

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC AND
NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T FOR
A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE, AND OPERATION
OF A TELECOMMUNICATIONS FACILITY AT
1837 PONUS RIDGE ROAD,
TOWN OF NEW CANAAN, CONNECTICUT

DOCKET NO. 509

July 7, 2022

**HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC (AT&T)
UPDATED WITNESS LIST AND EXHIBIT LIST**

Homeland Towers, LLC and AT&T (the “Applicants”) respectfully submit the following updated information regarding the above-referenced Application.

I. List of Witnesses

1. Raymond Vergati, Regional Manager, Homeland Towers LLC
2. Harry Carey, Director, External Affairs, AT&T
3. Robert Burns, P.E., Project Manager, All Points Technology Corp. P.C.
4. Dean Gustafson, Professional Soil Scientist & Senior Wetland Scientist, All Points Technology Corp, P.C.
5. Brian Gaudet, Project Manager, All Points Technology Corp. P.C.
6. Martin Lavin, Radio Frequency Engineer, C² Systems on behalf of AT&T
7. Eric Fine, Implementation Engineer, Town of New Canaan Wireless Consultant, Norcom Northeastern Communications, Inc.

II. Exhibits to be Offered

The Applicants intend to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed on April 12, 2022.
2. Bulk File exhibits including:
 - a. Section 1: New Canaan 2014 Plan of Conservation
 - b. Section 2: New Canaan Zoning Regulations, adopted May 1937, last amended December 17, 2021

- c. Section 3: New Canaan Zoning Map, effective August 30, 2021
- d. Section 4: New Canaan Inland Wetlands and Watercourses Regulations, The Inland Wetlands Commission of the Town of New Canaan Connecticut, Adopted December 13, 2000, Revised through January 1, 2013
- e. Section 5: Technical Report
- f. Section 6: Wireless Market Study of the Town of New Canaan, CT, prepared by Centerline Solutions, December 1, 2014
- g. Section 7: New Canaan Cell Phone Survey Results Through October 25, 2012

- 3. Affidavit of Publication of the Legal Notice published in the Stamford Advocate on April 11, 2022 and April 12, 2022.
- 4. Applicants' Responses to Siting Council Interrogatories, Set I, dated June 2, 2022.
- 5. Applicants' Response to Party/Intervener Mark Buschmann, Trustee and Mark Buschmann's Motion to Dismiss/Motion to Stay of Proceeding, dated June 15, 2021.
- 6. Applicants' affidavit of sign posting with photographs dated June 13, 2022 (attached).
- 7. Supplemental Submission dated June 21, 2022.
- 8. Applicants' Responses to Party Mark Buschmann, Trustee, Pre-Hearing Interrogatories, dated June 21, 2022.
- 9. Applicants' Responses to Intervenor New Canaan Neighbors Pre-Hearing Interrogatories, dated June 21, 2022.
- 10. Applicants' Submission of Updated Drawings, dated June 24, 2022.
- 11. Applicants' Response to NCN Motion to Compel, dated June 24, 2022.
- 12. Applicants' Responses to Siting Council's Request for late-filed exhibits, dated June 7, 2022.

The Applicants reserve the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as may be necessary during hearing process and on redirect.

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing was sent electronically and one (1) original and fifteen (15) hard copies were sent overnight mail to the Connecticut Siting Council and sent electronically to the parties on the service list as noted below.

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
kbaldwin@rc.com

David F. Sherwood, Esq.
Moriarty, Paetzold & Sherwood
2230 Main Street, P.O. Box 1420
Glastonbury, CT 06033-6620
Phone (860) 657-1010
dfsherwood@gmail.com

Justin Nishioka
60 Squires Lane
New Canaan, CT 06840
Phone (510) 913-3476
Justin.nishioka@gmailcom

Dated: June 7, 2022



Lucia Chiocchio, Esq.
Kristen Motel, Esq.
Cuddy & Feder LLP
445 Hamilton Ave, 1⁴th Floor
White Plains, NY 10601
(914)-761-1300

cc: Homeland
AT&T
APT
Smartlink
C Squared