

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

In the Matter of:

THE APPLICATION OF )  
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS )  
AND HORVATH TOWERS VI, LLC FOR ISSUANCE ) CASE NO. 2024-00132  
OF A CERTIFICATE OF PUBLIC CONVENIENCE AND )  
NECESSITY TO CONSTRUCT A WIRELESS )  
COMMUNICATIONS FACILITY IN THE )  
COMMONWEALTH OF KENTUCKY IN THE COUNTY )  
OF FLEMING )

SITE NAME: TILTON

\* \* \* \* \*

**RESPONSE TO STAFF’S THIRD REQUEST FOR INFORMATION FOR  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY  
FOR CONSTRUCTION OF A WIRELESS COMMUNICATIONS FACILITY**

Cellco Partnership, d/b/a Verizon Wireless and Horvath Towers VI, LLC (“Co-Applicants”), by counsel, pursuant to (i) KRS §§278.020, 278.040, 278.650, 278.665, and other statutory authority, and the rules and regulations applicable thereto, and (ii) the Telecommunications Act of 1996, respectfully submit this Application requesting issuance of a Certificate of Public Convenience and Necessity (“CPCN”) from the Kentucky Public Service Commission (“PSC”) to construct, maintain, and operate a Wireless Communications Facility (“WCF”) to serve the customers of the Co-Applicant with wireless communications services.

In response to the Third Request for Information, Co-Applicants respectfully provide and state the following information:

1. Refer to the Geotechnical Report provided as Exhibit 1 to the Supplemental Information Post Order filed on November 26, 2024. Joseph V. Borrelli stamped and signed the report as a licensed engineer in Kentucky. Confirm Joseph V. Borrelli was actively licensed in Kentucky at the time of filing and provide the date

when the license expires. If not confirmed, explain how the application complied with the applicable regulations.

**Answer:** Joseph V. Borrelli was actively licensed with the Kentucky Board of Engineers and Land Surveyors on November 26, 2024, at the time of filing. The Kentucky Board of Engineers and Land Surveyors renewal requirements state all persons with Last Name A - K are required to renew their license every odd year by June 30 and Last Name L - Z every even year by June 30. Please see **Exhibit 1** attached indicating Mr. Borrelli's license is active and due for renewal on June 30, 2025.

2. Refer to the Site Development Plan and Vertical Sketch provided as Exhibit C to the Application. Stephen E. Hunt stamped and signed the report as a licensed engineer in Kentucky. The stamp stated the expiration date was May 16, 2024. Confirm Stephen E. Hunt was actively licensed in Kentucky at the time of filing and provide the date when the license expires. If not confirmed, explain how the application complied with the applicable regulations at the time of filing.

**Answer:** Stephen E. Hunt was actively licensed by the Kentucky Board of Engineers and Land Surveyors on May 29, 2024, at the time of filing. The Kentucky Board of Engineers and Land Surveyors renewal requirements state all persons with Last Name A - K are required to renew their license every odd year by June 30 and Last Name L - Z every even year by June 30. Please see **Exhibit 2** attached indicating Mr. Hunt's license is due for renewal on June 30, 2025. Also, please note the stamp on the Site Development Plan and Vertical Sketch did not

state an expiration date of May 16, 2024. The May 16, 2024 date is the date he signed and sealed the drawings.

3. Refer to the Tower and Foundation Designs provided as Exhibit 2 to the Supplemental Information Post Order filed on November 26, 2024. Allen Schneider stamped and signed the report as a licensed engineer in Kentucky. Confirm Allen Schneider was actively licensed in Kentucky at the time of filing and when the license expires. If not confirmed, explain how the application complied with the applicable regulations at the time of filing.

**Answer:** Allen Schneider was actively licensed by the Kentucky Board of Engineers and Land Surveyors on November 26, 2024, at the time of filing. The Kentucky Board of Engineers and Land Surveyors renewal requirements state all persons with Last Name A - K are required to renew their license every odd year by June 30 and Last Name L - Z every even year by June 30. Please see **Exhibit 3** attached indicating Mr. Schneider's license is due for renewal on June 30, 2026.

4. Attached hereto as **Exhibit 4** please find an Affidavit of Certification for all information contained in this application.
5. All Exhibits to this Application are hereby incorporated by reference as if fully set out as part of the Application.
6. 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 conditional 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

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Indianapolis, IN 46204

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Email: [rbrown@clarkquinnlaw.com](mailto:rbrown@clarkquinnlaw.com)

Attorney for Cellco Partnership d/b/a Verizon Wireless

#### **LIST OF EXHIBITS**

- 1 Joseph V. Borrelli License Information
- 2 Stephen E. Hunt License Information
- 3 Allen Schneider License Information
- 4 Affidavit of Certification

**Search for Kentucky Licensees**

**Name:** Joseph Borrelli

**Professional Engineer:** Number: 30809

Status: Current

Issue Date: 03/20/2015

Expiration Date: 06/30/2025

**Professional Land Surveyor:**

**Address of Record:** 708 SANDOWN PL  
RALEIGH, NC 27615

**Responsible Charge For:** Responsible Charge For:

LegalName

Select Delta Oaks Group, PLLC

**Disciplinary Action?:**

**Search for Kentucky Licensees**

**Name:** Stephen Hunt

**Professional Engineer:** Number: 25003  
Status: Current  
Issue Date: 12/12/2006  
Expiration Date: 06/30/2025

**Professional Land Surveyor:**

**Address of Record:** 1961 Northpoint Blvd  
STE 130  
Hixson, TN 37343

**Responsible Charge For:** Responsible Charge For:

**LegalName**

Select TELECAD WIRELESS  
SITE DESIGN INC

**Disciplinary Action?:**

**Search for Kentucky Licensees**

**Name:** Allen Schneider

**Professional Engineer:** Number: 37506  
Status: Current  
Issue Date: 02/28/2022  
Expiration Date: 06/30/2026

**Professional Land Surveyor:**

**Address of Record:** 152 Country Dr  
Green Valley, IL 61534

**Responsible Charge For:**

**Disciplinary Action?:**

