

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

In the Matter of:

THE APPLICATION OF )  
NEW CINGULAR WIRELESS PCS, LLC, )  
A DELAWARE LIMITED LIABILITY COMPANY, )  
D/B/A AT&T MOBILITY )  
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC ) CASE NO.: 2024-00095  
CONVENIENCE AND NECESSITY TO CONSTRUCT )  
A WIRELESS COMMUNICATIONS FACILITY )  
IN THE COMMONWEALTH OF KENTUCKY )  
IN THE COUNTY OF CALDWELL )

SITE NAME: MEADOWVIEW

\* \* \* \* \*

**APPLICANT’S RESPONSE TO COMMISSION’S DATA REQUEST**

New Cingular Wireless PCS, LLC, a Delaware limited liability company, d/b/a AT&T Mobility (“Applicant”), by counsel, makes this Response to the Kentucky Public Service Commission Staff’s First Request for Information to New Cingular Wireless PCS, LLC, a Delaware limited liability company, d/b/a AT&T Mobility (“Data Request”). Applicant respectfully states, as follows:

**Question 1:** Refer to 807 KAR 5:063, Section 1(1)(r). Provide a brief description of the character of the general area in which the tower is proposed to be constructed, which includes the *existing land use for the specific property involved*.

**Response 1:** As discussed in paragraph 25 of the filed application, the general area where the proposed facility is to be located is rural in character. The site parcel is used for agricultural purposes, and the proposed tower will have no substantial effect on the parcel’s existing use.

**Question 2:** Provide the Property Value Administrator list of the property owners that are within 500 feet of the proposed tower or contiguous to the site property.

**Response 2:** A list of all property owners, including owners within 500' of the proposed tower site, who received notice of the proposal was included as part of Exhibit J. Copies of the PVA records obtained from the Caldwell County PVA and relied upon to create the list of property owners entitled to notification are attached as Exhibit J-1.

An Affidavit of Certification signed by the attorney supervising the preparation of the response on behalf of Applicant certifying that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry is attached as **Exhibit 1**.

**WHEREFORE**, there being no ground for denial of the subject application, and there being substantial evidence in support of the requested CPCN in the case record, Applicant respectfully requests the Kentucky Public Service Commission:

- (a) Accept this Response for filing;
- (b) Issue a Certificate of Public Convenience and Necessity to construct and operate the WCF at the location set forth herein without further delay; and
- (c) Grant Applicant any other relief to which it is entitled.

Respectfully submitted,



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David A. Pike  
And



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F. Keith Brown  
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Telefax: (502) 543-4410  
Email: dpike@pikelegal.com  
Email: kbrown@pikelegal.com  
Attorneys for Applicant

## **LIST OF EXHIBITS**

- 1 - Affidavit of Certification
- J-1 - Caldwell County PVA Records

**EXHIBIT 1**

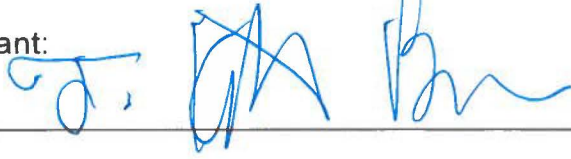
**AFFIDAVIT OF CERTIFICATION**

**AFFIDAVIT OF CERTIFICATION  
COMMONWEALTH OF KENTUCKY  
PUBLIC SERVICE COMMISSION  
CASE #: 2024-00095**

I, F. Keith Brown, attorney for New Cingular Wireless PCS, LLC, a Delaware limited liability company, d/b/a AT&T Mobility (“Applicant”), do hereby certify that I am the person supervising the preparation of this Response to Commission Staff’s Data Request on behalf of Applicant, and that this response is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

Further the affiant sayeth naught

Affiant:



Date:

May 21, 2024

State of Kentucky

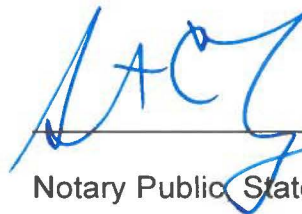
County of Bullitt

**AFFIANT ACKNOWLEDGEMENT**

On this, the 21st day of May 2024 before me, the subscriber, a Notary Public in and for the above state, personally appeared to me F. Keith Brown and in due form of law, acknowledged, subscribed, and swore that he executed this instrument as his voluntary act and deed.

In testimony whereof, I have hereunto set my hand and affixed my seal in said County and State on the day and year last above written.

My commission expires on: December 4, 2024.



Notary Public State at Large

KYNP19462



**EXHIBIT J-1**

**CALDWELL COUNTY PVA RECORDS**

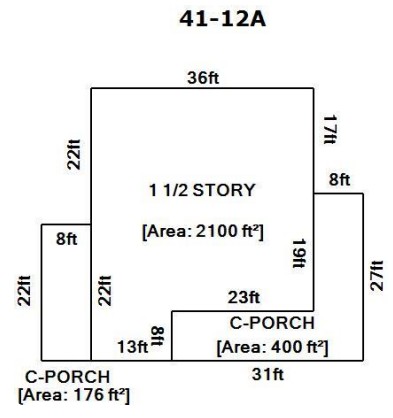


# Caldwell County, KY PVA

## Parcel Summary

Map Number 41-11A 12A  
Account Number 103910 (PID: 227296 PTID: 103910)  
Location Address 2924 HWY 1272  
Tax District 00 Caldwell County  
Homestead No  
Tax Rate 0.817  
Property Class RESIDENTIAL  
Description HOUSE & 78.91 ACRES  
Acres N/A  
Deed Information 169/429

[View Map](#)



## Owner Information

Current Owner  
LESTER ANDREW P  
2924 HWY 1272  
PRINCETON KY 42445

The Caldwell County Property Valuation Administrator's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next certified taxroll.

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# Caldwell County, KY PVA

## Parcel Summary

Map Number	41-9 10 12
Account Number	101873 (PID: 225762 PTID: 101873)
Location Address	HWY 1272
Tax District	00 Caldwell County
Homestead	No
Tax Rate	0.817
Property Class	FARM
Description	BLD & 159.39 ACRES
Acres	N/A
Deed Information	139/41

[View Map](#)

## Owner Information

**Current Owner**  
LESTER RICHARD B  
2788 HWY 1272  
PRINCETON KY 42445

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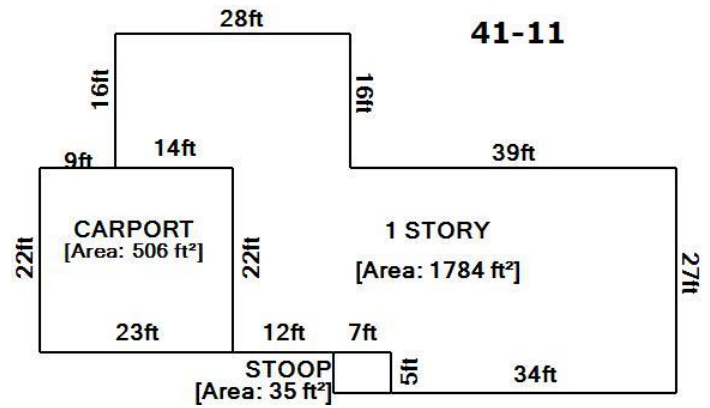
Developed by  
 Schneider  
GEOSPATIAL

# Caldwell County, KY PVA

## Parcel Summary

Map Number 41-11  
Account Number 108000 (PID: 222481 PTID: 108000)  
Location Address 2788 HWY 1272  
Tax District 00 Caldwell County  
Homestead Yes  
Tax Rate 0.817  
Property Class RESIDENTIAL  
Description HOUSE & 2 ACRES  
Acres N/A  
Deed Information 265/469

[View Map](#)



## Owner Information

**Current Owner**  
LESTER RICHARD B  
2788 HWY 1272  
PRINCETON KY 42445

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# Caldwell County, KY PVA

## Parcel Summary

**Map Number** 41-13 & 14  
**Account Number** 107829 (PID: 222349 PTID: 107829)  
**Location Address** 3069 HWY 1272  
**Tax District** 00 Caldwell County  
**Homestead** No  
**Tax Rate** 0.817  
**Property Class** FARM  
**Description** BUILDING & 174.153 ACRES  
**Acres** N/A  
**Deed Information** 336/332

[View Map](#)



## Owner Information

**Current Owner**  
SPRINGLAKE FARMS LLC  
150 EAST PALMETTO PARK ROAD SUITE 800  
BOCA RATON FL 33432

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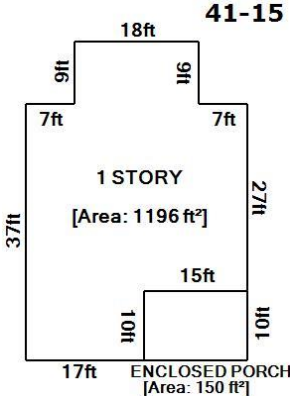
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## Parcel Summary

Map Number 41-8 15 53-12  
Account Number 100368 (PID: 224598 PTID: 100368)  
Location Address 2250 HWY 1272  
Tax District 00 Caldwell County  
Homestead No  
Tax Rate 0.817  
Property Class FARM  
Description HOUSE & 198 ACRES  
Acres N/A  
Deed Information 286/287

[View Map](#)



## Owner Information

Current Owner  
BROWN JOHN AND BONNIE  
REVOCABLE TRUST  
2691 HWY 1272  
PRINCETON KY 42445

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Developed by  
 Schneider  
GEOSPATIAL

# Caldwell County, KY PVA

## Parcel Summary

Map Number	41-17 53-13A
Account Number	106601 (PID: 221434 PTID: 106601)
Location Address	HWY 1272
Tax District	00 Caldwell County
Homestead	No
Tax Rate	0.817
Property Class	FARM
Description	83.50 ACRES
Acres	N/A
Deed Information	286/287

[View Map](#)

## Owner Information

**Current Owner**  
BROWN JOHN AND BONNIE  
REVOCABLE TRUST  
2691 HWY 1272  
PRINCETON KY 42445

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