

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

In the Matter of:

THE ELECTRONIC APPLICATION OF	)	
VERTICAL BRIDGE AND CELLCO PARTNERSHIP	)	
D/B/A VERIZON WIRELESS FOR ISSUANCE OF A	)	
CERTIFICATE OF PUBLIC CONVENIENCE AND	)	CASE NO. 2026-00133
NECESSITY TO CONSTRUCT A WIRELESS	)	
COMMUNICATIONS FACILITY IN THE	)	
COMMONWEALTH OF KENTUCKY IN THE COUNTY	)	
OF TAYLOR	)	

SITE NAME: FAIRWAY

* * * * *

**RESPONSE TO STAFF’S FIRST REQUEST FOR INFORMATION FILING
APPLICATION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
FOR CONSTRUCTION OF A WIRELESS COMMUNICATIONS FACILITY**

Cellco Partnership, d/b/a Verizon Wireless and The Towers, 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 May 19, 2026.

RESPONSE TO STAFF:

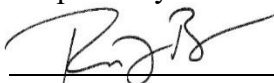
1. Provide all updated information pertaining to the status of a signed U.S. Postal Service Form 3811, otherwise known as “signed green cards,” or a copy of the notice reflecting that the certified mail was returned to Verizon Wireless as undelivered for Gray Mark and Danny and Pam Huber.
2. Attached as **Exhibit 1** please find the 2nd mailing to the owners, dated June 30, 2026 (Certified Mail Tracking No. 9589 0710 5270 1687 9002 77) with USPS Tracking

- indicating that the article arrived at the Louisville KY Distribution Center on July 2, 2026, and the 3rd mailing to the owners, dated August 12, 2026 (Certified Mail Tracking No. 9589 0710 5270 1450 3442 15) is USPS Tracking indicating the article arrived at the Louisville KY Distribution Center on August 14, 2026.
3. Attached as **Exhibit 2** please find the executed “Option and Lease Agreement” for the tower compound, previously submitted as Exhibit J, indicating that Gray, Mark and Danny and Pam Huber are owners of the subject property.
 4. Attached as **Exhibit 3** 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

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. Updated Certified Mail (2nd and 3rd attempts)
2. Executed Option and Lease Agreement (Exhibit J)
3. Affidavit of Certification