

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE: :
 :
 : DOCKET NO. 500
 :
 ARX WIRELESS INFRASTRUCTURE, LLC :
 APPLICATION FOR A CERTIFICATE OF :
 ENVIRONMENTAL COMPATIBILITY AND :
 PUBLIC NEED FOR THE CONSTRUCTION, :
 MAINTENANCE AND OPERATION OF A :
 WIRELESS TELECOMMUNICATIONS :
 FACILITY LOCATED AT 1061-1063 :
 BOSTON POST ROAD, MILFORD, : June 1, 2021
 CONNECTICUT :

**PARTY CITY OF MILFORD INTERROGATORIES
TO ARX WIRELESS INFRASTRUCTURE, LLC**

1. Reconcile ARX’s references to “target search area,” “site search ring,” and “site search area” referenced in the Technical Report at pages 6-7 with ARX’s claim in the March 26, 2021 letter to the City (*see Ex. M to App.*) that “*No document describes the search area, as the proposed facility is a replacement site.*”
2. Explain the difference, if any, between the (a) “target search area,” (b) “site search ring,” and (c) “site search area” referenced in the Technical Report at pages 6-7, including whether the two carriers (Verizon and AT&T) had different search areas.
3. Confirm that the 75 x 75-foot lease area described in the site plan for the proposed tower completely within the residential R-12.5 One Family Residential zone.
4. Confirm that, pursuant to § 3.1.4 of the Milford Zoning Regulations, the maximum as-of-right building height in the R-12.5 zone is thirty-five (35) feet.
5. Confirm that the proposed tower would not be eligible for a special permit or special exception in the R-12.5 zone under § 3.1.2.18 of the Milford Zoning Regulations because the lot size is less than five (5) acres, and the proposed tower does not meet the minimum setback requirements.
6. ARX’s May 4, 2021 “Supplement to Section VII(C) of the Application Narrative” asserts: “*The tower, with AGL 116.0’ to the top of the antennas, would not be set back from all lot lines by a distance equal to or greater than 116.0’. The tower would, however, be setback more than 116.0’ from all street lines.*” Identify the precise measurements from the base of the proposed tower to all surrounding lot lines and street lines, and provide an accurate visual depiction of those measurements.

7. What is the distance and direction from the base of the proposed tower to the nearest ten (10) residences? Provide an accurate visual depiction of those measurements.
8. Confirm that the site of the current antenna that Verizon and AT&T are seeking to replace – i.e., the former hotel site at 1052 Boston Post Road – is located in the ICD “Interchange Commercial District.”
9. Confirm that, pursuant to § 3.22.4.3(3) of the Milford Zoning Regulations, the maximum as-of-right building height in the ICD zone is one hundred twenty (120) feet.
10. Confirm that the Connecticut Post Mall property (1201 Boston Post Road) is located in the SCD “Shopping Center District.”
11. Confirm that, pursuant to § 3.22.4.3(3) of the Milford Zoning Regulations, the maximum as-of-right building height in the SCD zone is one hundred twenty (120) feet.
12. Identify all potential replacement solutions for the current facility at 1052 Boston Post Road (hotel site) that ARX considered as an alternative to the proposed tower in the Application. For each such solution:
 - a. Describe all of ARX’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 ARX is relying to support the assertion.
 - c. If ARX 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.
13. In October 2020, the City provided ARX with contact information for the owners of 1052 Boston Post Road (current hotel site), including Wes Clark (phone number and email

address) and John Wilcox (phone number). What was the basis of ARX's decision not to utilize the contact information provided by the City?

14. In October 2020, the City advised ARX that the owner of 1201 Boston Post Road (Mall property) is interested in further discussion about locating wireless antennas on the Mall property. The City clarified that wireless siting inquiries for the Mall property should be directed to Christopher Leverone of American Tower, whose phone number, mailing address, and email address were provided to ARX. What was the basis of ARX's decision not to utilize the contact information provided by the City?
15. 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.
16. Has ARX made a determination as to whether the carriers' asserted coverage needs could be accomplished via multi-site solutions that do not require construction of a new freestanding tower? If so, describe ARX's conclusions and the basis therefor, and provide all documentation on which ARX is relying.
17. Is obtaining approval at 1063 Boston Post Road, as opposed to other potential sites identified in the Application, material to ARX's involvement in the underlying project? In other words, would ARX lose the business if another site, or combination of sites, were selected?
18. What weight, if any, should the Siting Council give to ARX's and/or the carriers' business interests in light of the State's policy of avoiding the unnecessary proliferation of towers in the state? Cite any legal authority on which your answer relies.

Respectfully submitted,

CITY OF MILFORD

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on June 1, 2021:

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