

**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 CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS (“VERIZON”)**

1. In its March 26, 2021 letter to the City (*see* Exhibit M to App.), ARX states: “*Verizon did not generate a new search ring for this area . . . .*” Is Verizon relying on an old search ring? If the answer is yes, please provide it.
2. Provide all maps, photos or representations generated by Verizon, or provided by Verizon 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.”
3. Confirm that the Verizon propagation plots on pages 30-35 of the PDF document containing the Technical Report do not show existing coverage from the antenna currently operating at 1052 Boston Post Road (hotel site).
4. Provide propagation plots showing existing coverage in the “target” area.
5. Identify all potential replacement solutions for the current facility at 1052 Boston Post Road (hotel site) that Verizon considered as an alternative to the proposed tower in the Application. For each such solution:
  - a. Describe all of Verizon’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 Verizon is relying to support the assertion.

- c. If Verizon 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.
6. 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.
7. In its March 26, 2021 letter to the City (*see* Ex. M to App.), ARX states: "*Verizon has evaluated the roof of the Connecticut Post Mall and determined that it is too low and would not satisfy its service objective in the area.*" Identify the precise roof locations that Verizon evaluated, and provide any analysis and backup documentation Verizon is relying on to support its "determination."
8. In its October 8, 2020 letter to the City (*see* Ex. M to App.), ARX states: "*Small cell sites that are operational are in fact identified in the Verizon propagation plots contained in the Technical Report.*" For each site marked in the propagation plots on pages 30-35 of the PDF document containing the 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.
9. In its October 8, 2020 letter to the City (*see* Ex. M to App.), ARX stated that it would disclose two additional Verizon antenna sites that had been approved by PURA but were not on the propagation plot in the Technical Report. However, in its March 26, 2021 letter to the City (*id.*), ARX stated: "*Verizon has indicated that it will not provide us with additional plots other than what we have already provided to you.*" Provide an updated propagation plot identifying all Verizon antenna sites that exist, or have been approved, within the area depicted on the propagation plots on pages 30-35 of the PDF document containing the 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.

10. In Council Interrogatories to Verizon, Set One 5/21/21, No. 10, the Council asked: *“Please explain the feasibility of meeting Cellco’s service objectives from each of the alternative [potential] facilities identified in the City of Milford’s October 27, 2020 correspondence.”* Has Verizon 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 Verizon’s conclusions and the basis therefor, and provide all analysis and documentation on which Verizon is relying.

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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