
<i>Class</i>	<i>Acreage</i>	<i>Per Acre</i>	<i>Value/Class</i>	<i>Adjustment</i>	<i>Adj Value</i>
Totals					

CHAIN OF OWNERSHIP			
<i>Name</i>	<i>Deed</i>	<i>Sale Date</i>	<i>Sale Price</i>
MORGAN COUNTY SCHOOL	233-47	05/02/2016	0.00

Property Sketch

Notes

Description LAND

Location 7977 HWY 7/WRIGLEY HILL

District 00 County

Class FARM (20)

Deed 217-163

Total Taxable 24,000

Owner WHITT JERRY

Building 0

Building Value 0

7977 HWY 7

Year Const

Effective Age

WEST LIBERTY, KY 41472

Subdivision

Block

Lot

Date Checked	01/01/1900
Lot Size	0x0
Frontage	0
Acreage	148.000000
Neighborhood	Typical
Road	Gravel
Topography	Rolling
Flood Hazard	

Checked By	
Lot Size Sq Ft	6446880
Depth	0
Acres Est Ac	
Site Condition	
Driveway	Gravel
Shape	

Date Assessed	01/01/1900
Lot Est Actual	
Plat Book	
Source	
Zoning	Residential
Sidewalks	
Drainage	
Land Value	15000

Tenant Houses	0	Barns	0	Silos	0	Grain Bins	0	Fencing	0
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- Electricity
 Gas
 Water
 Sewer

No Stories	0.00
ResidenceType	
MobHomeType	
Garage/Carport	
Width	0
Story Desc.	
Framing Type	
Roof Type	
Basement Type	
Heat Type	

Avg Height	0
Commercial	
Manufacturer	
Type	
Length	0
Bldg Cond	
Constr. Quality	
Roof Cover	
Basement Size	
Heat Source	

Stalls	0
Bents	0

Com2	
Model	
Size	
Area	0
Exterior	
Foundation	
Roof Pitch	
BasementFinish	
Supplemental	

Farm	
Skirting	
Exterior	
Driveway	
Patio/Deck	
Tennis Court	
Pool	
Pool Size	0
AirCond Type	

Living	0
Dining	0
Family	0
Kitchen	0
BedRm	0
FullBaths	0
HalfBaths	0
OtherRm	0
Total	0
Fireplaces	0

SqFeet	
Living	0
Basemt	0
Garage	0
Porch	0
Deck	0
Office	0
Manufacturing	0
Asphalt	0
Concrete	0

- Heat
 Cooling
 Electricity
 Gas
 Water
 Sewer
 Sprinklers
 Fire Alarm
 SpecialImprvmt

Year	Net Taxable	Exemption	Total Taxable	Land	Improvements	Ag Improvements	Land FCV	Imprvmts FCV	Ag Imprvmts FCV	Total FCV
2022	24000	0	24000	24000	0	0	45000	0	0	45000
2021	24000	0	24000	24000	0	0	45000	0	0	45000
2020	24000	0	24000	24000	0	0	45000	0	0	45000

Soil Capability Classification And Valuation					
<i>Class</i>	<i>Acreage</i>	<i>Per Acre</i>	<i>Value/Class</i>	<i>Adjustment</i>	<i>Adj Value</i>
Totals					

CHAIN OF OWNERSHIP			
<i>Name</i>	<i>Deed</i>	<i>Sale Date</i>	<i>Sale Price</i>
WHITT JERRY	217-163	02/03/2010	0.00
WHITT LINDA	214-697	05/08/2009	0.00
WHITT JERRY	-	03/01/2007	29,000.00

Property Sketch

Notes

Blank area for Property Sketch.

Blank area for Notes.

Description No Description

Location HWY 7

District 00 County

Class FARM (20)

Deed 192-783

Total Taxable 9,000

Owner CASKEY ROBERT L & DOROTHY
4362 FILLY LANE
DESTIN, FL 32541

Building 0

Building Value 0

Year Const

Effective Age

Subdivision

Block Lot

Date Checked	01/01/1900
Lot Size	0x0
Frontage	0
Acreage	65.000000
Neighborhood	
Road	
Topography	Not Used
Flood Hazard	

Checked By	
Lot Size Sq Ft	2831400
Depth	0
Acres Est Ac	
Site Condition	
Driveway	
Shape	

Date Assessed	01/01/1900
Lot Est Actual	
Plat Book	
Source	
Zoning	Residential
Sidewalks	
Drainage	
Land Value	0

Tenant Houses	0	Barns	0	Silos	0	Grain Bins	0	Fencing	0
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- Electricity
 Gas
 Water
 Sewer

Stalls	0
Bents	0

No Stories	0.00
ResidenceType	
MobHomeType	
Garage/Carport	
Width	0
Story Desc.	
Framing Type	
Roof Type	
Basement Type	
Heat Type	

Avg Height	0
Commercial	
Manufacturer	
Type	
Length	0
Bldg Cond	
Constr. Quality	
Roof Cover	
Basement Size	
Heat Source	

Com2	
Model	
Size	
Area	0
Exterior	
Foundation	
Roof Pitch	
BasementFinish	
Supplemental	

Farm	
Skirting	
Exterior	
Driveway	
Patio/Deck	
Tennis Court	
Pool	
Pool Size	0
AirCond Type	

Living	0
Dining	0
Family	0
Kitchen	0
BedRm	0
FullBaths	0
HalfBaths	0
OtherRm	0
Total	0
Fireplaces	0

SqFeet	
Living	0
Basemt	0
Garage	0
Porch	0
Deck	0
Office	0
Manufacturing	0
Asphalt	0
Concrete	0

- Heat
 Cooling
 Electricity
 Gas
 Water
 Sewer
 Sprinklers
 Fire Alarm
 SpecialImprvmt

Year	Net Taxable	Exemption	Total Taxable	Land	Improvements	Ag Improvements	Land FCV	Imprvmts FCV	Ag Imprvmts FCV	Total FCV
2022	9000	0	9000	9000	0	0	20000	0	0	20000
2021	9000	0	9000	9000	0	0	20000	0	0	20000
2020	9000	0	9000	9000	0	0	20000	0	0	20000

Soil Capability Classification And Valuation					
<i>Class</i>	<i>Acreage</i>	<i>Per Acre</i>	<i>Value/Class</i>	<i>Adjustment</i>	<i>Adj Value</i>
Totals					

CHAIN OF OWNERSHIP			
<i>Name</i>	<i>Deed</i>	<i>Sale Date</i>	<i>Sale Price</i>
CASKEY ROBERT L & DOROTHY	192-783	10/01/2002	9,000.00

Property Sketch

Notes

Description LAND

Location LICK FORK

District 00 County

Class FARM (20)

Deed 204-267

Total Taxable 50,000

Owner PHIPPS LYNN & DAVID PHIPPS
5429 HWY 191
WEST LIBERTY, KY 41472

Building 0
Year Const

Building Value 0
Effective Age

Subdivision

Block Lot

Date Checked	10/20/2021
Lot Size	0x0
Frontage	0
Acreage	180.000000
Neighborhood	Not Supplied
Road	
Topography	Not Used
Flood Hazard	

Checked By	
Lot Size Sq Ft	7840800
Depth	0
Acres Est Ac	Estimated
Site Condition	None
Driveway	None
Shape	None

Date Assessed	10/20/2021
Lot Est Actual	
Plat Book	
Source	
Zoning	Residential
Sidewalks	
Drainage	None
Land Value	50000

Tenant Houses	0	Barns	0	Silos	0	Grain Bins	0	Fencing	0
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- Electricity
 Gas
 Water
 Sewer

Stalls	0
Bents	0

No Stories	0.00
ResidenceType	
MobHomeType	
Garage/Carport	
Width	0
Story Desc.	
Framing Type	
Roof Type	
Basement Type	
Heat Type	

Avg Height	0
Commercial	
Manufacturer	
Type	
Length	0
Bldg Cond	
Constr. Quality	
Roof Cover	
Basement Size	
Heat Source	

Com2	
Model	
Size	
Area	0
Exterior	
Foundation	
Roof Pitch	
BasementFinish	
Supplemental	

Farm	
Skirting	
Exterior	
Driveway	
Patio/Deck	
Tennis Court	
Pool	
Pool Size	0
AirCond Type	

Living	0
Dining	0
Family	0
Kitchen	0
BedRm	0
FullBaths	0
HalfBaths	0
OtherRm	0
Total	0
Fireplaces	0

SqFeet	
Living	0
Basemt	0
Garage	0
Porch	0
Deck	0
Office	0
Manufacturing	0
Asphalt	0
Concrete	0

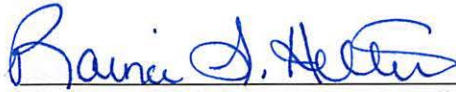
- Heat
 Cooling
 Electricity
 Gas
 Water
 Sewer
 Sprinklers
 Fire Alarm
 SpecialImprvmt

Year	Net Taxable	Exemption	Total Taxable	Land	Improvements	Ag Improvements	Land FCV	Imprvmts FCV	Ag Imprvmts FCV	Total FCV
2022	50000	0	50000	50000	0	0	100000	0	0	100000
2021	50000	0	50000	50000	0	0	100000	0	0	100000
2020	50000	0	50000	50000	0	0	100000	0	0	100000

Exhibit 2

AFFIDAVIT OF CERTIFICATION

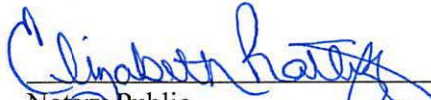
I, Raina L. Helton, Regulatory Compliance Director for East Kentucky Network, LLC d/b/a Appalachian Wireless, do hereby certify, under penalty of perjury, that as the person responsible for supervising the preparation of this response all statements and information contained herein are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Raina L. Helton, Regulatory Compliance Director
East Kentucky Network, LLC
d/b/a Appalachian Wireless

COMMONWEALTH OF KENTUCKY
COUNTY OF FLOYD

The foregoing instrument was acknowledged before me on this 30 day of September, 2024, by Raina L. Helton, Regulatory Compliance Director of East Kentucky Network, LLC d/b/a Appalachian Wireless.



Notary Public
Commission No.: KYNP 03132

My Commission Expires 12-9-2026