

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

In the Matter of:

THE APPLICATION OF APC TOWERS IV, LLC, AND)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO. 2026-00017
CONVENIENCE AND NECESSITY TO CONSTRUCT A)
WIRELESS COMMUNICATIONS FACILITY IN THE)
COMMONWEALTH OF KENTUCKY IN THE COUNTY)
OF CRITTENDEN)

SITE NAME: GUM CREEK ROAD

* * * * *

**RESPONSE TO PSC MARCH 27, 2026, NOTICE OF DEFICIENCY
CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS AND APC TOWERS IV, LLC**

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

1. 807 KAR 5:063 Section 1(1)(m): A list of property owners who received the notice, together with copies of the certified letters sent to listed property owners; Two undeliverable certified mail return receipts sent to property owners Stephen H. Hill & Jennifer Little and Carlos & Kathy Travis appear to have been sent to incorrect addresses according to the PVA information provided in the application. Please resend notice to the correct addresses; Stephen H. Hill & Jennifer Little is 7255 SR 120; Marion KY 42064 and Carlos & Kathy Travis is 9907 SR 120; Marion KY 42064.
2. Attached as **Exhibit 1** please find an addendum to Exhibit L – Property Owner Notification with notices sent to the corrected addresses.
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 Exhibit L Addendum
- 2 Affidavit of Certification



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

March 30, 2026

**Notice of Proposed Construction of
Wireless Communications Facility
Site Name: Gum Creek Road**

Cellco Partnership, d/b/a Verizon Wireless and APC Towers propose to construct a wireless communications facility on a site located near the intersection of Kentucky Route 120 and Frank Hill Road (North Latitude: 37° 21' 46.88"), West Longitude: 85° 55' 49.91"). The proposed facility will include a 300-foot-tall guyed tower, plus a 5-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 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 PSC for additional information concerning this matter at: Kentucky Public Service Commission, Executive Director, 211 Sower Boulevard, PO Box 615, Frankfort Kentucky 40602. Please refer to docket number 2026-00017 in any correspondence sent in connection with this matter.

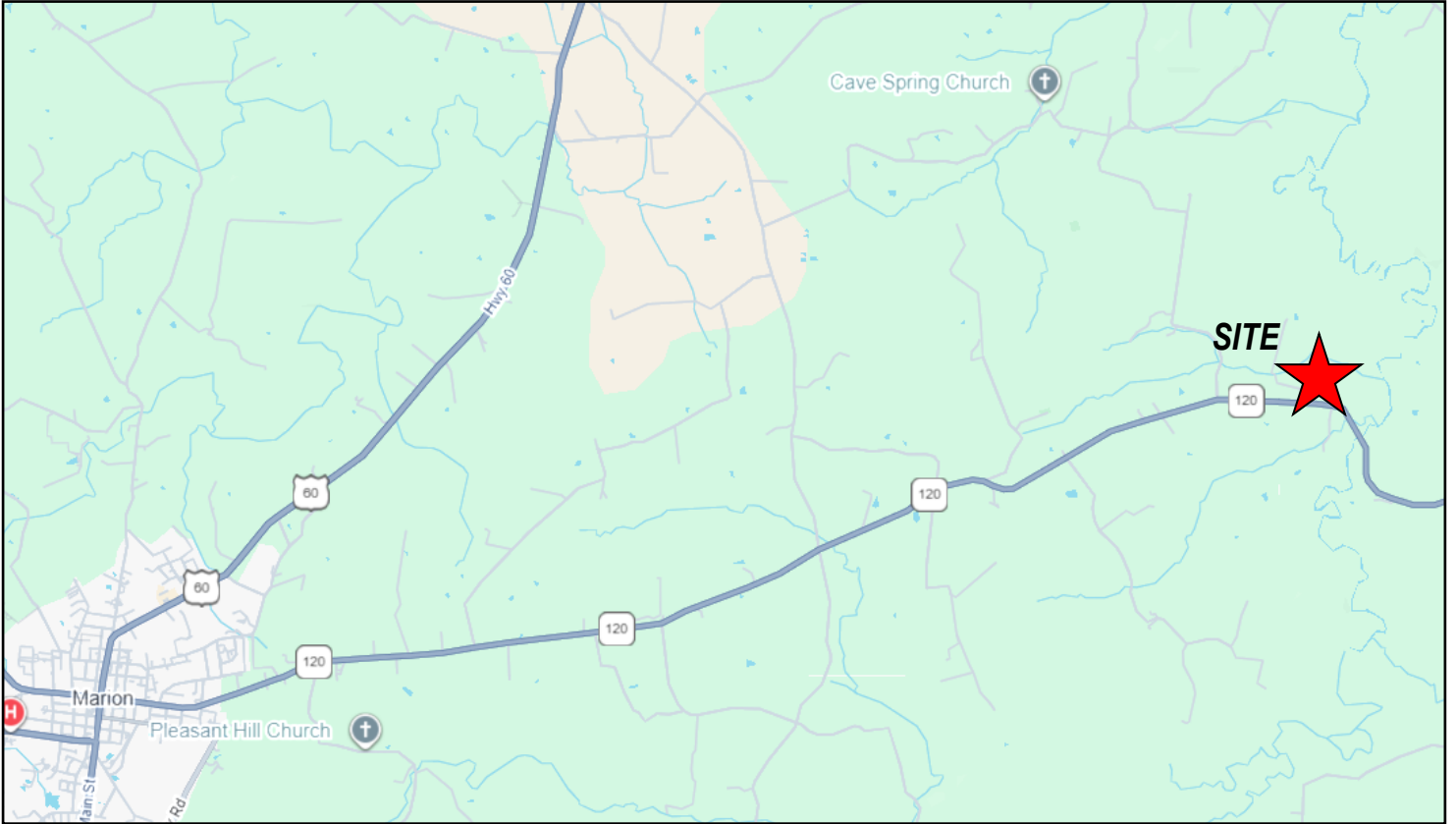
We have attached a map showing the site location for the proposed tower. Co-Applicant's radio frequency engineers assisted in selecting the proposed site for the facility, and they have determined it is the proper location and elevation needed to provide quality service to wireless customers in the area. 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/jmc
Enclosure

LOCATION MAP | KY 1822 EV GUM CREEK RD



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

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL®



9589 0710 5270 1687 8979 59

Stephen H. Hill &
Jennifer Little
7255 SR 120
Marion, KY 42064

FIRST-CLASS



US POSTAGE^{IMI}PITNEY BOWES



ZIP 46204 \$ 010.44⁰
02 7H
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ClarkQuinn
Clark, Quinn, Moses, Scott & Grahn, LLP

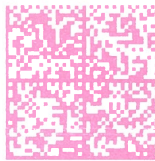
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL®



9589 0710 5270 1687 8979 66

Carlos & Kathy Travis
9907 SR 120
Marion, KY 42064

FIRST-CLASS



US POSTAGE^{IMI}PITNEY BOWES

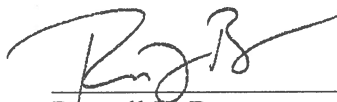


ZIP 46204 \$ 010.44⁰
02 7H
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STATE OF INDIANA)
)SS:
COUNTY OF MARION)

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

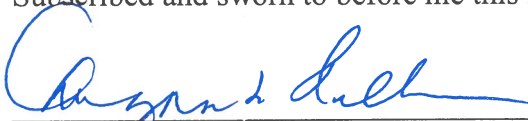
I, Russell L. Brown, attorney for Cellco Partnership d/b/a Verizon Wireless do hereby certify that as the person supervising the preparation of this application and all statements and information contained herein are true and accurate to the best of my knowledge, information, and belief formed after 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 31th day of March, 2026.



Notary Public
Printed Name of Notary: Megan N. Webb
My commission expires: May 24, 2028
My County of Residence: Marion
Commission #: 0634690

