

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

In the Matter of:

THE APPLICATION OF TAG TOWERS III, LLC, AND)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO. 2026-00032
CONVENIENCE AND NECESSITY TO CONSTRUCT A)
WIRELESS COMMUNICATIONS FACILITY IN THE)
COMMONWEALTH OF KENTUCKY IN THE COUNTY)
OF OHIO)

SITE NAME: CROMWELL

* * * * *

**RESPONSE TO PSC APRIL 8, 2026, NOTICE OF DEFICIENCY
CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS AND TAG TOWERS III, LLC**

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


1. 807 KAR 5:063 Section 1(2)(a)(t): A map of the area in which the tower is proposed to be located, that is drawn to a scale and that clearly depicts the search area in which a site should, pursuant to radio frequency requirements, be located; The map submitted with application is not clear, as required by the regulation.
2. Attached as **Exhibit 1** please find updated Exhibit P – Clear Radio Frequency Design Search Area Map.
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,

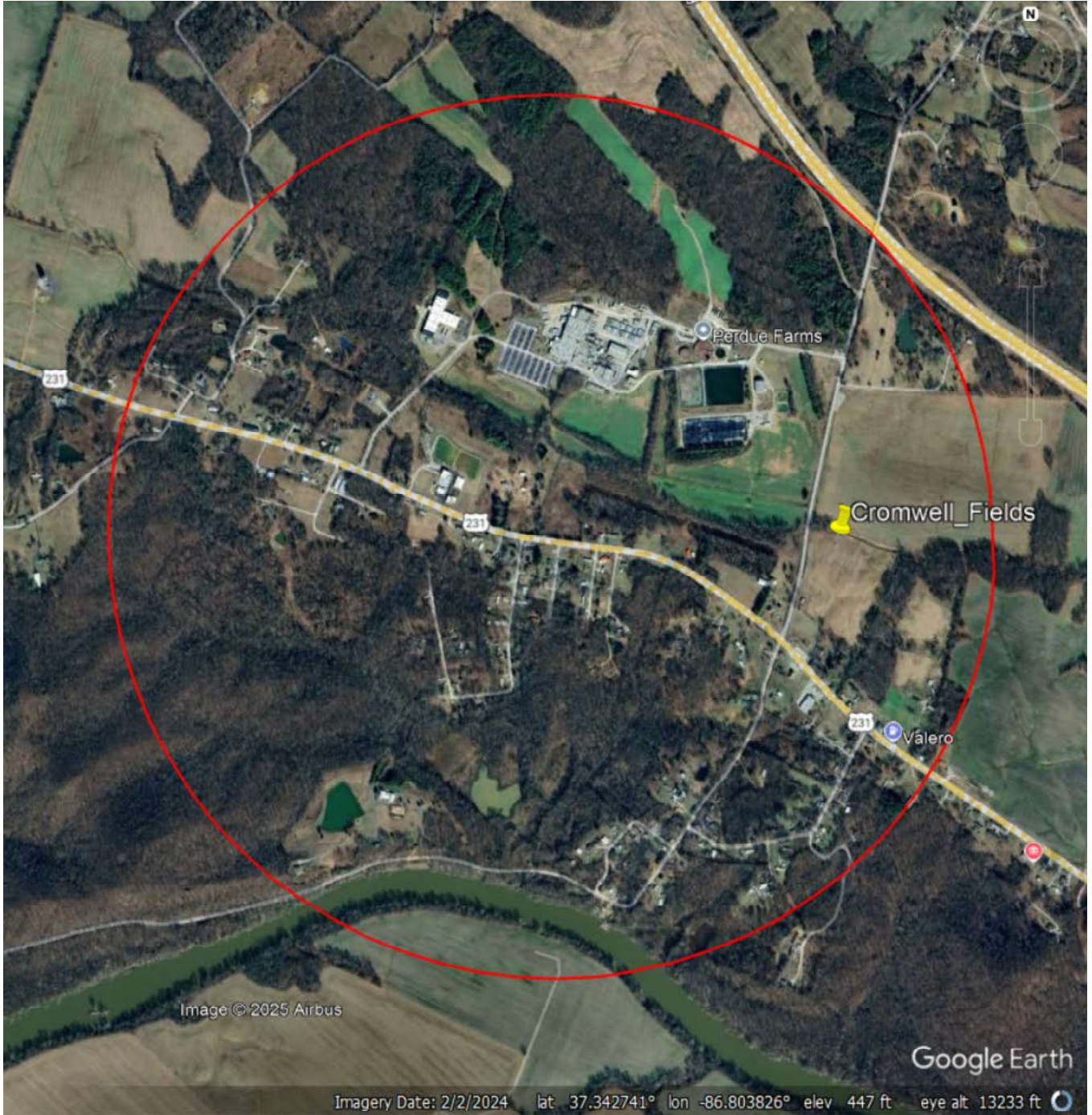


Russell L. Brown
Clark, Quinn, Moses, Scott & Grahn, LLP
320 North Meridian Street, Suite 1100
Indianapolis, IN 46204
Phone: (317) 637-1321 / FAX: (317) 687-2344
Email: rbrown@clarkquinnlaw.com
Attorney for Cellco Partnership d/b/a Verizon Wireless

LIST OF EXHIBITS

- 1 Exhibit P: Radio Frequency Design Search Area Map
- 2 Affidavit of Certification

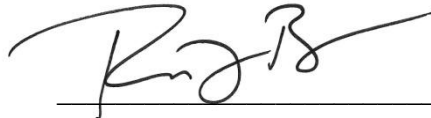
SARF Map



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 and TAG Towers III, LLC 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
and APC Towers IV, LLC

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

Subscribed and sworn to before me this 8th day of April, 2026.



Notary Public
Printed Name of Notary: Joseph M. Csikos
My Commission Expires: August 5, 2033
My County of Residence: Johnson
Commission No. NP0765036

