## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NEW	)	
CINGULAR WIRELESS PCS, LLC D/B/A AT&T	)	
MOBILITY FOR ISSUANCE OF A CERTIFICATE	)	
OF PUBLIC CONVENIENCE AND NECESSITY	)	CASE NO.
TO CONSTRUCT A WIRELESS	)	2021-00398
COMMUNICATIONS FACILITY IN THE	)	
COMMONWEALTH OF KENTUCKY IN THE	)	
COUNTY OF GRAYSON	)	

## COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION TO NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T MOBILITY AND TILLMAN INFRASTRUCTURE, LLC

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility (AT&T Mobility) and Tillman Infrastructure, LLC (together, "Joint Applicants"), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than August 11, 2023. The Commission directs Joint Applicants to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID- 19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Joint Applicants fails or refuses to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Application, Exhibit B, PDF page 52, marked Page 1 of 3 in lower right-hand corner and Joint Applicants' Response to Nicolais' First Request for Information, Exhibit E.

- a. Reconcile the difference between the map and the survey location of the cellular tower lease location.
- b. Provide and depict on a map the accurate distance from the closest point on the cellular tower footprint to the Nicolai residence.
- c. Provide and depict on a map the accurate distance from the center point of the cellular tower to the Nicolai residence.
- 2. Reference Joint Applicants' Response to Nicolais' First Request for Information, Item 5. Provide a copy of each of the letters sent to property owners by the site acquisition agents as referenced in paragraph four of the response.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

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DATED \_ JUL 28 2023

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