

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
 :  
APPLICATION OF NEW CINGULAR : DOCKET NO. 510  
WIRELESS PCS, LLC AND TARPON :  
TOWERS II, LLC FOR A CERTIFICATE OF :  
ENVIRONMENTAL COMPATIBILITY :  
AND PUBLIC NEED FOR A :  
TELECOMMUNICATIONS FACILITY AT :  
92 GREENS FARMS ROAD, WESTPORT, :  
CONNECTICUT : AUGUST 2, 2022

**RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS  
TO THE TOWN OF WESTPORT PRE-HEARING INTERROGATORIES – SET ONE**

On July 26, 2022, the Town of Westport (“Town”) issued Pre-Hearing Interrogatories – Set One to the Intervenor, Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Docket No. 510. Below are Cellco’s responses.

Question No. 1

How and when was Verizon made aware of the availability of the proposed site?

Response

Cellco receives regular communications from tower companies, like Tarpon, about the availability of sites that they (the tower companies) have leased. Our records indicate that Tarpon reached out to Cellco in the first quarter of 2016 with the 92 Greens Farm Road site and provided Cellco with information about the location and height of the proposed tower. Cellco’s RF Engineers evaluated the Greens Farm Road location and determined, first, that it had a need for a site in this area and second, that it could satisfy that need with antennas at the 108-foot level on the proposed 124-foot tower. After which, Cellco established its Westport 3 search area.

Question No. 2

Provide Verizon's site acquisition request document (the "SARF") regarding Verizon determination of need for a facility in the area of the proposed site and any map indicating a search locus (such as a "search ring") that was contemporaneously generated by Verizon.

Response

As referenced in Cellco's response to Council question no. 8, the center of the Westport 3 search ring was located at 41.12361111, -73.345 and has a radius of approximately one-half mile. *See Attachment 1.* Because an acceptable site was presented by Tarpon, Cellco did not need to issue a traditional SARF to its site acquisition team.

Question No. 3

Does Verizon have any SARF documents that it issued relating to seeking a facility in the general area of the proposed facility?

- a. If so, provide the SARF and any search area map contemporaneously generated by Verizon.
- b. If not, by what process did Verizon determine it was interested in the site and approve a commitment to Tarpon? Provide supporting documentation.

Response

*See Cellco's response to Q.1 and Q.2 above.*

Question No. 4

When did Verizon commit to participating as an intervenor in a Siting Council application? Provide documentation of Verizon authorization to proceed.

Response

See Cellco’s response to Q.1 above. Cellco filed its Petition to Intervene in Docket No. 510 on June 7, 2022. This request was approved by the Council on June 23, 2022.

Question No. 5

Provide a height comparative coverage analysis and map showing height reductions in ten-foot increments.

Response

Antenna Height (AGL)	700 MHz Coverage in square miles		850 MHz Coverage in Square Miles		1900 MHz Coverage in Square Miles		2100 MHz Coverage in Square Miles		3550 MHz Coverage in Square Miles		3700 MHz Coverage in Square Miles	
	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm
108’	1.54	3.36	1.05	2.45	0.15	1.01	0.1	0.82	0.02	0.07	0.36	1.08
98’	1.38	3.07	0.90	2.23	0.15	0.88	0.1	0.73	0.01	0.05	0.32	0.95
88’	1.19	2.79	0.78	2.03	0.14	0.77	0.1	0.63	0.01	0.05	0.29	0.82
78’	1.0	2.53	0.67	1.8	0.14	0.66	0.1	0.55	0.009	0.04	0.25	0.7

Coverage plots showing Cellco’s proposed coverage with antennas at the 98, 88, and 78-foot levels included in Attachment 2, Attachment 3 and Attachment 4, respectively. It is important to remember that Cellco is not ultimately driving the height of the proposed tower. Cellco is committed to sharing the proposed tower at the highest available level, which happens to be the 108-foot centerline height.

Question No. 6

Have you considered a small cell alternative to the cell tower? If not, why not?

## Response

No. The use of small cells facilities to satisfy the need for improved wireless service in this portion of Westport is not a suitable option here considering the area to be covered and the number of users we are intending to offload along I-95 and the surrounding area to help offload WESTPORT CT Beta sector. Individual small cells have a very small coverage footprint (about 0.15 miles radius) and a very limited capacity to handle only a few users at any one time. Given what Cellco is trying to achieve here in Westport, small cells are not the answer. The two small cell facilities located to the southwest and west of the proposed 92 Greens Farm Road site, identified as Westport SC 2 and Westport SC 2A were activated in June of 2016 and July of 2017 respectively, to provide coverage relief along portions of I-95. Neither of these small cells provides any type of capacity relief to WESTPORT CT Beta sector antennas or coverage beyond a small (0.15 mile) coverage radius.

## Question No. 7

Have you analyzed whether the proposed cell tower can be in the form of a “flagpole” or “tree?”

- a. If so, provide the analysis.
- b. If not, why not?

## Response

Neither alternative tower design was analyzed primarily because Tarpon, the applicant, presented Cellco and ultimately the Council with a traditional monopole tower design. Cellco, as a tenant on the tower, cannot require Tarpon to change or modify the tower design.

That said, a tree tower would be acceptable to Cellco as it would afford the opportunity for the installation of a full array of antennas similar to the more traditional monopole tower

proposed by Tarpon. A flagpole tower would restrict the number of antennas that Cellco could install and operate at any particular height, would likely require Cellco to occupy two or more antenna locations on the tower, thereby increasing the overall structure height and impact Cellco's ability to take advantage of new technological to expand or upgrade its facility in the future. A flagpole tower would not be an acceptable alternative tower design.

Question No. 8

In view of informal discussions between representatives of Tarpon and the Town of Westport, has Verizon done any analysis, formal or informal, of coverage and capacity for a cell tower located on property owned by the State of Connecticut Department of Transportation ("CT DOT") on Hales Road in Westport, identified as Assessor's Map D06; Lot 238?

- a. If so, provide a copy of any written analysis or summary of verbal analysis.
- b. If not, why not?

Response

No. The CT DOT parcel off Hales Road was not presented to Cellco as a possible alternative tower location and was not evaluated. According to the Site Search Summary (Exhibit F – Tarpon Application), the CT DOT is not interested in hosting a tower at its Hales Road property.

CERTIFICATE OF SERVICE

I hereby certify that on the 2<sup>nd</sup> day of August, 2022, a copy of the foregoing was sent, via electronic mail, to:

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Kenneth C. Baldwin

# **ATTACHMENT 1**



TCS in Westport, CT

Ruler

Line Path Polygon **Circle** 3D path 3D polygon

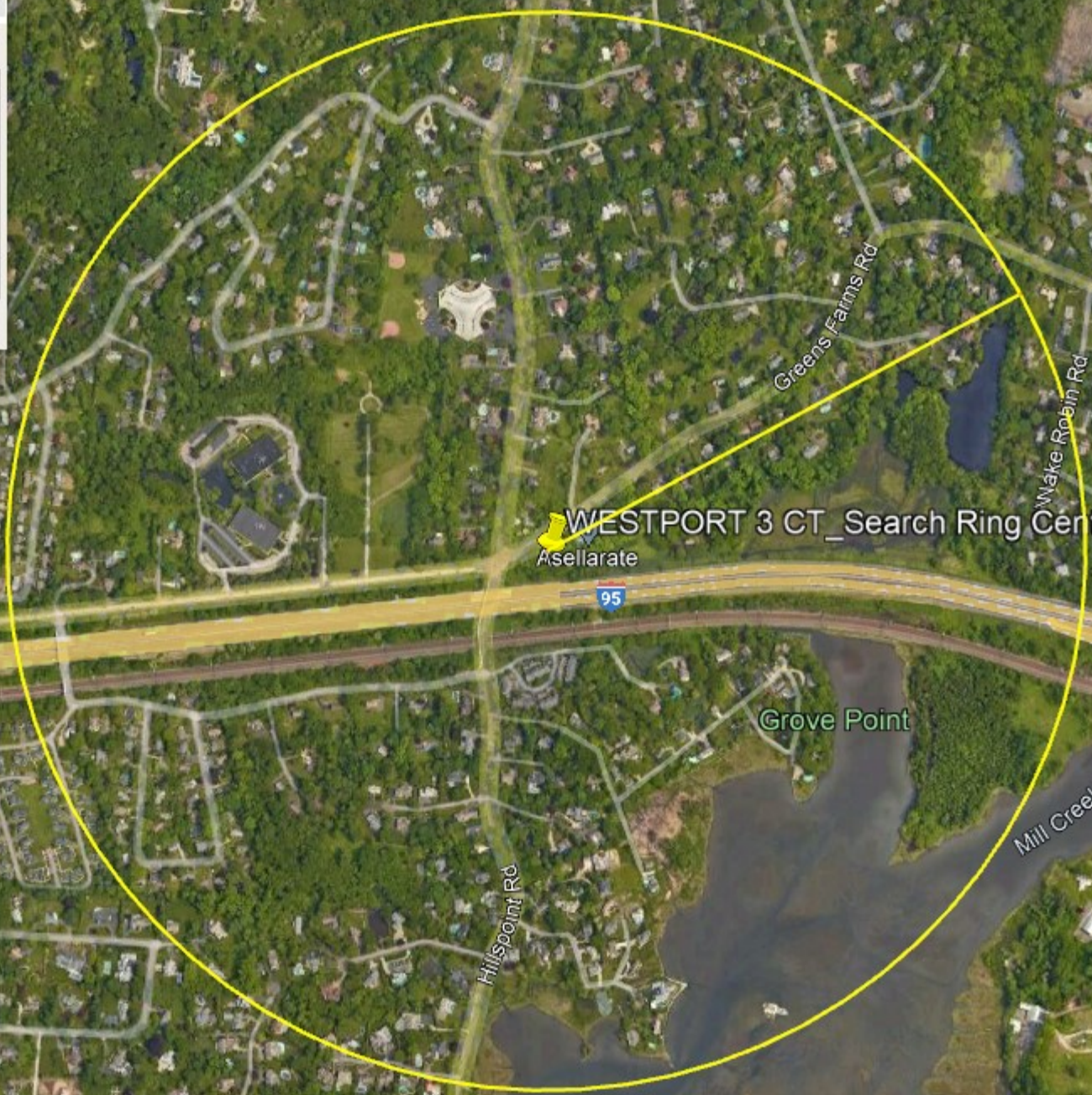
Measure the circumference or area of a circle on the ground

Radius: 0.50 Miles

Area: 2,043,427.62 Square Meters

Circumference: 3.15 Miles

Mouse Navigation Save Clear



WESTPORT 3 CT\_Search Ring Center  
Asellarate

95

Grove Point

Mill Creek

Sherwood Island State Pa

Sherwood Island

Compo Rd S

Compo Rd S

Hillspoint Rd

Greens Farms Rd

Wake Robin Rd

Ver Oaks Rd

Hillspoint

Prospect Rd

Ellery Ln

Westport Town Transfer

Wes

Colonial Ce

Nya

Bridgewater

augatuck

e

Hill



# **ATTACHMENT 2**

**Existing and Proposed Verizon Wireless 700 MHz Coverage  
With Proposed Westport 3 CT Facility at 98' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



**Legend**

- Proposed Verizon Wireless Facility
- Existing and Proposed RSRP >= -85 (in building)
- Existing Verizon Wireless Facilities
- Existing and Proposed RSRP >= -85 (vehicular)
- Major Route
- - - Town Line

ALL POINTS  
ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

Map Note:  
This map was prepared at a map scale of 1:10,000 at 24" by 36" (6096 mm by 9144 mm). All map data were reduced to 11" x 17". Refer to graphic cover  
Open Space, Schools, and State Forests/Parks are regulated using available State GIS data, which may be outdated in some areas.  
Base map: ©2010 Google Earth

0
0.25
0.5  
 Miles

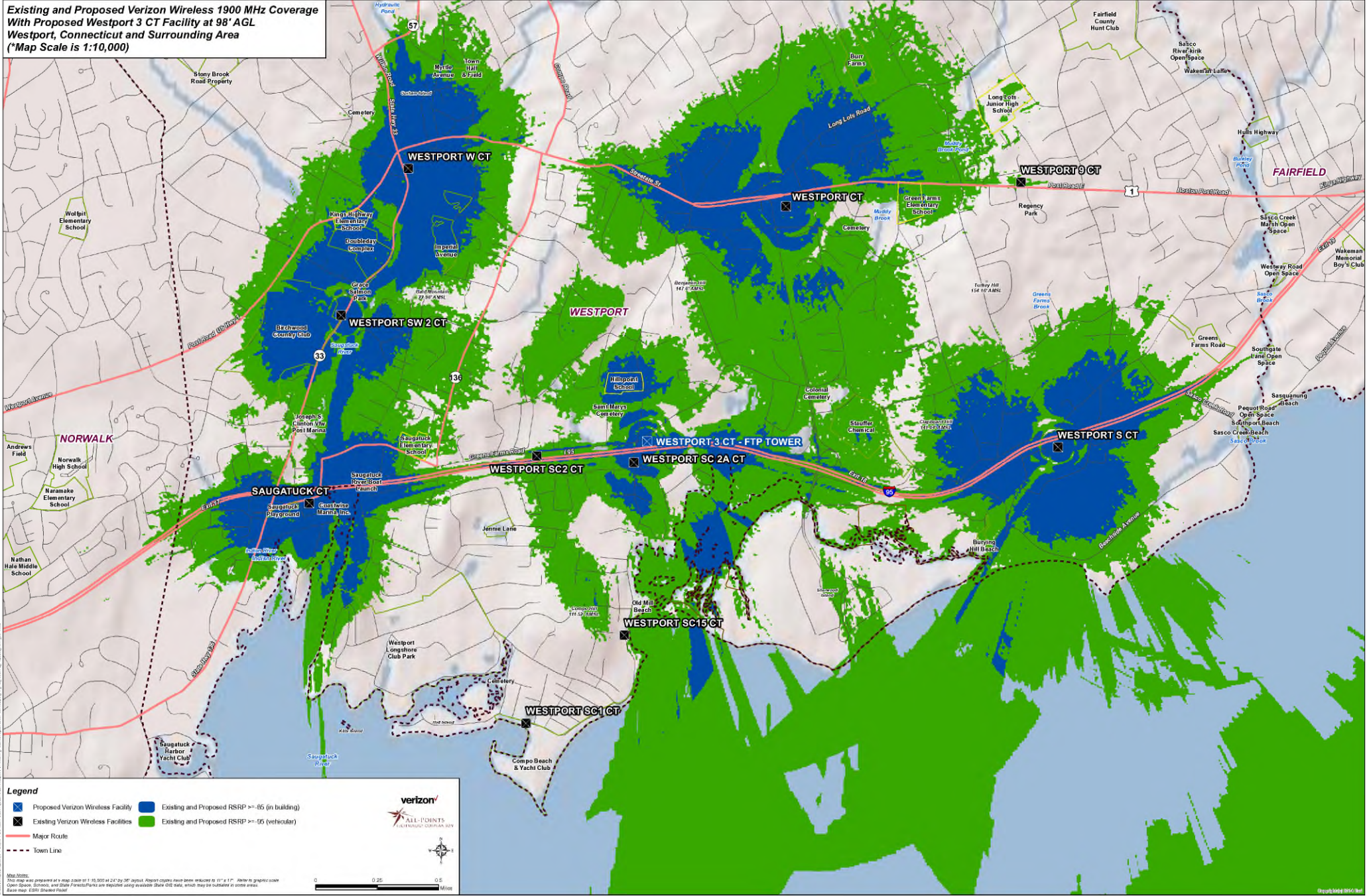


**Existing and Proposed Verizon Wireless 850 MHz Coverage  
With Proposed Westport 3 CT Facility at 98' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**





**Existing and Proposed Verizon Wireless 1900 MHz Coverage  
With Proposed Westport 3 CT Facility at 98' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



**Legend**

- Proposed Verizon Wireless Facility
- Existing and Proposed RSRP >= -85 (in building)
- Existing Verizon Wireless Facilities
- Existing and Proposed RSRP >= -85 (vehicular)
- Major Route
- Town Line

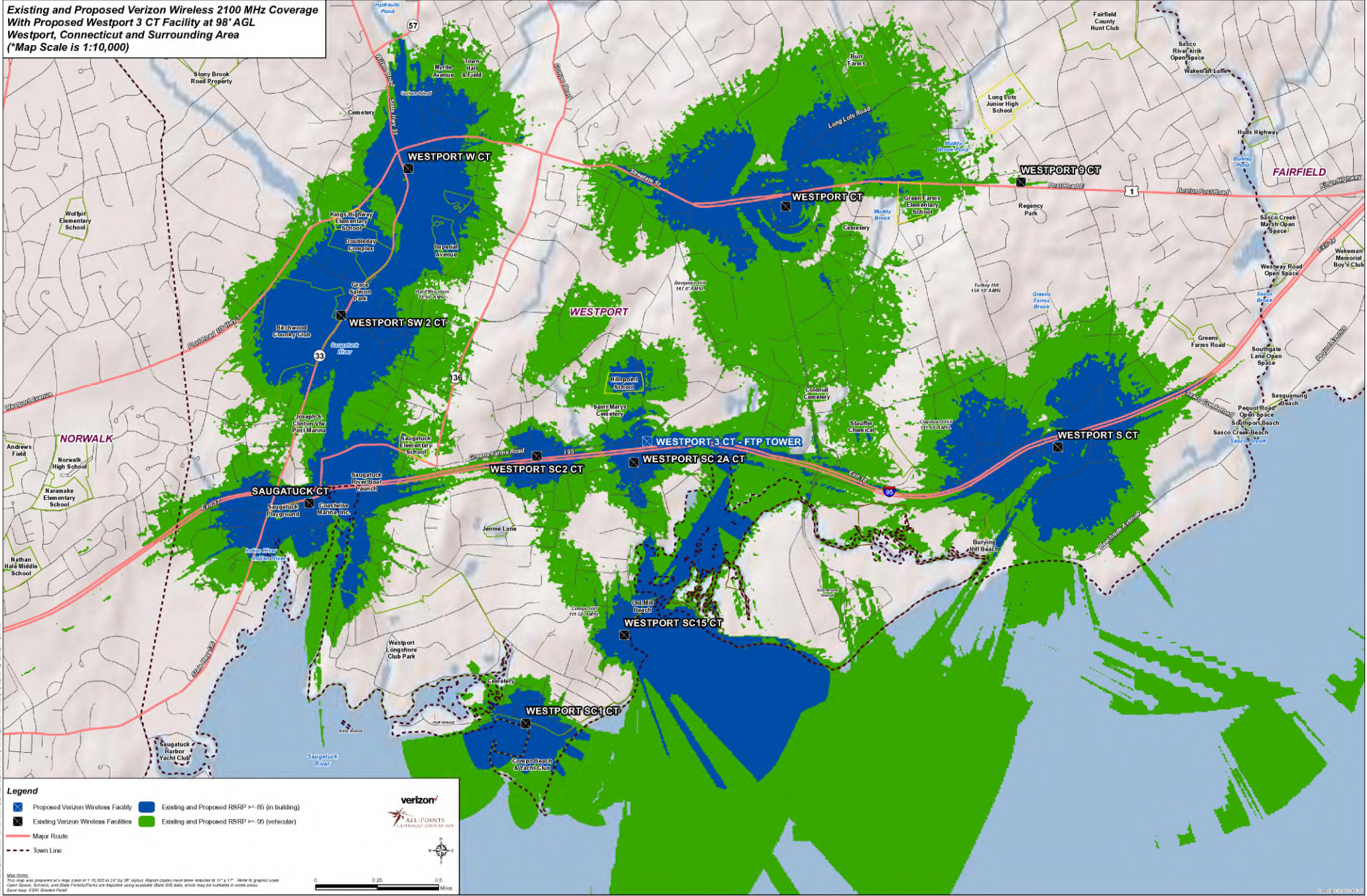
ALL POINTS  
 ALL-PURPOSE COVERAGE

Map Note:  
This map was prepared at a map scale of 1:10,000 at 24" by 36" format. Region colors have been reduced to 11" x 17". Refer to graphic cover  
Open Space, Schools, and State Forests/Parks are regulated using available State GIS data, which may be outdated in some areas.  
Base map: ©2010 Google Earth

0      0.25      0.5  
 Miles

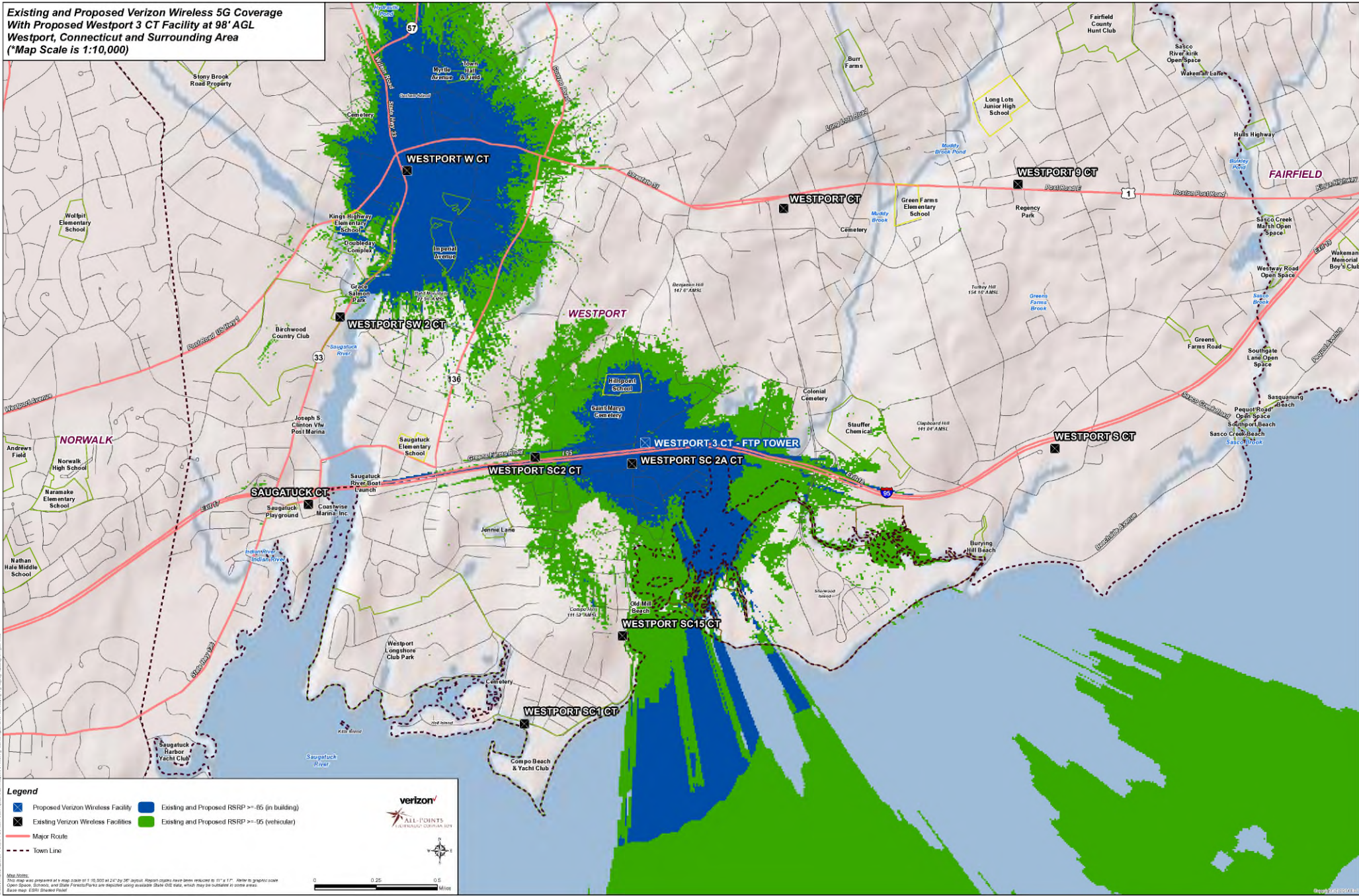


**Existing and Proposed Verizon Wireless 2100 MHz Coverage  
With Proposed Westport 3 CT Facility at 98' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**





**Existing and Proposed Verizon Wireless 5G Coverage  
With Proposed Westport 3 CT Facility at 98' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



**Legend**

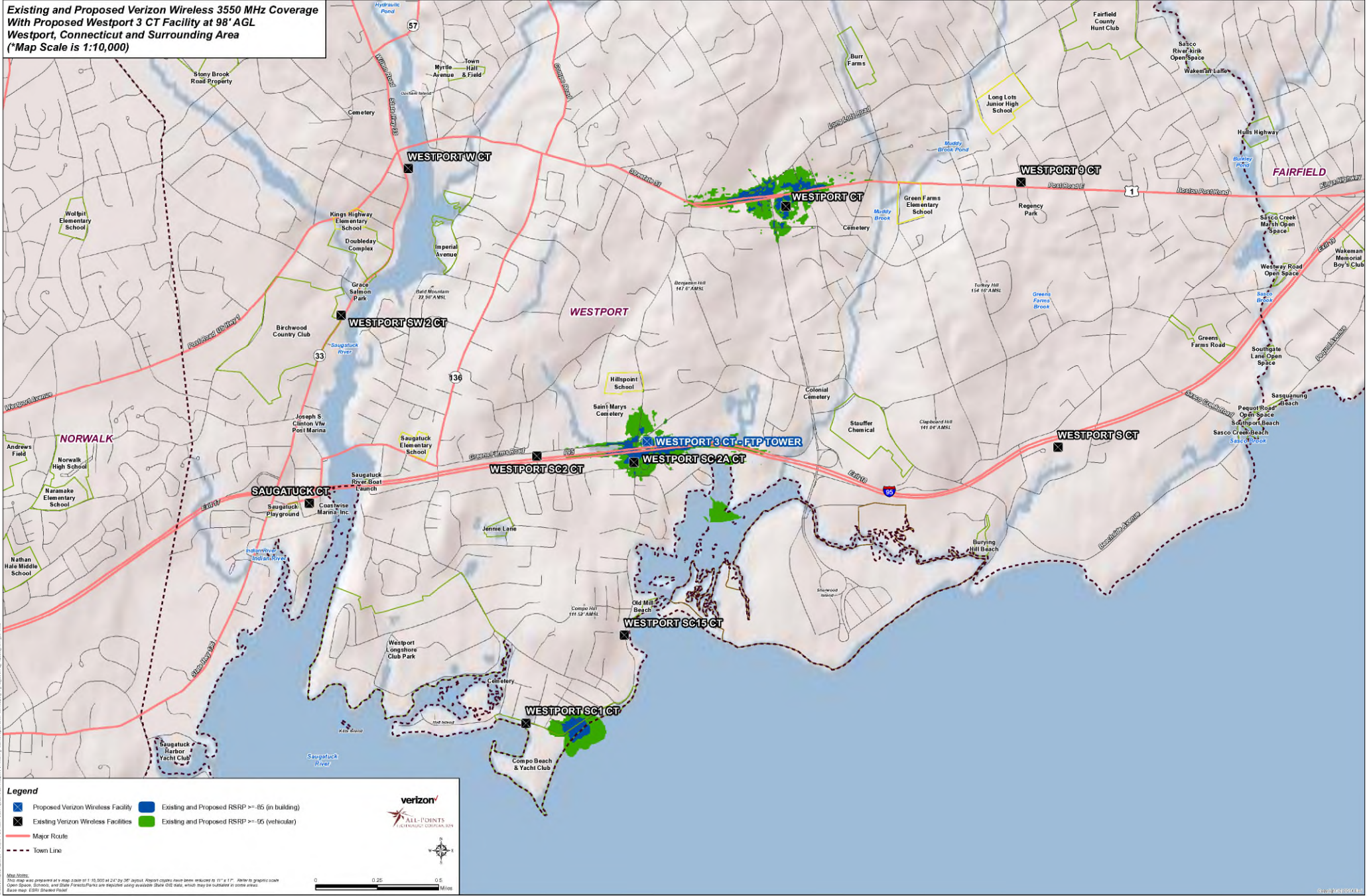
- Proposed Verizon Wireless Facility
- Existing and Proposed RSRP >= -65 (in building)
- Existing Verizon Wireless Facilities
- Existing and Proposed RSRP >= -65 (vehicular)
- Major Route
- Town Line

ALL POINTS  
UNIVERSITY MICROFILMS INTERNATIONAL

Map Note:  
This map was prepared at a map scale of 1:10,000 at 24" by 36" (610mm by 914mm). Region copies have been reduced to 11" x 17". Refer to graphic cover for Open Space, Schools, and State Forests/Parks are regulated using available State GIS data, which may be outdated in some areas.  
Base map: ©2019 Google Earth



**Existing and Proposed Verizon Wireless 3550 MHz Coverage  
With Proposed Westport 3 CT Facility at 98' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



# **ATTACHMENT 3**



**Existing and Proposed Verizon Wireless 700 MHz Coverage  
With Proposed Westport 3 CT Facility at 88' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



Map Note:  
This map was prepared at a map scale of 1:10,000 at 24" by 36" (6096 mm by 9144 mm). All map data has been reduced to 11" by 17". Refer to graphic cover  
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Base map: ©2010 Google Earth

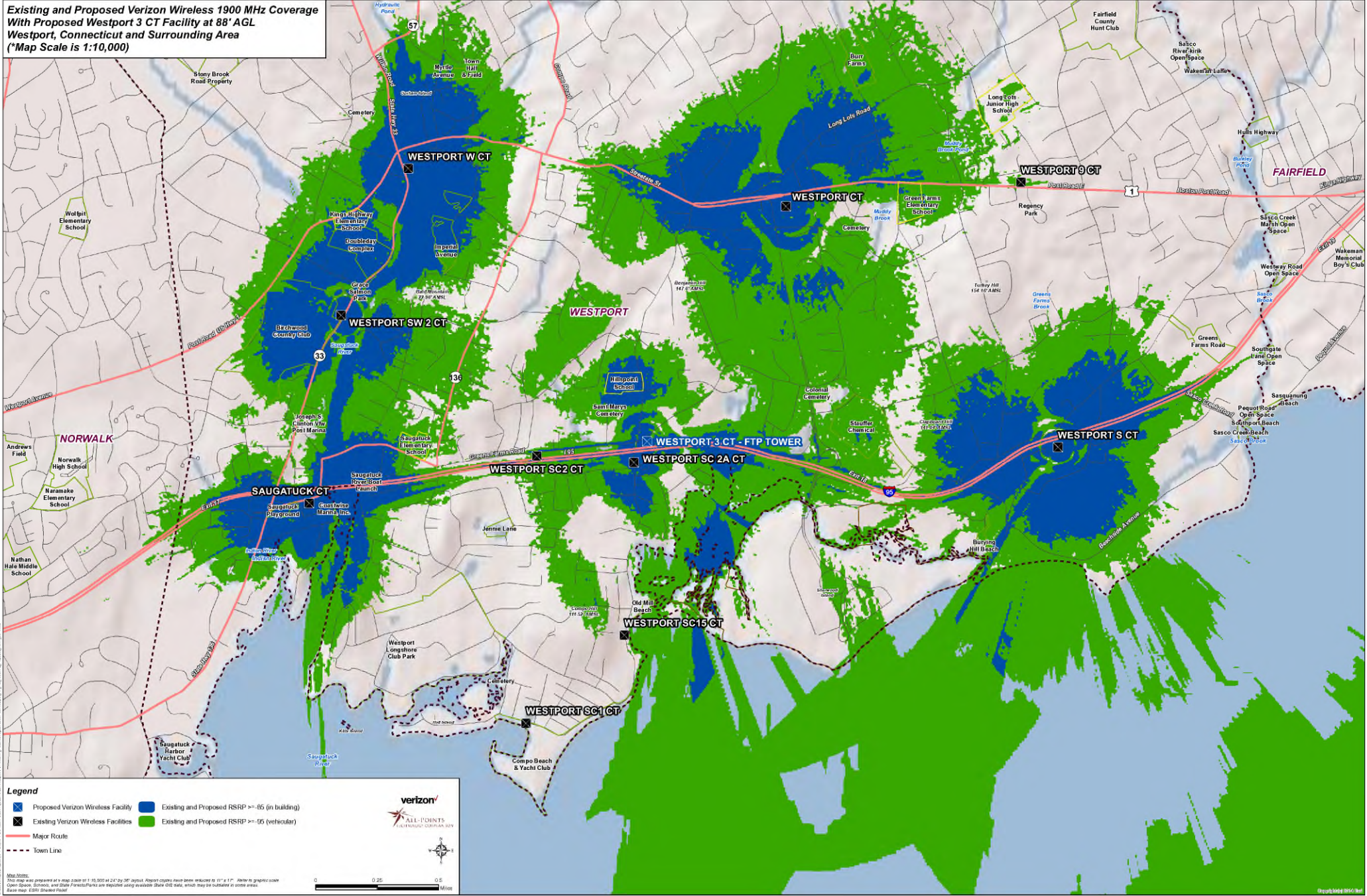


**Existing and Proposed Verizon Wireless 850 MHz Coverage  
With Proposed Westport 3 CT Facility at 88' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**







**Existing and Proposed Verizon Wireless 1900 MHz Coverage  
With Proposed Westport 3 CT Facility at 88' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



**Legend**

- Proposed Verizon Wireless Facility
- Existing and Proposed RSRP >= -65 (in building)
- Existing Verizon Wireless Facilities
- Existing and Proposed RSRP >= -65 (vehicular)
- Major Route
- - - Town Line

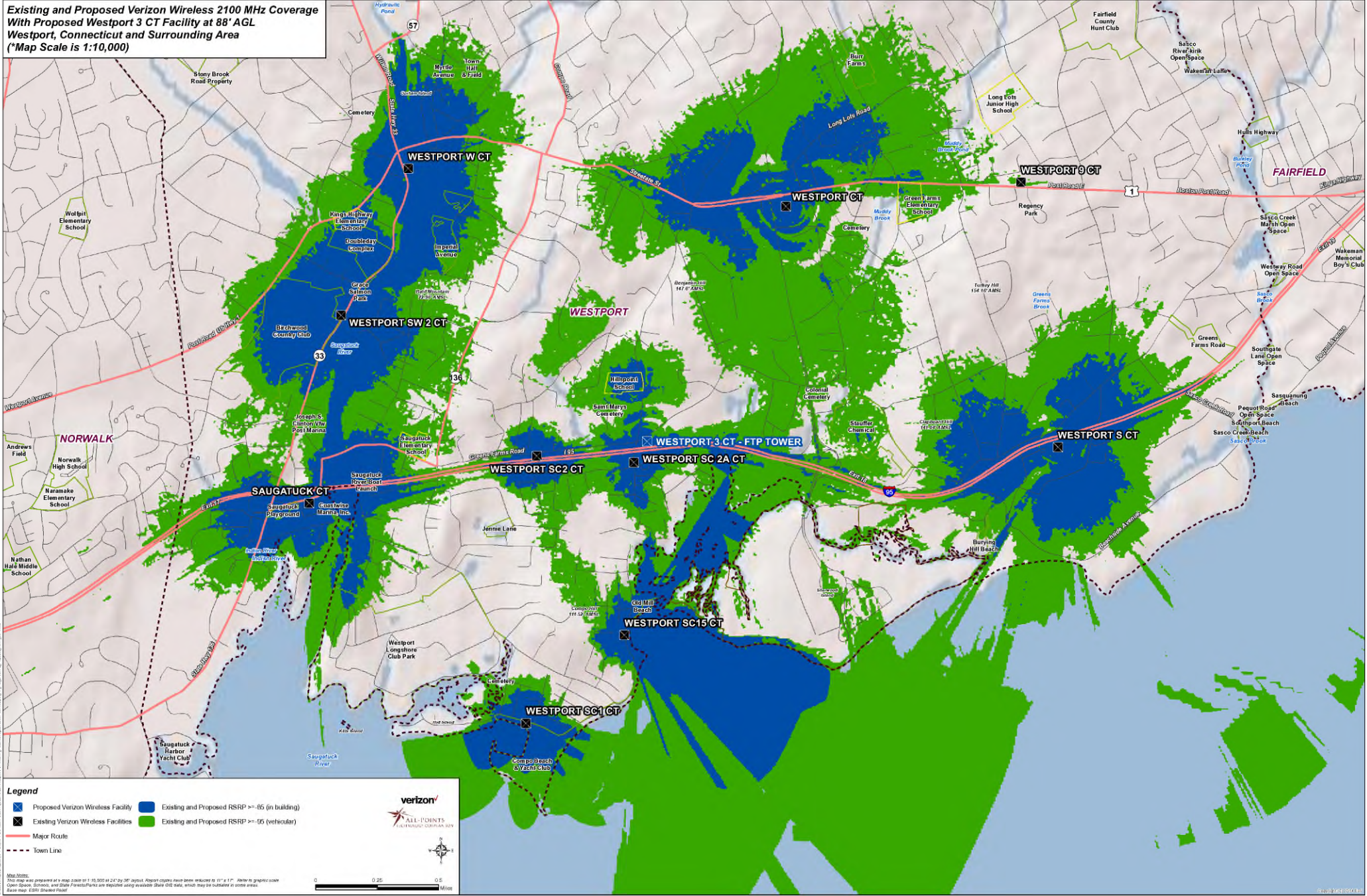
  
 ALL POINTS  
 ALL-PURPOSE COVERAGE

  
 0 0.25 0.5  
 Miles

Map Notes:  
This map was prepared at a map scale of 1:10,000 at 24" by 36" format. Report copies have been reduced to 11" x 17". Refer to graphic cover Open Space, Schools, and State Forests/Parks are regulated using available State GIS data, which may be outdated in some areas.  
Base map: ©2010 Google Earth

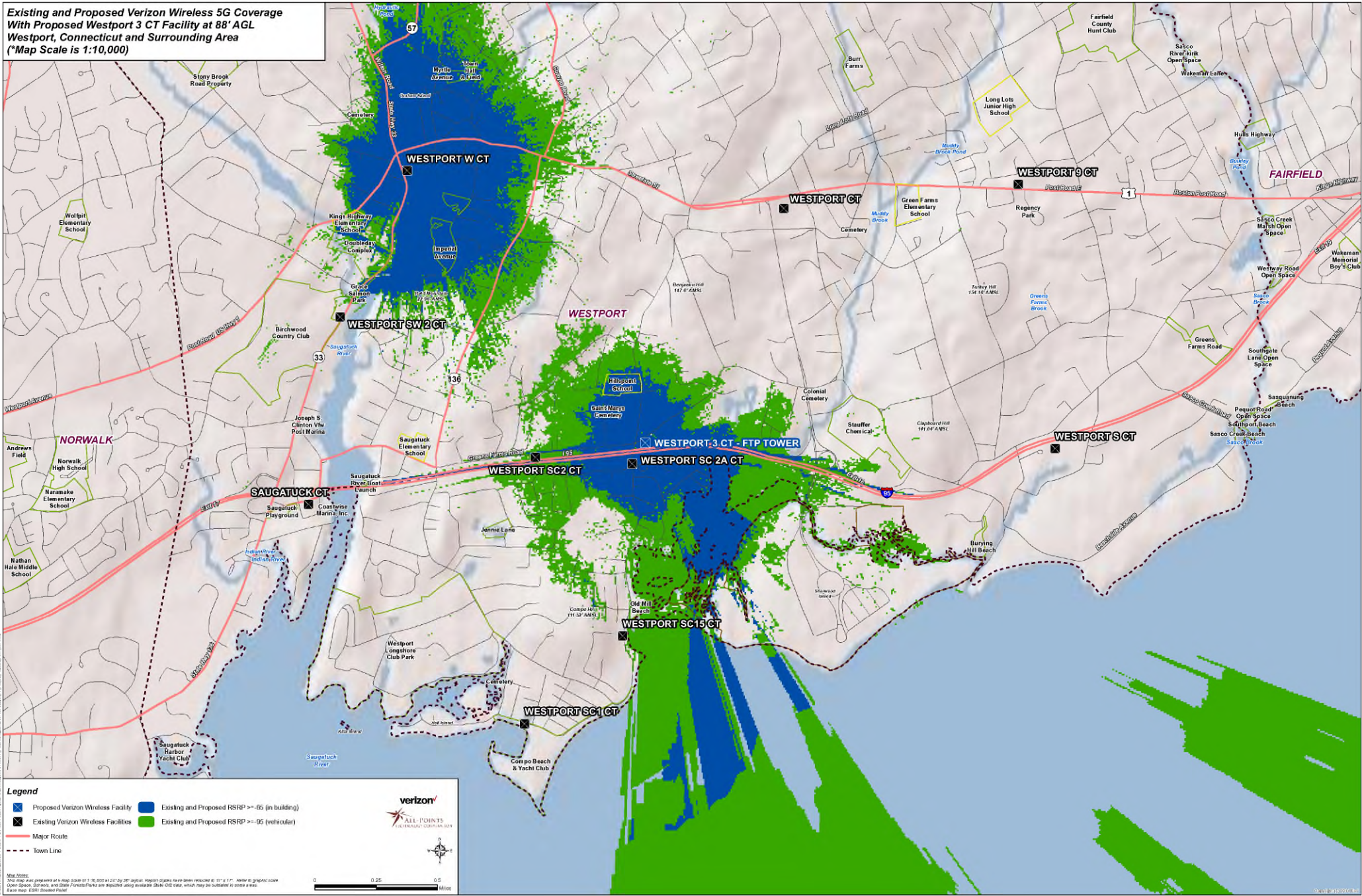


**Existing and Proposed Verizon Wireless 2100 MHz Coverage  
With Proposed Westport 3 CT Facility at 88' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**





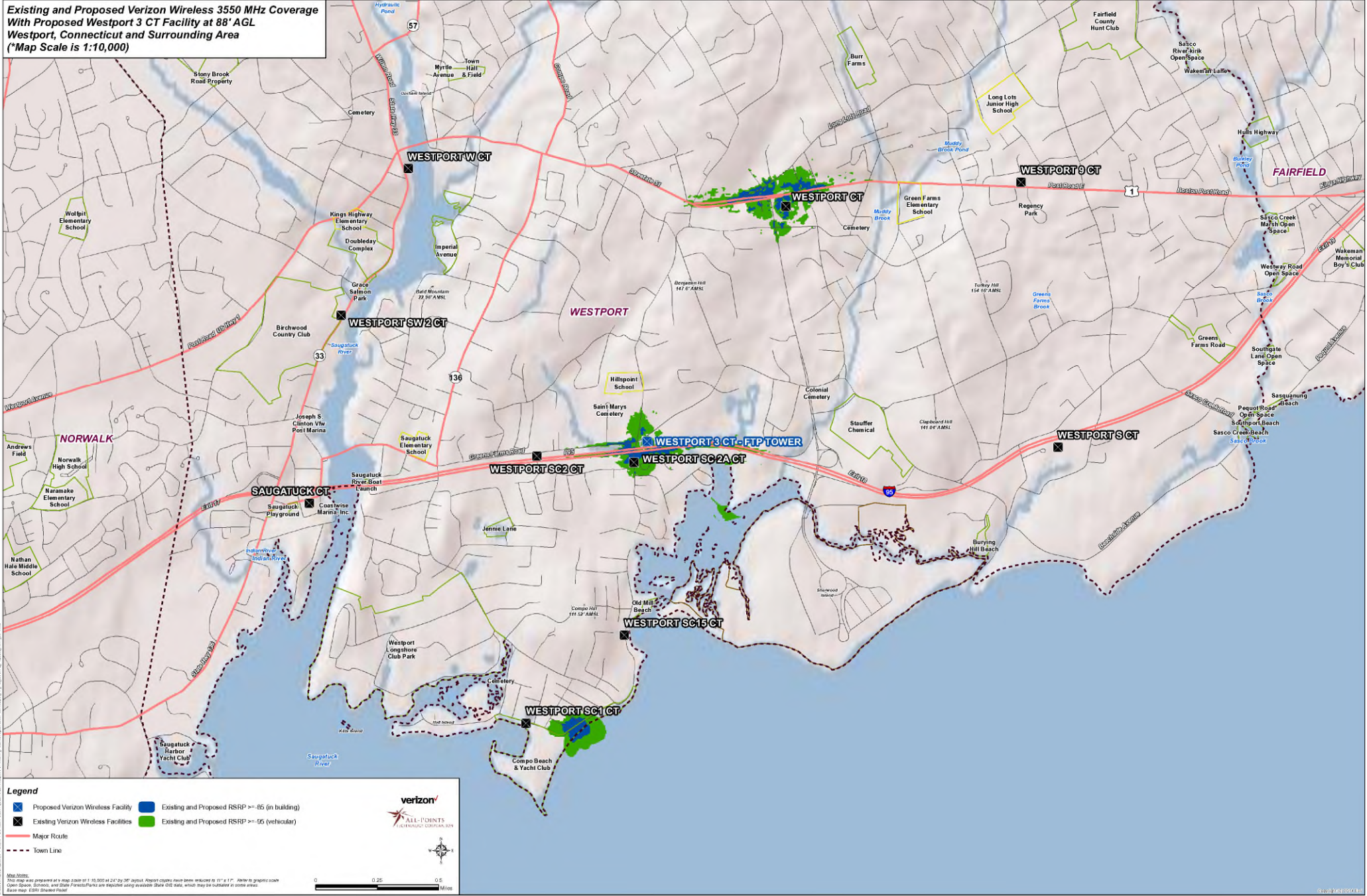
**Existing and Proposed Verizon Wireless 5G Coverage  
With Proposed Westport 3 CT Facility at 88' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



Map Notes:  
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Base map: ©2018 Google/Mapbox



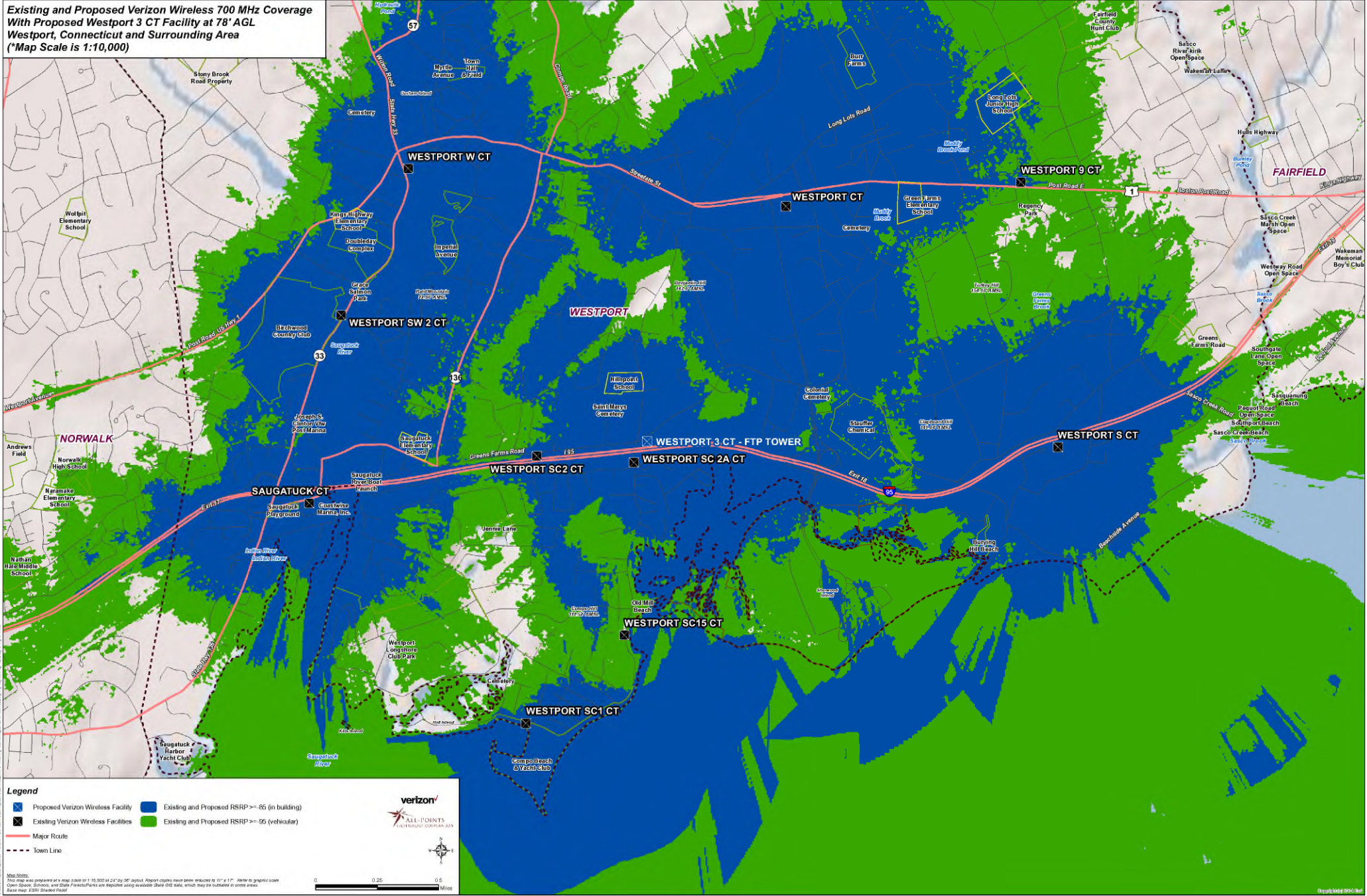
**Existing and Proposed Verizon Wireless 3550 MHz Coverage  
With Proposed Westport 3 CT Facility at 88' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



# **ATTACHMENT 4**



**Existing and Proposed Verizon Wireless 700 MHz Coverage  
With Proposed Westport 3 CT Facility at 78' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



Map Note:  
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Open Space, Schools, and State Forests/Parks are regulated using available State GIS data, which may be outdated in some areas.  
Base map: ©2010 Google Earth

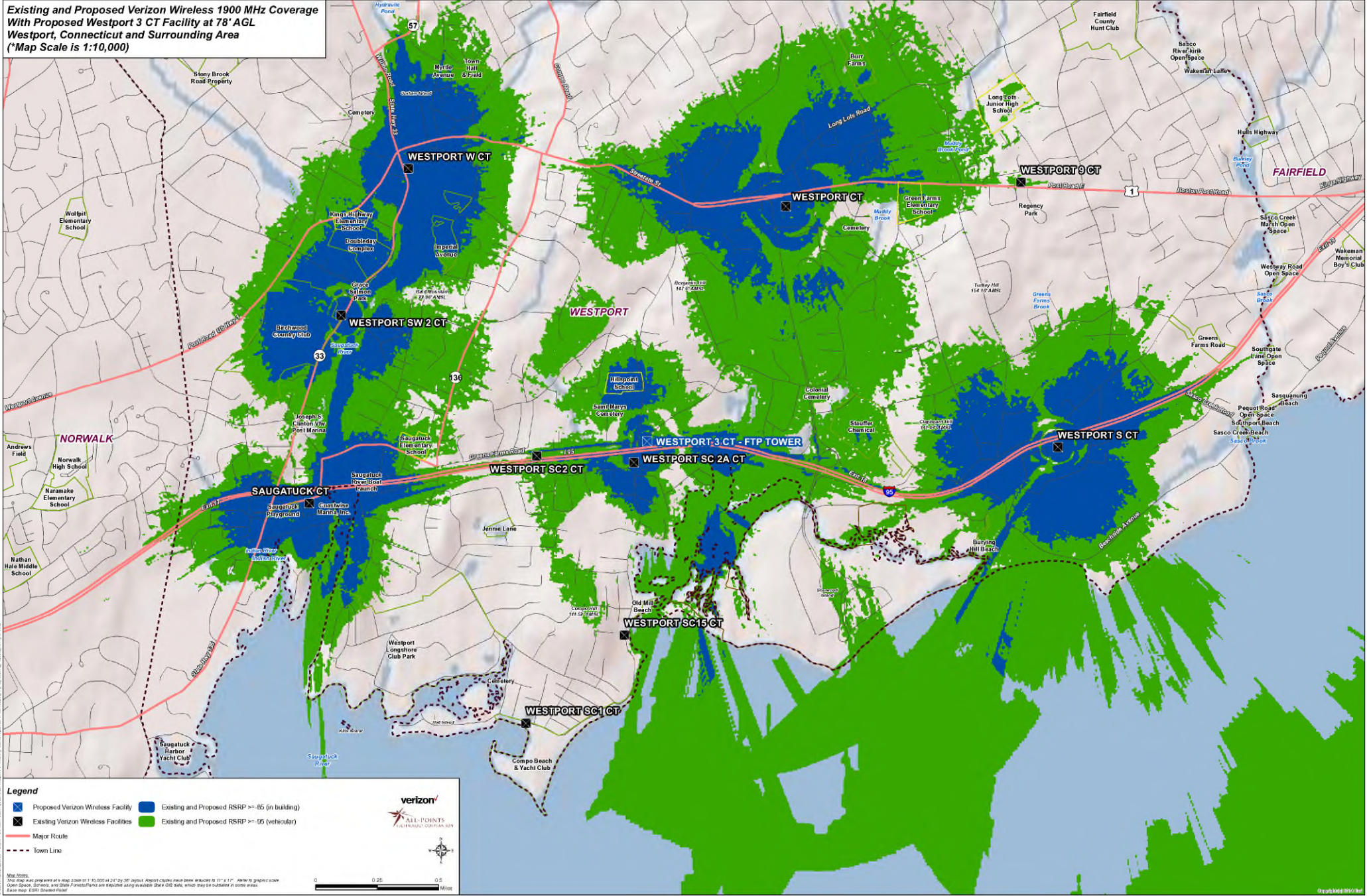


**Existing and Proposed Verizon Wireless 850 MHz Coverage  
With Proposed Westport 3 CT Facility at 78' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**





**Existing and Proposed Verizon Wireless 1900 MHz Coverage  
With Proposed Westport 3 CT Facility at 78' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



**Legend**

- Proposed Verizon Wireless Facility
- Existing and Proposed RSRP >= -05 (in building)
- Existing Verizon Wireless Facilities
- Existing and Proposed RSRP >= -05 (vehicular)
- Major Route
- - - Town Line

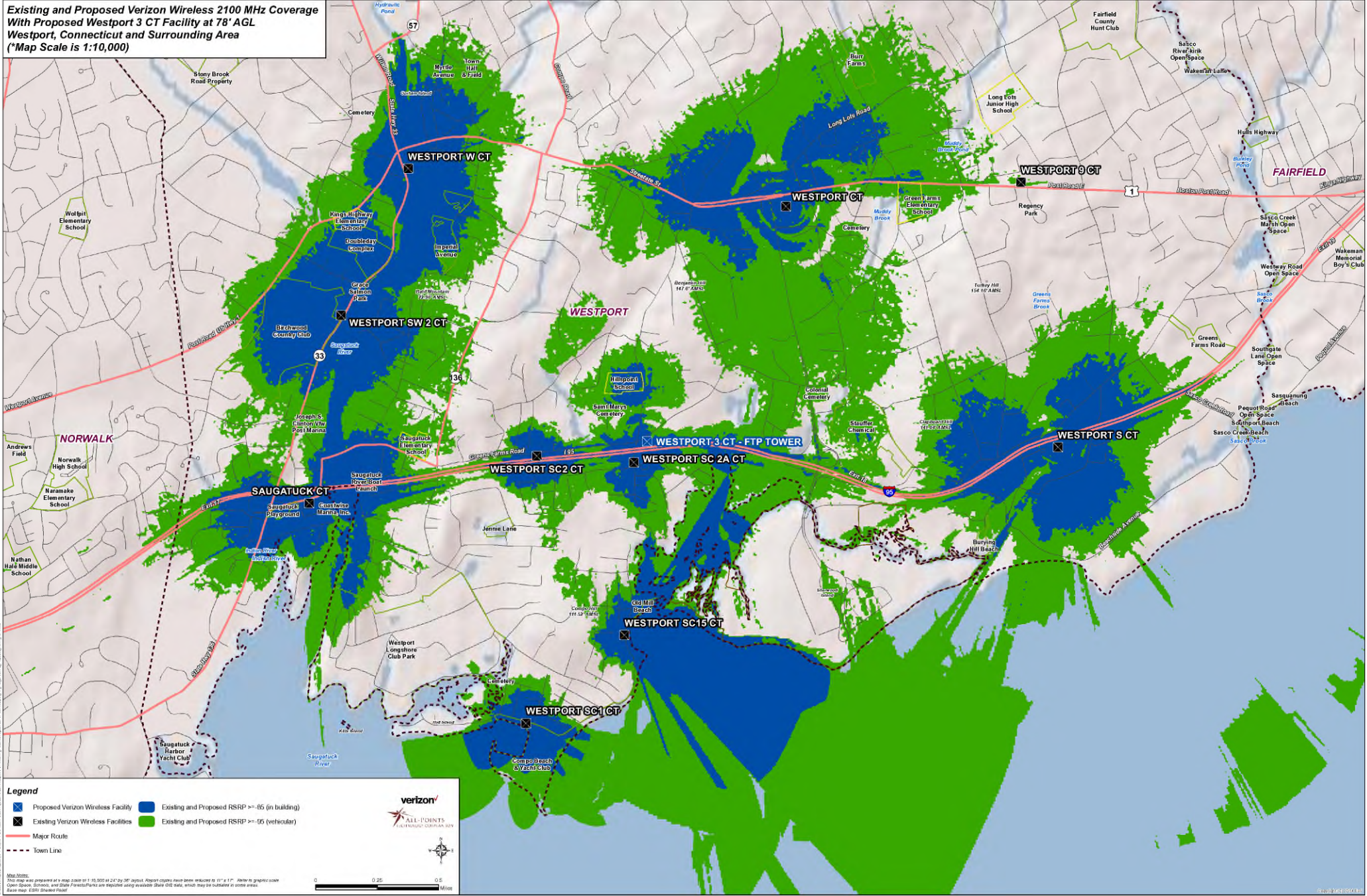
ALL POINTS  
 ALL-PURPOSE COVERAGE

Map Note:  
 This map was prepared at a map scale of 1:10,000 at 24" by 36" format. Region copies have been reduced to 11" x 17". Refer to graphic cover  
 Open Space, Schools, and State Forests/Parks are regulated using available State GIS data, which may be outdated in some areas.  
 Base map: ©2011 Google Earth

0 0.25 0.5  
 Miles




**Existing and Proposed Verizon Wireless 2100 MHz Coverage  
With Proposed Westport 3 CT Facility at 78' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



**Legend**

- Proposed Verizon Wireless Facility
- Existing and Proposed RSRP >= -65 (in building)
- Existing Verizon Wireless Facilities
- Existing and Proposed RSRP >= -65 (vehicular)
- Major Route
- - - Town Line

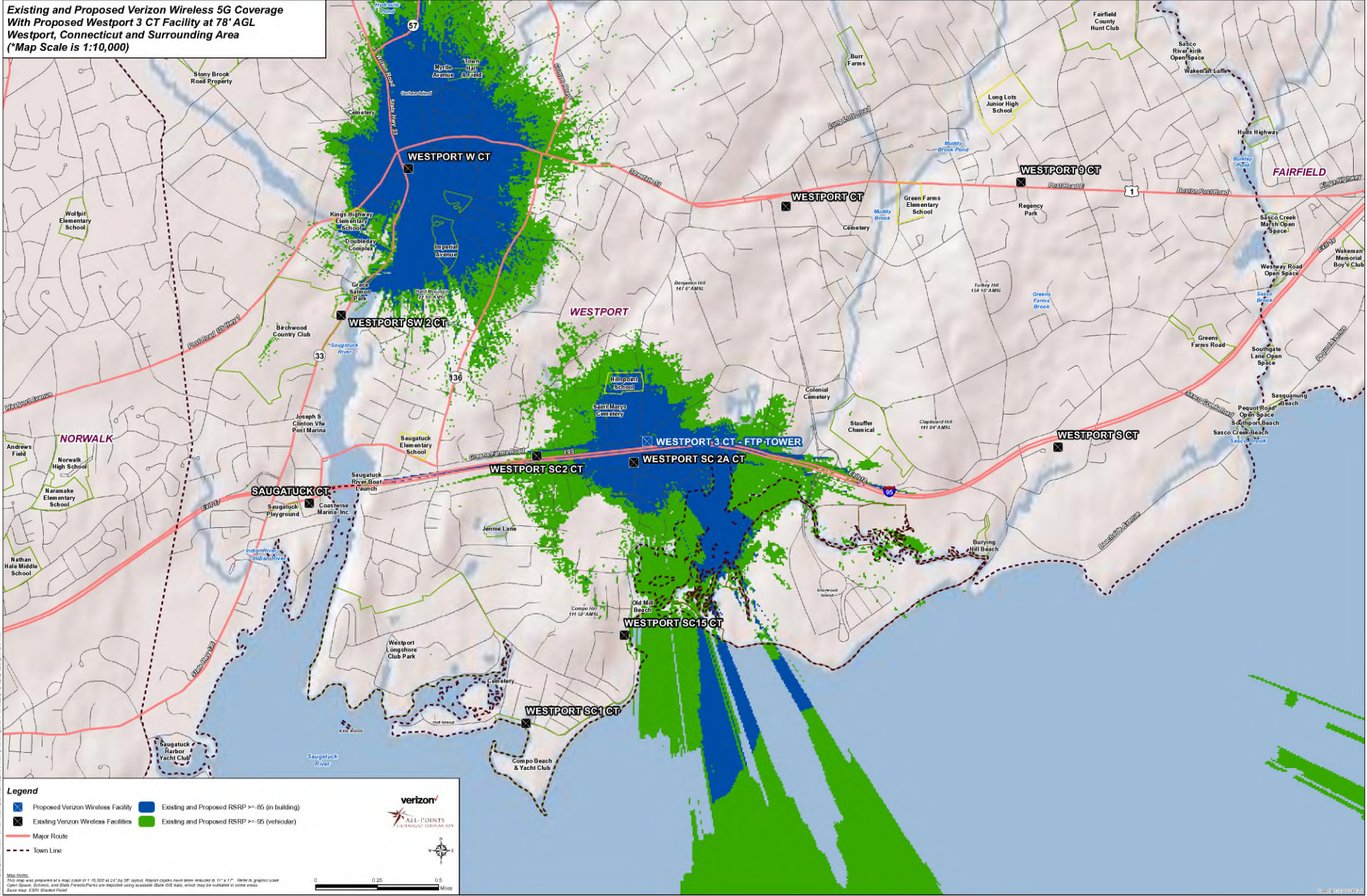
  
 ALL POINTS  
 ALL-PURPOSE COVERAGE

Map Note:  
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 Base Map: ©2010 Google Earth

0 0.25 0.5  
Miles



**Existing and Proposed Verizon Wireless 5G Coverage  
With Proposed Westport 3 CT Facility at 78' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**



**Legend**

- Proposed Verizon Wireless Facility
- Existing and Proposed RSRP >= -65 (in building)
- Existing Verizon Wireless Facilities
- Existing and Proposed RSRP >= -65 (vehicular)
- Major Route
- Town Line

ALL-POINTS  
UNIVERSITY MICROFILMS INTERNATIONAL

Map Notes:  
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Base map: ©2018 Google Earth

0 0.25 0.5  
Miles



**Existing and Proposed Verizon Wireless 3550 MHz Coverage  
With Proposed Westport 3 CT Facility at 78' AGL  
Westport, Connecticut and Surrounding Area  
(\*Map Scale is 1:10,000)**

