



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

April 28, 2020

Keith R. Ainsworth, Esq.
Law Offices of Keith R. Ainsworth, Esq.
51 Elm Street, Suite 201
New Haven, CT 06510-2049

RE: **DOCKET NO. 488** - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at one of two sites: Kent Tax Assessor ID #M10, Block 22, Lot 38 Bald Hill Road or 93 Richards Road, Kent, Connecticut.

Dear Attorney Ainsworth:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than May 12, 2020. To help expedite the Council's review, please file individual responses as soon as they are available.

At this time, consistent with the Council's policy to prevent the spread of Coronavirus, please submit an electronic copy only to siting.council@ct.gov. However, please be advised that the Council may later request one or more hard copies for records retention purposes.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

s/Melanie Bachman

Melanie Bachman
Executive Director

c: Parties and Intervenors

MB/RM/CW

Docket 488 - Kent
Planned Development Alliance of Northwest Connecticut, Inc

Pre-Hearing Interrogatories – Set One
April 28, 2020

1. Referring to the Planned Development Alliance of Northwest Connecticut's Application to Intervene to the Council, dated March 3, 2020, please provide the following:
 - a) Page 2 states in part, "*..there are feasible and prudent alternatives to the coverage using alternative locations and/or smaller facilities...*" What coverage analysis studies were performed to support this conclusion? Please provide.
 - b) What alternative locations are available to the Applicant that will provide comparable wireless telecommunication services in this area?
 - c) Referring to page 3, Item 4 – Please describe the best available technology that can be used to reduce the visual impact of the proposed facilities.
 - d) Did PDA take photographs of the publicly noticed balloon/crane test conducted by the Applicant that took place on January 18, 2020? If so, please submit.