

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

ARX WIRELESS INFRASTRUCTURE LLC
APPLICATION FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE, AND OPERATION OF A
TELECOMMUNICATIONS FACILITY LOCATED
AT 1061-1063 BOSTON POST ROAD IN THE
CITY OF MILFORD, CONNECTICUT

DOCKET NO. 500

Date: JUNE 7, 2021

PRE-FILED TESTIMONY OF KEITH COPPINS

Q1. Mr. Coppins, please summarize your professional background in the telecommunications industry.

A1. I am the founder and Managing Director of ARX Wireless Infrastructure LLC ("ARX"), the applicant in this proceeding. I have been part of the telecommunications industry for thirty years with a primary focus on property development, lease contract negotiations, and construction of newly-approved towers. I have successfully completed all aspects of development activities for more than 450 sites in Connecticut, Massachusetts, Rhode Island and New York. I personally handled or directly managed the leasing, zoning and construction of every site. I also coordinate with wireless carriers to address their coverage needs and determine their interest in occupying each location.

In addition, I am the principal/owner of Phoenix Partnership LLC, a telecommunications site development company. I was formerly the Vice President of Development at Optasite where I led a development team in the

Northeast Region telecommunications development and site acquisition activities. I joined Optasite from Site Acquisitions, Inc. where I was Vice-President and oversaw the leasing, zoning and construction of new tower sites. I also managed a consulting team for AT&T Wireless and T-Mobile.

Previously, I was also General Manager for American Tower Corporation and managed a consulting group for Cellular One and Southern New England Telephone. My primary responsibilities were site acquisitions, lease negotiations and zoning of new cellular sites in the New England and New York markets.

Q2. What is the purpose of your testimony?

A2. My testimony provides background information relating to this Application for a Certificate of Environmental Compatibility and Public Need ("Application") for the proposed Milford facility ("Facility").

Q3. What was your role in this Application?

A3. I was responsible for ARX's site search, site acquisition, coordination with the landowner, and communication with the wireless carriers for this Application.

Q4. Please describe your site search process for the Milford Facility.

A4. As detailed in Exhibit F to the Application, before concluding that the Site at 1061-1063 Boston Post Road was the best location to meet the carriers' needs, we affirmatively reached out to the owners of eight other properties in the area. In many instances multiple letters were ignored by the property owner. In others, such as the location at 271 Cherry Street, we met with the owner and were then advised by the owner that he was not interested in the development of a tower on his property.

Q5. Did the City of Milford ("City") request any changes to the proposed Facility design after the Technical Report was filed?

A5. Yes, attorneys David Ball, Phil Pires and I met with Milford's attorneys, John Knuff and Jon Berchem, on October 1, 2020, five weeks after the Technical Report was filed with the City. In our meeting, Mr. Knuff asked numerous questions as to whether there were other viable locations for the Facility, including the Boston Post Mall. Mr. Knuff indicated that the owner of the Mall was his client and may be interested in the Facility. Subsequently, Mr. Knuff sent a letter to counsel dated October 27, 2020 in which he inquired about four specific potential alternative locations – 1052 Boston Post Road, 1212 Boston Post Road, 1201 Boston Post Road (Connecticut Post Mall), and 10 Leighton Road.

Q6. Did you respond to the City's request?

A6. Yes. In a continuing effort to explore every possible location, and to respond to the City's inquiries, over the course of the next five (5) months we addressed the issues raised by Mr. Knuff and in particular made efforts to again contact the owners of the properties identified by the City. We also sent certified letters to each of the property owners who had not responded to our prior communications.

Q7. Did any of the property owners respond to your certified letters?

A7. Yes, two property owners responded to our certified letters: i) the owner of 10 Leighton Road, the site of Schick Manufacturing, and ii) Al Subbloie, the owner of 354 North Street.

Q8. What were the results of your discussions with the two property owners who responded to your certified letters?

10 Leighton Road, the site of Schick Manufacturing, was one of the locations the City had inquired about. Jake Bealke of Global Real Estate and Corporate Services (the agent for Schick) asked me for more details about the project. I responded with details including a potential area where a tower could be located on that site. On October 28, 2020, Mr. Bealke called me to advise that Schick was not interested in moving forward with a potential cell tower on that site because it had other plans for future expansion of the property.

In January 2021, I spoke with Al Subbloie, the owner of 354 North Street. However, AT&T deemed the site unusable because it was too close to an existing AT&T site and therefore did not meet its objectives.

Q9. Did you respond to the City's October 27, 2020 letter?

A9. Yes. Once we were confident that we had fully explored every potential alternative site, we concluded that the proposed site at 1061-1063 Boston Post Road remained the best location to meet the carriers' coverage needs.

My counsel responded to Mr. Knuff in a letter dated March 26, 2021 explaining in detail the efforts we undertook to evaluate each of the alternative sites that the City had inquired about (See Exhibit M to Application).

- We explained that the proposed new hotel building at the "Howard Johnson's site" located at 1052 Boston Post Road would not satisfy the coverage needs of Verizon.
- We explained that the property owners of 1052 Boston Post Road were not interested in a new "stub tower" on the roof of the proposed new hotel building, and that Verizon's project engineers questioned whether the new hotel building would be structurally capable of supporting such a large structure on the roof of the proposed new building.
- We also explained that the proposed new hotel building at the "Howard Johnson's site" located at 1052 Boston Post Road did not satisfy the coverage and capacity needs of AT&T.

- We advised the City that the owner of 1212 Boston Post Road did not respond to our latest certified letter, even though it was received by the owner on October 22, 2020.
- With respect to the Connecticut Post Mall at 1201 Boston Post Road, we advised the City that Verizon concluded that locating antennas on the roof of the Mall would not satisfy its service objective for the area. We also notified the City that the owner of the Mall did not respond to any of ARX's multiple communications.
- We advised the City that Schick Manufacturing, at 10 Leighton Road, was not interested in having a cell tower on its property.


Q10. Are you confident that you've completed a thorough search of potential alternative sites for the Facility?

A10. Yes. Even before the municipal consultation process, we sent multiple communications to property owners in the area to gauge their interest in a telecommunications facility. We also worked closely with the carriers to take into account their coverage needs. Following our consultations with the City we continued our process by again reaching out to each owner. And even where property owners did not necessarily respond, we worked with the carriers to examine the optimum site for their coverage needs. We filed the Application with the Siting Council only after we exhausted these efforts and again concluded that the proposed site at 1061-1063 Boston Post Road remained the best location for the Facility.

Q11. Does this conclude your testimony?

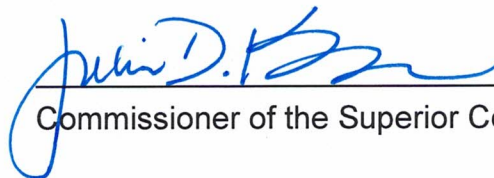
A11. Yes.

I hereby affirm that the foregoing is true and correct to the best of my knowledge.



Keith Coppins

Sworn to and subscribed before me this 17th day of June, 2021.



Commissioner of the Superior Court