

DAVID A. BALL

Please Reply To Bridgeport  
E-Mail: dball@cohenandwolf.com

September 15, 2022

**Via e-mail and Hand Delivery**

Attorney Melanie Bachman  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**Re: Docket No. 510 – New Cingular Wireless PCS, LLC d/b/a AT&T and Tarpon Towers II, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 92 Greens Farms Road, Westport, Connecticut**


Dear Attorney Bachman:

On behalf of the applicants, I've enclosed an original and fifteen (15) copies of the following:

- Applicants' Responses to Intervenor's Interrogatories
- Supplemental Pre-Hearing Submission
- Applicants' Late-Filed Exhibits
- Pre-Filed Testimony of Keith Coppins and Douglas Roberts
- Pre-Filed Testimony of Martin Lavin
- Pre-Filed Testimony of Rachelle Lewis

Thank you.

Very truly yours,



David A. Ball

cc: Service List

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

IN RE:

NEW CINGULAR WIRELESS PCS, LLC  
D/B/A AT&T AND TARPON TOWERS II,  
LLC APPLICATION FOR A CERTIFICATE  
OF ENVIRONMENTAL COMPATIBILITY  
AND PUBLIC NEED FOR THE  
CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A  
TELECOMMUNICATIONS FACILITY  
LOCATED AT 92 GREENS FARMS  
ROAD, WESTPORT, CONNECTICUT

DOCKET NO. 510

SEPTEMBER 15, 2022

**SUPPLEMENTAL PRE-HEARING SUBMISSION OF  
NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T  
AND TARPON TOWERS II, LLC**

Applicants New Cingular Wireless PCS, LLC d/b/a AT&T and Tarpon Towers II, LLC respectfully submit the following supplemental pre-hearing information in connection with the hearing scheduled for September 22, 2022.

A. List of Witnesses

1. Martin Lavin, Radio Frequency Engineer, C Squared Systems, LLC, on behalf of AT&T
2. David Walsh, Program Manager, Smart Link Group
3. Harry Carey, Director, External Affairs, AT&T
4. Keith Coppins, CEO of ARX Wireless Infrastructure LLC, on behalf of Tarpon Towers, II, LLC
5. Douglas Roberts, AIA on behalf of Tarpon Towers, II, LLC
6. Brian Gaudet, Project Manager, All-Points Technology Corporation
7. Dean Gustafson, Senior Wetland Scientist, All-Points Technology Corporation
8. Eric Reuter, Reuter Associates LLC, resume attached

9. Rachele Lewis, Area Manager, Construction & Engineering, AT&T, resume attached

B. Additional Exhibits To Be Offered


8. Applicants' Late-Filed Exhibits
  - 8.a. Revised Construction Drawings and Project Plans dated August 31, 2022
  - 8.b. Photosimulation of Monopine Tower
  - 8.c. Noise Study of Reuter Associates LLC dated August 18, 2022
9. Applicants' Responses to Interrogatories of Intervenor Donald L. Bergmann dated September 15, 2022
10. Pre-Filed Testimony of Martin Lavin dated September 15, 2022
11. Pre-Filed Testimony of Rachele Lewis dated September 15, 2022
12. Supplemental Pre-Filed Testimony of Keith Coppins and Douglas Roberts, AIA, dated September 13, 2022

RESPECTFULLY SUBMITTED,

**TARPON TOWERS II, LLC**

**NEW CINGULAR WIRELESS PCS, LLC**

By: \_\_\_\_\_

  
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Juris No. 010032

By: \_\_\_\_\_

  
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**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing was sent via electronic mail on this 15th day of September, 2022, to the following:

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\_\_\_\_\_  
David A. Ball

## Eric L. Reuter

### Education

Worcester Polytechnic Institute, BS Electrical Engineering  
BS Humanities and Arts: Music

### Professional Affiliations

Acoustical Society of America – Fellow  
Institute of Noise Control Engineering – Board Certified Member  
National Council of Acoustical Consultants – Immediate Past President  
ASTM – Voting Member

Eric Reuter has 25 years of experience as a consultant and educator in acoustics and audio. Mr. Reuter founded Reuter Associates, LLC in Portsmouth, NH in 2001 to provide consulting services in architectural and environmental acoustics and noise control. He is an Associate Professor at Berklee College of Music in Boston, where he has taught courses in acoustics and electronics to more than 5000 students since 2000.

Mr. Reuter is an expert in assessment, modeling, and mitigation of environmental noise. He has managed several hundred environmental noise projects in areas such as transportation, industrial processes, manufacturing, mineral extraction, telecommunications, recreational facilities, and protection of conservation land.

Reuter also has extensive expertise in architectural acoustics, including schools, multifamily dwellings, commercial and industrial facilities, noise control of building mechanical systems, and speech privacy.

Mr. Reuter is a Fellow of the Acoustical Society of America and immediate past chair of the Technical Committee on Architectural Acoustics. He is a Board-Certified Member of the Institute of Noise Control Engineering, Immediate Past President of the National Council of Acoustical Consultants, and a voting member of ASTM committee E33 – Building and Environmental Acoustics. Reuter was an author of ANSI S12.70 *American National Standard Criteria for Evaluating Speech Privacy in Healthcare Facilities*, released in 2016.

Mr. Reuter is the author of Berklee Online's *Architectural Acoustics* distance learning course, and developed the acoustics curriculum for the Bachelor of Arts in Sound Recording at the New England Institute of Art. He has delivered several guest lectures on architectural acoustics and noise control at the Dartmouth College Thayer School of Engineering, Worcester Polytechnic Institute, and the University of Massachusetts.

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## **Objective**

To obtain a technical position where my professional experience and education will allow me to make an immediate contribution as an integral part of AT&T.

## **Employment History**

03/2016 - Present

*Senior Real Estate & Construction Manager*

Meriden, CT

- Responsible for reviewing, evaluating, and initiating real estate transactions with various internal and external business entities. Manage and negotiate provisioning and preconstruction activities of real estate assets for network systems and operations. Interpret and apply leasing guidelines as appropriate and in a manner that aligns with AT&T's organizational goals. Effectively manage AT&T's vendor partners in order to ensure wireless goals are met or exceeded. Responsible for cost estimates as it relates to tower modifications.

09/2011 - 03/2016

*Transport Project Manager*

Rocky Hill, CT

- Managed MLPPP sites for New England and Upstate NY.
- Reviewed and approved (or disapproved/rejected) OOM submissions in NORAD. Exported OOMs and created Purchase Orders (PO).
- Worked with vendors to ensure timely install, test and extension of T1 circuits.
- Responsible for managing MEI for New England and Upstate NY MLPPP projects.

*Equipment Engineer*

- Prepared equipment maintenance requirements and policies.
- Identified and tracked equipment deficiencies and designs.
- Implemented rearrangements and improvements.
- Determined equipment required for storage capacity needs.
- Managed capital and facility expense budgets.
- Served as liaison for hardware, facility vendors, laboratories for testing and product evaluation.

### *Lead Finance Manager*

- Successfully managed a team of finance PMs in Update NY and CT.
- Conducted and documented complex financial analysis projects.
- Worked on problems of diverse scope, including the analysis of financial reports, trend, and opportunities.
- Responsible for the analysis and interpretation of financial and other data.
- Developed recommendations to achieve the organizations financial objectives.

06/2009 – 09/2011

*Manager, Network Operations*

Northeast Global Voice and Data CMC

White Plains, NY and Meriden, CT

- Supervise communications technicians.
- Train and coach communications technicians in the 22 states footprint processes and the Legacy T systems.
- Create methods and procedures for *Northeast Global Voice and Data CMC*.
- Subject matter expert for T1 and voice circuits.
- Serve as MSOC SPOC to ensure center productivity goals are met.
- Key contributor for various center projects and initiatives.
- Point person for *Nationwide Mutual Insurance*.
- Troubleshoot circuits (i.e. DS0, T1 and T3) to isolate and resolve customer reported issues.
- Ensure customer trouble reports are resolved in a timely manner to meet established MTTR targets.
- Participate in technical troubleshooting bridges.
- Work with tier II centers to resolve layer II circuit troubles.
- Interact with engineering to redesign circuits.

01/2008 – 06/2009

*Senior Specialist – Network Support/Network Engineer*

Northeast Global Voice and Data CMC

White Plains, NY

- Responsible for 24/7, 365-day surveillance of the AT&T global network.
- Utilize my training in various network services such as voice, transport, data and INCS services in order to isolate various network outages for timely resolution.
- Knowledge of telecommunication fundamentals and skilled in troubleshooting DS0, DS1, DS3, SONET, CSU/DSU, Frame Relay and IMA
- Interact with internal and external vendors in scheduling and coordinating dispatches and trouble resolution.
- Ensure customers receive scheduled progress updates regarding reported troubles.
- Interact with LECs and independent carriers for status and escalation of troubles tickets referred to their networks.

- Provide support to various AT&T groups including GCSC, IBM, and Service Executives.
- Calculate and provide data during outages for real time impact analysis
- Interfaces with all levels of management to provide real time status of service and network performance by utilizing the 3CP process.
- Monitor KPI tracking summary as well as Worklist Status Tool (WST) for daily updates to upper management team.
- Inform, activate and run Technical Control Bridges as part of 3CP, determine impact and reports FCC incident thresholds as required.
- Supervise communications technicians when needed.

02/2004 - 01/2008

*Customer Sales and Service Representative*  
AT&T East, New Haven, CT

- Followed the "Art of the Call" requirements to ensure proper handling of all incoming calls.
- Handled customer requests to change or update products and services.
- Discussed, investigated, and resolved customers billing inquiries regarding rates, policies, and practices.
- Performed in-depth analysis of customer records in order to accurately recommended products and services that are appropriate to the customer's needs.
- Identified potential sales opportunities to ensure customer satisfaction and increase AT&T share revenue.
- Met or exceeded daily and monthly sales objectives. This included sales of AT&T entertainment services, voice and data products (DSL/internet, U-Verse, Satellite TV, etc.).

08/2000 - 02/2004

*Process Support Center Administrator*  
SBC, Cheshire, CT

- Maintained mechanized loop testing trunks and subscriber loop carrier systems.
- Assisted outside installation technicians in order to resolve dial tone service and other repair issues.
- Responsible for creating and programming cable shifts to clear plant facilities.
- Updated and maintained facility and customer records in AT&T systems such as LMOS, SONAR, SWITCH, LFACS, and MIZAR.
- Responded immediately to service related problems received from various AT&T departments.
- Interfaced directly with customers and other groups to expand upon trouble descriptions in attempt to resolve customer issues.



- Renegotiated commitment times using diplomacy and tact in order to restore customer confidence.
- Directed and aided residence and business service representatives in resolving discrepancies to ensure customer satisfaction.
- Reviewed trouble reports in order to coordinate methods for repair and installation.

### **Skills**

- Excellent problem-solving and negotiating skills.
- Proficient in Microsoft Word, Power Point and Excel
- Excellent communication skills (written and oral)
- Knowledge of many AT&T systems such as PACE, iComply, WARP, 1-2-3 Report, NORAD, FFLOW, NIIMS, Tirks, ISOR, Netscope, ICORE, BMP2 and CTP.

### **Education:**

University of New Haven, West Haven CT  
*B.S., 2003, Political Science/Pre-Law, GPA 3.3*

University of New Haven, West Haven, CT  
*M.S. 2004, Labor Relations, GPA 3.5*

### **Professional Licenses, Accreditations, and Memberships**

University of New Haven, West Haven CT  
*Paralegal Studies Certificate, 1998*

AT&T Legacy T

- Six Sigma White Belt, 2008
- Six Sigma Yellow Belt, 2008
- Six Sigma Green Belt, 2010

### **Foreign Languages**

- Spanish - some knowledge
- French - conversational/some knowledge
- Creole - fluent