

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

IN RE:

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

DOCKET NO. 500

June 7, 2021

**RESPONSES OF NEW CINGULAR WIRELESS PCS, LLC (“AT&T”)  
TO THE CITY OF MILFORD INTERROGATORIES**

- Q1. Provide all maps, photos or representations generated by AT&T, or provided by AT&T to ARX, depicting each of the following areas referenced in the Technical Report at pages 6-7:
- a. “target search area”;
  - b. “site search ring”; and
  - c. “site search area.”
- A1. *The search area for the proposed facility is the general area that is currently served by AT&T’s rooftop facility, which will be decommissioned. Please see page 2 of AT&T’s Radio Frequency Analysis Report (“AT&T’s RF Report”), included in Exhibit E of the Application for a detailed discussion of the area of lost coverage, which is identified as the “targeted area.” Also reference Attachments 2- 4 in AT&T’s RF Report. Please also see AT&T’s response to Question 7 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One.*
- Q2. The propagation plot at page 13 of the August 21, 2020 Radio Frequency Analysis Report (which is appended to ARX’s Technical Report) is labeled “Existing and Proposed 700 MHz LTE Coverage.” Clarify whether the image shows coverage from both the existing (CT2216) and proposed (CT2327) facilities in combination, or from the proposed facility only.
- A2. *The image shows proposed coverage from CT2327. It does not depict coverage from the current site (CT2216).*
- Q3. Identify all potential replacement solutions for the current facility at 1052 Boston Post Road (hotel site) that AT&T considered as an alternative to the proposed tower in the Application. For each such solution:
- a. Describe all of AT&T’s bases for rejecting each potential solution, including engineering reasons, coverage reasons, and/or lack of interest by the site owner.

- b. If rejected for engineering or coverage reasons, provide the analysis and backup documentation on which AT&T is relying to support the assertion.
- c. If AT&T is asserting that a site was rejected due to lack of interest by the owner:
  - i. Identify and provide all written communications with owner or owner's representative, including:
    - Date;
    - Addressee and address;
    - Whether receipt was confirmed; and
    - Owner's response.
  - ii. Identify dates of all oral communications (or attempted calls) with owner or owner's representative, including:
    - Date;
    - Names and roles of persons on the call; and
    - Owner's response.

*A3. Please see AT&T's response to Q8 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One.*

**Q4.** Provide any and all coverage analyses generated from 2019 to the present relating to the Connecticut Post Mall property (1201 Boston Post Road), including potential coverage from antennas at various locations and heights on the 74.86-acre Mall property.

*A4. Please see AT&T's response to Q8 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One.*

**Q5.** For each site marked in the propagation plots on pages 10-13 of the August 21, 2020 Radio Frequency Analysis Report (which is appended to ARX's Technical Report), identify:

- Type of antenna (e.g., large antenna array, DAS, small cell, etc.);
- Antenna height;
- Structure on which antenna is located (e.g., freestanding tower, rooftop facility, utility pole, etc.); and
- Carriers co-located on the structure.

*A5. Please see the information contained in Attachment 2 of AT&T's RF Report, included in Exhibit E of the Application. All of AT&T's surrounding sites are macro sites. AT&T has no information on collocators or other wireless carriers' facilities at these sites.*

- Q6. Provide an updated propagation plot identifying all AT&T antenna sites that exist, or have been approved, within the area depicted on the propagation plots on pages 10-13 of the August 21, 2020 Radio Frequency Analysis Report (which is appended to ARX's Technical Report) but that do not appear on those pages. For each newly-marked site, identify:
- Type of antenna (e.g., large antenna array, DAS, small cell, etc.);
  - Antenna height;
  - Structure on which antenna is located (e.g., freestanding tower, rooftop tower, utility pole, etc.); and
  - Carriers co-located on the structure.
- A6. *There are no other or additional AT&T sites that exist or have been approved within the area depicted in the plots.*
- Q7. In Council Interrogatories to AT&T, Set One 5/21/21, No. 8, the Council asked: *“Please explain the feasibility of meeting AT&T’s service objectives from each of the alternative [potential] facilities identified in the City of Milford’s October 27, 2020 correspondence.”* Has AT&T made a determination as to whether its asserted coverage needs could be accomplished through a multi-site solution, i.e., a combination of facilities? If so, describe AT&T conclusions and the basis therefor, and provide all analysis and documentation on which AT&T is relying.
- A7. *No, AT&T has not made a determination as to whether coverage needs could be accomplished through a multi-site solution in compliance with the state mandate in C.G.S. §§16-50g and 16-50aa requiring a one-tower solution where feasible. AT&T seeks to avoid the unnecessary proliferation of towers.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, an electronic copy and 15 hard copies of the foregoing was sent to the Connecticut Siting Council with an electronic copy sent to:

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Dated: June 7, 2021



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