

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 471
D/B/A VERIZON WIRELESS FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE :
AND OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT :
208 KIRK ROAD (a/k/a 1075 PARADISE :
AVENUE) IN HAMDEN, CONNECTICUT : APRIL 24, 2017

**RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
TO PRE-HEARING INTERROGATORIES FROM MS. PATRICIA SORRENTINO**

On April 6, 2017, Ms. Patricia Sorrentino issued Pre-Hearing Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Docket No. 471. Below are Cellco’s responses.

Question No. 1

For the record, please identify the partners in Cellco Partnership. Indicate the percentages of each partner's partnership interest at the present time and identify the general or managing partner.

Response

Cellco objects to this question as it seeks information that is beyond the scope of and not relevant to the jurisdiction of the Council over the proposed telecommunications facility. Subject to and without waiving the foregoing objections, Cellco Partnership responds as follows:

Bell Atlantic Mobile Systems LLC – 23.204935%

GTE Wireless LLC – 30.235488%

Verizon Americas, Inc. – 46.559577%

Question No. 2

Does Cellco Partnership use other d/b/a's in addition to Verizon Wireless? If so, what are those d/b/a's and where are they used.

Response

Cellco objects to this question as it seeks information that is beyond the scope of and not relevant to the jurisdiction of the Council over the proposed telecommunications facility. Subject to and without waiving the foregoing objections, Cellco Partnership responds as follows:

In Connecticut, the only jurisdiction relevant to the Docket No. 471 proceeding, the applicant is Cellco Partnership d/b/a Verizon Wireless.

Question No. 3

Do entities other than Cellco Partnership use Verizon Wireless as a d/b/a? If so, what are those entities?

Response

Cellco objects to this question as it seeks information that is beyond the scope of and not relevant to the jurisdiction of the Council over the proposed telecommunications facility. Subject to and without waiving the foregoing objections, Cellco Partnership responds as follows:

No other entities in Connecticut use Verizon Wireless as a d/b/a.

Question No. 4

For each of these entities named in your responses to Interrogatories 1-3, please list any completed or pending litigation, regulatory proceedings or arbitrations during the period of April 1, 2012 through and including March 31, 2017, alleging violations of federal, state or municipal laws, statutes, regulations, certificates, ordinances, or agreements concerning the installation, construction, operation, and maintenance of wireless telecommunications facilities owned or

constructed by or on behalf of any entity using the d/b/a of Verizon Wireless. For each such entry, please summarize the issue and the disposition.

Response

Cellco objects to this question as it seeks information that is beyond the scope of and not relevant to the jurisdiction of the Council over the proposed telecommunications facility. Subject to and without waiving the foregoing objections, Cellco Partnership responds as follows:

As it relates to its entity in Connecticut, Cellco is not aware of any such violations.

Question No. 5

Reference the Application at p. 11 (“Cell Site Selection”) concerning the Applicant's “goal in selecting cell sites.” Does Cellco Partnership or any entity using Verizon Wireless as a d/b/a have any written manual and/or policies concerning the siting of wireless telecommunications tower facilities in residential areas? If so, please submit any such documents into the record of this Docket.

Response

No such manual exists. Cellco has constructed wireless facilities throughout Connecticut in residential, commercial and industrial areas based on the needs of its customers.

Question No. 6

Reference the “Photo Log” in Tab 9 of the Attachments to the Application. Please resubmit depicting Country Club Road in its entirety, including the *cul de sac* area at the top thereof.

Response

Although difficult to make out due to the scale of the map, the Photo Log map in the Visibility Analysis (Tab 9 of the Application) does include the entirety of Country Club Road,

including the cul-de-sac near the subject parcel. An additional aerial photograph showing the northerly portion of Country Club Road is included in Attachment 1 to these responses.

Question No. 7

Reference the Visibility Analysis in Tab 9 of the Attachments to the Application. Are there any photographs depicting the view of the proposed tower from the Sorrentino home?

Response

No. As stated in the Visibility Analysis, all photographs included are taken from public rights of way. No photographs are taken from private property.

Question No. 8

Please submit into the record in this Docket at least four (4) photographs, without any lens enhancement or distortion, from the proposed tower site to the Sorrentino home:

- a. One photograph from the tree where the tower is proposed directed to the front side window of the Sorrentino home.
- b. One photograph from a point of the proposed fence area closest to the Sorrentino home directed to the front side window of the Sorrentino home.
- c. One photograph from the front side window of the Sorrentino home directed to the proposed tree where the tower is proposed to be constructed.
- d. One photograph from the front side window of the Sorrentino home directed to the proposed tree or trees where the equipment cabinet is proposed to be constructed.

Response

- a. Included in Attachment 1 is a photograph taken from the proposed tower location within the facility compound looking toward the Sorrentino home. The

photograph was taken using a focal lens setting of 50 millimeters (mm).

- b. Also included in Attachment 1 is a photograph taken from the location of the proposed facility compound fence looking toward the Sorrentino home. The photograph was taken using a focal lens setting of 50 mm.
- c. Cellco's consultants do not have any photographs of the tower site or facility compound from any private properties in the area nor does it have permission to access private property. As a party in this proceeding, Mrs. Sorrentino is entitled to produce and submit into the Docket No. 471 record, photographs of the tower site from her property.
- d. *See* response 8.c. above.

Question No. 9

Reference the All Points Technology letter to the Applicant in Tab 10 of the Attachments to the Application, which in part states that “[t]he project would result in [plus or minus] 0.4 acre of tree removal.” And on p. 7 of the Application it is stated that “[a]pproximately twenty-nine (29) trees, 6 inches or greater at breast height will need to be cleared. . . .”

- a. If the Application is approved as submitted, please state exactly how many trees in total would be removed in order to construct the facility, its twelve (12) foot wide access road and related utility conduits?
- b. Please produce an exhibit in the form of a map, photograph or other schematic depicting all of the trees that would need to be removed.
- c. For purposes of the scheduled site visit, are all of the trees currently “marked” those that the Applicants intends to remove?
- d. Please explain how the proposed tree removal required to accommodate the

Applicant's facility comports with the legislative finding and purpose set forth in Conn. Gen. Stat. § 16-50g concerning “. . . the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values . . . with minimal damage to the environment. . . .”

- e. Has the Applicant considered other areas in the vicinity that would not require the destruction of so many trees?

Response

- a. If approved as proposed in the Application, a total of twenty-nine (29) trees, larger than six inch diameter at breast height would be removed to construct the proposed facility.
- b. Please see Tab 1 of the Application. Plan Sheet C-2 depicts the location of the twenty-nine (29) trees that will be removed.
- c. The twenty nine (29) trees referenced above will be marked, in some fashion prior to the Council’s site visit in May 2, 2017.
- d. Any development of land, whether it involves the development of a residential home or a telecommunications facility will have some degree of environmental effect. Cellco believes however, that, consistent with the language in Conn. Gen. State. § 16-50g, the current proposal was successful in minimizing those effects. The Council must assess those environmental effects and then balance them with the need for the proposed wireless facility.
- e. Given the heavily-wooded nature of the westerly portion of the subject parcel it is likely that any alternative tower location in the vicinity of the existing site would require tree removal, similar to that described in the Application.

Question No. 10

Please provide actual distance in feet for the following:

- a. Distance from actual tower as proposed to the Sorrentino home property line.
- b. Distance from actual tower as proposed to the Sorrentino home.
- c. Distance from site fencing as proposed to the Sorrentino home property line.
- d. Distance from site fencing as proposed to the Sorrentino home.

Response

- a. 220 feet.
- b. 270 feet.
- c. 180 feet.
- d. 230 feet.

Question No. 11

Reference p. 11 of the Application wherein it is stated that “Cellco submits that there are no equally effective technological alternatives that would allow Cellco to provide its wireless service to the area than those described in this Application.” Please elaborate and provide any supporting documentation for this statement. Also, explain whether “small cell” facilities could provide the coverage gaps that are claimed on p. 7 of the Application.

Response

As discussed in the Application and in its response to the Council’s pre-hearing questions 4 and 5, the Hamden 8 Facility will provide coverage to existing gaps in wireless service in the area and capacity relief to three (3) adjacent cell sites. Providing service to the existing coverage gaps and, at the same time, providing capacity relief to other existing Cellco facilities in the area, from a single “macro-cell” base station is the most technologically effective and efficient way to

resolve these wireless service problems. It may be possible that a series of small cell installations could help improve wireless service in the area around the Hamden 8 Facility. The actual number of small cell facilities that would be needed to provide a service comparable to that from the proposed Hamden 8 Facility tower is not known but would be significant given the overall size of the area that Cellco is attempting to serve, the location and size of the coverage gaps and the capacity off-load needs at both 700 MHz and 2100 MHz at the surrounding sites.

Question No. 12

Concerning coverage gaps, anecdotally Verizon Wireless customers in this area of Hamden do not experience any dropped calls. Please provide any documentation and a non-technical explanation that supports the claim of coverage gaps in this area of Hamden, CT.

Response

The coverage gaps in the Hamden area referred to in the Application are accurately depicted on the coverage maps included behind Tab 6 of the Application and exist in all of Cellco's operating frequencies. The propagation modeling tool used to produce these coverage maps is highly accurate and is "fine-tuned" by incorporating actual drive data gathered by Cellco technicians. Cellco customers do, in fact, experience dropped calls in the area around the proposed Hamden 8 Facility. Recent dropped-call data for the week of April 9-15 2017, for example, shows that there were a total of 341 dropped calls (Voice Over LTE (VoLTE) and CDMA service) in the area around the proposed Hamden 8 Facility. "Dropped calls" is only one of several system performance indicators analyzed by Cellco's RF design engineers.

Question No. 13

Reference Tab 8 of the Application and Attachment 1 to the response to Siting Council Interrogatory No. 9 concerning the purported "sites investigated."

- a. For each of the parcels rejected, please describe each of the “Hamden 8 wireless service objectives” that could not be satisfied and describe to what extent in percentage terms that each of those objectives could not be satisfied.
- b. The 3 parcels in the Application that were rejected were the same three parcels that were identified during the Town Meeting in Hamden with Verizon Wireless representatives, and it became evident at that meeting that there would be overwhelming local opposition to the proposed site. Did the Applicant do any further investigation of other sites since that Town Meeting? If not, why not?

Response

- a. 1125 Shepard Avenue, Hamden, CT – A wireless facility placed at either of the two parcels identified as 1125 Shepard Avenue would be within approximately 0.9 miles of Cellco’s existing Hamden North facility and would interfere with the service from that existing facility. A cell site at 1125 Shaparel Avenue would effectively only cover approximately 41% of target area and 62% of target population.
905 Shepard Avenue, Hamden, CT - A wireless facility placed at 905 Shepard Avenue would only cover 45% of target area and 72% of target population.
310 West Shepard Avenue, Hamden, CT - A facility placed at 310 West Shepard Avenue (Laurel View Country Club) would only cover approximately 81% of target area and 78% of target population.
- b. Alternative site locations on Town-owned property were investigated following the initial municipal consultation meeting on September 7, 2016. No additional alternative sites were investigated following the November 16, 2017 Public

Information Meeting. As discussed in response to Question 13.a. above and in Cellco's response to the Council's Pre-Hearing Question No. 12, the alternative sites investigated were either rejected by Cellco's RF Engineers or withdrawn from consideration by the property owner, in this case, the Town. Contrary to the assertion in this question, a majority of the attendees at the November 16, 2017 Public Information Meeting who spoke in opposition to the tower proposal were opposed to the Laurel View Country Club site alternative. That said, Cellco submits that it has presented the Council with a cell site location that satisfies its wireless service objectives and the Council's review and approval criteria.

Question No. 14

Reference Attachment 17 of the Application, specifically Lease Exhibit designated L-2.

- a. The Lease Exhibit shows the location of a "proposed AT&T CSC Cabinet." Inasmuch as AT&T's wireless entity has indicated that it has no interest in this site, please explain its inclusion and the purpose of such cabinet.
- b. The Lease Exhibit shows a proposed "1000 gal. propane tank" on a "conc. pad at grade." Please confirm whether the Applicant plans to utilize a 1000 gallon propane tank on the site.
- c. The Lease Exhibit depicts "proposed plantings, size and type to be coordinated with Lessor" substantially around most of the proposed compound. This depiction does not appear to be consistent with the "Partial Site Plan" Sheet Number C-3 in Attachment 1 of the Application. In fact, C-3 appears to depict only screening to a portion of the area, mostly relating to the Lessor's house and tree farm. Please clarify the Applicant's intention with respect to screening.

Response

- a. To be clear, in its April 3, 2017 letter to the Council, AT&T confirmed that it had “an identified need for a tower in the area of the proposed facility” but that the Hamden 8 Facility was not a part of its current build plan. As discussed in Cellco’s Response to Council Pre-hearing Question No. 10, prior to Cellco signing a lease with the landowner, AT&T had a lease to develop a tower site on the same parcel. In July of 2015, when the Cellco lease agreement was signed, AT&T was planning to share the tower. Its equipment shelter therefore remained on the lease exhibit. The AT&T equipment cabinet is used to store AT&T’s equipment.
- b. Cellco does not intend to install any propane-fueled equipment at the Hamden 8 Facility. Cellco will utilize a 20 kW diesel-fueled back-up generator at the proposed cell site.
- c. Due to the need for a small retaining wall along the westerly side of the facility compound and the existing vegetation to the west, which will remain after the facility is constructed, supplemental plantings in this area are no longer proposed. Additional plantings along the south side of the facility compound and/or privacy slats in the compound fence could be installed to help screen views into the cell site compound from Ms. Sorrentino’s property.

CERTIFICATION OF SERVICE

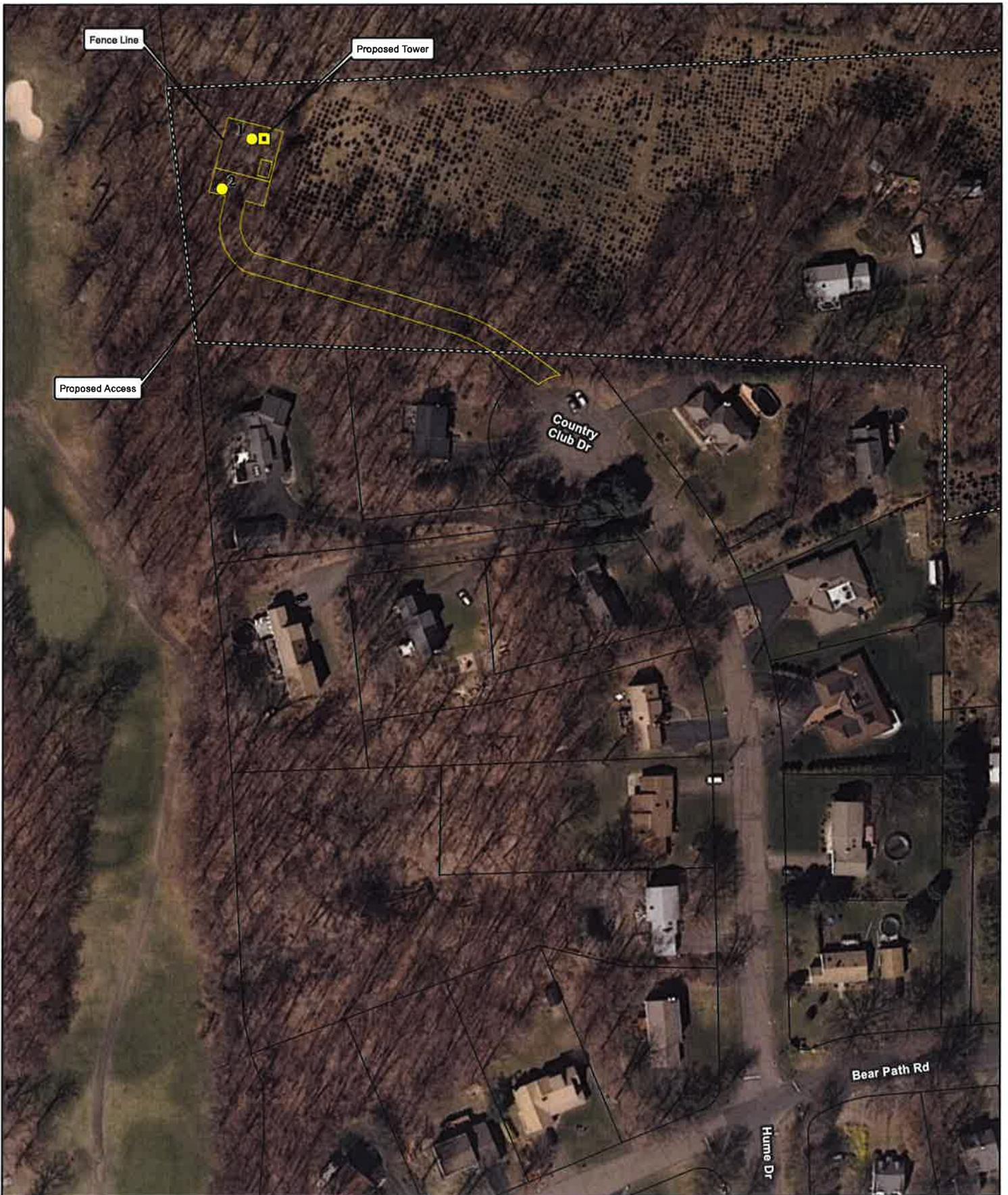
I hereby certify that on this 24th day of April 2017, a copy of the foregoing was sent via electronic mail to the following:

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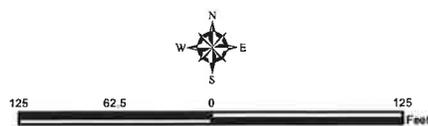
ATTACHMENT 1



Legend

- Photo Location
- Proposed Facility Layout
- Approximate Subject Property Boundary
- Approximate Parcel Boundary (CTDEEP GIS)

Map Notes:
 Base Map Source: 2012 Aerial Photograph (CT ECO)
 Map Scale: 1 inch = 125 feet
 Map Date: April 2017



Photographic Location Map

Proposed Wireless
 Telecommunications Facility
 Hamden 8
 208 Kirk Road
 Hamden, Connecticut





EXISTING

PHOTO

1

LOCATION

PROPOSED TOWER LOCATION

ORIENTATION

SOUTH



ALL-POINTS
TECHNOLOGY CORPORATION

verizon



EXISTING

PHOTO

2

LOCATION

PROPOSED FACILITY COMPOUND FENCE LOCATION

ORIENTATION

SOUTH



ALL-POINTS
TECHNOLOGY CORPORATION

verizon