## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NEW CINGULAR WIRELESS PCS, LLC (AT&T) FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE, AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT 499 MILE LANE, CITY OF MIDDLETOWN, CONNECTICUT

DOCKET NO. 506

January 25, 2022

## RESPONSES OF NEW CINGULAR WIRELESS PCS, LLC (AT&T) TO TALIAS TRAIL PRE-HEARING INTERROGATORIES

- Q1. Please review the Middletown owned property on Newfield Street identified in the **attachments** below. Can AT&T's objectives be met by a tower at this location? If not, please provide an explanation.
- A1. No. The ground elevation at this parcel on Newfield Street is approximately 70' lower than the tower location on 499 Mile Lane and well east of the ridge that the proposed site is located on. The main loss of coverage from this location would be on the west side of the ridge the proposed site is on (as well as some losses to the north). To comparably serve the shadowed area on the west side of the ridge from this location on Newfield Street would probably require a tower somewhere between 300 and 400 feet in height AGL. A tower of that height, beyond the visual impacts, would create network interference concerns because of excessive propagation overlap into other adjacent wireless site's service areas.
- Q2. At the 499 Mile Lane facility, would AT&T accept a tower design that would not include the ability to sub-lease equipment space other carriers?
- A2. It would be highly unusual for an applicant like AT&T to restrict future collocation at a proposed tower site in an agreement with a grouping of homeowners participating in a Docket, like the Talias Trail group, because that goes directly to the statutory criteria the Council uses in a Certificate proceeding which includes a finding that a tower facility applicant will "cooperate relative to the future shared use of the proposed facility" and in light of the Council's authority to impose reasonable conditions as part of approving a tower site in order to "promote future shared use of such facilities." C.G.S. §§ 16-50p(b)(1)(ii), 16-50p(b)(2).
- Q3. Please provide a rendering of the potential 180 ft. tower discussed as a single tower solution at 499 Mile Lane. The rendering should include AT&T's equipment, Middletown's equipment, and the expected equipment of other carriers.

A3. Enclosed are renderings of a 180' lattice tower with AT&T equipment, City existing and reserved antenna spaces and future collocation for three additional wireless carriers shown. The renderings are from the same photologs in the application and include one for a collocatable lattice tower at the existing tower location and another for a location closer to the homes on Fir Lane, Birchwood Drive and Hemlock Place to the east of the site.

## **CERTIFICATE OF SERVICE**

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

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January 25, 2022

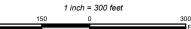
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Kristen Motel Cuddy & Feder LLP 445 Hamilton Ave, 14<sup>th</sup> Floor White Plains, NY 10601 (914)-761-1300 Attorneys for the Applicant

cc: Christopher J. Forte, Esq., City of Middletown Office of the Attorney General Joseph Barbagallo, Talias Trail Kelly Pugliares, Talias Trail Michael Siteman, Talias Trail AT&T, Smartlink Group













рното	LOCATION	ORIENTATION	DISTANCE TO EXISITNG LOCATION
1	MILE LANE	SOUTH	+/- 0.16 MILE







РНОТО







рното	LOCATION	ORIENTATION	DISTANCE TO PROPOSED LOCATION
1B	MILE LANE	SOUTH	+/- 0.15 MILE







PHOTO	LOCATION	ORIENTATION	DISTANCE TO EXISITNG LOCATION
2	TALIAS TRAIL	SOUTHEAST	+/- 0.12 MILE







рното	LOCATION	ORIENTATION	DISTANCE TO PROPOSED LOCATION
2A	TALIAS TRAIL	SOUTHEAST	+/- 0.16 MILE







рното	LOCATION	ORIENTATION	DISTANCE TO PROPOSED LOCATION
2B	TALIAS TRAIL	SOUTHEAST	+/- 0.11 MILE







рното	LOCATION	ORIENTATION	DISTANCE TO EXISITING LOCATION
3	SPRUCE STREET AT HEMLOCK PLACE	WEST	+/- 0.37 MILE







РНОТО	LOCATION	ORIENTATION	DISTANCE TO PROPOSED LOCATION
3A	SPRUCE STREET AT HEMLOCK PLACE	WEST	+/- 0.32 MILE







рното	LOCATION	ORIENTATION	DISTANCE TO PROPOSED LOCATION
3B	SPRUCE STREET AT HEMLOCK PLACE	WEST	+/- 0.37 MILE



