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and New York

March 8, 2022

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

Re: **Docket No. 507 – Application of Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility at 222 Clintonville Road, North Branford, Connecticut**

Dear Attorney Bachman:

On behalf of Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless (collectively the “Applicant”), enclosed please find the original and fifteen (15) copies of the following:

1. Applicant’s Supplemental Responses to Council Interrogatories Nos. 5, 6, 13, 15, 16, 18, 25 and 28;
2. Applicant’s Pre-Hearing Submission identifying the Applicant’s witness panel and list of exhibits; and
3. Resumes for several of the applicant’s witnesses who have not appeared before the Council previously or for some time. Attached are the resumes for Matthew W. Allen, Martin Brogie, Maureen A. Bowman, Sr., Elaine Langer, Robert C. Russo, and Paul H. Zito.

Melanie A. Bachman, Esq.
March 8, 2022
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We look forward to appearing before the Council at the evidentiary hearing on March 15, 2022.

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

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF HOMELAND TOWERS, : DOCKET NO. 507
LLC AND CELLCO PARTNERSHIP D/B/A :
VERIZON WIRELESS FOR A CERTIFICATE :
OF ENVIRONMENTAL COMPATIBILITY :
AND PUBLIC NEED FOR THE :
CONSTRUCTION, MAINTENANCE AND :
OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT :
222 CLINTONVILLE ROAD, NORTH :
BRANFORD, CONNECTICUT : MARCH 8, 2022

**SUPPLEMENTAL RESPONSES OF HOMELAND TOWERS LLC
AND CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
TO SITING COUNCIL PRE-HEARING INTERROGATORIES**

Below is a supplemental response of Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless (“Applicants”), to the Siting Council’s Pre-Hearing Interrogatories, Set One, Question Nos. 5, 6, 13, 15, 16, 18, 25 and 28.

Question No. 5

When did Cellco issue the Site Acquisition Request Form (SARF) for the facility?

Provide a copy of the SARF.

Response

Cellco’s search ring for the Northford 2 facility was issued in 2014. A copy of the 2014 SARF is attached.

Question No. 6

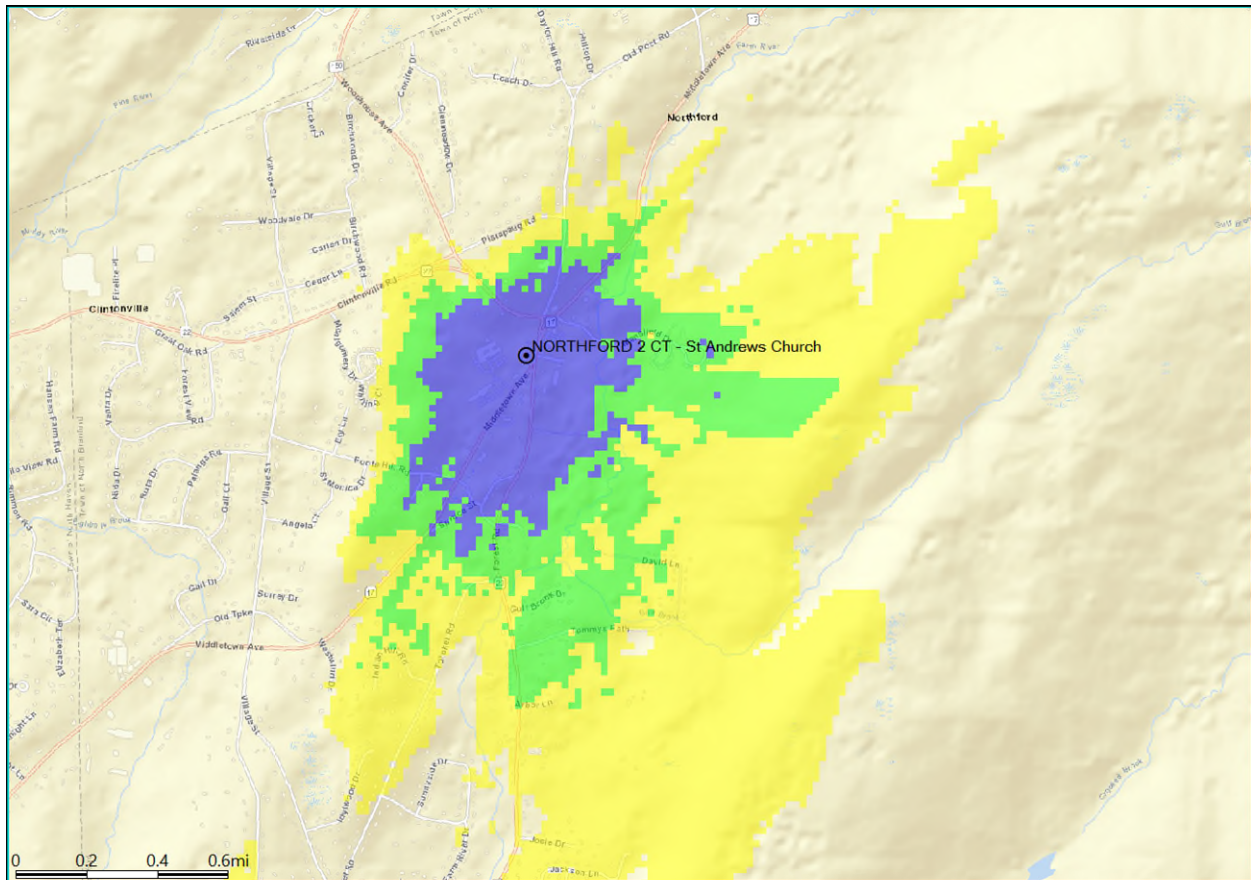
Referencing Application Attachment 8, provide propagation modeling for Site 29 and Site 30. What antenna height was modeled at each location?

Response

Site #29: St Andrews Church 700MHz modeled at 40'.

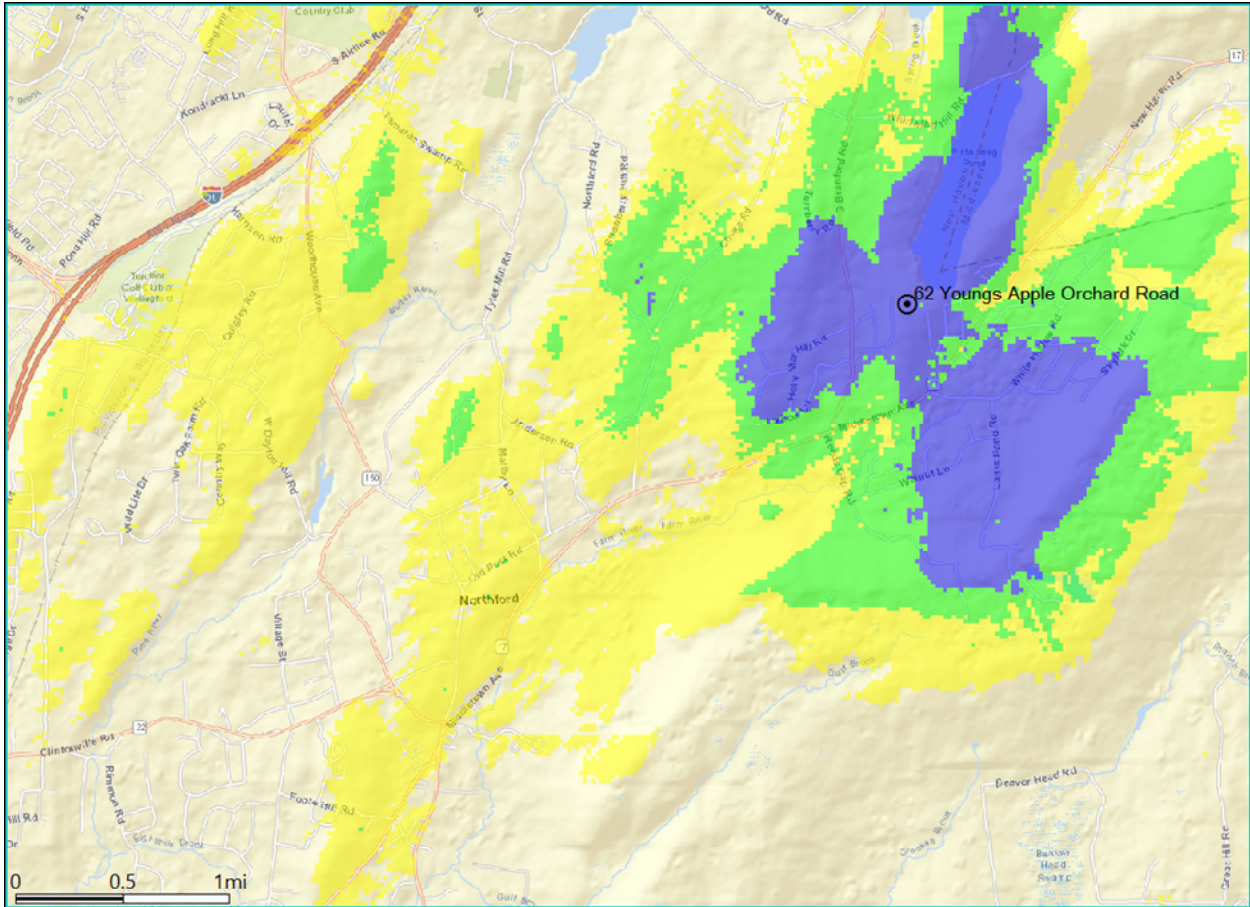
The Church covers a much smaller area than the proposed site.

	Frequency	Area (sq mi)	CT-17 (mi)	CT-22 (mi)	CT-150 (mi)
Proposed Site at 96'	700 MHz	7.2	1.6	3.2	0.8
Church at 40'	700 MHz	0.84	1	1	0.2



Site #30: 62 Youngs Apple Orchard Rd – 700MHz modeled at 96’.

The existing tower doesn’t cover the area near the intersection of CT-22 and CT-17.



Question No. 13

Application Attachment 6 indicates other frequencies will be installed in addition to the 700 MHz frequency. Does the 700 MHz frequency act as the “base frequency” of the network where most of the wireless traffic occurs? How do the other frequencies interact in Cellco’s wireless system?

Response

Among the frequencies owned by Cellco, 700MHz has the largest range and it serves as the base coverage layer. The other frequencies serve as capacity overlay and often carry more traffic than the 700MHz layer.

Question No. 15

Can coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect coverage needs and/or capacity relief within the service area.

Response

Cellco could potentially lower its antenna centerline height but going below 85 feet would significantly reduce its coverage in the Northford area and would limit tower sharing opportunities by other carriers. Please note that lowering Cellco's antennas would not reduce the overall tower height of the tower because the Town still needs a 110-foot centerline for its emergency service communications antenna.

Question No. 16

Can flush-mounted antennas be installed at the site to provide the required coverage? Describe any antenna/tower modifications that would be required to achieve coverage objectives.

Response

Flush mounting antennas would require Cellco to occupy at least two and possibly three antenna slots thereby occupying more vertical space on the tower and limiting or eliminating altogether tower sharing opportunities. In addition, using flush-mounted antennas on monopine tower (if a monopine is ultimately approved) can also present certain screening challenges related to the location and the installation of faux branches in order to achieve the desired screening of the antennas.

Question No. 18

Referencing Application p. 10, provide the distance to the listed adjacent Cellco sites. Provide the facility type and antenna centerline heights at these existing facilities.

Response

See table below.

Site Name	Distance to Proposed (mi)	Structure Type	Antenna CL (ft)
WALLINGFORD E CT	3.25	Monopole	120
N BRANFORD CT	2.6	Self-Support Lattice	90
NORTHFORD CT	2.1	Self-Support Lattice	195
NO HAVEN CT	3.35	Monopole	120
DURHAM SOUTH CT	6	Monopole	107
GUILFORD NORTH 2 CT	5.4	Monopole	161
NORTH HAVEN 2 CT	3.4	Monopole	108
GUILFORD 4 CT	5	Monopole	145

Question No. 25

Is the proposed facility located within a Department of Energy and Environmental Protection designated Aquifer Protection Area?

Response

The proposed facility is not in a DEEP designated Aquifer Protection Area.

Question No. 28

Would any mapped areas of prime farmland soil be impacted by the project? If yes, estimate the amount of disturbance.

Response

Yes, 100% of the facility compound and a portion of the access and utility route to the cell site are located in areas designated Prime Farmland. Approximately 60% of the total area of disturbance is located within the Prime Farmland (40% of the area of disturbance is not located in Prime Farmland). Notwithstanding the soil's designation, the Property is not currently used for agricultural purposes.

SARF

Project Name : <i>NORTHFORD 2 CT - New Build</i>	Task Submitted On : <i>09/09/2014</i>
Task Submitted By : <i>Jaime Laredo</i>	

Site Acquisition Request Form (SARF)

GeoPlan Market: NewEnglandWest	Location Name: NORTHFORD 2 CT
Area: Northeast	Region: New England West
	Market: Wallingford 1
Issue Date: <i>09/09/2014</i>	Site Name: <i>NORTHFORD 2 CT</i>
From: <i>Jaime Laredo</i>	Type:
Request Type:	
Project Title: <i>NORTHFORD 2 CT - New Build</i>	Budget:
Desired In-Service Date: <i>09/30/2015</i>	Site Location Type: <i>Permanent</i>
Project Manager: <i>Maria Montrose</i>	Acquisition:
Priority: <i>1</i>	
Coverage Objective:	
<i>Additional capacity for sectors serving Northford shops and surrounding residences</i>	
Further Explanation:	
Special Instructions:	
Type of Site	
<input checked="" type="checkbox"/> 700	
Preferred Location:	
Center of Search Ring	Street Address:
Latitude: <i>41-23-31.46 N</i>	Search Ring Center City: <i>Northford</i>
Longitude: <i>72-47-32.22 W</i>	Search Ring Center County: <i>New Haven</i>
Datum: <i>NAD83</i>	Search Ring Center State: <i>CT</i>
Radius of Search Ring (mi):	Search Ring Center Zip Code: <i>06472</i>
Voltage (V):	Donor Site Name:
Amperage (A):	Donor Site Sector:
Phase:	
Antenna Center Line (ft AGL): <i>40.00</i>	Min Center Line (ft AGL):
Building Height Req.:	Max Center Line (ft AGL):
Generator?:	

Equipment Requirements

Number of Sectors					
Whip:					
Panel:					
Link:					
Current			Future		
	Quantity	Size		Quantity	Size
Whip:			Whip:		
Panel:			Panel:		
Link:			Link:		