

Docket No. 510
Cellco Partnership d/b/a Verizon Wireless (Intervenor)
Pre-Hearing Interrogatories from Town of Westport (Party)
July 26, 2022

Set One

1. How and when was Verizon made aware of the availability of the proposed site?
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.
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.
4. When did Verizon commit to participating as an intervenor in a Siting Council application? Provide documentation of Verizon authorization to proceed.
5. Provide a height comparative coverage analysis and map showing height reductions in ten-foot increments.
6. Have you considered a small cell alternative to the cell tower? If not, why not?
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?
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 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?