

**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: On June 22, 2026, Applicants filed a response, stating that

Applicants had 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). Additionally, Applicants' response stated that Applicants had 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).

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). Since filing Applicants' June 22, 2026 response, Applicants received a signed United States Postal Service Form 3811 "green card" corresponding to the second letter addressed to Maria A. Warren with tracking number 9589071052701828063199. A copy of the "Certified Mail Receipt" confirming the date on which the letter was sent, along with the returned "green card" is attached as **Exhibit B**.

Additionally, Applicants have received a returned letter marked "Return to Sender / Unclaimed / Unable to Forward", this being the second letter addressed to Eugene & Rosetta Wilson with tracking number 9589071052701828063205. A copy of the "Certified Mail Receipt" confirming the date on which the letter was sent, along with a copy of the returned undelivered letter is attached as **Exhibit C**.

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**.

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 - Supplemental Proof of Notice – Warren
- C - Supplemental Proof of Notice – Wilson

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:

[Signature]

Date:

07/2/26

State of Kentucky

County of Bullitt

AFFIANT ACKNOWLEDGEMENT

On this, the 2nd day of July, 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:

July 13, 2026

Chad Smith KYNP54887

Notary Public, State at Large

EXHIBIT B

SUPPLEMENTAL PROOF OF NOTICE – WARREN

9589 0710 5270 1828 0631 99

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

WARREN MARIA A
 2197 EVERGREEN RD
 FLAT LICK, KY 40935



PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- 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.

1. Article Addressed to:

WARREN MARIA A
 2197 EVERGREEN RD
 FLAT LICK, KY 40935



9590 9402 7926 2305 8637 99

2. Article Number (Transfer from service label)

9589 0710 5270 1828 0631 99

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

EXHIBIT C

SUPPLEMENTAL PROOF OF NOTICE – WILSON

9589 0710 5270 1828 0632 05

**U.S. Postal Service™
CERTIFIED MAIL® RECEIPT**
Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL SHEPHERDSVILLE KY

Certified Mail Fee \$
 Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage \$

WILSON EUGENE & ROSETTA
9334 HIGHWAY 92
PINEVILLE, KY 40977

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

JUN 04 2026
Postmark Here

Pike
P. O. Box 369
Shepherdsville, KY 40165-0369

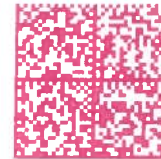
CERTIFIED MAIL®



9589 0710 5270 1828 0632 05

WILSON EUGENE & ROSETTA
9334 HIGHWAY 92
PINEVILLE, KY 40977

FIRST-CLASS



US POSTAGE™ PITNEY BOWES

ZIP 40165
02 7H
0006034260

\$ 006.04⁰
JUN 04 2026

7-2

UTFK1: 9333120511

UNC

40165>0369

4097788125 8002

NIXIE 372 DE 1 0006/28/26

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

BC: 40165036969 *1370-00532-05-42



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

SENDER: COMPLETE THIS SECTION

- 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.

1. Article Addressed to:

WILSON EUGENE & ROSETTA
9344 HIGHWAY 92
PINEVILLE, KY 40977



9590 9402 7926 2305 8638 05

2. Article Number (Transfer from service label)

9589 0710 5270 1828 0632 05

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Insured Mail

☐ Insured Mail Restricted Delivery
(over \$500)

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted
Delivery

☐ Signature Confirmation™

☐ Signature Confirmation
Restricted Delivery

Domestic Return Receipt