



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

November 4, 2021

Christopher B. Fisher, Esq  
Cuddy & Feder LLP  
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RE: **DOCKET NO. 506** - New Cingular Wireless PCS, LLC (AT&T) application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a wireless telecommunications facility located at 499 Mile Lane, Middletown, Connecticut.

Dear Attorney Fisher:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than November 23, 2021.

Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the November 23, 2021 deadline.**

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman  
Executive Director

MB/MP

c: Service List dated October 6, 2021

**Docket No. 506**  
**Pre-Hearing Questions**  
**November 4, 2021**  
**Set One**

**General**

1. Of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners?
2. Referencing Attachment 3 of the Application, Sheet C-1, New Cingular Wireless PCS, LLC's (Applicant or AT&T) Plot Plan appears to indicate the site parcel is zoned NPD rather than R-15 (Residential) as noted in the Zoning Information box. Please clarify.
3. Estimate the total cost of the proposed project. Break down the total cost into categories that AT&T deems appropriate.
4. How is the construction cost of the facility recovered?
5. What is the cost difference between a monopole and a monopine design?
6. Compare the construction costs between the proposed facility versus reinforcement of the existing facility.
7. What is the cost difference between the new facility and sharing the existing facility (with the necessary reinforcements)?
8. Pursuant to CGS §16-50o, please submit a copy of the Land Lease Agreement.

**Site Search**

9. When was the search ring established for the proposed facility?
10. Identify the approximate center and radius of the site search area.
11. Provide a map of existing towers within a four-mile radius.
12. Would any existing tall structures within a 4-mile radius (other than the existing tower) meet AT&T's coverage objectives?
13. Explain in detail what reinforcements and other structural modifications would be required for AT&T to collocate equipment on the existing tower.
14. Did the City of Middletown (City) and AT&T consider sharing a new tower facility and decommissioning the existing tower?

15. Identify any raw land sites that AT&T considered in its site search and include the reasons such sites were rejected.
16. Could the new tower location be moved deeper into the parcel toward the school rather than the neighborhoods? Is the City amenable to leasing other areas of the host parcel for tower development?
17. Are any of the other City parcels abutting the proposed site available for tower development?

**Site/tower**

18. Where is the nearest commercial child day care center located? Provide the distance and direction from the proposed tower, and describe the visibility of the proposed tower from that location.
19. Where is the nearest school located? Provide the distance and direction from the proposed tower to the nearest school building, and describe the visibility of the proposed tower from that location.
20. How many residences are located within a 1,000-foot radius of the proposed site?
21. What is the distance and direction from the proposed site to the nearest residence?
22. Provide the approximate widths of the monopole at the base and at the top.
23. What is the distance from the center of the existing tower to the center of the proposed tower?
24. What, if any, stealth tower design options (other than a monopole) would be feasible to employ at this site? Please provide costs related to each stealth tower design.
25. Referencing Attachment 3 of the Application, Drawing C-1, provide the distance from the center of the proposed 150-foot monopole to the nearest property line. If this distance is less than 150 feet, could the tower be designed with a yield point to ensure that the tower setback radius remains within the boundaries of the subject property? What would be the cost of installing such yield point?
26. Would the monopole have a galvanized gray finish or a different color/finish?
27. Would the monopole be designed for EIA/TIA-222 structural standards version G, H, or both?
28. What is the structural design standard applicable to the proposed antenna mount?
29. Referencing Attachment 3 of the Application, Drawing A-2, Proposed Antenna Layout Design, is AT&T seeking approval of the “Future AT&T RRH’s” as part of this project, or would AT&T seek such approval in the future? Are the future RRH’s factored into the structural and mount analyses?
30. Would the proposed monopole and foundation be designed to accommodate an extension in tower height? If yes, for how many feet?
31. Referencing Tab 2 of the Application, provide a bulk filing of the full Structural Calculations Report dated January 7, 2019.

32. Quantify the amounts of cut and fill that would be required to develop the proposed facility.
33. Would any blasting be required to develop the site?
34. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
35. Referencing Attachment 3 of the Application, Drawing A-1, how tall is the existing tower compound chain link fence? Would the proposed expansion fence be designed to match the existing fence?
36. Identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.
37. Have any other wireless carriers expressed an interest in co-locating on the proposed facility?

#### **Coverage/Capacity**

38. Referencing Tab 4 of the Application, RF Report, page 5, Table 2, of the existing AT&T sites listed, which sites would the proposed facility interact with?
39. Referencing Tab 4 of the Application, RF Report, page 5, Table 2, provide the distances and directions from the proposed site to each of the existing sites (except for CT1044, CT5118, CT5144, and CT5272).
40. Are all frequencies used to transmit voice and data?
41. Would AT&T provide 5G services at this site, or would new antennas and/or equipment be required to provide 5G service in the future? Explain.
42. What are the lowest heights at which AT&T's antennas could achieve its wireless service objectives from the proposed tower and from the existing tower?
43. Could the required coverage and capacity upgrade needs be met by a series of small cell facilities or a distributed antenna system rather than the proposed macro tower facility?
44. What are the existing signal strengths for 700 MHz and other proposed frequency bands within the area that AT&T is seeking to cover from the site?
45. Does AT&T have any statistics on dropped calls and/or ineffective attempts in the vicinity of the proposed facility? If so, what do they indicate? Does AT&T have any other indicators of substandard service in this area?
46. Referencing Attachment 4, Radio Frequency Analysis Report, p. 1, it states, "...[T]he proposed site will provide additional capacity and coverage..." With respect to capacity, please respond to the following:
  - a) What nearby AT&T wireless facilities (or sectors) are nearing capacity limits and what frequencies?
  - b) Please include a projected exhaustion date for each of these sectors.

- c) Would the deployment of the proposed facility be sufficient to address AT&T's capacity concerns or would an additional facility be required in the near term to off-load traffic?
- 47. Would flush-mounted antennas provide the required coverage? Would a flush-mount configuration result in reduced coverage and/or necessitate greater antenna height with multiple levels of antennas? Explain.
- 48. What, if any, coverage/capacity would be gained if AT&T collocated at a 180-foot antenna centerline on the existing tower versus at a 150-foot antenna centerline on a new monopole?
- 49. Referencing Attachment 4 of the Application, RF Report, page 10, provide a similar coverage plot based on AT&T co-located on the existing lattice tower.
- 50. Referencing Attachment 4, RF Report, page 4, Table 1, provide a similar "Incremental Coverage from Proposed Site (700 MHz)" table based on AT&T co-located on the existing tower.
- 51. Referencing Attachment 9 of the Application, Calculated Radio Frequency Exposure, page 3, Table 1, provide AT&T's percent maximum permissible exposure (%MPE) alone (i.e. neglecting the City of Middletown antennas).
- 52. Referencing Attachment 9 of the Application, Calculated Radio Frequency Exposure, page 3, Table 1, provide a similar RF Power Density Analysis Table assuming AT&T is co-located on the same tower as the City.

#### **Backup power**

- 53. Would the backup generator have containment measures to protect against fluid leakage?
- 54. What would be the respective run times for AT&T's diesel generator before it needs to be refueled, assuming it is running at full load under normal conditions?
- 55. Would a battery backup (if applicable) be used to provide uninterrupted power and prevent a reboot condition? How long could the battery backup alone supply power to the facility in the event that the generator fails to start?
- 56. Would the backup generator run periodically for maintenance purposes? If so, at what frequency and duration? Would this be scheduled for daytime hours?
- 57. Would the backup generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

#### **Public Safety**

- 58. Will the proposed facility support text-to-911 service? Is additional equipment required for this purpose?
- 59. Would AT&T's antennas comply with federal E911 requirements?
- 60. Would AT&T's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?

61. Why was the proposed site selected for FirstNet deployment?

62. Describe the additional equipment necessary to operate FirstNet services.

**Environment**

63. Is the proposed site located within a 100-year or 500-year flood zone?

64. Do the proposed sites contain any Prime Farmland Soils? If so, provide the total acreage of Prime Farmland Soils on the subject property, and provide the acreage of disturbance of Prime Farmland Soils for the project.

65. Identify the nearest “Important Bird Area” as designated by the National Audubon Society?

66. Would AT&T’s proposed facility comply with recommended guidelines of the United States Fish and Wildlife Service for minimizing the potential for telecommunications towers to impact bird species?

67. Provide a viewshed map to depict the projected year-round and seasonal visibility of the tower within a two-mile radius. Would the proposed tower result in any new seasonal or year-round visibility areas beyond those of the existing lattice tower? Explain.

68. Where is the nearest publicly accessible recreational area from the proposed monopole? Provide the distance and describe the visibility from such location.

69. Referencing Attachment B of the Application, page 5, Section IV (b), AT&T notes that the City Planning and Zoning Commission was invited to comment on a 150-foot monopine versus a 150-foot monopole and decided that the monopole was the better option. Referencing Attachment 7 of the Application, the State Historic Preservation Office indicates installation of a 154-foot monopine tower. Explain.

70. Would the proposed facility comply with Department of Energy and Environmental Protection (DEEP) noise control standards at the property boundaries?

71. Is the proposed facility located within a DEEP-designated Aquifer Protection Area?

72. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;

7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.