

**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. 2024-00134
OF A CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY TO CONSTRUCT A WIRELESS)
COMMUNICATIONS FACILITY IN THE)
COMMONWEALTH OF KENTUCKY IN THE COUNTY)
OF BRECKINRIDGE)

SITE NAME: STEPHENSPORT COW RELO

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

Public Service Commission (PSC) Staff’s provided a Request for Information on July 31, 2024, pursuant to the application:

1. Refer to the Application, Exhibit C, which shows the location of the tower and identifies every owner of real estate within 500 feet of the proposed tower. Confirm which parcel the tower will be located on.

a. The proposed tower will be constructed on the east side of HWY 2779, south of KY 144, Stephensport, KY 40170 (North Latitude: (37° 54’ 13.31”, West Longitude 86° 31’ 40.29”), on a parcel of land located entirely within the county referenced in the caption of this application. The property on which the WCF will be located is owned by Corey M & Lisa Biddle, Parcel 41-3D pursuant to a Deed recorded in Deed Book 380, Page 733 in the office of the County Clerk. Please see **Exhibit 1** which includes a map from the PVA records indicating the

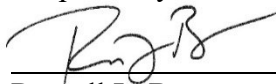
entire Biddle property, Parcel 41-3D with the lease area show within the property lines. **Exhibit 1** also includes marked up copies of map pages 55 and 58 in the application demonstrating the property lines, ownership and lease area.

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,



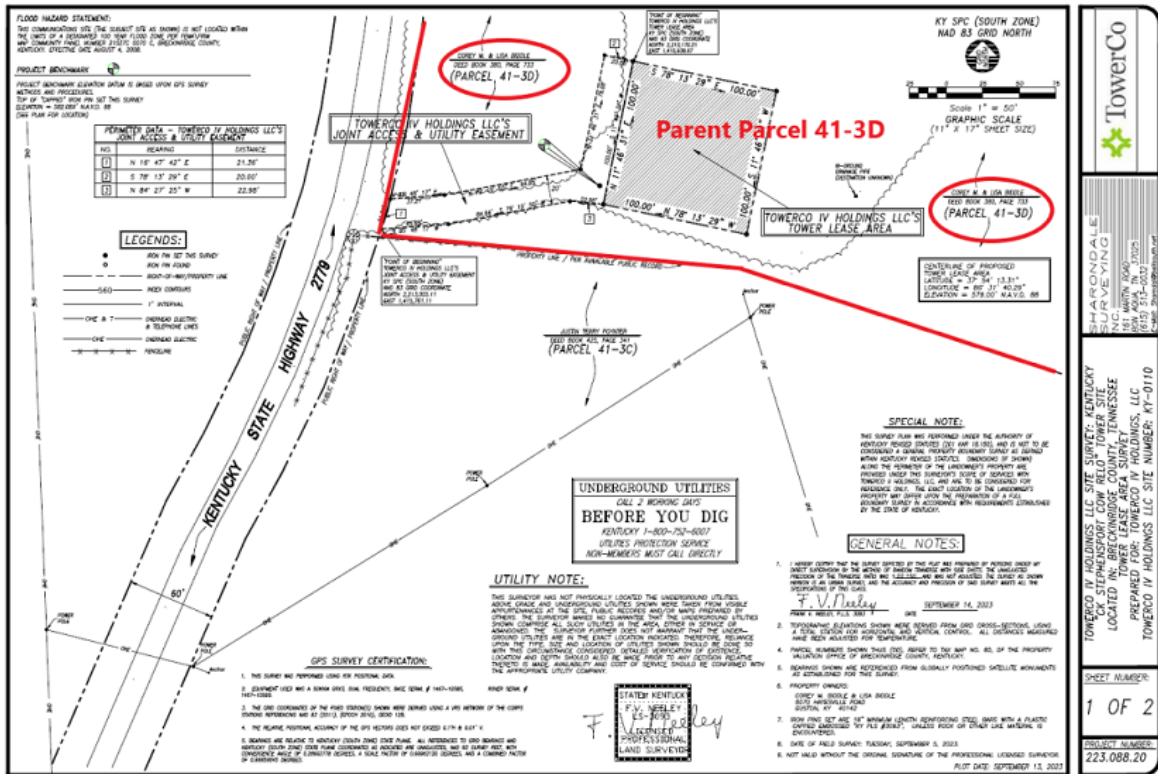
Russell L. Brown
Clark, Quinn, Moses, Scott & Grahn, LLP
320 North Meridian Street, Suite 1100
Indianapolis, IN 46204
Phone: (317) 637-1321 / FAX: (317) 687-2344
Email: rbrown@clarkquinnlaw.com
Attorney for Cellco Partnership d/b/a Verizon Wireless

LIST OF EXHIBITS

1. Maps Parcel 41-3D
2. Affidavit of Certification

PVA MAP OF PARCEL 41-3D

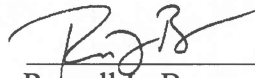




STATE OF INDIANA)
) SS:
COUNTY OF MARION)

**AFFIDAVIT OF CERTIFICATION
COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION**

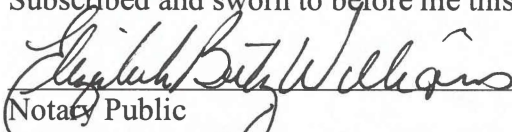
I Russell L. Brown, attorney for Cellco Partnership, d/b/a Verizon Wireless do hereby certify that as the person supervising the preparation of this application and all statements and information contained herein are true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry for all information within this application.



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 1st day of August, 2024.



Notary Public

Printed Name of Notary: Elizabeth Bentz Williams
My commission expires: November 18, 2028
My County of Residence: Marion
Commission #: 0639620

