

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
 APPLICATION OF HOMELAND : DOCKET NO. 509
 TOWERS, LLC FOR A CERTIFICATE :
 OF ENVIRONMENTAL :
 COMPATIBILITY AND PUBLIC NEED :
 FOR THE CONSTRUCTION, :
 MAINTENANCE AND OPERATION OF :
 A TELECOMMUNICATIONS FACILITY :
 AT 1837 PONUS RIDGE ROAD, NEW :
 CANAAN, CONNECTICUT : AUGUST 31, 2022

**New Canaan Neighbors (“NCN”) Fourth Supplemental Request for
Administrative Notice**

NCN respectfully requests that the Siting Council take administrative notice of the following items found in the public record, as well as judicially cognizable facts and generally recognized technical or scientific facts within the Council’s specialized knowledge, and facts not subject to reasonable dispute and known within the jurisdiction of the Council or capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned:

1. USDA – Land Capability Class, by State, 1997,
https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/?cid=nrcs143_014040 (last visited on August 23, 2022).

2. Michigan State University – “Sediment Clogging,”
<https://www.egr.msu.edu/bae/water/drainage/sediment-clogging> (last visited August 23, 2022.)
3. Town of New Canaan – Assessor’s Office, 46 Buttery Road,
<https://www.propertyrecordcards.com/PropertyResults.aspx?towncode=090&uniqueid=43%20%20219%2016> (last visited August 30, 2022.)
4. Town of New Canaan – Assessor’s Office, 228 Park Street, Apt. 8,
<https://www.propertyrecordcards.com/PropertyResults.aspx?towncode=090&uniqueid=K%20%202047%20%20915%20%20%208> (last visited August 30, 2022.)
5. Town of New Canaan – Homeland Towers’ Response to the Town of New Canaan’s Request for Proposal for the Design, Construction and Operation of Wireless Communications Infrastructure in the Town of New Canaan.
(Attached as Public Record 47.)

Respectfully submitted,

/s/Justin Nishioka
Justin Nishioka, NCN Representative

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on August 31, 2022.

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/s/Justin Nishioka
Justin Nishioka, NCN Representative

NCN Supplemental Request for
Administrative Notice

Public Record 47



**Response to Request for Proposal
for the Design, Construction and Operation of
Wireless Communications Infrastructure
in the Town of New Canaan, CT**

Closing Date and Time: Wednesday, May 4, 2016 @ 4:00 p.m.

Submitted to:
The Office of the First Selectman
Town of New Canaan
174 South Avenue
2nd Floor
New Canaan, CT 06840
Attention: Pam Flynn
Via Hand Delivery

Submitted by:
Homeland Towers, LLC
22 Shelter Rock Lane, Building C
Danbury, CT 06810



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Photos of stealth tower options



HOMELAND TOWERS

1. Letter of Interest

Homeland Towers, LLC (“HT”) is pleased to offer this letter of interest in response to a Request For Proposal from **The Town of New Canaan** (“Town”) for the design, construction and operation of wireless communications infrastructure (“Facility”) in the Town of New Canaan, Connecticut. HT commends the Town for their commitment to this project and the fact that they recognize the concerns of the wireless industry.

Homeland Towers is uniquely positioned to provide the Town of New Canaan with an effective solution to maximize capacity and increase wireless services in underserved areas of Town. HT understands that aesthetics are extremely important to the Town’s residents and therefore we will be proposing various stealth options with minimal heights in an effort to minimize visual impacts to the community. In addition to providing enhanced cellular coverage throughout town, our goal is to also improve the quality of wireless telecommunication systems that first responders and other government personnel use. While increasing public safety, our proposal also provides for increased reliability of wireless services to the surrounding community and those that commute through the area. We maintain a proven track record of partnering with municipalities, private landlords, and organizations. HT has the necessary resources, manpower and experience to effectively work with the Town to design and construct facilities that telecom providers and Public Safety entities will collocate on.

HT specializes in working directly with local governments and organizations providing comprehensive wireless solutions by analyzing the telecommunication needs and desires, designing a custom solution, and interfacing directly with the telecommunications industry as a zealous advocate for the municipality or organization. Our reputation depends on providing informative, insightful and honest advice from the initial planning stage through the life of the telecommunications facility to insure that the changing needs of the community and the technological advances of the industry remain in step.

HT’s management team has more than forty (40) years of combined experience providing wireless solutions utilized by leading telecommunications providers throughout New York and Connecticut. HT has successfully built and managed wireless infrastructure in partnership with several communities in the tri-state area that have historically faced challenges in the balanced siting of wireless infrastructure. Our managers, resources and strategic partners have guided hundreds of sites throughout New England and are uniquely familiar with the process requirements, time lines, and deliverables required. We are fully familiar with the Connecticut Siting Council (“CSC”) process requirements as well as the 8-24 referral processes involved when partnering with a municipality in Connecticut.

HT manages the acquisition of all land use, permits and other entitlements that may be required. HT manages design and construction activities to ensure that all work performed complies with applicable local, county, state and federal laws, rules, and regulations. It is our hands on approach, market knowledge and experience which separates us from our competition.



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In conclusion, Homeland Towers will provide the Town of New Canaan with the ability to address the communication needs of its first responders, the community and the telecommunications industry. HT has an impeccable reputation within the telecommunications industry and has enjoyed tremendous success partnering with municipalities to create smart solutions to difficult development challenges. HT has partnered with other Connecticut municipalities such as Washington, Brookfield, Cheshire and Easton as well as a number of New York municipalities. We have strong financial backing and can take on projects of any size or difficulty. We would be happy to provide any additional information not requested through this RFP to assist the Town of New Canaan in its decision making process.

Management Contact Information

Manuel J. Vicente, Founder and President of Homeland Towers, LLC

Mr. Vicente created Homeland Towers' unique approach to wireless siting after working as an executive in the wireless industry for more than 12 years. Starting his career with Sprint PCS, Mr. Vicente was involved in developing and launching the first all-digital CDMA network in the nation. He has managed the development of over 4,000 telecommunications facilities in his career and has been involved in the development of new wireless delivery technologies, including in-building systems and DAS (distributed antenna systems).

Mr. Vicente held several positions at Nextel Communications, ending his tenure as Regional Director of Site Development responsible for overall management and long term planning for site acquisition, development and construction of their Northeast wireless network. A graduate of Pace University School of Law and State University of New York at Oneonta, he remains dedicated to developing effective solutions for meaningful infrastructure that addresses communication needs while minimizing impact on surrounding environment.

Raymond Vergati, Site Development Manager

Mr. Vergati has been in the wireless telecommunications industry since 1997 and has been working with Homeland Towers since 2010. Mr. Vergati has managed full turnkey site development projects throughout the New England Market for AT&T, T-Mobile, Sprint/Nextel, General Dynamics, Bechtel, Black & Veatch and Advanced Radio Telecom. Mr. Vergati has extensive real estate knowledge and experience in testifying before the CSC on raw land applications. Mr. Vergati holds a BS in Finance from Seton Hall University.

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Homeland Towers, LLC

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Danbury, CT 06810

Manny Vicente, President

Date: 5/4/16



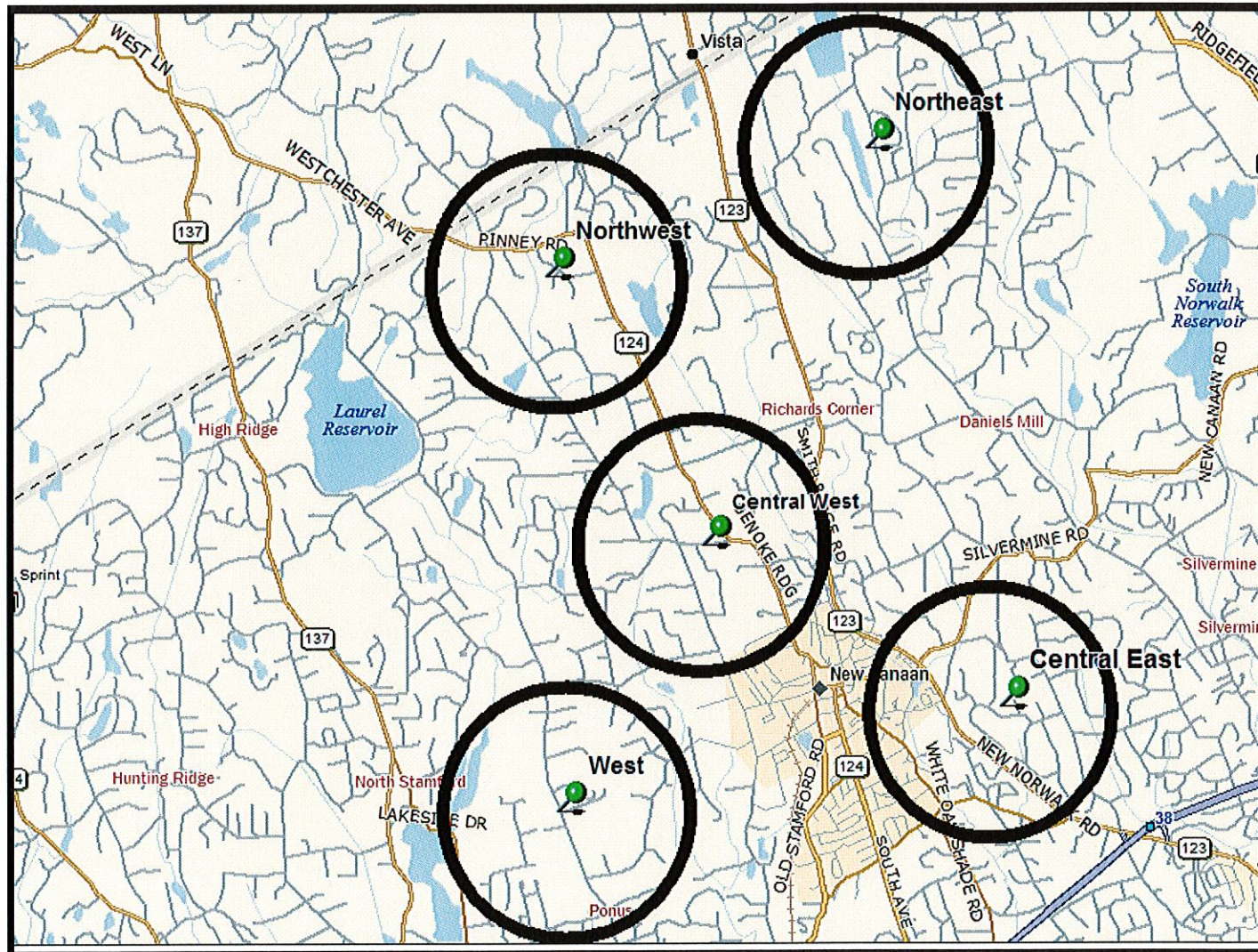
2. Proposal

Homeland Towers recognizes there are existing coverage gaps throughout the Town of New Canaan. Wireless providers have encountered many challenges and frustrations in the past in their attempts to bring service to the Town, primarily due to their fluctuating annual budgets and lack of interested landlords. HT's approach is different because we do not work off of an annual budget cycle. Once we identify an area that lacks service, we will continue our search until a viable location can be found, in some cases purchasing vacant land for a tower location. HT appreciates the opportunity to respond to this RFP and the Town's willingness to make municipal properties available for lease.

The Wireless Market Study Report dated December 1, 2014 prepared by Centerline Solutions identified the various areas in the Town that lack reliable wireless coverage. This comprehensive report provided to the Utilities Commission recommends both private and municipal properties that may be viable locations for wireless facilities. HT has carefully reviewed this report and we agree with many of its findings and conclusions. Using information from this report along with our own knowledge of service gaps throughout Town, we have developed a comprehensive plan that we feel is both thoughtful and realistic. We have chosen locations and tower designs that will have the least visual impact to the community while providing the carriers a solution for wireless coverage. While HT has outlined locations for wireless facilities along with proposed designs and heights that we feel would be appropriate, these are recommendations that are subject to change based on additional input from the Town. During HT's due diligence, should additional properties become available for leasing, either private or municipal, HT will conduct a thorough investigation to determine their viability. This comprehensive plan is aimed at balancing the objectives of the Town, the residents and the wireless providers.

The Centerline report identified five (5) areas in the Town where coverage gaps currently exist for all four (4) wireless providers- Verizon, AT&T, T-Mobile and Sprint. These gaps in coverage are located in the Northeast, Northwest, Central west, West and Central east sections of the Town. Below is HT's proposal to provide coverage to each of these areas.

Existing Coverage gaps in the Town of New Canaan

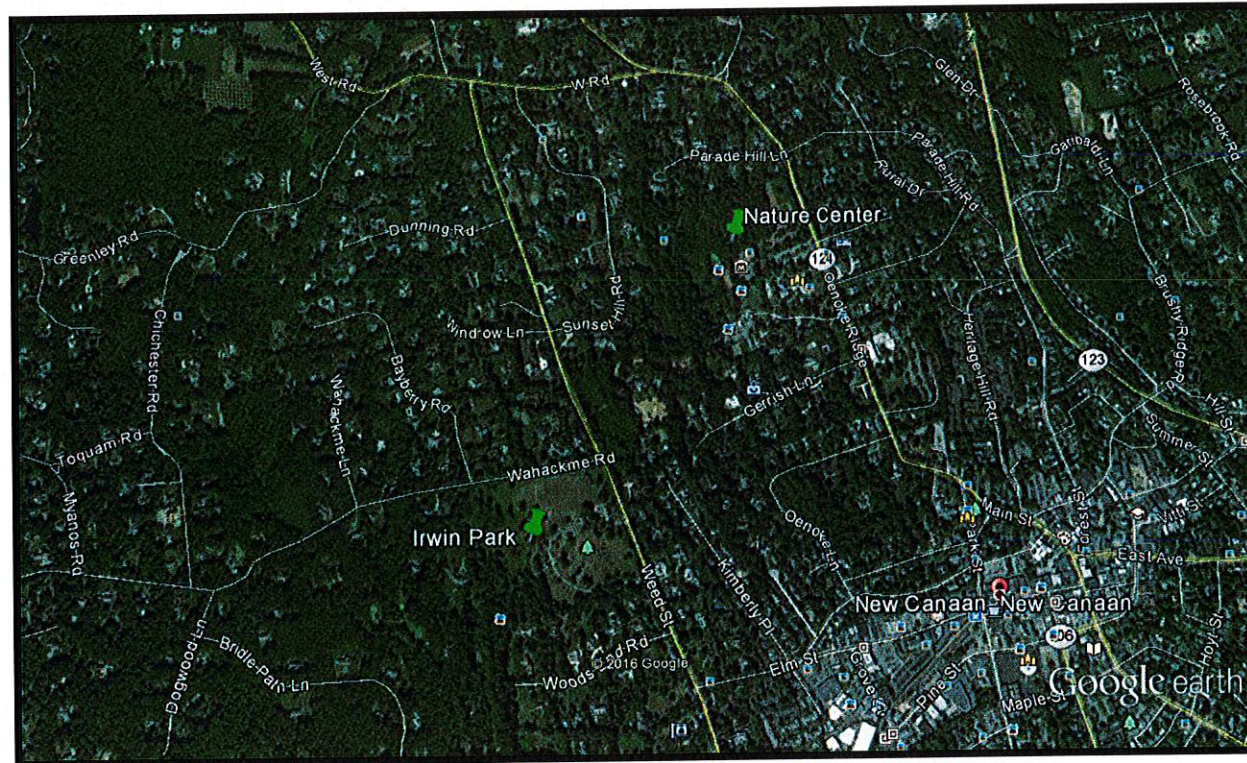


1. Central West Section

Proposed Site Location: Irwin Park, 848 Weed Street or The New Canaan Nature Center, 144 Oenoke Ridge, New Canaan, CT.

Landlord: Town of New Canaan

Proposed Tower Design and Height: Stealth monopine or Silo, up to 110'.



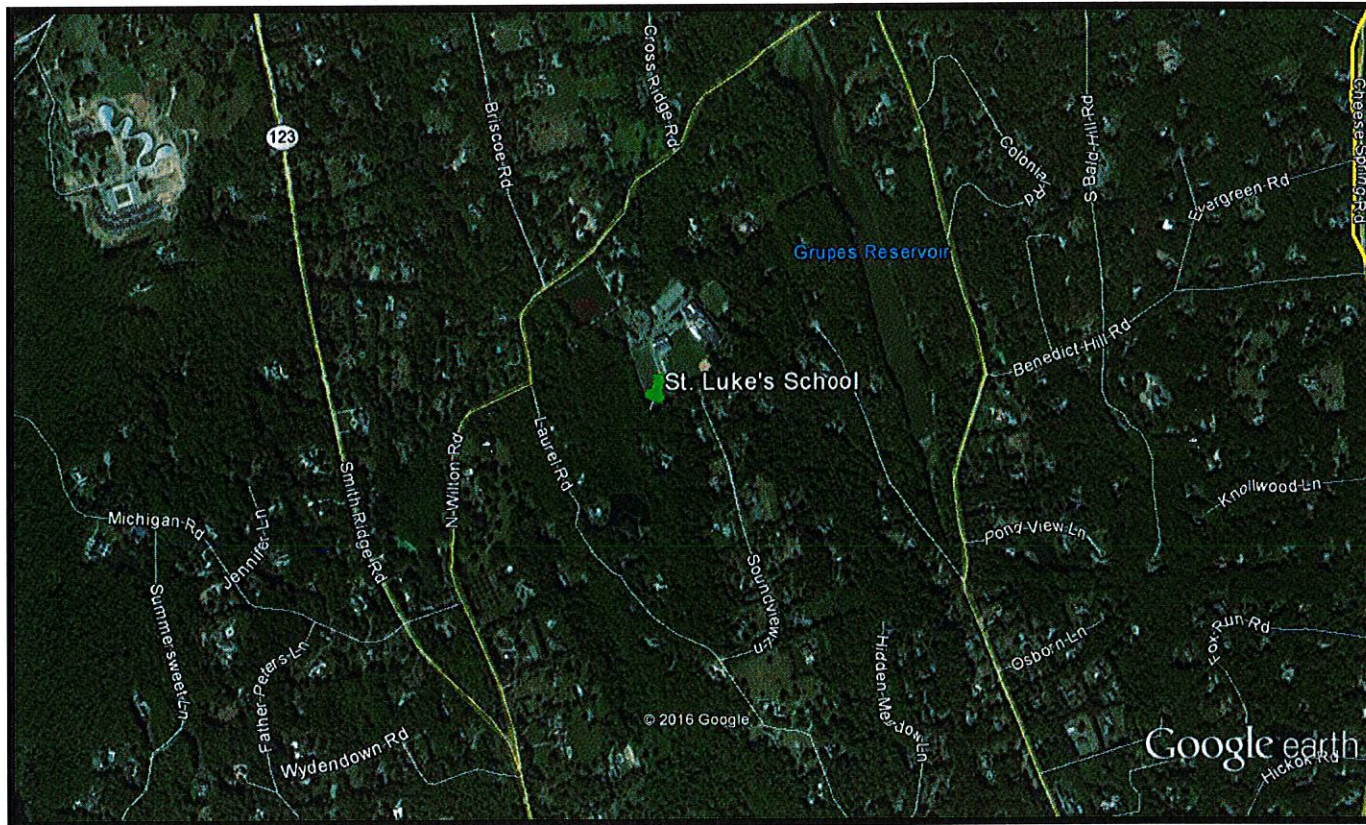
Comments: Homeland Towers would propose to lease approximately 5,625 square feet (75' x 75') of ground space at either Irwin Park or the Nature Center. These (2) municipal parcels are within ½ mile of each other so only one site would be pursued for a lease with the Town. Location of the facility along with access would be reviewed after a site visit is conducted with the Town. The Centerline report concluded that both Irwin Park and the Nature Center are the “Most Likely” locations for the carriers and HT agrees with this assessment. Irwin Park is 36.23 acres and our initial due diligence indicates that 12.52 acres may be deed restricted. The Nature Center is approximately 40 acres; a possible location here could be on the north side of the property in the wooded area, away from the Nature Center activities and buildings. A site located at either Irwin Park or the Nature Center would provide coverage to residents in the central west side of town and along Ponus Ridge Road, Weed Street and Oenoke Ridge. The Centerline report also mentioned (1) other private property in this area that may be a viable location, the Saint Mark’s Bell Tower. HT would need to confirm lack of interest from St. Mark’s Episcopal Church on using the existing bell tower for antenna attachments. HT would consider either Irwin Park or the Nature Center based on information gathered at site visits, review of possible view sheds and review of land records.

2. Northeast Section

Proposed Site Location: TBD, possibly Saint Luke's School.

Landlord: Private

Proposed Tower Design and Height: Possible stealth monopine.



Comments: Homeland Towers would explore the option of leasing from a private landlord for the construction of a stealth facility. Upon review of municipal parcels, there appears to be no available properties that can be leased from the Town to address this particular area. The proposed height of this facility would be in the vicinity of 110'. Various stealth designs could include a monopine tree, old fashion faux water tank or flagpole. As concluded in the Centerline report, Saint Luke's School may be an ideal candidate for a stealth facility. It should be noted that HT is currently constructing a stealth monopine tower on the campus of a private institution, Salisbury School, located in Salisbury, Connecticut.



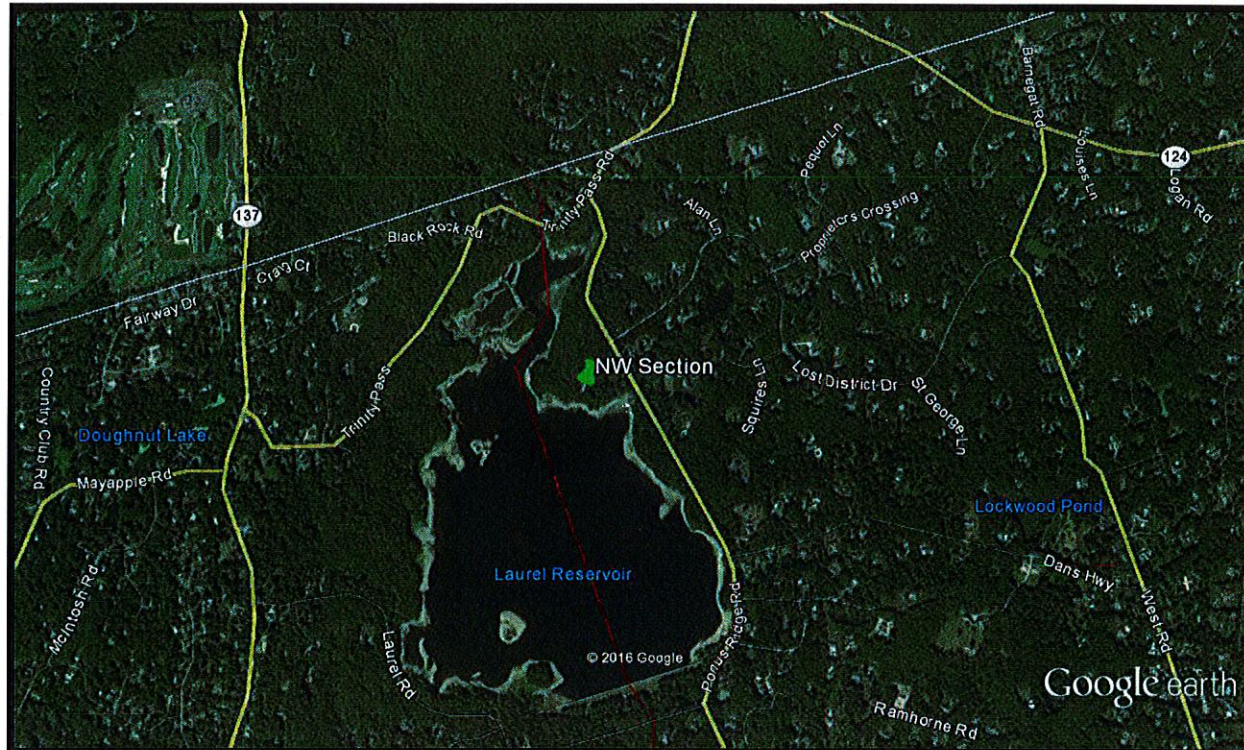
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3. Northwest Section

Proposed Site Location: TBD, possibly Aquarion or private property. May consider sites in northeast part of Stamford, CT

Landlord: TBD, possibly private

Proposed Tower Design and Height: Stealth monopine or old fashion faux water tank due to presence of Laurel Reservoir in area, up to 110'.



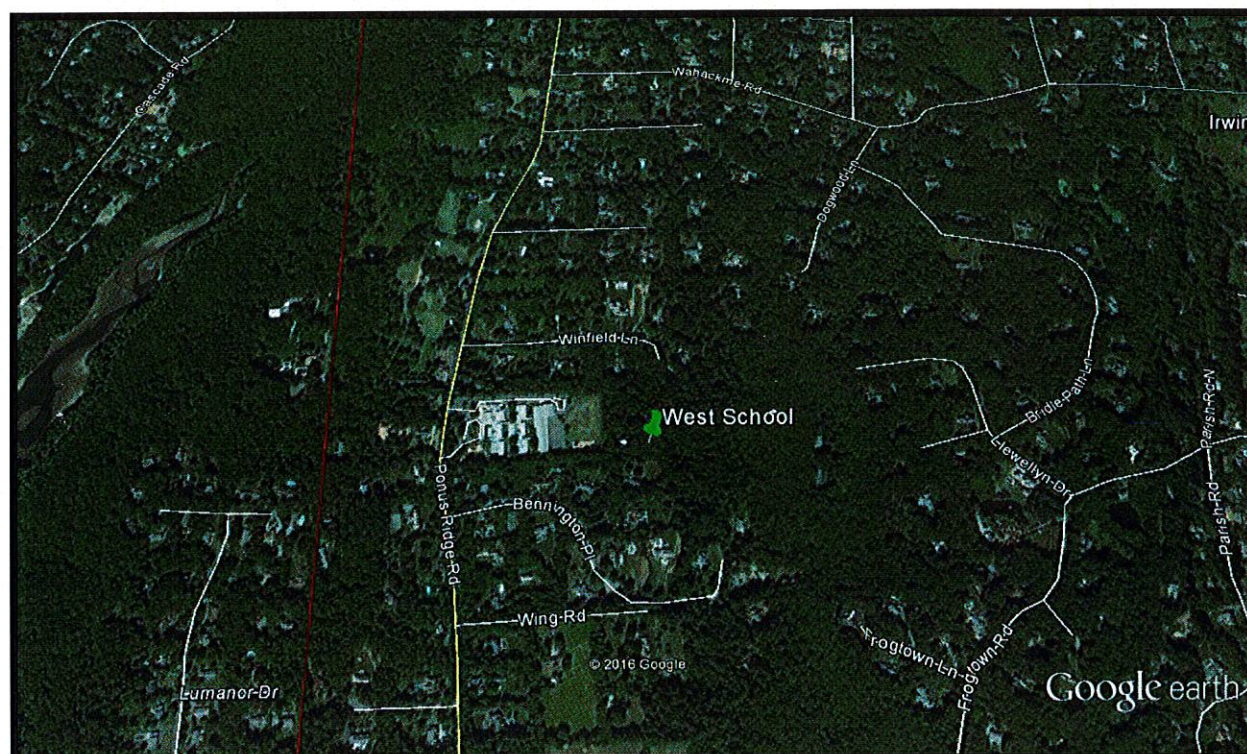
Comments: Homeland Towers would explore the option of leasing from a private landlord for the construction of a stealth facility in this section of town. The Centerline report concluded that this location was the “Most/Next Likely” viable cell site location for all 4 carriers. The Town owns a parcel called Clark property which is located slightly further to the southeast which had been previously reviewed by Verizon and determined to have potential wetland issues along with a restrictive covenant that would not allow a facility to be constructed. It is our understanding the Town is in the midst of obtaining approval for a proposed 80’ tower to be located on Aquarion property along Reservoir Road. In speaking with Town officials, this proposed tower would be used solely for public safety and not for carrier use. Verizon had also pursued a private landlord off of Puddin Hill Road but they appear to have abandoned efforts due to local opposition. The Aquarion property is the best site in the area due to lack of non-residential properties. HT has been speaking with Aquarion and will be persistent in our efforts.

4. West Section

Proposed Site Location: West Elementary School, 769 Ponus Ridge Rd, New Canaan, CT or New Canaan Country School.

Landlord: Town of New Canaan or Private

Proposed Tower Design and Height: Stealth monopine or old fashion faux water tank, up to 110'.



Comments: Homeland Towers would propose to lease municipal property from the Town behind the West Elementary School. The Centerline report concluded that this location was the “Next Likely” viable cell site location for all 4 carriers, HT agrees. This parcel is 47.47 acres in size and offers excellent screening from residences due to generous setbacks and to the existence of mature trees. There is an existing 50'+/- water tank located on this parcel which is owned by Aquarion Water. HT has inquired with Aquarion on the possible use of the water tank for antenna attachments but Aquarion’s policy no longer allows cell antennas on their water tanks, especially if there are no existing antennas as it causes maintenance issues related to painting of the tanks. Due to Aquarion’s policy, this structure would be ruled out as a viable candidate during the zoning process through the Connecticut Siting Council. HT feels that a 110’ tall stealth facility would provide adequate coverage for the carriers. HT would propose to lease approximately 5,625 square feet (75’ x 75’) of ground space which would be sufficient for all the carriers along with public safety. Pending a site visit with the Town to determine a tower location, access could possibly be achieved from Ponus Ridge Road through the existing school parking lot or possibly off of Winfield Lane or Llewellyn Drive. It should be



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noted that Homeland Towers was awarded an RFP from the Town of Easton to construct a stealth monopine tower at the Staples Elementary School. HT is in the midst of working with a carrier on a lease so that a formal zoning application can be made to the Connecticut Siting Council. The CSC requires that a wireless facility be located 250 feet away from a school structure. Our initial assessment of a possible tower location could be in the vicinity behind the existing water tank and located approximately 700' away from the school. HT recognizes that proposed towers on or near school grounds can have the perception of not being sited in an appropriate location. It is our opinion as a builder of critical infrastructure that reliable communications and public safety have become necessities for schools. The siting of wireless facilities on school grounds is not a first in the wireless industry and has been accepted by many communities. It is our hope that the Town considers this a viable location. Below is a list of other towns in Connecticut that have a cell tower located on school property.

List of existing cell towers in surrounding towns and their proximity to schools:**

	Tower Owner	Tower Address	Town	Tower Height	School	Distance from Tower to School Building	# of carriers on Tower
1	Crown	56 Norfield Road (Weston Town Hall)	Weston	190'	Hurlbutt Elementary & Weston Intermediate School	200' & 1800' +/-	4 carriers
2	WNLK Radio	6 Shirley Street	Norwalk	336'	Kendall Elementary School	800' +/-	1 carrier
3	Crown	281 Woodhouse Rd	Fairfield	171'	Burr Elementary School	1500' +/-	6 carriers
4	Crown	14 Booth Hill Rd	Trumbull	200'	Booth Hill Elementary School (Shelton)	1500' +/-	4 carriers
5	AT&T	28 Great Oak Lane	Redding	180'	Redding Elementary School	700' +/-	1 carrier
6	Richard Knapp	24 1/2 Richdale Drive	Wilton	71'	Cider Mill School	700' +/-	1 carrier
7	Richard Knapp	24 1/2 Richdale Drive	Wilton	71'	Middlebrook School	700' +/-	1 carrier
8	Crown	50 Rockland Road	Norwalk	180'	Brien McMahon High School	1200' +/-	7 carriers
9	Town of Ridgefield	76 East Ridge Street	Ridgefield	130'	Veteran's Park Elementary School & East Ridge Middle School	950' & 1300' +/-	3 carriers
10	Homeland Towers	515 Moorehouse Road	Easton	TBD/150'	Staples Elementary School	2100' +/-	In leasing
11	Town of Bedford, NY	Fox Lane	Bedford, NY	150'	Fox Lane Middle School	1100' +/-	3 carriers

** Information on CT tower sites obtained from Connecticut Siting Council Database

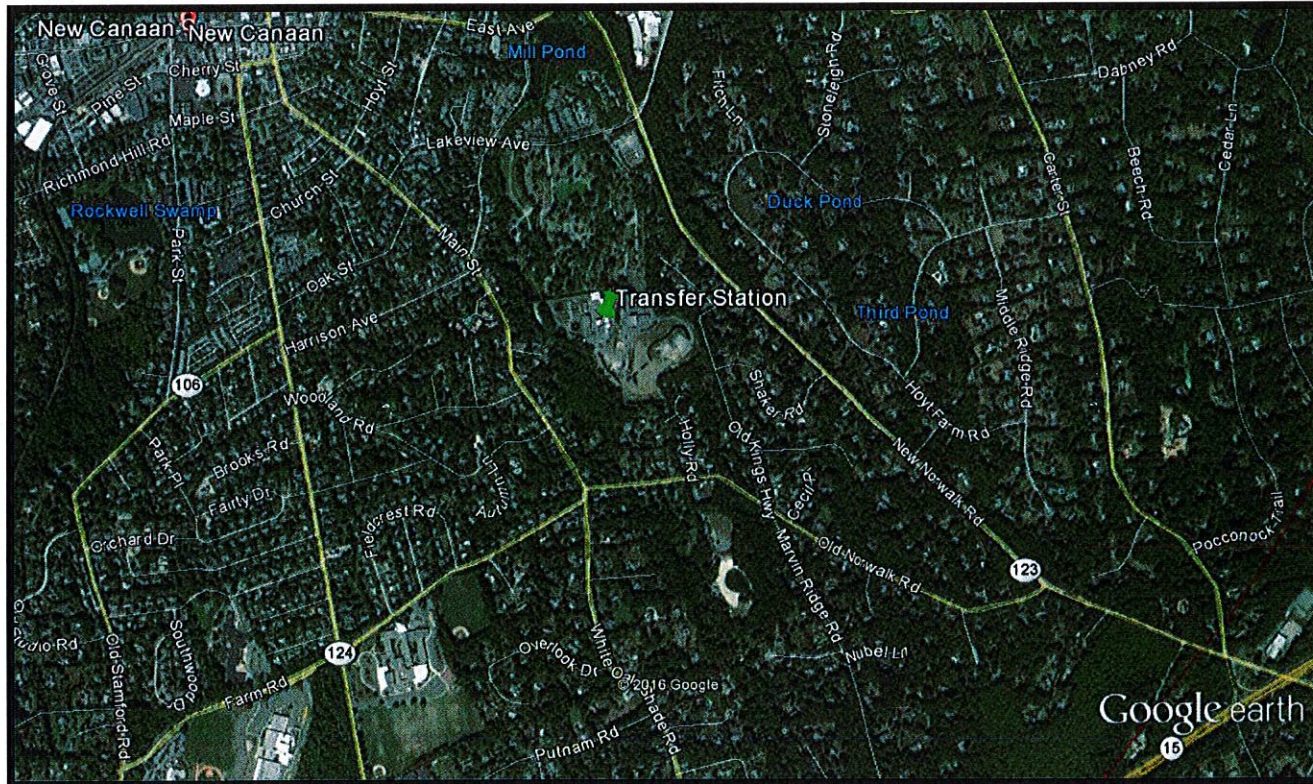
The list above includes towers only and does not include other cell site installations such as rooftops, water tanks and utility pole mounts located on or near school property. The list includes only public schools.

5. Central East Section

Proposed Site Location: Town Transfer Station, 394 Main Street, New Canaan, CT.

Landlord: Town of New Canaan

Proposed Tower Design and Height: One or two flagpole(s), up to 110'.



Comments: Homeland Towers would propose to lease approximately 5,625 square feet (75' x 75') of ground space from the Town at the transfer station. This parcel is 29.26 acres in size. The Centerline report concluded that this location was a combination of “Next Likely” for T-Mobile and Sprint and “Excluded” as a viable cell site location for AT&T and Verizon. HT questions the reasoning for excluding this site for AT&T and Verizon given the fact AT&T had previously worked with the Town for the construction of a 150' monopole tower on this parcel. It is our understanding that due to opposition from residents and lack of annual funding AT&T abandoned its efforts and is not actively pursuing the site. In the process of reviewing coverage plots in the Centerline report along with coverage plots from AT&T’s proposal to the Town, HT believes that the proposed site to the south at the Norwalk Army will provide coverage north along Route 123 and therefore a 150' tall structure is not warranted at this location. HT’s proposal to the Town would differ from AT&T’s in two ways. First, HT would propose a stealth design, possibly one or two flag poles with all antennas concealed within. AT&T had proposed a standard monopole which is more industrial in design with antenna and platforms located on the exterior of the pole. Although this site is used as a dump/transfer station, there are still residential homes in the surrounding area and thus it is HT’s opinion that a stealth design



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would certainly be more appropriate. Second, HT would propose a much shorter structure. HT reviewed the AT&T photo simulations conducted by All-points Technology. The photo simulations depict a 150' monopole with the top 40' (4 carriers/levels of antennas) in view extending above the tree tops from various vantage points. However, if the height of the structure was lowered down to 110', it is our opinion that many of the views above the tree line become non-existent and softened, especially with a silhouette/low profile structure such as a flagpole. It should be noted that the Centerline report also identified (2) town owned parcels for possible locations in providing coverage on the east side of town. The first parcel is located at the intersection of Silvermine Road and Heather Drive. This parcel consists of a 5.82 acre parcel in a residential area that upon initial review appears to have wetland issues. The second location is the East Elementary School. It is HT's opinion that a site at the transfer station would be the preferred location.



3. Qualifications, Licensing and Subcontracting

The following comprehensive Scope of Work is offered to highlight Homeland Tower's approach and philosophy. HT is prepared to provide expert advice and service from the initial evaluation phase through leasing, permitting and construction. HT will remain a partner with the Town of New Canaan throughout the life of the Facility to ensure that (i) the Facility remains in compliance with all applicable regulations; (ii) tenants remain current on all financial obligations; and (iii) that any technological or leasing developments are addressed in a timely and professional manner, all to the benefit of the Town. HT will reliably handle each aspect of the project alone or in "lock-step" with designated Town officials. Our goal is to provide the Town with the experience and commitment necessary to make the project a success, while allowing the Town to participate as much or as little as it deems necessary. The Scope of Work outlined below is undertaken by HT in contemplation of developing a wireless Facility.

Site Marketing

Marketing efforts will involve aggressive pursuit of all potential tenants with the goal of maximizing collocation. Based on HT's impeccable reputation, as well as its years of experience in the industry, our personnel have established reliable and working relationships with the major wireless service providers such as AT&T, Verizon, Sprint and T-Mobile.

HT meets regularly with the leadership of the major carriers to market its site locations and publishes a detailed database of all available site locations. HT investigates new potential technologies and services and targets those potential tenants early on in their network development to increase the tenant base of all HT facilities. These ongoing marketing services are professional and effective. All costs associated with site marketing are at our full cost and expense.

Site Leasing

HT was established to offer comprehensive wireless telecommunications plans and services, and site leasing is one of our most important services. The following are the leasing services we provide:

- HT will provide a standard lease agreement
- HT will perform lease negotiations
- HT will review restrictions, covenants, and conditions related to the Property and Facility
- HT will perform billing and rental collection functions.

All costs associated with leasing activities are at our full cost and expense. Legal and other review costs undertaken by the Town related directly to the Ground Lease agreement between the Town and HT will be reimbursed to the Town by HT with a cap outlined in the proposal.



Land Use Approvals Entitlements

Homeland Towers provides a full range of services to ensure all necessary municipal land use and environmental approvals are obtained in a timely and effective manner. HT will perform the following functions free of charge to the Town of New Canaan:

- Prepare comprehensive siting analysis
- Coordinate all land use permitting services whether they be local or state
- File all applications and supporting documents
- Produce and coordinate all site plan and construction drawings and revisions
- Coordinate all necessary experts and produce corresponding reports
- Publish, mail, and post all necessary public notices
- Attend all required meetings and hearings
- Ensure environmental compliance via Phase 1, NEPA, SHPO

Installation Management, New (Additional) Tenants

Installation management begins when a new tenant expresses interest in the Facility and continues well after the Facility is constructed. HT will coordinate, manage, and control each step of the installation of a new tenant's equipment to ensure that all plans are followed, all applicable laws, regulations and approvals are complied with and service to pre-existing tenants is not interrupted. HT provides the following installation management services:

- Review and approval of the tenant's proposed engineering drawings
- Verify space is available to accommodate the proposed equipment of our tenants in addition to verifying that the structural integrity of the tower is capable of supporting the additional load to the structure by means of an engineering structural analysis.
- Analyze all frequencies (intermodulation study) on each site to avoid harmful interference between different wireless carriers and Town of New Canaan public safety services
- Ensure that tenants utilize only licensed and experienced installers, who are fully insured and have proven track records to perform Facility installations and that all installations meet the required specifications and quality standards of the industry and any applicable laws, codes, rules or regulations.

All costs associated with installation management are at our full cost and expense.

Design and Construction Management

HT will provide all construction management services, which include the following:

- Qualify all vendors of construction services



HOMELAND TOWERS

- Review and approve construction drawings
- Coordinate Building Permit filing and approval
- Obtain Certificate of Occupancy
- Coordinate 2C certification for E-911
- File and obtain FAA approval
- Coordinate Electrical Permit filing and approval
- Coordinate design review and approval
- Schedule all construction activities
- Coordinate safety inspections and compliance
- Material procurement
- On site Construction management
- Conduct punch list walkthrough and assist the Town with final site inspection
- Evaluate compliance with all promulgated emissions standards after each tenant's equipment is on-air.

All costs associated with design and construction is at HT's full cost and expense.

Tower Management and Maintenance

HT will be solely responsible for the operation, maintenance, repair of, and the insurance for the telecommunications Facility.

Site Management

Once a site is built, HT takes responsibility for managing the administration, maintenance and continued marketing of the Facility. HT provides the following service for each site:

- Conduct lease negotiations
- Conduct lease administration and tracking
- File Memorandum of Agreement
- Collect rent (copies of agreements which outline business terms can be provided)
- Perform billing and document control
- Ensure bond acquisition and management
- Maintain tenant database, including tenant contact information, lease terms, renewals, special conditions, location of equipment at site, and other tenant and site specific information
- Perform ongoing marketing of the Facility to service providers of existing and new technologies
- Administer and track title actions and compliance.

All costs associated with site management are at HT's full cost and expense.



Facility Maintenance

HT will provide site maintenance to ensure peaceful coexistence among tenants and the Town, compliance with regulatory and use permits, and reduce the potential for conflict. Facility maintenance services include:

- Routine site maintenance of the ground space and compound area
- Periodic site inspections including reports and logs
- Coordination of all required site repairs and tenant related maintenance issues
- Manage restrictions, covenants, and conditions related to the property and Facility.

All costs associated with Facility maintenance are at HT's sole cost and expense.

Financial Standing

HT has the financial backing and is a development partner with InSite Towers, LLC. InSite Towers, LLC is a wholly-owned subsidiary of InSite Wireless Group, which also owns InSite Wireless, LLC and other tower and distributed antenna system ("DAS") subsidiaries. InSite Wireless, LLC was formed in 2000 and was merged with its parent company in 2006 when InSite Towers, LLC was also formed. Currently, InSite Towers owns 1040 tower sites and 20 major DAS properties. The Company is funded by \$147 million of equity from its principals, \$177.5 million in Fitch rated multiple class series tradable seven year bonds with a fixed interest rate, and \$105 million Senior Credit Facility with Goldman Sachs. Seventy percent of the InSite's outstanding bond debt is rated investment grade (BBB) by Fitch. InSite is 43.9% owned by Cox Communications and its affiliates. InSite Wireless Group's consolidated gross profit was \$43,144,814 for 2015. InSite Wireless Group's revenue is under long-term lease contracts (e.g., 10 to 25 years) with the majority paid by high quality customers such as AT&T, Verizon, Sprint and T-Mobile. InSite generated EBITDA \$26,856,071 for 2015.

InSite Wireless Group's D&B number is 109929526. InSite can provide bank references if necessary; HT's principal United States depository bank is Wells Fargo. InSite Wireless Group's consolidated 2015, 2014, and 2013 audited financial statements are available upon request.



4. History of Similar Projects

Homeland Towers has partnered over the years with many municipalities throughout Connecticut and New York in an effort to provide critical infrastructure to the wireless industry. We have leased, permitted and constructed many sites on both private and municipal properties. There are a number of similar projects that come to mind in comparison to the needs of New Canaan. One particular project that HT had excellent success in working with a municipality was in the town of Mount Pleasant, NY. Mount Pleasant, like New Canaan, had (5) significant dead zones throughout town. HT leased from the town and built (2) towers on municipal property and we are in the process of permitting the third site. HT continues to work with the town on the (2) remaining dead zones by working with key members of the community to come up with the best siting solution that will have the least visual impact to the community.

HT also worked with the Town of Kent, NY to bring both cell and public safety coverage to the town. HT worked in concert with town officials, the town planner and carriers and provided a comprehensive plan to address the lack of reliable service throughout the town. HT identified both municipal and private properties and ended up constructing a stealth monopine at the town hall, a tower at the highway garage and another tower at the transfer station, all on municipal property.

HT is currently working with Putnam County New York to build out up to (6) telecommunication facilities throughout Putnam County. These sites will significantly enhance public safety communication along with commercial wireless service to residents throughout Putnam County. HT has been working closely with the Putnam County Sheriff Department and we have completed a plan which will be going through the permitting process this year. The project encompassed the entire County and we evaluated hundreds of properties and locations, both county owned and privately owned, in completing the project.



HOMELAND TOWERS

Company References:

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HOMELAND TOWERS

Putnam County, New York

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Commissioner Steve Woodstead
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South Salem, New York 10590

teamwood@optonline.net
914-533-2727



5. Recommendations and Timelines

Homeland Towers recommends that the best approach to solve coverage gaps in the Town is to create a good skeleton and foundation for a network. We believe the best way to achieve this is to build towers that are shorter than normal and that are of stealth design. Once that network is in place and operating, only then can HT, the Town and the carriers look at alternative solutions to add onto and enhance that skeleton. Only when these traditional stealth macro facilities have been constructed can a true assessment be made on any remaining areas that experience coverage gaps. This is where distributed antenna systems ("DAS") may be considered as a second viable solution for filling in and providing coverage to areas that still lack reliable service. DAS is typically deployed in settings such as airports, stadiums and concourses where there is a high concentration of traffic and people. DAS has been deployed in areas such as Block Island and along small sections of the Merritt Parkway; it is typically not deployed in suburban areas that lack a high concentration of users and where challenges in terrain are encountered. Some pitfalls of DAS are that the coverage footprint is much smaller than a traditional tower or macro site. HT would be open to assessing alternate technology such as DAS once macro sites have been deployed and are operating. Only then can the wireless providers and a tower developer make an educated decision if DAS is warranted and feasible. HT's funding partner, Insite Wireless Group, owns and operates many DAS networks throughout the country. Some of these DAS networks include the Rockefeller Center, Target Field, Mascone Center, Boston Convention Center, Las Vegas Convention Center and the Boston T.

It is our recommendation that stealth tower facilities be pursued as a first step in solving the Town's coverage gaps. HT would conduct balloon floats and provide Visual Reports of the proposed facility design/height on each site prior to leasing. HT will work closely with Town officials with input from residents and carriers on the best method and design to resolve any remaining gaps.

Timelines

Timelines can greatly vary on projects such as these due to a number of factors. Assuming a smooth process, a typical time frame to build and complete a tower site from executed ground lease to being on-air and operational is approximately 24 months. Below is a breakdown of this timeframe.

Ground leasing process: 3-4 months which includes the 8-24 statute referral process on municipal leases. There is no local zoning but local P&Z/boards must provide approval to the First Selectman to enter into a lease.

Carrier marketing/leasing process: 3-4 months to market the site and for a carrier to enter into a lease with HT.

Zoning process: 12 months – includes 2 months for preparation of a zoning application, 3 months for the technical report process, 7 months for Connecticut Siting Council (CSC) approval.

Local building permit process: 1 month.

Construction of facility: 3 months to make tower tenant ready with power and telco service.

Carrier operational: 1-2 months for a carrier to install and integrate site into their network and be on air.

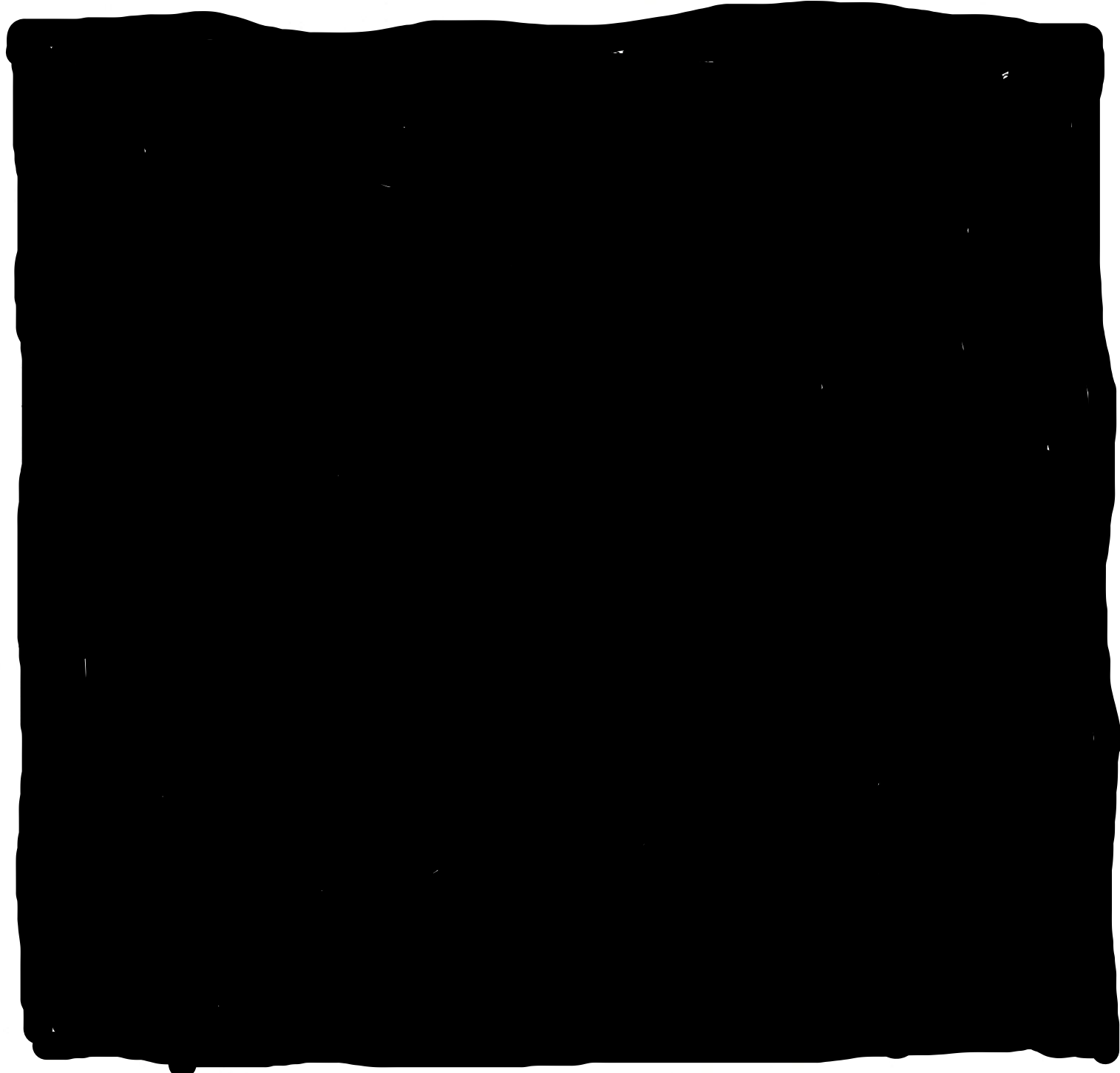


It should be noted that an application for a new tower site can only be filed with the CSC when a carrier has signed a lease with HT. The carrier must prove the need for the site in zoning, not HT.

6. Miscellaneous Information

- Mr. Vergati was directly responsible for negotiating the cell tower lease with Silver Hill Hospital and receiving approval from the Connecticut Siting Council for construction of a 120' stealth "slick stick" a.k.a. "flagless flagpole" with all antennas concealed within the pole. Mr. Vergati was also responsible for leasing and zoning of Homeland's site located just over the New Canaan border at the Vista Fire House in Lewisboro, NY.
- HT understands aesthetics are very important and will work closely with the Town to establish a visually appealing design and take into consideration the avoidance of unnecessary removal of existing trees.
- HT will comply with the requirements for access road and underground utilities, dependent on necessary approvals from the utility company.
- HT agrees with the idea of shorter stealth designs and has extensive experience with these types of towers in other local municipalities.
- HT recognizes the Town's requirement to remove the tower upon termination of the lease agreement at no cost to the town. HT is willing to post a removal bond.
- HT and the tenants shall be responsible, to the extent applicable, for any and all personal property taxes, assessments, and similar charges attributable to the structure and tenant's equipment and other property owned by tenants located at the Leased Premises.
- Homeland Towers will be available for any meetings and public hearings as scheduled, and understands the requirement to provide regular status reports to the Town.
- HT has spoken with the Town in an effort to understand their public safety needs. While the existing public safety coverage appears to be adequate for now, the Town has expressed an interest on collocating on any future towers.
- HT has spoken with Verizon and they have confirmed that they are currently pursuing (2) antenna attachments to transmission towers in the southern section of Town south of the Merritt Parkway. These sites will not provide coverage to the areas where HT is proposing to cover.

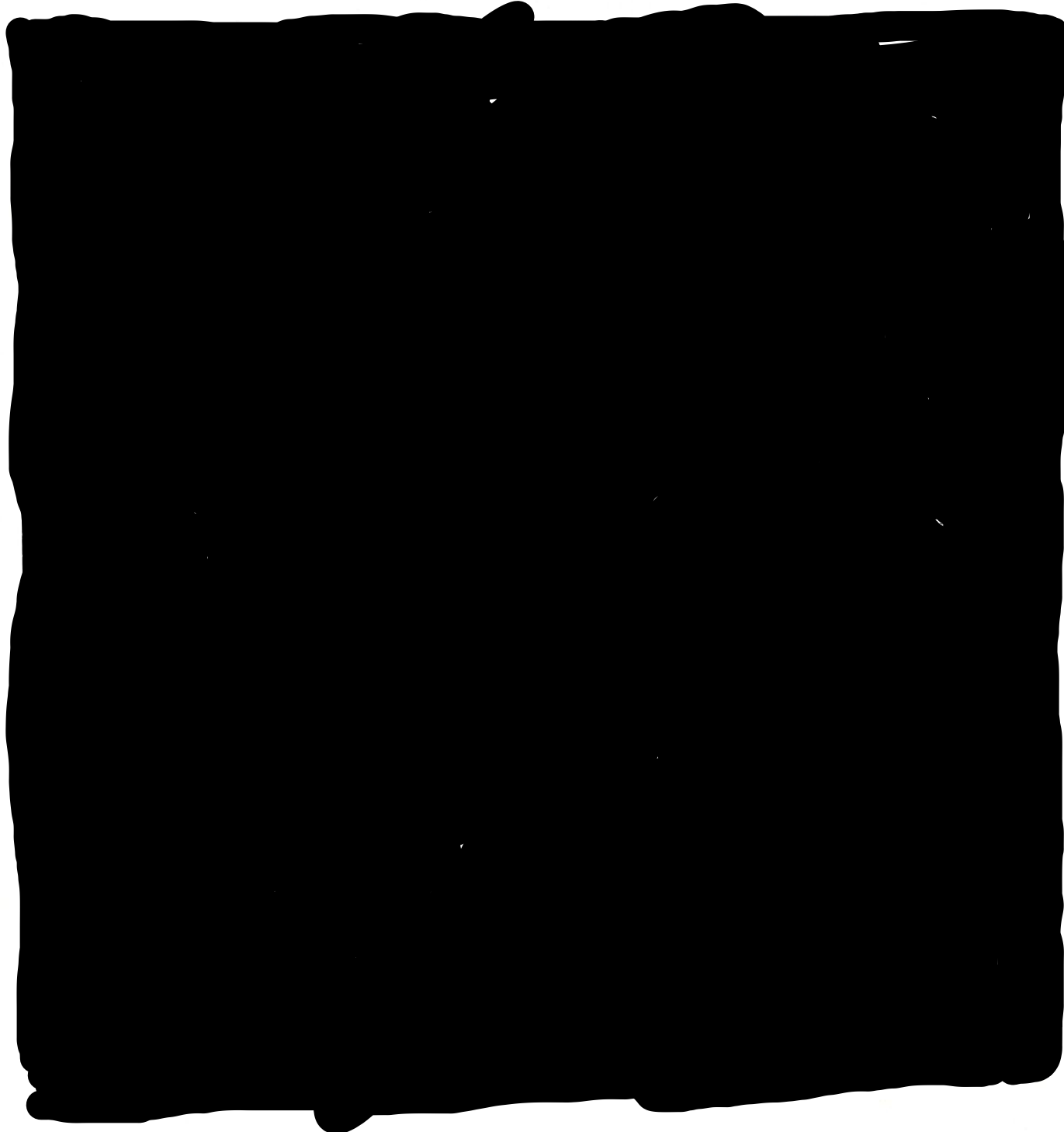
7. Financial Proposal





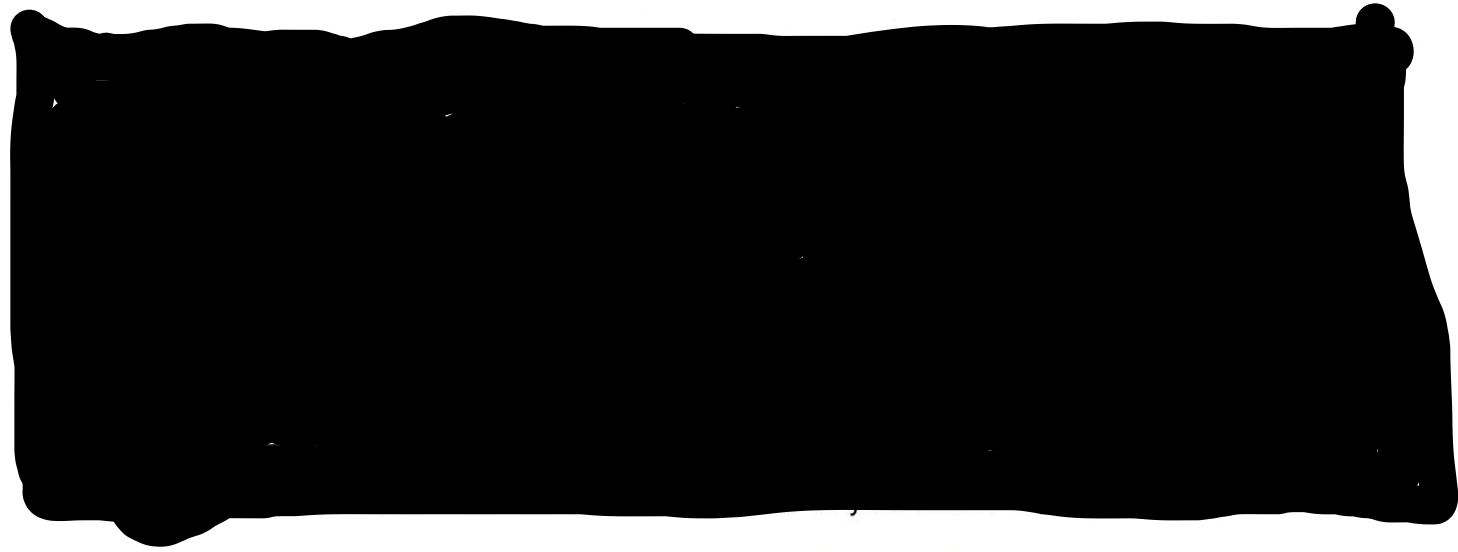
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RENT MATRIX for (1) municipal site





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In conclusion, Homeland Towers will provide the Town of New Canaan with the ability to address the communication needs of the community and the telecommunications industry, while generating a steady revenue stream for the municipality. HT will work to maximize the potential benefits of wireless infrastructure, while minimizing the impact on the New Canaan community.

HT's stealth facilities are specifically designed and located to accommodate collocation of multiple wireless tenants and to maximize the income for the Town. HT's designs and locations will be coordinated with the Town and will ensure three things: (1) minimal visual impact to the community; (2) maximum benefit to the Town in the form of revenue; and (3) state of the art platforms to accommodate the expanding developments in communications technologies of the 21st century. Once all necessary approvals are secured from the appropriate government authorities, HT will provide all capital funding required in order for us to develop the site.

This proposal is submitted to the Town of New Canaan for its approval which will allow HT to lease, market, and develop the proposed Facility for current and future carrier demand. Upon execution of a lease agreement, HT will provide the additional services listed above.

In closing, HT would like to draw attention to the results of an online cell phone survey conducted by the Town in October, 2012. The results of that survey show that 91% of residents support building more towers and 90% of residents think that cell phone service in the Town is not acceptable. Respondents to the survey stated that the north section of town has the worst service followed by the east and west sections. We believe the time has come to bring this critical infrastructure to the Town in a manner that is appropriate and thoughtful. Reliable cell and public safety service has become a necessity to communities such as New Canaan and we feel we are well positioned to deliver this much needed service.

Thank you once again for this opportunity; we look forward to working with you.

Sincerely,



Manuel Vicente
Homeland Towers, LLC

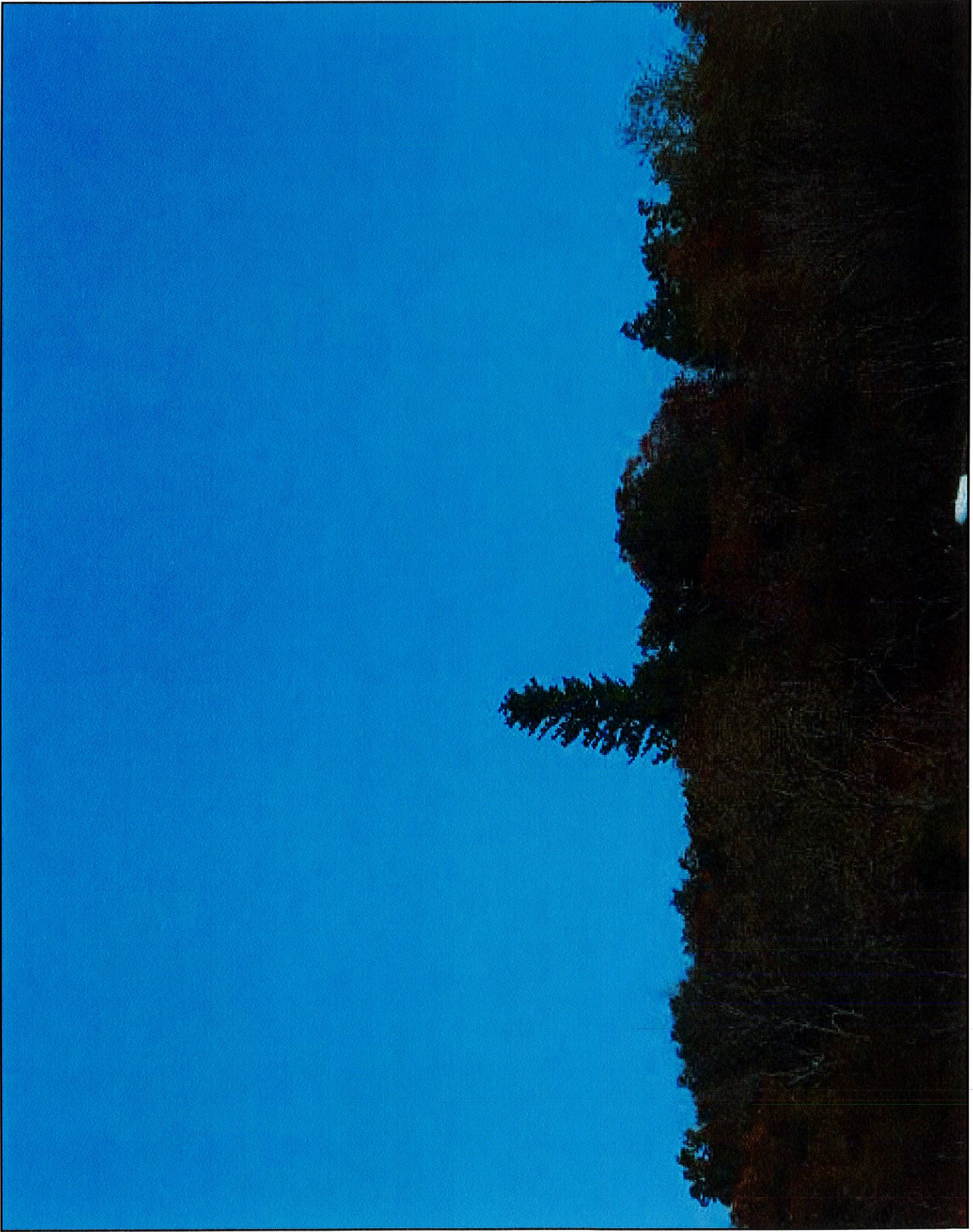


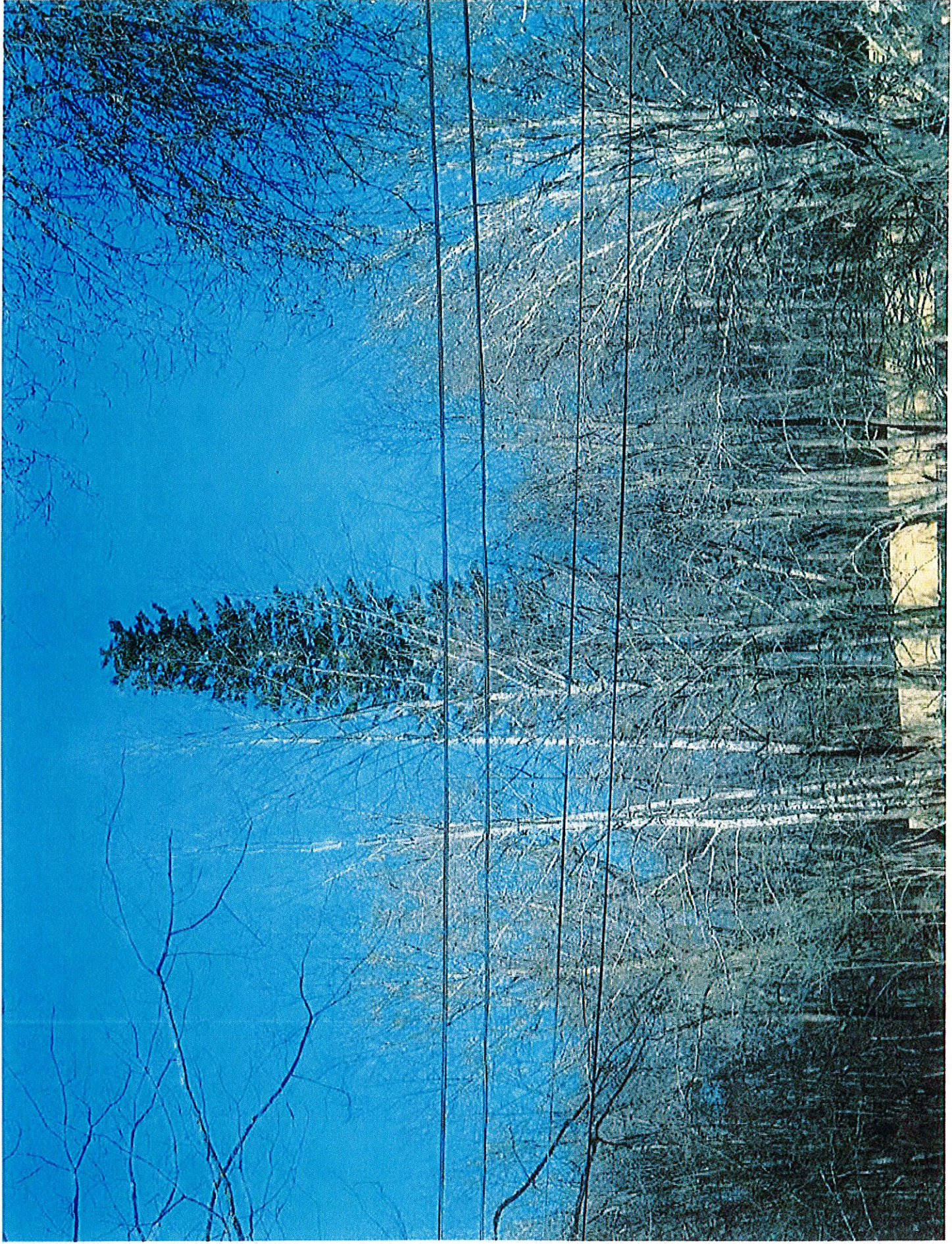
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Attachments:

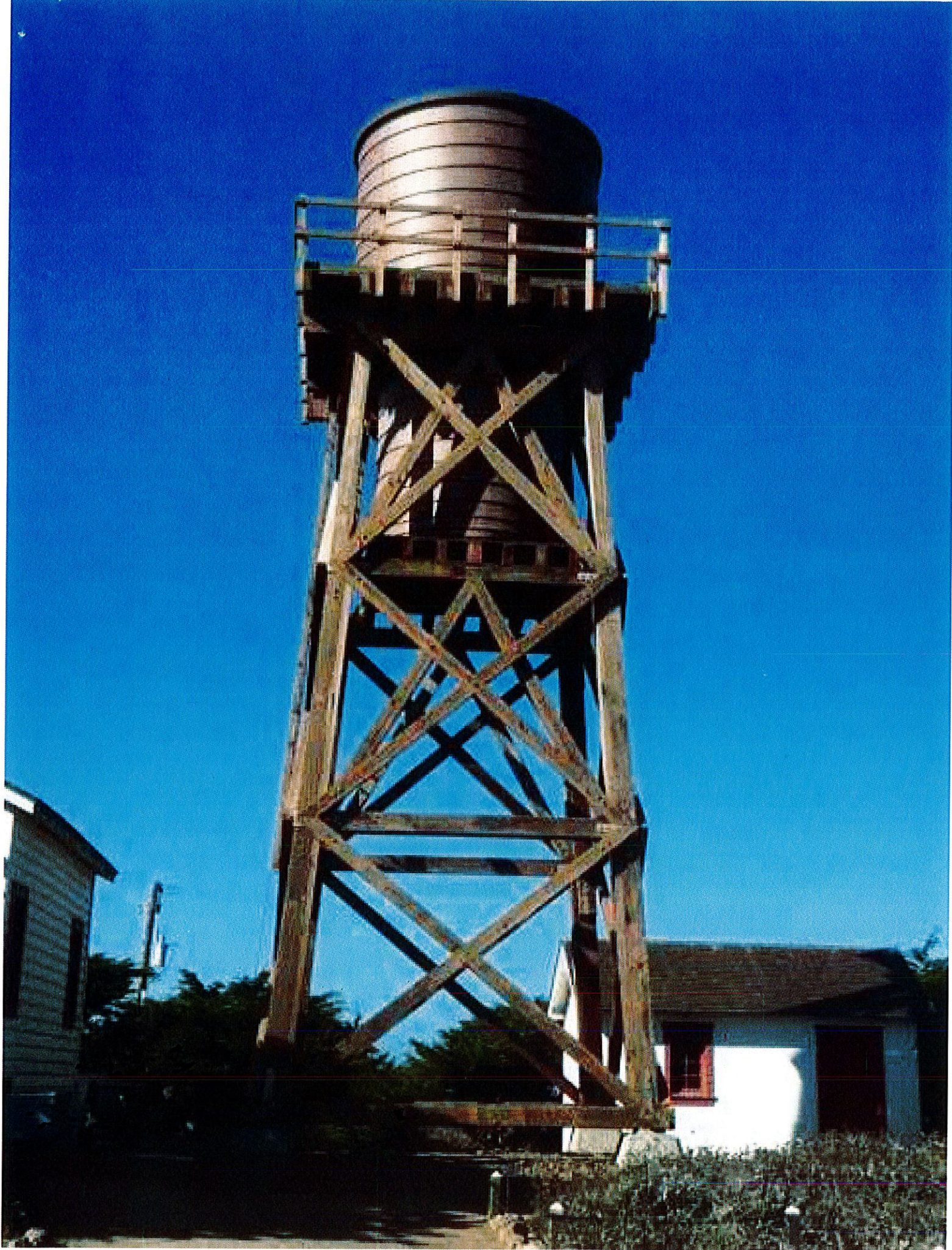
Photos of stealth tower sites:

- Stealth Monopine Tower
- Old Fashion Faux Water Tank
- Flag Pole
- Flagless Flagpole, a.k.a. "slick stick"
- Silo
- Obelisk
- Monument (square façade)
- Monument (twisted façade)











Sabre









