

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  
ONE OF TWO SITES IN THE TOWN OF  
KENT, CONNECTICUT

DOCKET NO. 488

July 16, 2020

HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T  
PRE-HEARING SUBMISSION

Homeland Towers, LLC and AT&T (the “Applicants”) respectfully submit the following pre-hearing information available at this time regarding the above-referenced Application.

I. List of Witnesses

1. Raymond Vergati, Regional Manager, Homeland Towers LLC
2. Manuel Vicente, President, Homeland Towers LLC
3. Harry Carey, External Affairs, AT&T
4. Robert Burns, P.E., Project Manager, All Points Technology Corp. P.C.
5. Michael Libertine, LEP, Director of Siting and Permitting, All Points Technology Corp. P.C.
6. Brian Gaudet, Project Manager, All Points Technology Corp. P.C.
7. Martin Lavin, Radio Frequency Engineer, C<sup>2</sup> Systems on behalf of AT&T
8. Dan Stebbins, AT&T FirstNet Solutions Consultant

II. Documents to be Administratively Noticed

The Applicants seek Administrative Notice for Petition No. 1010 Greenwich and Docket No. 427 Branford.

III. 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 February 28, 2020.
2. Bulk File exhibits including:
  - a. Section 1: Kent 2012 Plan of Conservation
  - b. Section 2: Kent Zoning Regulations, Adopted 1965, Effective December 30, 2019
  - c. Section 3: Kent Zoning Map, Effective July 1, 2018
  - d. Section 4: Kent Inland Wetlands and Watercourses Regulations, originally adopted July 1, 1988, revised effective date March 15, 2018
  - e. Section 5: Technical Report
3. Responses to Siting Council Interrogatories, Set I, dated April 17, 2020 (Attachment 2 includes the Affidavit of Public Notice published in the Republican-American on February 26, 2020 and February 27, 2020).
4. Responses to Bald Hill Neighbors Interrogatories, Set I, dated May 15, 2020.
5. Responses to PDA Interrogatories, Set I, dated May 15, 2020.
6. Supplemental Submission dated July 16, 2020.
7. Responses to Siting Council Interrogatories, Set II, dated July 16, 2020.
8. Responses to Town of Kent Interrogatories, Set I, dated July 16, 2020.
9. Responses to Bald Hill Neighbors Interrogatories, Set II, dated July 16, 2020.
10. Affidavit of Sign Posting dated July 16, 2020.

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.

#### IV. Remote Public Comment Session Presentation

Robert Burns, P.E. is the designated presenter for the 6:30 p.m. remote public comment session. For **Site A**, the presentation drawing is CP-1 last revised January 28, 2020 included in **Attachment 3** of the Application and for **Site B**, the presentation drawing is CP-1 last revised January 28, 2020 included in **Attachment 4** of the Application.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day the foregoing was sent electronically to the Connecticut Siting Council and to the service list below with one hard copy sent to the Connecticut Siting Council via first class mail in accordance with Connecticut Siting Council directives:

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July 16, 2020



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cc: Homeland Towers; AT&T; APT; C Squared