

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

In the Matter of:

THE APPLICATION OF TOWERCO 2013, LLC, AND	)	
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS	)	
FOR ISSUANCE OF A CERTIFICATE OF PUBLIC	)	CASE NO. 2026-00187
CONVENIENCE AND NECESSITY TO CONSTRUCT A	)	
WIRELESS COMMUNICATIONS FACILITY IN THE	)	
COMMONWEALTH OF KENTUCKY IN THE COUNTY	)	
OF BATH	)	

SITE NAME: BALD EAGLE

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**RESPONSE TO PSC SEPTEMBER 3, 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:

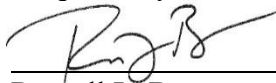
1. 807 KAR 5:063 Section 1(1)(f): Provide the lease or sale agreement for the property on which the tower is proposed to be located.
2. Attached as **Exhibit 1** please find an updated Exhibit J, executed Easement Agreement between Douglas B Wells and Donna J Wells (“Grantor”) and TowerCo VI, LLC (“Grantee”).
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 & Grahm, 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,



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LIST OF EXHIBITS

- 1 Updated Exhibit J
- 2 Affidavit of Certification