

**STATE OF CONNECTICUT
SITING COUNCIL**

DOCKET NO. 502 - Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 118 Newton Road, Woodbridge, Connecticut

JUNE 29, 2021

WNNET'S DISCOVERY REQUESTS TO APPLICANT

WNNET, Intervenor in these proceedings, hereby propounds the attached Interrogatory requests to the Applicant.

Respectfully Submitted,

WNNET,

By _____

Keith R. Ainsworth, Esq.

Law Offices of Keith R. Ainsworth, Esq., L.L.C. #403269

51 Elm Street, Suite 201

New Haven, CT 06510-2049

(203) 435-2014

keithrainsworth@live.com

Docket No. 502
Pre-Hearing Interrogatories to Applicant – Verizon Wireless

June 23, 2021

1. Referring to the Application, provide the following:
 - a) For each alternate site to the one applied for, please describe the studies performed to determine the technical suitability of the site to provide the wireless coverage desired.
 - b) For each study described in the previous sub-part of this interrogatory, please provide the data generated for each site so that the same may be evaluated for accuracy?
 - c) For each study described in sub-part a of this Interrogatory, please provide the identity of the technical tools used to perform the study and the assumptions or inputs that gave rise to the data outputs so that the same may be reproduced and evaluated for accuracy.
 - (1) Please provide the test data in non-proprietary format with column headers, such as .csv file.
 - (2) Please include all inputs and assumptions (such as EIRP, transmit antenna, receive antenna and link budget parameters) used to gather the data.
 - (3) Indicate whether any post processing was performed on the drive test data supplied and what was done to it.
2. Please state whether the Applicant considered using small cell technology to provide additional coverage and or capacity for the area targeted for coverage in this application.
3. If small cell technology¹ was considered, please describe any studies which were conducted to determine the suitability of small cell technology placed on or near state highways or rights-of-way would serve to provide the coverage and capacity required to meet the public need.
4. For any study identified in the previous interrogatory, please provide the data generated for each site so that the same may be evaluated for accuracy and provide the identity of the technical tools used to perform the study and the assumptions or inputs that gave rise to the data outputs so that the same may be reproduced and evaluated for accuracy.
 - (a) Please provide the test data in non-proprietary format with column headers, such as .csv file.

¹ Small cell installation being defined in this instance as a wireless telecommunications facility less than 50ft in height utilizing either CRAN or DAS-type configurations.

(b) Please include all inputs and assumptions (such as EIRP, transmit antenna, receive antenna and link budget parameters) used to gather the data.

(c) Indicate whether any post processing was performed on the drive test data supplied and what was done to it.

5. Please state whether Verizon Wireless has implemented small cell installations for the purpose of providing coverage or capacity in Connecticut and how many such installations exist.

6. Please state whether Verizon Wireless has implemented small cell installations for the purpose of providing coverage or capacity in other states and how many such installations exist.

7. Please state whether Verizon Wireless is a carrier providing wireless telecommunications service through the small cell array located in Chilmark, Massachusetts.

(a) If so, please provide a description of the number of nodes in that array, the type and capacity of power backup utilized, the square area of the coverage provided by the array (or a map of the coverage provided at the frequency bands utilized by Verizon) and the height of the antennas used by Verizon, the heights and types of the structures on which they are installed, the ERP used and the reason a macro tower was not utilized to provide coverage to that community.

8. The quality of the scans of the technical submissions to the Council are of limited quality such that text is illegible (e.g.: the limitations text at the bottom of the visual impact study cannot be read) preventing an understanding of the document. Please provide electronic original copies (typically pdf files from original electronic documents, not scans) of all materials submitted to CSC.

9. Please provide the SARF (site acquisition request form) and associated graphics (such as a search ring map and coverage maps produced contemporaneously with the SARF) that resulted in the present proposal.

10. Please provide copies of any communications between Verizon and its site acquisition personnel (including without limitation site acquisition company, employees and/or agents) regarding the initiation of and pursuit of site acquisition for the respective search ring.

11. Provide the analysis and/or documentation upon which Verizon personnel determined there was a coverage and/or capacity need that led to the selection of a search ring and generation of a SARF. Such material may include, without limitation, coverage maps produced contemporaneously with the decision to establish a search ring, capacity metrics and trends for sectors of surrounding cell sites.

12. In Attachment 14 of the Application, the general power density table first column deviates from the model found in the referenced Nov 10, 2015 Council memorandum by not including the air-interface technology with each band in the "Operator" column.

(a) Which of the several frequency bands depicted in the table in Attachment 14 and the Attachment 6 coverage maps are presently providing which services?

(b) Which are scheduled to be migrated to providing 5G NR services and when?

13. FCC licenses for WPLM399, WPOH945, WRDG500, WRBA734 and WRBA735 were included in the licenses in Appendix 05. Are these intended to be used at the site?

(a) If so, are there coverage maps for these licenses provided?

(b) Also, if so, why were they not included in the RF emissions analysis and the site drawings? and

(c) if not, why were they included in the Appendix?

14. CBRS (3.6 GHz band) and C Band (3.8 GHz band) equipment is included in Appendix 07 Antenna and Equipment Specs. No licenses and no coverage maps are provided for this band. These bands are not mentioned in the application narrative (p.8) What is Verizon's intention with regard to deployment of this kind of equipment at the proposed site?

15. Attachment 07 Antenna and Equipment specs shows three antennas: CBRS Clip-on, Commscope JHH-, and Samsung Massive MIMO. The narrative and site drawings call out 12 antennas for installation on the proposed tower.

(a) How many of each antenna type are proposed in each sector?

16. In reference to Application narrative p.7 "significant portions of Town where reliable service is lacking in all of Cellco's operating frequencies."

(a) Are significant portions of the Town lacking reliable 700 MHz Cellco service? If so, please describe.

(b) Are significant portions of the Town lacking reliable 800 MHz Cellco service. If so, please describe.

17. Please provide drive test map documents of the March 10, 2021 drive test, if any were prepared.

(a) Please provide drive test data in non-proprietary format with column headers, such as .csv file.

(b) Please include all inputs and assumptions (such as EIRP, transmit antenna, receive antenna and link budget parameters) used to gather the data.

(c) Indicate whether any post processing was performed on the drive test data supplied and what was done to it.

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 29th day of June 2021 and addressed to:

Ms. Melanie Bachman, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (15 orig, plus 1 electronic) (US Mail/electronic) siting.council@ct.gov .

And electronic copies to the service list as attached:

Cellco Partnership d/b/a Verizon Wireless
Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597 kbaldwin@rc.com

Timothy Parks
Real Estate Regulatory Specialist
Cellco Partnership d/b/a Verizon Wireless
20 Alexander Drive
Wallingford, CT 06492 timothy.parks@verizonwireless.com

Town of Woodbridge
Ira W. Bloom, Esq.
Berchem Moses PC
1221 Post Road East
Westport, CT 06880 ibloom@berchemmoses.com
nbamonte@berchemmoses.com

Gerald Weiner, Esq.
Town Attorney
Woodbridge Town Hall
11 Meetinghouse Lane
Woodbridge, CT 06525 gweiner@aol.com

The Honorable Beth Heller
First Selectman
Woodbridge Town Hall
11 Meetinghouse Lane
Woodbridge, CT 06525 bheller@woodbridgect.org

Keith R. Ainsworth, Esq.