

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CELLCO)	
PARTNERSHIP D/B/A VERIZON WIRELESS AND)	
HORVATH TOWERS VI, LLC FOR ISSUANCE)	
CASE NO. 2024-00132 OF A CERTIFICATE OF)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY TO)	2024-00132
CONSTRUCT A WIRELESS COMMUNICATIONS)	
FACILITY IN THE COMMONWEALTH OF)	
KENTUCKY IN THE COUNTY OF FLEMING)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO CELLCO PARTNERSHIP DBA VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless (Verizon Wireless) and Horvath Towers VI, LLC (Horvath Towers) (jointly, 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 on April 9, 2025. 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

¹ 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 obtain 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 fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for their 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 the Geotechnical Report provided as Exhibit 1 to the Supplemental Information Post Order filed on November 26, 2024. Joseph V. Borrelli stamped and signed the report as a licensed engineer in Kentucky. Confirm Joseph V. Borrelli was actively licensed in Kentucky at the time of filing and provide the date when the license

expires. If not confirmed, explain how the application complied with the applicable regulations.

2. Refer to the Site Development Plan and Vertical Sketch provided as Exhibit C to the Application. Stephen E. Hunt stamped and signed the report as a licensed engineer in Kentucky. The stamp stated the expiration date was May 16, 2024. Confirm Stephen E. Hunt was actively licensed in Kentucky at the time of filing and provide the date when the license expires. If not confirmed, explain how the application complied with the applicable regulations at the time of filing.

3. Refer to the Tower and Foundation Designs provided as Exhibit 2 to the Supplemental Information Post Order filed on November 26, 2024. Allen Schneider stamped and signed the report as a licensed engineer in Kentucky. Confirm Allen Schneider was actively licensed in Kentucky at the time of filing and when the license expires. If not confirmed, explain how the application complied with the applicable regulations at the time of filing.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED MAR 21 2025

cc: Parties of Record

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