

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

In the Matter of:

THE APPLICATION OF)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS)
AND VB BTS II, LLC D/B/A VERTICAL BRIDGE)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO. 2024-00160
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF TAYLOR)

SITE NAME: FAIRWAY

* * * * *

**RESPONSE TO PSC JULY 11, 2024, NOTICE OF DEFICIENCY
CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS
AND VB BTS II, LLC D/B/A VERTICAL BRIDGE**

Public Service Commission (PSC) Staff's provided a Deficiency Letter pursuant to the application:

807 KAR 5:063 Section 1(1)(l): Applicant failed to inform every person who owned property within 500 ft of the proposed tower.

1. Co-Applicants have sent certified notices to every person who, according to the records of the County Property Valuation Administrator, owns property which is within 500 feet of the proposed tower or contiguous to the site property, by certified mail, return receipt requested, of the proposed construction. Each notified property owner has been provided with a map of the location of the proposed construction, the PSC docket number for this application, the address of the PSC, and informed of his or her right to request intervention. On May 16, 2024, fourteen (14) notices were sent to surrounding property owners; at the time of filing, on July 10, 2024, nine (9) notice green cards and

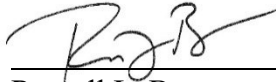
one (1) envelope had been returned. United States Postal Service (USPS) tracking indicated that one (1) notice had been delivered, one (1) notice was being returned because the forwarding order had expired, and two (2) notices were “moving through the network”.

2. New notice was sent to the three (3) owners, whose May 16th notices were identified “as working through the network” and “being returned for forwarding order expiration” on July 10, 2024. The PVA records were also investigated to re-verify the ownership and mailing addresses on July 10, 2024. As of the time of filing this response, July 19, 2024, Co-Applicants have not received any additional green cards or returned envelopes from the second mailing. However, USPS indicates that one (1) notice has been delivered, and one (1) notice was attempted delivery on July 13, but USPS could not access delivery location, delivery will be attempted again. One (1) notice is “moving through the network”, Co-Applicants would note that this notice is to the landowner of the subject property and has signed as such on the Real Statement Agreement attached in **Exhibit J** of the original filing. A copy of the form of the notice sent by certified mail to each landowner on July 10, 2024, and USPS information is attached as **Exhibit 1**. This information will be updated as received.
3. Attached hereto as **Exhibit 2** please find an Affidavit of Certification for all information contained in this application.
4. All Exhibits to this Application are hereby incorporated by reference as if fully set out as part of the Application.
5. 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. Property Owner Notification July 10, 2024
2. Affidavit of Certification



ClarkQuinn

www.clarkquinnlaw.com

Russell L. Brown
Attorney at Law
rbrown@clarkquinnlaw.com

320 N. Meridian St., Ste. 1100
Indianapolis, IN 46204
(317) 637-1321 main
(317) 687-2344 fax

July 10, 2024

**Notice of Proposed Construction of
Wireless Communications Facility
Site Name: Fairway**

Cellco Partnership, d/b/a Verizon Wireless and The Towers, LLC (Vertical Bridge) propose to construct a wireless communications facility on a site located 601 Salem Church Road, Campbellsville, KY 42718 (North Latitude: (37° 22' 13.45", West Longitude 85° 23' 10.76"). The proposed facility will include a 180-foot tall monopole tower, plus a 10-foot lightning arrestor and related ground facilities. This facility is needed to provide improved coverage for wireless communications in the area.

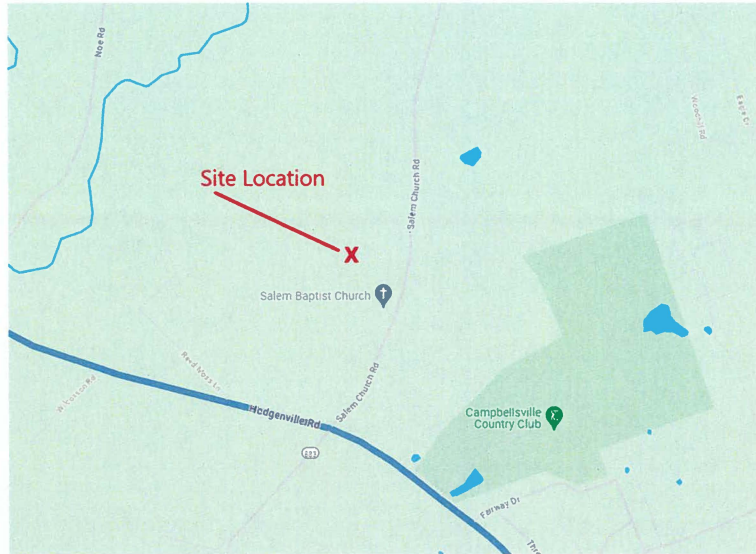
This notice is being sent to you because the County Property Valuation Administrator's records indicate that you may own property that is within a 500' radius of the proposed tower site or contiguous to the property on which the tower is to be constructed. You have a right to submit testimony to the Kentucky Public Service Commission ("PSC"), either in writing or to request intervention in the PSC's proceedings on the application. You may contact the PSC for additional information concerning this matter at: Kentucky Public Service Commission, Executive Director, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602. Please refer to docket number 2024-00160 in any correspondence sent in connection with this matter.

We have attached a map showing the site location for the proposed tower. Applicant's radio frequency engineers assisted in selecting the proposed site for the facility, and they have determined it is the proper location and elevation needed to provide quality service to wireless customers in the area. Please feel free to contact us at 317-637-1321 if you have any comments or questions about this proposal.

Sincerely,
Russell L. Brown

Attorney for Applicant
RLB/mnw
enclosure

Vicinity Map



Location Map



ClarkQuinn
Clark, Quinn, Moses, Scott & Grahn, LLP



9589 0710 5270 2002 9185 19

FIRST-CLASS



US POSTAGE^{IM}PITNEY BOWES



ZIP 46204 \$ 008.69⁰
02 7H
0006035028 JUL 10 2024

GRAY MARK & DANNY &
PAM HUBER
80 CAMELOT DR
CAMPBELLSVILLE, KY 42718

CERTIFIED MAIL[®]

ClarkQuinn
Clark, Quinn, Moses, Scott & Grahn, LLP



9589 0710 5270 2002 9185 26

FIRST-CLASS



US POSTAGE^{IM}PITNEY BOWES



ZIP 46204 \$ 008.69⁰
02 7H
0006035028 JUL 10 2024

SALEM BAPTIST CHURCH
271 SALEM CHURCH RD
CAMPBELLSVILLE, KY 42718

CERTIFIED MAIL[®]

ClarkQuinn
Clark, Quinn, Moses, Scott & Grahn, LLP



9589 0710 5270 2002 9185 33

FIRST-CLASS



US POSTAGE^{IM}PITNEY BOWES



ZIP 46204 \$ 008.69⁰
02 7H
0006035028 JUL 10 2024

COCHRAN ANGELA GAIL &
COCHRAN MARY KATLIN
344 SALEM CHURCH RD
CAMPBELLSVILLE KY 42718

ALERT: FLOODING AND SEVERE WEATHER IN THE SOUTHERN AND CENTRAL U.S. MAY IMPA...

USPS Tracking®

[FAQs >](#)

Tracking Number:

[Remove X](#)

9589071052702002918526

[Copy](#)

[Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)

Latest Update

Your item was picked up at the post office at 9:16 am on July 16, 2024 in CAMPBELLSVILLE, KY 42718.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Feedback

Delivered

Delivered, Individual Picked Up at Post Office

CAMPBELLSVILLE, KY 42718

July 16, 2024, 9:16 am

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

ALERT: FLOODING AND SEVERE WEATHER IN THE SOUTHERN AND CENTRAL U.S. MAY IMPA...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

9589071052702002918519

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Out for Delivery

Preparing for Delivery

Moving Through Network

In Transit to Next Facility

July 16, 2024

Arrived at USPS Regional Facility

LOUISVILLE KY DISTRIBUTION CENTER

July 12, 2024, 1:50 pm

See All Tracking History

Feedback

[What Do USPS Tracking Statuses Mean?](https://faq.usps.com/s/article/Where-is-my-package) (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



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Product Information



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Enter tracking or barcode numbers

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FAQs

ALERT: FLOODING AND SEVERE WEATHER IN THE SOUTHERN AND CENTRAL U.S. MAY IMPA...

USPS Tracking®

[FAQs >](#)

Tracking Number:

[Remove X](#)

9589071052702002918533

[Copy](#)

[Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)

Latest Update

We could not access the delivery location to deliver your package at 10:29 am on July 13, 2024 in CAMPBELLSVILLE, KY 42718. We will redeliver on the next delivery day. No action needed.

Get More Out of USPS Tracking:

[USPS Tracking Plus®](#)

Feedback

Alert

No Access to Delivery Location

CAMPBELLSVILLE, KY 42718
July 13, 2024, 10:29 am

Arrived at USPS Regional Facility

LOUISVILLE KY DISTRIBUTION CENTER
July 12, 2024, 1:50 pm

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

[Text & Email Updates](#)



[USPS Tracking Plus®](#)





Product Information

See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

