

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

In the Matter of:

THE APPLICATION OF)
HORVATH TOWERS VI, LLC AND)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS)
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC) CASE NO.: 2026-00050
CONVENIENCE AND NECESSITY TO CONSTRUCT)
A WIRELESS COMMUNICATIONS FACILITY)
IN THE COMMONWEALTH OF KENTUCKY)
IN THE COUNTY OF BELL)

SITE NAME: BRUSH CREEK GAP

* * * * *

APPLICANTS' RESPONSE TO COMMISSION'S DATA REQUEST

Horvath Towers VI, LLC and Cellco Partnership d/b/a Verizon Wireless ("Applicants"), by counsel, make this Response to the Kentucky Public Service Commission Staff's First Request for Information to Horvath Towers VI, LLC and Cellco Partnership d/b/a Verizon Wireless ("Data Request"). Applicants respectfully state, as follows:

Question 1: Provide a copy of all signed United States Postal Service Form 3811, otherwise known as "signed green cards," or a copy of the notice that the certified mail was returned to the Joint Applicants as undelivered by the United States Postal Service. Specifically, provide the materials requested for the certified letter with the tracking number 70223330000036365821 (postmarked on March 4, 2026). Consider this request ongoing and should be updated in a supplemental filing until all signed green cards and undelivered notices are returned to Joint Applicants.

Response 1: Since filing, Applicants have not received either a signed green

card or a returned undelivered certified mailing corresponding to the notice letter addressed to Maria A. Warren with tracking number 70223330000036365821 (postmarked on March 4, 2026). According to United States Postal Service (“USPS”) tracking data, this letter is “On the Way / Arrived at USPS Facility”¹. A copy of the USPS tracking data for this notice, dated June 22, 2026, is attached hereto as **Exhibit B-1**.

Additionally, since filing, Applicants have not received either a signed green card or a returned undelivered certified mailing corresponding to the notice letter addressed to Eugene & Rosetta Wilson with tracking number 70223330000036365807 (postmarked on March 4, 2026). According to United States Postal Service (“USPS”) tracking data, this letter was “Delivered, Left with Individual”². A copy of the USPS tracking data for this notice, dated June 22, 2026, is attached hereto as **Exhibit C-1**.

Upon receipt of the Kentucky Public Service Commission Staff’s Data Request, Applicants issued additional notice letters to the two recipients referenced above (postmarked on June 4, 2026). As of June 22, 2026, Applicants have not received either a signed green card or a returned undelivered certified mailing corresponding to these notice letters. According to United States Postal Service (“USPS”) tracking data, the second letter addressed to Maria A. Warren with tracking number 9589071052701828063199 is “On the Way / Arrived at USPS Facility”³. A copy of the USPS tracking data for this notice, dated June 22, 2026, is attached hereto as **Exhibit B-2**. According to United States Postal Service (“USPS”) tracking data, the second letter addressed to Eugene & Rosetta Wilson with tracking number

¹ Tracking Number: 70223330000036365821
<https://tools.usps.com/tracking/70223330000036365821>

² Tracking Number: 70223330000036365807
<https://tools.usps.com/tracking/70223330000036365807>

³ Tracking Number: 9589071052701828063199
<https://tools.usps.com/tracking/9589071052701828063199>

9589071052701828063205 is “Available for Pickup”⁴. A copy of the USPS tracking data for this notice, dated June 22, 2026, is attached hereto as **Exhibit C-2**.

An Affidavit of Certification signed by the attorney supervising the preparation of the response on behalf of Applicants certifying that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry is attached as **Exhibit A**.

⁴ Tracking Number: 9589071052701828063205
<https://tools.usps.com/tracking/9589071052701828063205>

WHEREFORE, there being no ground for denial of the subject application, and there being substantial evidence in support of the requested CPCN in the case record, Applicants respectfully request the Kentucky Public Service Commission:

- (a) Accept this Response for filing;
- (b) Issue a Certificate of Public Convenience and Necessity to construct and operate the WCF at the location set forth herein without further delay; and
- (c) Grant Applicants any other relief to which they are entitled.

Respectfully submitted,



David A. Pike
And



F. Keith Brown
Pike Legal Group, PLLC
1578 Highway 44 East, Suite 6
P. O. Box 369
Shepherdsville, KY 40165-0369
Telephone: (502) 955-4400
Telefax: (502) 543-4410
Email: dpike@pikelegal.com
Email: kbrown@pikelegal.com
Attorneys for Applicants

LIST OF EXHIBITS

- A - Affidavit of Certification
- B-1 - Supplemental Proof of Notice – Warren 1
- B-2 - Supplemental Proof of Notice – Warren 2
- C-1 - Supplemental Proof of Notice – Wilson 1
- C-2 - Supplemental Proof of Notice – Wilson 2

EXHIBIT A

AFFIDAVIT OF CERTIFICATION

**AFFIDAVIT OF CERTIFICATION
COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
CASE #: 2026-00050**

I, F. Keith Brown, attorney for Horvath Towers VI, LLC and Cellco Partnership d/b/a Verizon Wireless (“Applicants”), do hereby certify that I am the person supervising the preparation of this Response to Commission Staff’s Data Request on behalf Applicants and that this response is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Further the affiant sayeth naught.

Affiant:

[Handwritten Signature]

Date: 06/22/26

State of Kentucky

County of Bullitt

AFFIANT ACKNOWLEDGEMENT

On this, the 22 day of June, 2026 before me, the subscriber, a Notary Public in and for the above state, personally appeared to me F. Keith Brown and in due form of law, acknowledged, subscribed, and swore that he executed this instrument as his voluntary act and deed.

In testimony whereof, I have hereunto set my hand and affixed my seal in said County and State on the day and year last above written.

My commission expires on: 1-25-28

[Handwritten Signature: Robert W Grant]

Notary Public, State at Large



EXHIBIT B-1

SUPPLEMENTAL PROOF OF NOTICE – WARREN 1

ALERT: IMPACTS FROM THE WORLD SOCCER TOURNAMENT HELD IN MAJOR CITIES THROUGHOUT THE U.S. FROM JUNE 11TH THROUGH JULY 19TH, 2026 AND FLOODING IMPACTS IN THE GULF COAST REGION OF THE U.S. MAY DELAY FINAL DELIVERY OF YOUR MAIL AND PACKAGES. [READ MORE](#)

USPS Tracking®

[FAQs >](#)

**Track Packages
Anytime, Anywhere**

Get the free Informed Delivery® feature to receive automated notifications on your packages

[Learn More](#)

Tracking Number:

7022333000036365821

[Remove X](#)

[Copy](#) [Add to Informed Delivery](#)

Latest Update

Your item arrived at our USPS facility in KNOXVILLE TN DISTRIBUTION CENTER on March 5, 2026 at 12:00 pm. The item is currently in transit to the destination.

Get More Out of USPS Tracking:
USPS Tracking Plus®

On the Way

- Arrived at USPS Facility**
KNOXVILLE TN DISTRIBUTION CENTER
March 5, 2026 12:00 PM
- Arrived at USPS Facility**
LOUISVILLE KY DISTRIBUTION CENTER
March 4, 2026 8:00 PM

[What Do USPS Tracking Statuses Mean?](#)

Text & Email Updates ∨

USPS Tracking Plus® ∨

Product Information ∨

[See Less ^](#)

Track Another Package

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

EXHIBIT B-2

SUPPLEMENTAL PROOF OF NOTICE – WARREN 2

ALERT: IMPACTS FROM THE WORLD SOCCER TOURNAMENT HELD IN MAJOR CITIES THROUGHOUT THE U.S. FROM JUNE 11TH THROUGH JULY 19TH, 2026 AND FLOODING IMPACTS IN THE GULF COAST REGION OF THE U.S. MAY DELAY FINAL DELIVERY OF YOUR MAIL AND PACKAGES. [READ MORE](#)

USPS Tracking®

[FAQs >](#)

**Track Packages
Anytime, Anywhere**

Get the free Informed Delivery® feature to receive automated notifications on your packages

[Learn More](#)

Tracking Number:

9589071052701828063199

[Remove X](#)

[Copy](#) [Add to Informed Delivery](#)

Latest Update

Your item arrived at our USPS facility in KNOXVILLE TN DISTRIBUTION CENTER on June 7, 2026 at 10:48 am. The item is currently in transit to the destination.

Get More Out of USPS Tracking:
USPS Tracking Plus®

- Delivered
- Out for Delivery
- Preparing for Delivery
- On the Way**
- **Arrived at USPS Facility**
KNOXVILLE TN DISTRIBUTION CENTER
June 7, 2026 10:48 AM
- **Arrived at USPS Facility**
LOUISVILLE KY DISTRIBUTION CENTER
June 5, 2026 9:06 PM

[What Do USPS Tracking Statuses Mean?](#)

- [Text & Email Updates](#) ∨
- [USPS Tracking Plus®](#) ∨
- [Product Information](#) ∨

[See Less ^](#)

Track Another Package

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

EXHIBIT C-1

SUPPLEMENTAL PROOF OF NOTICE – WILSON 1

ALERT: IMPACTS FROM THE WORLD SOCCER TOURNAMENT HELD IN MAJOR CITIES THROUGHOUT THE U.S. FROM JUNE 11TH THROUGH JULY 19TH, 2026 AND FLOODING IMPACTS IN THE GULF COAST REGION OF THE U.S. MAY DELAY FINAL DELIVERY OF YOUR MAIL AND PACKAGES. [READ MORE](#)

USPS Tracking®

[FAQs >](#)

**Track Packages
Anytime, Anywhere**

Get the free Informed Delivery® feature to receive automated notifications on your packages

[Learn More](#)

Tracking Number:

7022333000036365807

[Remove X](#)

[Copy](#) [Add to Informed Delivery](#)

Latest Update

Your item was delivered to an individual at the address at 12:43 pm on March 14, 2026 in PINEVILLE, KY 40977.

Delivered

Delivered, Left with Individual
PINEVILLE, KY 40977
March 14, 2026 12:43 PM

[See All Tracking History](#)

Get More Out of USPS Tracking:
[USPS Tracking Plus®](#)

[What Do USPS Tracking Statuses Mean?](#)

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](#)

EXHIBIT C-2

SUPPLEMENTAL PROOF OF NOTICE – WILSON 2

ALERT: IMPACTS FROM THE WORLD SOCCER TOURNAMENT HELD IN MAJOR CITIES THROUGHOUT THE U.S. FROM JUNE 11TH THROUGH JULY 19TH, 2026 AND FLOODING IMPACTS IN THE GULF COAST REGION OF THE U.S. MAY DELAY FINAL DELIVERY OF YOUR MAIL AND PACKAGES. [READ MORE](#)

USPS Tracking®

[FAQs >](#)

**Track Packages
Anytime, Anywhere**

Get the free Informed Delivery® feature to receive automated notifications on your packages

[Learn More](#)

Tracking Number:

9589071052701828063205

[Remove X](#)

[Copy](#)

[Schedule a Redelivery](#)

Latest Update

Your item arrived at the PINEVILLE, KY 40977 post office at 11:15 am on June 16, 2026 and is ready for pickup. Your item may be picked up at PINEVILLE, 111 S WALNUT ST, PINEVILLE, KY 409779998, M-F 0830-1600; SAT 0900-1100.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Available for Pickup

Available for Pickup

PINEVILLE
111 S WALNUT ST
PINEVILLE KY 40977-9998
Mon-Fri 8:30 AM-4:00 PM
Sat 9:00 AM-11:00 AM
June 16, 2026 11:15 AM

Reminder to Schedule Redelivery of your item before **June 30, 2026**

June 15, 2026

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean?](#)

Text & Email Updates



Schedule Redelivery



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](#)