

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

|                                   |   |                |
|-----------------------------------|---|----------------|
| IN RE:                            | : |                |
|                                   | : |                |
| APPLICATION OF HOMELAND TOWERS,   | : | DOCKET NO. 509 |
| LLC AND NEW CINGULAR WIRELESS     | : |                |
| PCS, LLC FOR A CERTIFICATE OF     | : |                |
| ENVIRONMENTAL COMPATIBILITY       | : |                |
| AND PUBLIC NEED FOR THE           | : |                |
| CONSTRUCTION, MAINTENANCE AND     | : |                |
| OPERATION OF A WIRELESS TELE-     | : |                |
| COMMUNICATIONS FACILITY           | : |                |
| LOCATED AT 1837 PONUS RIDGE ROAD, | : |                |
| NEW CANAAN, CONNECTICUT           | : | APRIL 14, 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. 509 proceeding.

As the Council is aware, Cellco is a licensed provider of wireless services throughout Connecticut. The proposed telecommunications facility described in the Docket No. 509 application would fit neatly into Cellco’s network design for southwest Connecticut and provide Cellco with much needed wireless service in the northwest New Canaan area.

Cellco’s involvement in the Docket No. 509 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. 509, 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 Docket No. 509 proceeding and hearing, 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



By \_\_\_\_\_

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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 14<sup>th</sup> day of April 2022, a copy of the foregoing was sent, via electronic mail, to:

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Kenneth C. Baldwin