STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF NEW CINGULAR	:	DOCKET NO. 506
WIRELESS PCS LLC (AT&T) FOR A	:	
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED	:	
FOR THE CONSTRUCTION,	:	
MAINTENANCE AND OPERATION OF A	:	
WIRELESS TELE-COMMUNICATIONS	:	
FACILITY LOCATED AT 499 MILE LANE,	:	
MIDDLETOWN, CONNECTICUT	:	MARCH 22, 2022

PETITION TO INTERVENE

Pursuant to Connecticut General Statutes ("C.G.S.") Section 16-50n and Regulations of Connecticut State Agencies ("R.C.S.A.") Section 16-50j-15, Cellco Partnership d/b/a Verizon Wireless ("Cellco") hereby requests permission of the Siting Council ("Council") to participate, as an intervenor in the Docket No. 506 proceeding, if the Council approves AT&T's March 16, 2022 Motion to Reopen the Evidentiary Record.

As the Council is aware, Cellco is a licensed provider of wireless services throughout Connecticut. The proposed telecommunications facility described in the Docket No. 506 application would fit neatly into Cellco's network design for central Connecticut and provide Cellco with much needed wireless service in the Middletown area.

Cellco's involvement in the reopened Docket No. 506 proceeding would aid the Council in evaluating additional need considerations as set forth in C.G.S. § 16-50g. Cellco's expertise and experience in designing, constructing, operating and maintaining a wireless telecommunications system in the State of Connecticut in accordance with the rules and regulations of the Council and the Federal Communications Commission, may be of benefit to the Council in resolving issues presented in Docket No. 506, including the evaluation and consideration of alternative tower locations. Cellco has been admitted as an intervenor in prior Siting Council dockets. Cellco proposes to participate in the reopened proceeding and hearing, if one is held, by cross-examining the Applicant's witnesses, offering oral and written testimony of its own witnesses, evidence and the filing of pre-hearing interrogatories.

For the above-stated reasons, Cellco seeks permission to participate in this docket as an intervenor.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Kunie mu

By_

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of March 2022, a copy of the foregoing was sent, via

electronic mail, to:

Christopher B. Fisher, Esq. Lucia Chiochio, Esq. Kristin Motel, Esq. Cuddy & Feder LLP 445 Hamilton Avenue, 14th Floor White Plains, NY 10601 CFisher@cuddyfeder.com

Christopher J. Forte, Esq. Assistant General Counsel City of Middletown 245 deKoven Drive Middletown, CT 06457 Christopher.forte@MiddletownCT.gov

Joseph Barbagallo 59 Talias Trail Middletown, CT 06457 barbagalloja@yahoo.com

Kelly Pugliares 50 Talias Trail Middletown, CT 06457 Kelly.pugliares@gmail.com

Michael Siteman 29 Talias Trail Middletown, CT 06457 Mike.siteman@gmail.com

Kung mu

Kenneth C. Baldwin