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June 8, 2021

*Via Electronic Mail and Federal Express*

Melanie A. Bachman, Esq.  
Executive Director/Staff Attorney  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: **Docket No. 500 – Application of ARX Wireless Infrastructure, LLC 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, Connecticut**

Dear Ms. Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless (“Cellco”), enclosed please find the original and fifteen (15) copies of Cellco’s Responses to the City of Milford’s Interrogatories related to Docket No. 500. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information please do not hesitate to contact me.

Melanie A. Bachman  
June 8, 2021  
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Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kenneth C. Baldwin

KCB/kmd  
Enclosures  
Copy to:

David A. Ball, Esq. (*via electronic mail*)  
Philip C. Pires, Esq. (*via electronic mail*)  
Kristen Motel, Esq. (*via electronic mail*)  
Lucia Chiochio, Esq. (*via electronic mail*)  
John W. Knuff, Esq. (*via electronic mail*)  
Jeffrey P. Nichols, Esq. (*via electronic mail*)

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
: :  
APPLICATION OF ARX WIRELESS : DOCKET NO. 500  
INFRASTRUCTURE, LLC FOR A :  
CERTIFICATE OF ENVIRONMENTAL :  
COMPATIBILITY AND PUBLIC NEED FOR :  
THE CONSTRUCTION, MAINTENANCE :  
AND OPERATION OF A WIRELESS TELE- :  
COMMUNICATIONS FACILITY LOCATED :  
AT 1061-1063 BOSTON POST ROAD, :  
MILFORD, CONNECTICUT : JUNE 8, 2021

**RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS  
TO PARTY CITY OF MILFORD INTERROGATORIES**

On June 1, 2021, the City of Milford, a designated Party to these proceedings, issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Docket No. 500. Below are Cellco’s responses.

**General**

**Question No. 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.

**Response**

The proposed site is a replacement for Cellco’s existing Forest Heights CT site located on the roof of the Howard Johnson at 41°-13’-59.2” N 73°-02’-43.8” W.

**Question No. 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.”

Response

As stated in the response to question 1 above, Cellco did not create a search ring or search area and we did not provide such documents to ARX.

Question No. 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).

Response

Correct. The plots in the ARX Technical Report (pp. 30-35 of the PDF document) depict coverage from Cellco’s existing sites in and around the target area with and without the proposed ARX tower, Cellco’s Forest Heights Relo Facility. As discuss in the ARX application, the Forest Heights Relo Facility would replace service from the existing Cellco facility at 1052 Boston Post Road.

Question No. 4

Provide propagation plots showing existing coverage in the “target” area.

Response

Propagation plots requested are being prepared and will be provided shortly. We apologize for the delay.

Question No. 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.

### Response

*See* Cellco's response to Council Interrogatory No. 10. Further, before intervening in the ARX application, Cellco began investigating two additional alternative locations for a replacement tower site, one at 354 North Street and one at 1052 Boston Post Road. Cellco reached out to AS Realty, LLC, the owner of property at 354 North Street, who expressed some interest in discussing a possible tower location. Cellco also reached out to the owners of 1052 Boston Post Road about hosting a new tower somewhere on this parcel. Prior to entering into lease negotiations at either owner, ARX commenced its Siting Council process and presented Cellco with a viable replacement tower location that would satisfy its wireless service objectives.

### Question No. 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.

### Response

Cellco has three existing sites that cover Connecticut Post Mall (the "Mall") property. They include: Old Gate is a monopole located 0.6 miles east of the mall; Milford SC4 is a small cell located on the west side of the Mall along Boston Post Road, and the an in-building system (MRO) that covers the inside of the Mall itself. These sites are shown on the coverage plots on pages 30 and 34 of the technical report labeled "W/O Forest Heights, 700 MHz" and "W/O Forest Heights, AWS". As shown on the plots, Cellco has very good coverage on the Mall property even without the existing Forest Heights site or the proposed ARX tower. We also have sufficient capacity in the area. Adding a site anywhere on the roof of the Mall would cause excessive overlap with the existing cell sites and would be a detriment to Cellco's network.

Question No. 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.”

Response

*See* Cellco’s response to Question No. 6 above and Council Interrogatory No. 10.

Question No. 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.

Response

*See* also Cellco’s response to Council’s Interrogatory No. 16.

<b>Site Name</b>	<b>Antenna Type</b>	<b>Structure Type</b>	<b>Antenna Height</b>	<b>Colocators</b>
Milford Center CT	Antenna Array	Self-Support	90'	Various
Milford S CT	Antenna Array	Smoke Stack	66'	Various
Milford S II CT	Antenna Array	Monopole	126'	Various
Old Gate CT	Antenna Array	Self-Support	100'	Various

Site Name	Antenna Type	Structure Type	Antenna Height	Colocators
CT Post Mall In-Building	In-building DAS	In-Building DAS	N/A	Various
Milford CT SC10	Small Cell	Utility Pole	37'	None
Milford CT SC4	Small Cell	Utility Pole	37'	None
Milford SC2 CT	Small Cell	Utility Pole	37'	None
Milford SC19 CT	Small Cell	Utility Pole	37	None
Milford SC26 CT	Small Cell	Utility Pole	37	None
Milford SC22 CT (Future)	Small Cell	Utility Pole	37	None

Question No. 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.

Response

The additional sites referenced are Milford SC19 and Milford SC26, which have been added to the table included in Response No. 8 above. Also included is information on Milford SC22 which we expect will be constructed and on-air by the end of 2021.



Question No. 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.

Response

ARX has presented the Council with a proposed tower location that allows for a single site solution as a replacement for the existing Forest Heights Facility. A multi-site solution is not the preferred approach and would only be considered if a single-site solution was not available.

**CERTIFICATION OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of June, 2021, a copy of the foregoing was sent, via electronic mail, to the following:

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Kenneth C. Baldwin