



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

May 13, 2022

Lucia Chiocchio, Esq.  
Kristen Motel, Esq.  
Cuddy & Feder, LLP  
445 Hamilton Avenue, 14th Floor  
White Plains, New York 10601  
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RE: **DOCKET NO. 509** - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 1837 Ponus Ridge Road, New Canaan, Connecticut.

Dear Attorneys Chiocchio and Motel:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 3, 2022.

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 June 3, 2022 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,

A handwritten signature in black ink, appearing to read "Melanie Bachman".

Melanie Bachman  
Executive Director

c: Service List dated May 12, 2022

**Docket No. 509**  
**Homeland Towers, LLC/New Cingular Wireless PCS, LLC**  
**Pre-Hearing Interrogatories**

**General**

1. Referring to Application Attachment 11, 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? Describe any additional attempts to contact those property owners.
2. Referring to Application p. 24, how is the construction cost of the facility recovered for both Homeland and AT&T?
3. Referring to Application pp. 23-24, how many residents attended the January 24, 2022, public information meeting? What concerns were raised by residents and town officials and how were these concerns addressed?

**Site Search**

4. When did AT&T commence a site search for the proposed service area? Identify the approximate center and radius of AT&T's site search area.
5. When did Homeland commence a site search in the northwestern New Canaan area?
6. Referring to the site search summary, is Location 6 (Proprietors Circle) an undeveloped parcel?
7. Referring to the Site Search Summary it states Location 24 (Lost District Drive) was rejected by AT&T's RF engineers. What height was modeled in this location? Provide a coverage plot from this location.
8. The 2014 New Canaan Wireless Market Study identified the intersection of West Road and Dan's Highway as a Likely Site location for an AT&T facility. Did AT&T agree with this assessment? Was a search conducted in this area?

**Site/Tower**

9. Would any blasting be required to develop the site? How would bedrock be removed?
10. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
11. Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.

### **AT&T Coverage/Capacity**

12. Application Attachment 7 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 AT&T’s wireless system?
13. Would the proposed antennas be capable of offering 5G services? If yes, at what frequencies?
14. Provide coverage models for existing and proposed 1900 MHz services.
15. The 700 MHz coverage plot appears to show marginal service to Route 137 (High Ridge Road). Was there any other type of analysis conducted to determine the site would provide adequate service to Route 137? If yes, discuss and provide relevant studies.
16. 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 proposed service area.
17. The 2014 New Canaan Wireless Market Study included an assessment of AT&T’s network by a third party (Centerline). Did AT&T provide data to Centerline for this study? Did AT&T comment to Centerline or the town regarding the study conclusions?
18. Referring to Application p. 12, provide technological limitations, if any, that would preclude the installation of a network of small cells to serve the area. Estimate the number of pole-mounted small cells that would be required for reliable service within the proposed service area. Would certain frequencies be limited through the use of small cells? What would be the cost of each small cell for both the use of existing utility poles and new poles specific for small cells. What type of equipment would be attached to each pole?

### **Backup Power**

19. Is the Town proposing a backup power source for its equipment? If yes, provide detail.
20. What would be the respective run time for AT&T’s proposed generator before it would need to be refueled, assuming it is running at full load under normal conditions?

### **Public Safety**

21. Would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?
22. Does the deployment of FirstNet require additional equipment? Explain.
23. Why was the proposed site selected for FirstNet deployment?
24. Referencing Application Attachment 7, revise Power Density Table 2 to include the Town’s antennas.

### **Environment**

25. Referring to Application p. 16, has the Applicant completed the Phase IB Survey and submitted the results to the State Historic Preservation Office?

26. Referring to Application Attachment 8 - Visibility Assessment, estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed tower.
27. What is the expected visibility of the proposed tower from the abutting residential property at 359 Dan's Highway?
28. What is the expected visibility of the proposed tower from the abutting residential property at 59 Squires Lane?
29. Are there sections of the Centennial Watershed State Forest in the area of the Laurel Reservoir? Revise the Viewshed Analysis Map (Application Attachment 8) to show the boundaries of the state forest. What is the expected view of the proposed tower from the state forest?
30. Would any mapped areas of prime farmland soil be impacted by the project? If yes, estimate the amount of disturbance?
31. Would the project require a DEEP Stormwater Permit? If yes, do the proposed stormwater controls conform to the requirements of the Stormwater Permit?
32. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies 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. tower location/compound;
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.