

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO	)	
PARTNERSHIP D/B/A VERIZON WIRELESS FOR	)	
ISSUANCE OF A CERTIFICATE OF PUBLIC	)	CASE NO.
CONVENIENCE AND NECESSITY TO	)	2023-00074
CONSTRUCT A WIRELESS COMMUNICATIONS	)	
FACILITY IN THE COMMONWEALTH OF	)	
KENTUCKY IN THE COUNTY OF CARROL	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO VERIZON WIRELESS PARTNERSHIP D/B/A VERIZON WIRELESS

Verizon Wireless Partnership d/b/a Verizon Wireless (Verizon Wireless), pursuant to 807 KAR 5:001E, shall file with the Commission an electronic version of the following information. The information requested is due on April 14, 2023. The Commission directs Verizon Wireless to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> 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 governmental agency, be accompanied by a signed certification of the preparer or the

---

<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).

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.

Verizon Wireless shall make timely amendment to any prior response if Verizon Wireless 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 Verizon Wireless fails or refuses to furnish all or part of the requested information, Verizon Wireless 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, Verizon Wireless shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to KRS 278.665(2) and 807 KAR 5:063, Section 1(1)(a)(l)(1). Also refer to Verizon Wireless's Amended Application, page 6, which states that Exhibit J includes copies of the certified green card receipts for landowners who were provided notice, and to Verizon Wireless's Amended Application, Exhibit J, which contains a certified mail receipt affixed to the mail sent to said landowners but not the signed return

receipt that documents notice was received by recipient. Provide all signed United States Postal Service Form 3811, otherwise known as “signed green cards,” that correspond to the notice list in Exhibit J.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED     MAR 30 2023    

cc: Parties of Record

\*Christopher Shouse  
Attorney  
Pike Legal Group PLLC  
1578 Highway 44 East, Suite 6  
P. O. Box 369  
Shepherdsville, KENTUCKY 40165-0369

\*Honorable David A Pike  
Attorney at Law  
Pike Legal Group PLLC  
1578 Highway 44 East, Suite 6  
P. O. Box 369  
Shepherdsville, KENTUCKY 40165-0369

\*Cellco Partnership dba Verizon Wireless  
One Verizon Way, Mailcode VC53S309D  
Basking Ridge, NJ 07920