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)	
THE TOWERS, 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 29, 2024, NOTICE OF DEFICIENCY AND SUPPLEMENTAL INFORMATION TO FILING CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS AND THE TOWERS, LLC D/B/A VERTICAL BRIDGE

Supplemental information:

Cellco Partnership, d/b/a Verizon Wireless and VB BTS II, LLC d/b/a Vertical Bridge ("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, filed an Application requesting issuance of a Certificate of Public Convenience and Necessity ("CPCN") on July 10, 2024.

1. Vertical Bridge will utilize a different entity for this site. As such, the co-applicants are Cellco Partnership, d/b/a Verizon Wireless and The Towers, LLC d/b/a Vertical Bridge. Please see updated entities attached as **Exhibit 1**.

Response to July 29 Deficiency Letter:

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

807 KAR 5:063 Section 1(1)(1): Applicant failed to inform every person who owned property within 500 ft of the proposed tower. Specifically, applicant did not provide documentation that Read and Juanita Moss, owners of parcel ID #25-006, received notification.

- Co-Applicants verified the notice list using the PVA on May 16, 2024. Parcel 25-006
 ownership was updated, because the PVA records indicated a transfer of the property
 from Read and Juanita Moss to Patsy Walters on December 8, 2023, please see PVA
 Property Owner Verification attached as Exhibit 2.
- 2. Updated notification information: 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 though the network".

3. 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 31,

2024, Co-Applicants have received one green card from the second mailing. USPS

indicates that 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 Estate 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 3.

This information will be updated as received.

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

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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. Co-Applicant Entities
- 2. PVA Property Owner Verification Parcel 25-006
- 3. Property Owner Notification July 10, 2024
- 4. Affidavit of Certification



I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF

DELAWARE, DO HEREBY CERTIFY "CELLCO PARTNERSHIP" IS DULY FORMED

UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND

HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS

OF THE TWENTY-SEVENTH DAY OF APRIL, A.D. 2023.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN PAID TO DATE.



Authentication: 203227418

Date: 04-27-23



Michael G. Adams Secretary of State

Certificate

I, Michael G. Adams, Secretary of State for the Commonwealth of Kentucky, do hereby certify that the foregoing writing has been carefully compared by me with the original thereof, now in my official custody as Secretary of State and remaining on file in my office, and found to be a true and correct copy of

CERTIFICATE OF ASSUMED NAME OF VERIZON WIRELESS ADOPTED BY GENERAL PARTNERS OF CELLCO PARTNERSHIP FILED JUNE 21, 2006.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 10th day of May, 2023.

CONTRACT OF REAL PROPERTY OF SECRETARY OF SE

Michael G. Adams

Secretary of State

Commonwealth of Kentucky

kdcoleman/0641227 - Certificate ID: 290787

COMMONWEALTH OF KENTUCKY TREY GRAYSON SECRETARY OF STATE



0641227.07

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Trey Grayson
Secretary of State
Received and Filed
06/21/2006 12:06:09 PM
Fee Receipt: \$20.00

CERTIFICATE OF ASSUMED NAME

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a Foreign Registered L a Foreign Limited Partr a Foreign Business Tru a Foreign Corporation	lmited Llabili nership st	
	, and v	whose address is
Basking Ridge	NJ	07920
City	State	Zip Code
Eligendary Differ on large an own and Man		
	a Foreign Registered L a Foreign Limited Partr a Foreign Business Tru a Foreign Corporation a Foreign Limited Liabi	a Foreign General Partnership a Foreign Registered Limited Liability a Foreign Limited Partnership a Foreign Business Trust a Foreign Corporation a Foreign Limited Liability Company a Foreign Ridge NJ State

Addendum

The full name of the Partnership is Cellco Partnership; a Delaware general partnership with its headquarters located One Verizon Way, Basking Ridge NJ 07920-1097.

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General Partners of Cellco Partnership	Address
Bell Atlantic Cellular Holdings, L.P.	One Verizon Way Basking Ridge, NJ 07920
NYNEX PCS Inc.	One Verizon Way Basking Ridge, NJ 07920
PCSCO Partnership	One Verizon Way Basking Ridge, NJ 07920
GTE Wireless Incorporated	One Verizon Way Basking Ridge, NJ 07920
GTE Wireless of Ohio Incorporated	One Verizon Way Basking Ridge, NJ 07920
PCS Nucleus, L.P.	2999 Oak Road, 7th Floor Walnut Creek, CA 94597
JV PartnerCo, LLC	2999 Oak Road, 7th Floor Walnut Creek, CA 94597

Page 1



I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF

DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT

COPY OF THE CERTIFICATE OF FORMATION OF "THE TOWERS, LLC",

FILED IN THIS OFFICE ON THE TWENTY-FOURTH DAY OF MARCH, A.D.

2023, AT 11:34 O'CLOCK A.M.



Authentication: 203008264

Date: 03-27-23

7370717 8100 SR# 20231132833 State of Delaware
Secretary of State
Division of Corporations
Delivered 11:34 AM 03/24/2023
FILED 11:34 AM 03/24/2023
SR 20231132833 - File Number 7370717

STATE OF DELAWARE CERTIFICATE OF FORMATION OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1.	The name of the	ne limited liability	company i	s		
		THE	OWERS, I	_LC		
2. locate	NO.	d Office of the limi 850 New Bu		y company ii , Suite 201	the State of 1	Delaware is(street),
in the	City of	Dover	, 7	Zip Code	19904	. The
	of the Registere ty company may	d Agent at such add be served is	dress upor	whom proce	ess against this	s limited
-		pur sendonomico mo	Y GLOBA	L INC.		,
			Ву:	/s/ Da	niel Marinberg	
		Na	ıme:		rized Person el Marinberg	
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mmoore ADD

Michael G. Adams Kentucky Secretary of State Received and Filed: 2/22/2024 11:15 AM Fee Receipt: \$90.00



COMMONWEALTH OF KENTUCKY MICHAEL G. ADAMS, SECRETARY OF STATE

Division of Business Filings P.O. Box 718 Frankfort, KY 40602 (502) 564-3490 www.sos.ky.gov		Ficate of Authority on Business Entity)		FBE
Pursuant to the provisions of KRS 1- and, for that purpose, submits the fol		by applies for authority to transac	t business in Kentucky on	behalf of the entity named below
1. The entity is a: profit combusiness limited particular profit. 2. The name of the entity is	trust X liu rtnership IIIc	onprofit corporation nited liability company d cooperative association refessional service corporation THE TOWERS, L the name on record with the Se	statutory trust public benefit cor other	ed liability company
3. The name of the entity to be used			, , , , , , , , , , , , , , , , , , , ,	e e
•	The state of the s	(Only provide if "real name" is		erwise, leave blank.)
4. The state or country under whose	0010410000		FLORIDA	
5. The date of organization is	03/24/2023	and the period of dural		Is considered perpetual.)
6. The mailing address of the entity's		DOCA BAT	ON EI	22.407
Street Address	MMERCE DR, STE 200	BOCA RATO	ON FL State	33487 Zip Code
7. The street address of the entity's	registered office in Kentucky is on Road Suite 219	Lexington		40504
Street Address (No P.O. Box Numb		City	1 KY State	Zip Code
and the name of the registered agent		Cogen	cy Global Inc.	
8. The names and business address				eneral nariners).
Ron Bizick				33487
Name	750 Park of Commerce Street or P.O. Box	City	State	Zip Code .
Name	Street or P.O. Box	City	State	Zip Code
Name	Street or P.O. Box	City	State	Zip Code
9. If a professional service corporation and treasurer are licensed in one or restatement of purposes of the corporation. I certify that, as of the date of filing the corporation is a service of the corporation.	nore states or territories of the l tion.	Inited States or District of Columb	bla to render a professional	service described in the
11. If a limited partnership, it elects to	be a limited liability limited part	nership. Check the box if applic	able:	
12. If a limited liability company, ch	ock-bo x if manager-managed:			
13. This application will be elective u	pon filing.		e	
		Ron Bizick, C	EO	02/05/2024
Signature of Authorized/Representative Cogency Type/Print Name of Registered Agent	Global Inc.	, consent to serve as the reg		Date the business entity.
F	r	I 11 11	4	v 02/06/2024
Toelle Churik Signature of Registered Agent	Printed	Joelle Churik	Asst. Secretar	Date
			ongopolisi.	

Commonwealth of Kentucky Michael G. Adams, Secretary of State

Michael G. Adams Secretary of State P. O. Box 718 Frankfort, KY 40602-0718 (502) 564-3490 http://www.sos.ky.gov

Certificate of Authorization

Authentication number: 307364

Visit https://web.sos.ky.gov/ftshow/certvalidate.aspx to authenticate this certificate.

I, Michael G. Adams, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

THE TOWERS, LLC

, a limited liability company authorized under the laws of the state of Florida, is authorized to transact business in the Commonwealth of Kentucky, and received the authority to transact business in Kentucky on February 22, 2024.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that an application for certificate of withdrawal has not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 18th day of March, 2024, in the 232nd year of the Commonwealth.

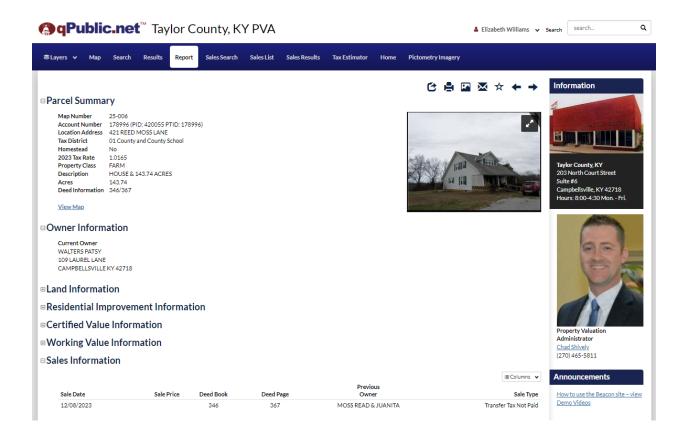


Michael G. adams

Michael G. Adams Secretary of State Commonwealth of Kentucky 307364/1343772

Property Owner Verification Parcel # 25-006

WALTERS PATSY 109 LAUREL LANE CAMPBELLSVILLE KY 42718





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







9589 0710 5270 2002 9185 19



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

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





9589 0710 5270 2002 9185 🖧

US POSTAGE MIPITNEY BOWES

ZIP 46204 \$ 008.690

SALEM BAPTIST CHURCH 271 SALEM CHURCH RD CAMPBELLSVILLE, KY 42718

Clark Quinn

Llark, Quinn, Moses, Scott & Grahn, LLP

CERTIFIED MAIL



9589 0710 5270 2002 9185 33

FIRST-CLASS

US POSTAGE MIPITNEY BOWES

ZIP 46204 \$ 008.690
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COCHRAN ANGELA GAIL & COCHRAN MARY KATLIN 344 SALEM CHURCH RD CAMPBELLSVILLE KY 42718

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. A
1. Article Addressed to:	D. Is delivery address different from item 1? Yes If YES, enter delivery address below:
SALEM BAPTIST CHURCH 271 SALEM CHURCH RD CAMPBELLSVILLE, KY 42718	
9590 9402 8749 3310 9086 42	3. Service Type
2. Article Number (Transfer from service label)	☐ Collect on Delivery Restricted Delivery ☐ Insured Mail
9589 0710 5270 2002 9185	All Restricted Delivery
PS Form 3811, July 2020 PSN 7530-02-000-9053	Domestic Return Receipt

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://informeddelivery.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

What Do USPS Tracking Statuses Mean? (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

9589071052702002918533

Copy Add to Informed Delivery (https://informeddelivery.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®

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)

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

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 31st day of July, 2024.

Notary Public

Printed Name of Notary: Elizabeth Bentz Williams

My commission expires: November 18, 2028

My County of Residence: Marion

Commission #: 0639620