Robinson+Cole

KENNETH C. BALDWIN

280 Trumbull Street Hartford, CT 06103-3597 Main (860) 275-8200 Fax (860) 275-8299 kbaldwin@rc.com Direct (860) 275-8345

Also admitted in Massachusetts and New York

August 25, 2022

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

Re: Docket No. 509 – Application of Homeland Towers, 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 Telecommunications Facility Located at 1837 Ponus Ridge Road, New Canaan, Connecticut

Dear Ms. Bachman:

Enclosed please find an updated Pre-Hearing Submission, filed on behalf of Cellco Partnership d/b/a Verizon Wireless ("Cellco"). Due to scheduling conflicts, Shiva Gadasu will be unable to attend the September 8, 2022 continuation of the evidentiary hearing. Mr. Gadasu will be replaced on the Cellco panel by Mark Brauer, RF Design Engineer.

Thank you.

Sincerely,

Kenneth C. Baldwin

Cunia JM

KCB/kmd Copy to:

Parties and Intervenors of Record

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 : AUGUST 25, 2022

REVISED PRE-HEARING SUBMISSION OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless ("Cellco"), an intervenor in this proceeding, hereby provides the Connecticut Siting Council ("Council") with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

- 1. Mark Brauer, Radio Frequency Engineer, Verizon Wireless
- 2. Timothy Parks, Real Estate/Regulatory Specialist, Verizon Wireless

B. Exhibits to be offered

Cellco intends to offer the following Exhibits:

- Cellco's Responses to Pre-Hearing Interrogatories (Set 1) from the Council dated
 June 2, 2022.
- Cellco's Responses to Pre-Hearing Interrogatories (Set 2) from the Council dated
 June 13, 2022.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Bv:

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597

Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August, 2022, a copy of the foregoing was sent, via electronic mail, to:

Lucia Chiocchio, Esq.
Kristin Motel, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
LChiocchio@cuddyfeder.com
KMotel@cuddyfeder.com

Raymond Vergati Manuel Vicente Homeland Towers, LLC 9 Harmony Street, 2nd Floor Danbury, CT 06810 rv@homelandtowers.us mv@homelandtowers.us

Brian Leyden Harry Carey AT&T 84 Deerfield Lane Meriden, CT 06067 bl5326@att.com hc3635@att.com

David F, Sherwood, Esq. Moriarty, Paetzold & Sherwood 2230 Main Street, P.O. Box 1420 Glastonbury, CT 06033-6620 dfsherwood@gmail.com

Justin Nishioka 60 Squires Lane New Canaan, CT 06840 Justin.nishioka@gmail.com

Kenneth C. Baldwin

Kung mu