



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

November 17, 2022

Thomas J. Regan, Esq.
Brown Rudnick LLP
185 Asylum Street
Hartford, CT 06103
tregan@brownrudnick.com

RE: SUBPETITION NO. 1133-CING-20221107 - New Cingular Wireless PCS, LLC d/b/a AT&T eligible facility request for modifications to an existing telecommunications facility located at 160 Wampus Lane, Milford, Connecticut.

Dear Thomas Regan:

The Connecticut Siting Council (Council) received the Eligible Facility Request (EFR) for the above-referenced facility on November 7, 2022.

According to Section 16-50j-39a of the Regulations of Connecticut State Agencies, “no declaratory ruling shall be issued to any person until a complete petition containing all information deemed relevant by the Council has been filed.”

Staff has reviewed this EFR for completeness and has identified some deficiencies with the request. On September 23, 2022, the Council issued a memorandum to telecommunications industry representatives requiring a **cumulative** far-field Radio Frequency Power Density Analysis to be provided with all telecommunications EFRs. The RF analysis prepared by C2 Systems, dated October 19, 2022, and provided with the filing, indicates a far field %MPE for AT&T in addition to the near field %MPE values from other wireless carriers located on the tower. The RF analysis does not provide a rigorous cumulative far-field analysis for all entities located on the tower. A copy of the memorandum is available on the Council’s website at the following link: [20220923-farfieldmemo_final.pdf \(ct.gov\)](http://portal.ct.gov/csc/20220923-farfieldmemo_final.pdf).

In addition, the Structural Analysis (SA) prepared by Tower Engineering Solutions, dated March 16, 2022; Mount Analysis (MA) prepared by Hudson Design Group, dated June 24, 2021; and Construction Drawings (CD) prepared by Hudson Design Group and last revised November 17, 2021, cite the 2015 International Building Code (IBC) and 2018 Connecticut State Building Code (CSBC); however, the State of Connecticut has adopted the 2022 CSBC (which incorporates the 2021 IBC) effective October 1, 2022.

Therefore, the EFR is incomplete at this time. The Council recommends that AT&T provide a revised **cumulative** RF Analysis that includes a rigorous far-field analysis for AT&T’s proposed installation and other entities located on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, and an updated MA, SA and CD that reference the 2022 CSBC/2021 IBC on or before December 16, 2022. If additional time is needed to provide the requested information, please submit a written request for an extension of time prior to December 16, 2022.

Thank you for your attention to this matter. Should you have any questions, please feel free to contact me at 860-827-2951.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie Bachman". The signature is fluid and cursive, with the first name being more prominent.

Melanie Bachman
Executive Director