

**Docket No. 510**  
**Tarpon Towers II, LLC (“Tarpon”) and New Cingular Wireless PCS, LLC (“AT&T”)**  
**Pre-Hearing Interrogatories from Town of Westport (Party)**  
**July 26, 2022**

**Set One**

1. When was the proposed property at 92 Greens Farms Road in Westport first encumbered with a lease (option) by Tarpon or its predecessor in interest?
2. When did a carrier first formally express interest in a site in the vicinity of the proposed site? Provide such evidence of formal interest in the form of official communication from a carrier to Tarpon or predecessor requesting a site in the area.
3. Provide AT&T’s site acquisition request document (the “SARF”) regarding AT&T 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 AT&T.
4. If Tarpon (or predecessor) obtained the site prior to receiving a formal search request from any carrier, provide the initial written communication to each carrier that announced the availability of the leased (optioned) site, or otherwise demonstrates the offering of the site to any carriers.
5. When did AT&T commit to participating in a Siting Council application? Provide document of AT&T authorization to proceed.
6. Provide a height comparative coverage analysis and map showing height reductions in ten-foot increments.
7. Have you considered a small cell alternative to the cell tower?
  - a. If not, why not?
8. 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?
9. 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 on Hales Road in Westport, identified as Assessor’s Map D06; Lot 23?
  - a. If so, provide a copy of any written analysis or summary of verbal analysis.
  - b. If not, why not?