

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

July 19, 2021

**RESPONSES OF NEW CINGULAR WIRELESS PCS, LLC (AT&T)
TO PARTY CITY OF MILFORD SUPPLEMENTAL INTERROGATORIES**

- Q8. Please confirm that the facility at 1052 Post Road is currently in operation.
- A8. *AT&T's facility at 1052 Post Road is currently in operation.*
- Q9. Please confirm that AT&T's coverage objectives could be met by placement of a tower at any one of the following sites:

- a. 1052 Boston Post Road (current hotel site)
- b. 1201 Boston Post Road (Mall)
- c. 1212 Boston Post Road (Old Navy)
- d. 10 Leighton Road (Schick).

A9.

- a) *This is the location of the current AT&T facility that the Proposed Facility is intended to replace. Please see AT&T's responses to Q8 and Q18 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One.*
- b) *Please see AT&T's responses to Q8 and Q18 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One and Q27 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set Two. Further, this site is not feasible given the property owner's lack of interest in leasing the site for use as a telecommunications facility.*
- c) *Please see AT&T's responses to Q8 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One.*
- d) *Please see AT&T's responses to Q8 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One and Q28 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set Two.*

Q10. Please confirm that, if a tower were approved at any of the sites listed in Request 12(a)-(d) above, AT&T could both aim the antennas, and utilize remote electrical tilt (“RET”) capability to optimize the coverage area and avoid overlap with existing cell sites, such as the existing self-support lattice tower at 434 Boston Post Road.

A10. *The site at 1052 Boston Post Road is the current AT&T facility which the Proposed Facility is intended to replace. Current operation of this facility evidences that it can coexist with the current site at 434 Boston Post Road and all the other existing AT&T sites.*

With respect to all the other locations listed in Q9(a)-(d) above, any confirmation (or denial) would have to be based on a specific location and antenna height, neither of which are provided in the interrogatory. As an example, the distance from a site on the Mall property to AT&T’s existing site CT2169 could be anywhere from roughly 4200 feet to 7900 feet based on the exact location chosen, making any blanket prediction of compatibility with existing sites impossible.

Q11. With reference to Attachments 1 and 2 to AT&T’s responses to the Council’s Requests Set Two (which show potential coverage from a tower at the Mall or the Schick billboard), please confirm that the depicted coverage areas could be changed by aiming and tilting the antennas.

A11. *Altering the configuration of any site by “aiming and tilting the antennas” can impact the facility’s “coverage areas”. The alternate locations cited were analyzed by AT&T in a configuration intended to maximize their coverage. Any such “aiming and tilting the antennas” would not expand the coverage area in any substantial way but would most likely “change” the coverage by reducing it.*

Q12. With reference to AT&T’s response to the City’s Request No. 7, in which AT&T stated: “AT&T seeks to avoid the unnecessary proliferation of towers,” please confirm that not every rooftop telecommunications facility involves a tower.

A12. *Very few rooftop telecommunications facilities involve a tower. AT&T has many sites on structures other than towers, including numerous rooftop facilities. AT&T’s response to City Request #7 did not assert that every rooftop telecommunications facility involves a tower. The Connecticut Siting Council has a statutory obligation, nonetheless, to avoid the unnecessary proliferation of towers and AT&T seeks to avoid that same unnecessary proliferation.*

Q13. Explain whether AT&T’s coverage objectives could be met with a combination of antennas on the roofs of existing buildings, such as:

- a. 1052 Boston Post Road (current hotel site)
- b. 1212 Boston Post Road (Old Navy)
- c. 10 Leighton Road (Schick)
- d. 354 North Street (Budderfly).

A13.

- a) *As previously stated in the response to Q9, the facility at 1052 Boston Post Road is the current AT&T facility which the Proposed Facility is intended to replace. Please see AT&T's responses to Q8 and Q18 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One.*
- b) *The Old Navy store located at 1212 Boston Post Road in Milford is a roughly 25-foot-high building, approximately 0.4 mile NE of the Proposed Facility. The area of this rooftop is approximately 250 feet by 250 feet, and given this small area, any location on the rooftop would provide only minimal coverage. Please see AT&T's response to Q8 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One.*
- c) *The "Schick" building rooftop is a complex covering approximately 9 acres of an approximately 20+ acre parcel. There appear to be over a dozen different roof sections, ranging from approximately 15 feet AGL to approximately 40 feet AGL. There is no information about which sections of the roof Schick would make available and they have previously expressed no interest in leasing to the Applicant. Given this lack of information, no reliable conclusion can be reached with respect to coverage.*

Please see AT&T's responses to Q8 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set One and Q28 of the Siting Council Pre-Hearing Interrogatories to AT&T, Set Two.

- d) *The Budderfly Procurement and Shipping Center located at 354 North Street in Milford is a roughly 25-foot-high building, approximately 1 mile WNW of the Proposed Facility, mainly surrounded by 50-75-foot-tall trees. Given these characteristics, the coverage achievable from this building's rooftop at 25 to 50 feet below the tree canopy would be very limited. This building is located within an area that is already substantially covered, so its minimal coverage would be largely redundant of existing coverage and could make no meaningful contribution to new coverage in this area.*

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

CERTIFICATE OF SERVICE

I hereby certify that on this day, one original and fifteen (15) hard copies and one electronic version of the foregoing was sent to the Connecticut Siting Council and one electronic copy was sent to:

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Dated: July 19, 2021



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