

**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. 2024-00128  
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: FARMINGTON

\* \* \* \* \*

**RESPONSE TO PSC JUNE 10, 2024, NOTICE OF DEFICIENCY  
CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS AND TOWERCO 2013, LLC**

Public Service Commission (PSC) Staff's Rejected to application:

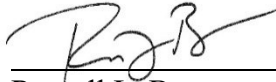
1. 807 KAR 5:063 Section 1(1)(b): A copy of the utility's applications to the Federal Aviation Administration and the Kentucky Airport Zoning Commission. A copy of the application to the Kentucky Airport Zoning Commission was not provided.
  - a. Attached as **Exhibit 1** please find the Application to the Kentucky Airport Zoning Commission.
2. Attached hereto as **Exhibit 2** 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  
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

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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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**

- 1 Kentucky Airport Zoning Commission Application
- 2 Affidavit of Certification



KENTUCKY AIRPORT ZONING COMMISSION

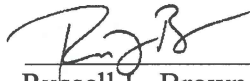
APPLICATION FOR PERMIT TO CONSTRUCT OR ALTER A STRUCTURE

<b>APPLICANT (name)</b> TowerCo, LLC		<b>PHONE</b> 919-272-7766	<b>FAX</b>	<b>KY AERONAUTICAL STUDY #</b>	
<b>ADDRESS (street)</b> 5000 Vallestone Dr., Suite 200		<b>CITY</b> Cary		<b>STATE</b> NC	<b>ZIP</b> 27519
<b>APPLICANT'S REPRESENTATIVE (name)</b> Wireless Applications Corporation		<b>PHONE</b> 425-643-5000	<b>FAX</b>		
<b>ADDRESS (street)</b> 111 108 <sup>th</sup> Ave NE, Suite 160		<b>CITY</b> Bellevue		<b>STATE</b> WA	<b>ZIP</b> 98004
<b>APPLICATION FOR</b> <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> Alteration <input type="checkbox"/> Existing				<b>WORK SCHEDULE</b>	
<b>DURATION</b> <input type="checkbox"/> Permanent <input type="checkbox"/> Temporary (months days )				Start End	
<b>TYPE</b> <input type="checkbox"/> Crane <input type="checkbox"/> Building <input checked="" type="checkbox"/> Antenna Tower <input type="checkbox"/> Power Line <input type="checkbox"/> Water Tank <input type="checkbox"/> Landfill <input type="checkbox"/> Other		<b>MARKING/PAINTING/LIGHTING PREFERRED</b> <input type="checkbox"/> Red Lights & Paint <input type="checkbox"/> White- medium intensity <input type="checkbox"/> White- high intensity <input checked="" type="checkbox"/> Dual- red & medium intensity white <input type="checkbox"/> Dual- red & high intensity white <input type="checkbox"/> Other			
<b>LATITUDE</b> 36°40'04.65"		<b>LONGITUDE</b> 088°31'54.91"		<b>DATUM</b> <input checked="" type="checkbox"/> NAD83 <input type="checkbox"/> NAD27 <input type="checkbox"/> Other	
<b>NEAREST KENTUCKY</b> City Farmington County Graves		<b>NEAREST KENTUCKY PUBLIC USE OR MILITARY AIRPORT</b> M25: Mayfield Graves			
<b>SITE ELEVATION (AMSL, feet)</b> 522		<b>TOTAL STRUCTURE HEIGHT (AGL, feet)</b> 265		<b>CURRENT (FAA aeronautical study #)</b> 2023-ASO-30240-OE	
<b>OVERALL HEIGHT (site elevation plus total structure height, feet)</b> 787				<b>PREVIOUS (FAA aeronautical study #)</b>	
<b>DISTANCE (from nearest Kentucky public use or Military airport to structure)</b> 6.239 nm				<b>PREVIOUS (KY aeronautical study #)</b>	
<b>DIRECTION (from nearest Kentucky public use or Military airport to structure)</b> 337.34 degrees					
<b>DESCRIPTION OF LOCATION (Attach USGS 7.5 minute quadrangle map or an airport layout drawing with the precise site marked and any certified survey.)</b> Dove Rd, Gravesl County, Mayfield KY, 42040					
<b>DESCRIPTION OF PROPOSAL</b> Proposed site is a 265 ft AGL SSL tower, including all top-mounted appurtenances.					
<b>FAA Form 7460-1 (Has the "Notice of Construction or Alteration" been filed with the Federal Aviation Administration?)</b> <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, when? 11/03/2023					
<b>CERTIFICATION (I hereby certify that all the above entries, made by me, are true, complete, and correct to the best of my knowledge and belief.)</b>					
<b>PENALTIES (Persons failing to comply with KRS 183.861 to 183.990 and 602 KAR 050 are liable for fines and/or imprisonment as set forth in KRS 183.990(3). Noncompliance with FAA regulations may result in further penalties.)</b>					
<b>NAME</b> Ronald Lageson, Jr	<b>TITLE</b> Manager	<b>SIGNATURE</b> 		<b>DATE</b> 3/29/2024	
<b>COMMISSION ACTION</b> <input type="checkbox"/> Chairperson, KAZC <input type="checkbox"/> Administrator, KAZC					
<input type="checkbox"/> Approved		<b>SIGNATURE</b>		<b>DATE</b>	
<input type="checkbox"/> Disapproved					

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 and 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.

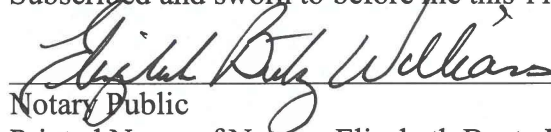


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Russell L. Brown  
Attorney, for Cellco Partnership, d/b/a Verizon Wireless

STATE OF INDIANA,  
COUNTY OF MARION, SS:

Subscribed and sworn to before me this 11<sup>th</sup> day of June, 2024.



Notary Public

Printed Name of Notary: Elizabeth Bentz Williams

My commission expires: November 18, 2028

My County of Residence: Marion

Commission #: 0639620

