

AUG 29 2022

PUBLIC SERVICE  
COMMISSION

# Roger & Janelle Nicolai

2663 Blue Bird Rd.  
Falls of Rough, Kentucky 40119



August 29, 2022

To Whom It May Concern,

This is our initial request for information from AT&T Mobility and Tillman Infrastructure LLC, the Joint Applicants. This request is made in compliance with the order set forth by the Kentucky PSC on August 18th, 2022.

**RE: Communication between the Joint Applicants and residents within Falls of Rough, Kentucky.**

## **Specific Questions**

1. Since January 1st, 2015 have any residents of the Falls of Rough requested a wireless communications facility to be constructed on their property?
2. At the public hearing on March 3rd, 2022, did any attendees, other than Terry and Kim Newton, express interest in hosting a communications facility on their property?

**RE: Communication between the Joint Applicants and Terry and Kimberly Newton (the Newtons).**

1. We are requesting all communication (written, verbal, et al.) between the Joint Applicants (including their legal representation; Pike Legal Group, PLLC) and the Newtons **from initial contact through present day.**

**Specific Questions:**

1. Who initiated contact regarding the proposed wireless communications facility, the Newtons or the Joint Applicants?
2. Who chose the proposed facility location within the property located at 2589 Blue Bird Rd., the Newtons or the Joint Applicants?
3. What other locations, within the previously mentioned piece of property, were considered prior to the CPCN?
  - 3.1. If alternative locations were considered, why were none chosen?
4. After Intervention was granted to the Nicolais by the PSC was any attempt made to relocate the proposed facility within 2589 Blue Bird Road?
  - 4.1. What has prevented the proposed site from being moved?

**RE: “Exhibit A, Real Estate Value Impact Study”, found within the Applicant response to Roger and Janelle Nicolai dated November 30th, 2021.**

1. We are requesting any and all communication (written, verbal, et al.) between the Joint Applicants (including their legal representation; Pike Legal Group, PLLC) and the author of this study (Glen D. Katz) that pertains to docket #2021-00398.

**Specific Questions**

1. Was any form of compensation involved in the procurement and creation of this study?
2. Has this study, in whole or in part, been used in any other cases involving the PSC?
  - 2.1. If yes, how many?
  - 2.2. If yes, what are their docket/case numbers?

Respectfully,

Roger & Janelle Nicolai