

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

APPLICATION BY ARX WIRELESS
INFRASTRUCTURE, LLC FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC
NEED FOR THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF A WIRELESS
TELECOMMUNICATIONS FACILITY AT
43 OSGOOD AVENUE,
NEW BRITAIN, CONNECTICUT

DOCKET NO. 503

August 26, 2021

RESPONSES OF INTERVENOR NEW CINGULAR WIRELESS PCS, LLC
d/b/a AT&T TO INTERVENOR CITY OF NEW BRITAIN
INTERROGATORIES DATED JULY 22, 2021

Intervenor, New Cingular Wireless PCS, LLC d/b/a AT&T ("AT&T") submits the following responses to Intervenor City of New Britain's Interrogatories dated July 22, 2021.

- Q1. For the existing cell tower structure located at 723 Farmington Avenue, New Britain, CT and .92 miles from 43 Osgood Avenue, and identified in the document entitled "Existing Adjacent Towers" in Exhibit F, has either the Applicant or Intervenor [AT&T] investigated this site to determine if this telecommunications facility would satisfy the Intervenor's [AT&T] wireless service objective; and
- A1. *Yes. AT&T actually installed a wireless facility at the tower located at 723 Farmington Avenue in New Britain, Connecticut (the "Tower") several years ago. AT&T operates and maintains a wireless facility at the Tower which is identified as AT&T site "CT1028" in the Radio Frequency Analysis Report dated October 23, 2020 and identified in the record as Tab "E" of the Application (see pages 7-8). The black star to the north of the proposed site at 43 Osgood Avenue (represented by the yellow star) represents the Tower's location (see page 9 of Tab "E" of the Application).*
- Q2. If the answer to Interrogatory No. 1 is yes, explain why the existing telecommunications facility located at 723 Farmington Avenue, New Britain, CT would not satisfy the Intervenor's [AT&T] wireless service objectives.
- A2. *As evidence by AT&T's existing coverage map on page 9 of Tab "E" of the Application, AT&T's existing wireless telecommunications facility at the Tower does not provide the necessary coverage to fill the existing significant gaps in coverage that the proposed facility at 43 Osgood Avenue will fill. In other words,*

AT&T needs both wireless facilities to provide adequate coverage in this area of New Britain, CT.

Respectfully submitted,

New Cingular Wireless PCS, LLC

By: /s/ Thomas J. Regan

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CERTIFICATE OF SERVICE

I hereby certify that on this day, August 26, 2021, an electronic copy of the foregoing was sent to the Connecticut Siting Council and:

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