



## STATE OF CONNECTICUT

### CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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#### VIA ELECTRONIC MAIL

November 21, 2023

Tracy Kulikowski, AICP  
Deputy Director Planning and Zoning/Assistant Town Planner  
Town of Greenwich  
Land Use-Planning and Zoning  
101 Field Point Road  
Greenwich, CT 06830-6463  
[Tracy.Kulikowski@Greenwichct.org](mailto:Tracy.Kulikowski@Greenwichct.org)

RE: **TS-DISH-057-231113** - Dish Wireless, LLC request for an order to approve tower sharing at an existing telecommunications facility located at 1111 East Putnam Avenue, Greenwich, Connecticut.

Dear Tracy Kulikowski:

The Connecticut Siting Council is in receipt of your recent correspondence concerning the above-referenced tower share request.

Before making a final decision on a tower share request, the Council carefully considers the proposal in accordance with the required feasibility criteria under Connecticut General Statutes §16-50aa. Entities requesting to share an existing telecommunications facility must demonstrate that the proposal is consistent with the Tower Sharing Policy of the State of Connecticut, which encourages the sharing of towers for fair consideration whenever technically, legally, environmentally and of towers economically feasible, and whenever such sharing meets public safety concerns, will avoid the unnecessary proliferation and is in the public interest.

Please note you may keep apprised of Council events on our website at <https://portal.ct.gov/CSC>, including the calendar and meeting agendas.

Thank you for your interest and concern in this very important matter. Your letter has been forwarded to Dish Wireless, LLC, the entity requesting to share the tower, and will be entered in the public comment file related to this tower share request.

Sincerely,

Melanie A. Bachman  
Executive Director

MAB/ANM/lm

c: Michael Jones, President, M+K Development ([mjones@mandkdevelopment.com](mailto:mjones@mandkdevelopment.com))

PATRICK LAROW, AICP  
DIRECTOR PLANNING AND ZONING/ZONING  
ENFORCEMENT COORDINATOR/TOWN PLANNER



TRACY KULIKOWSKI, AICP, Deputy Dir./Ass't. Town Planner  
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JACALYN PRUITT, Planner II  
LINDA BUZZEO, Planner I  
DAN CLARK, GIS Planning Analyst  
PETER MANGS, Systems and Compliance Specialist  
CRYSTAL BERRY, Housing Specialist  
DOREEN CARROLL-ANDREWS, Applications Coordinator

## PLANNING AND ZONING - LAND USE DEPARTMENT

### VIA ELECTRONIC MAIL

November 8, 2023

Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051  
siting.council@ct.gov

RE: DISH Wireless LLC Request for Order to Approve Shared Use of Existing Building, 1111 East Putnam Avenue, Riverside (Greenwich)

Dear Ms. Bachman,

I have reviewed M+K Development's October 10, 2023 request for an order from the Siting Council to approve the shared use by DISH Wireless LLC of an existing building at 1111 East Putnam Avenue in the Riverside area of the Town of Greenwich. The Greenwich Planning and Zoning Department received a copy of this request on November 2, 2023. The Department would like to comment on the radio frequency emissions information provided with the request as it relates to the 3 antennas, 6 RRH, 3 OVP and associated cables proposed for the roof level of the existing building. The summary statements made by M+K Development regarding radio frequency emissions are, at best, incomplete based upon the submitted report, Antenna Site FCC RF Compliance Assessment and Report for Municipal Submission, dated September 22, 2023.

M+K Development states in its cover letter:

"4. The operation of the proposed antennas will not increase radio frequency emissions at the facility at or above the Federal Communications Commission safety standard. As indicated in the attached power density calculations, the combined site operations will result in a total power density of 85.1328% as evidenced by Exhibit E."

"C. 2. Operation of DISH's antennas at the site would not exceed the RF emissions standard adopted by the Federal Communications Commission ("FCC"). Included in the EME report of this filing are the approximation tables that demonstrate that DISH's proposed facility will operate well within the FCC RF emissions safety standards."

However, the RF Compliance Assessment states on page 4 that the power density 85.1328% is obtained at street level only. In fact, “[a] supplemental analysis of the RF levels on the subject rooftop in the vicinity of the DISH antennas yields a worst-case result of 449.69 of the FCC general population MPE limit.” This is well above the 100-percent reference for compliance, yet not mentioned at all in the M+K Development cover letter to the Siting Council. While, barriers are to be installed at each of the DISH antenna sectors with notice signs and NOC information and guidelines are to be installed, RF Compliance Assessment does not indicate how well the barriers will work. No calculations for RF levels with the barriers in place are provided to demonstrate that the FCC’s RF compliance requirements will actually be satisfied on the roof. The Siting Council has already required RF access restriction and caution signage to be installed at this site in compliance with FCC guidance. (See EM-VER-057-230525, June 12, 2023.)

In addition, these proposed barriers do not appear to be shown on the Construction Drawings. See Sheets A-2 through A-5, dated 10/12/2023, for example.

Prior to approval of this request for order, the Planning & Zoning Department requests that:

1. The Siting Council review the RF Compliance Assessment and Report carefully and provide a response to the Town to assure that the total radio frequency emissions have been evaluated properly and will be below the applicable federal and state standards.
2. The specifications, details and proposed locations for the proposed barriers to be installed at each of the DISH antenna sectors be included in the Construction Drawings and provided to the Siting Council and the Town.

A condition of any approval by the Siting Council should be the following:

1. After the installation of all proposed equipment, but prior to the issuance of any final sign-off and/or Certificate of Occupancy by the Greenwich Building Department, DISH Wireless, LLC shall provide another independent assessment of the radio frequency levels and FCC compliance to assure that the barriers are effective and that all of the installed antenna operations on the roof comply with the applicable federal and state standards.
2. All signage required by the FCC and OSHA regarding standards for safety and human exposure to RF emissions must be installed and maintained.

If you have any questions, please do not hesitate to contact this office.

Sincerely,



Tracy D. Kulikowski, AICP

Deputy Director Planning and Zoning/Assistant Town Planner