

September 22, 2022

VIA IN-HAND DELIVERY AND ELECTRONIC MAIL

Melanie.bachman@ct.gov Siting.council@ct.gov

Ms. Melanie A. Bachman, Esq., Executive Director Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

Re: Docket 511

Dear Attorney Bachman:

This office represents Barrett Outdoor Communications, Inc. ("Applicant"). On behalf of the Applicant, I have enclosed one original and fifteen hardcopies of its response to the first set of interrogatories issued by the Connecticut Siting Council in the above-captioned Docket.

Please do not hesitate to contact me with any questions.

Very truly yours,

Jesse A. Langer

Enclosures

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

PETITION OF BARRETT OUTDOOR : DOCKET NO. 511

COMMUNICATIONS, INC. FOR A

DECLARATORY RULING THAT A

CERTIFICATE OF ENVIRONMENTAL

COMPATIBILITY AND PUBLIC NEED :

IS NOT REQUIRED FOR THE

RELOCATION OF A :

TELECOMMUNICATIONS FACILITY : September 22, 2022

APPLICANT'S RESPONSES TO THE FIRST SET OF INTERROGATORIES BY THE CONNECTICUT SITING COUNCIL

Barrett Outdoor Communications, Inc. ("Applicant" or "BOC") respectfully submits the following responses and non-privileged documentation to the First Set of Interrogatories issued by the Connecticut Siting Council ("Council") in connection with the above-captioned matter.

General

1. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?

No.

2. Submit photographs of the proposed telecommunications facility site construction area with descriptive captions and/or a map identifying the locations of the photographs.

Photographs and mapping responsive to this Interrogatory are appended hereto as <u>Attachment 1</u>.

3. Has the estimated cost of the proposed facility changed since the filing of Petition 1467? If yes, provide a revised cost estimate?

Foundation: \$50,000

Tower: \$75,500 (price of steel has increased)

Site Development: \$135,000 (price of steel has increased)

Utility Installation: \$75,000 (the utility installation path was revised leading to some per lineal foot reduction, but an increase in the per lineal foot costs)

4. When does BOC intend to decommission the non-tower antenna array (NTAA) structure located at 28 Sidney Street?

BOC would decommission the NTAA located at 28 Sidney Street after T-Mobile has either relocated to the proposed Facility or elsewhere after the expiration of T-Mobile's lease, which is in 2023.

Site Selection

5. What other alternatives did BOC examine besides the proposed site? Identify the alternative locations and the reasons for their rejection?

BOC considered several alternatives to the proposed site. Please see BOC's responses to Interrogatory Nos. 22-25, 115-17 in the Council's First and Second Sets of Interrogatories issued in Petition 1467. Those responses explain why BOC rejected those alternative locations.

Public Safety

6. What is the required clearance for the facility equipment platform in relation to the railroad and the United Illuminating (UI) transmission lines?

The required clearance for the facility equipment platform in relation to the UI transmission line is fifteen feet based on NESC and OSHA requirements. BOC is in the process of confirming the specific required clearance from the railroad and will relay them to the Council upon receipt.

7. Submit a revised Site Plan C-2 that depicts the required safety zone from the UI transmission lines to the platform-mounted antennas.

A revised Site Plan Sheet C-2 depicting the required safety zone per NESC and OSHA requirements is appended hereto as Attachment 2.

8. Application Site Plan C-2 shows a potential 20-foot extension on the tower. Would such an extension meet railroad and transmission line clearance requirements? Explain?

The proposed Facility and potential future extension would be designed to meet the clearance requirements for both the railroad and the UI transmission lines. In this instance, a second hinge-point would be designed for the extension.

9. Has BOC discussed the proposed project with UI? If yes, when and with whom? If no, where did BOC obtain conductor clearance requirements necessary to construct the facility?

BOC had significant discussions with UI in connection with UI's existing easement area and the proposed site of the Facility. UI ultimately expanded its easement area on the UB Railside Parcel as denoted on Sheet A1 of the detailed plans appended to

the Application as Attachment 1. The Railside Parcel is also referenced in BOC's response to Interrogatory No. 26 in Petition 1467. The expansion of the UI easement incorporated all safety setbacks from the transmission lines as required by UI. BOC's primary contact was Annette Potasz, General Services, Lead Analyst, Real Estate Services.

10. Under what circumstances could the required railroad and transmission line clearance be modified in the future (ex. updated industry standards)? How would BOC ensure compliance with any future clearance standards?

BOC is not aware of any circumstances in which the safety setbacks associated with the railroad and transmission lines would be modified. Any such modification would impact all adjoining properties and the structures located thereon.

11. Referring to Application Attachment 5, Federal Aviation Administration Email- provide the supporting letter and details of the extension.

The approval letter from the Federal Aviation Administration is appended hereto as Attachment 3.

Respectfully submitted by,

BARRETT OUTDOOR COMMUNICATIONS, INC.

By:

Jesse A. Langer

UPDIKE, KELLY & SPELLACY, P.C.

One Century Tower

265 Church Street – 10th Floor

New Haven, CT 06510

(203) 786-8317

Email: jlanger@uks.com

ATTACHMENT 1

(Photographs and Mapping)







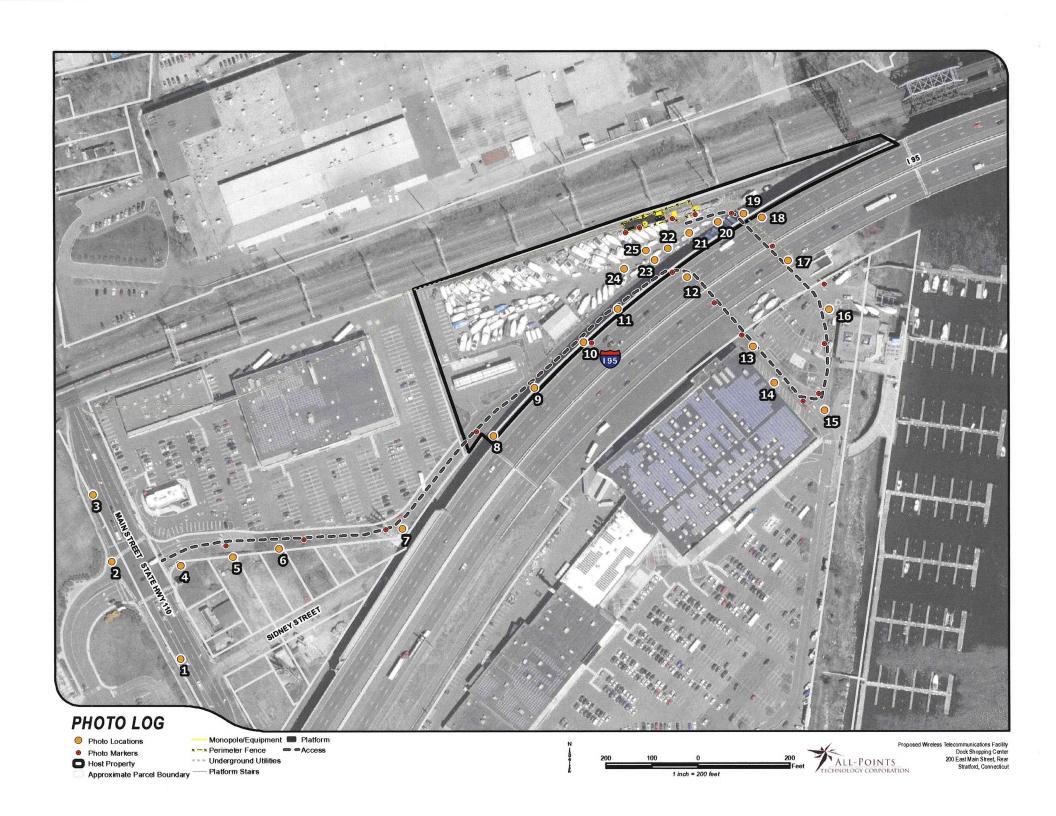
CT SITING COUNCIL DOCKET NO. 511
RESPONSE TO COUNCIL INTERROGATORY #2
"DOCK SHOPPING CENTER"
200 EAST MAIN STREET REAR
STRATFORD, CT

PREPARED FOR:



PREPARED RV-

ALL-POINTS TECHNOLOGY CORPORATION, P.C. 567 Vauxhall Street Extension — Suite 311 Waterford, CT 06385



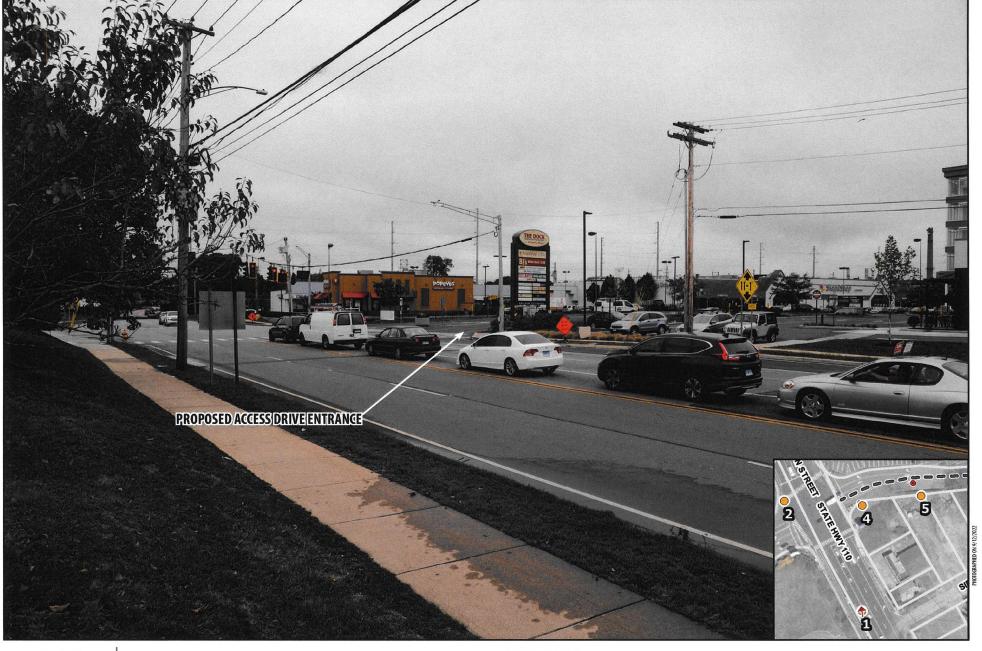
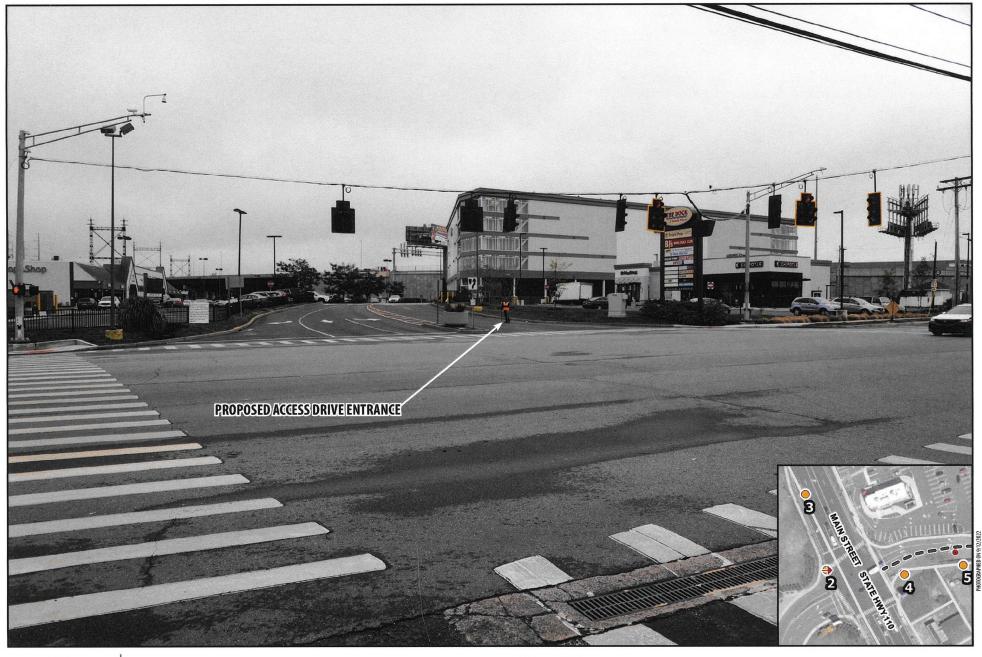


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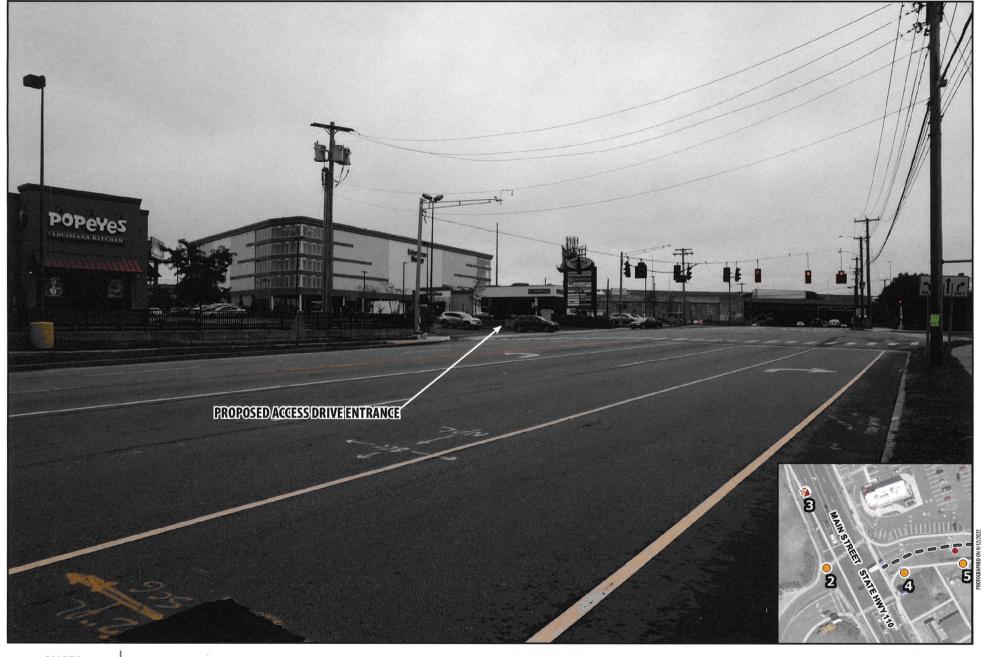
1 MAIN STREET LOOKING NORTH







MAIN STREET LOOKING EAST



FHOTO

DESCRIPTION

3

MAIN STREET LOOKING SOUTHEAST









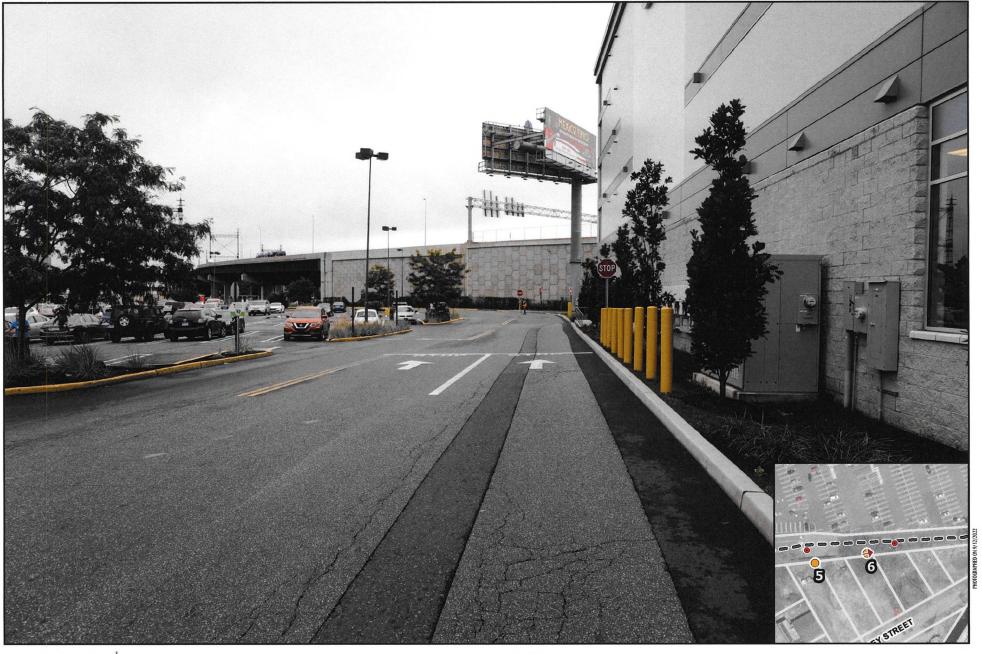




PHOTO **7**

DESCRIPTION







ACCESS DRIVE LOOKING NORTHEAST

8

















11





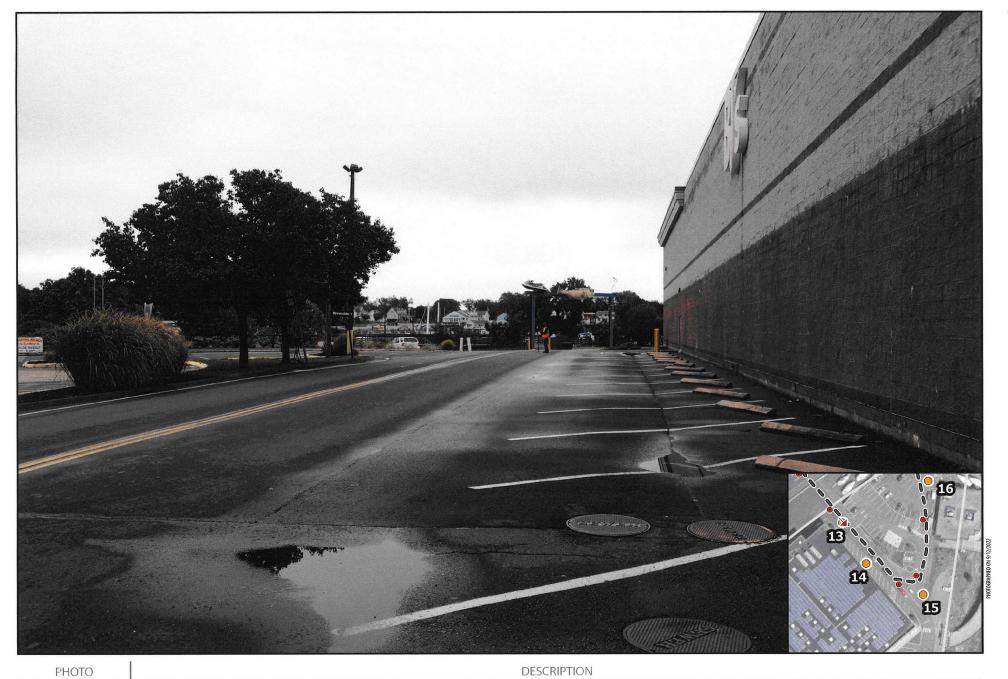


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12 ACCESS DRIVE LOOKING SOUTHEAST

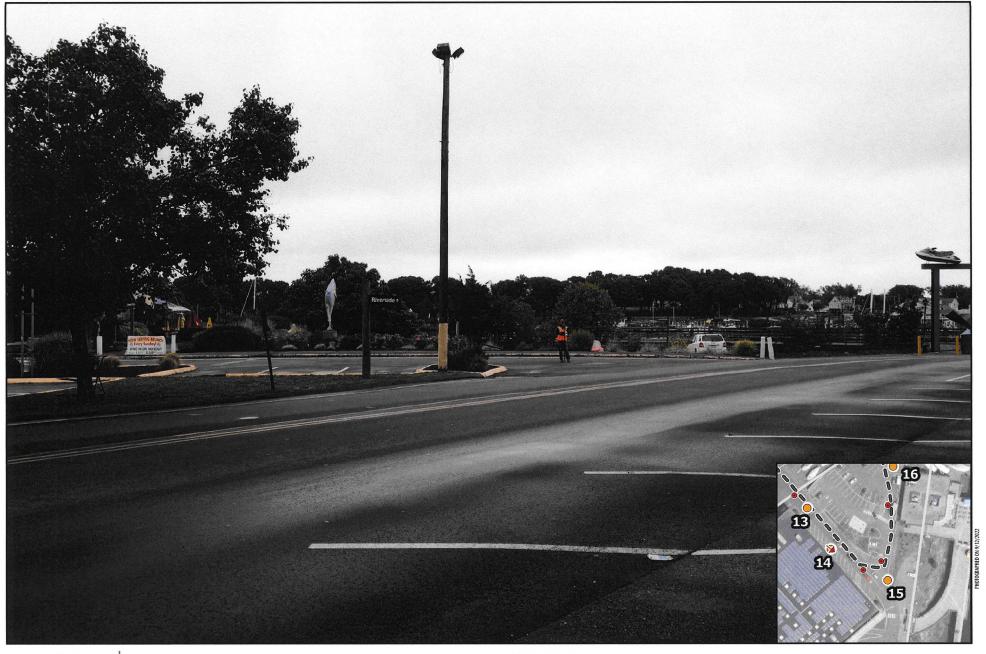


















ACCESS DRIVE LOOKING NORTH













ACCESS DRIVE LOOKING NORTHWEST

17





DESCRIPTION **FHOTO** 18







ACCESS DRIVE LOOKING WEST TOWARD PROPOSED COMPOUND

19







FHOTO

DESCRIPTION

20 SOUTHEAST OF PROPOSED COMPOUND LOOKING WEST







DESCRIPTION

21A

SOUTH OF PROPOSED COMPOUND LOOKING NORTHEAST







РНОТО DESCRIPTION

21B SOUTH OF PROPOSED COMPOUND LOOKING NORTHWEST







TALL-POINTS
TECHNOLOGY CORPORATION











23A SOUTH OF PROPOSED COMPOUND LOOKING NORTHEAST







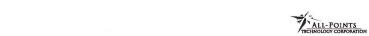
ALL-POINTS TECHNOLOGY CORPORATION





24

SOUTHWEST OF PROPOSED COMPOUND LOOKING NORTH







25

SOUTH OF PROPOSED COMPOUND LOOKING SOUTHWEST



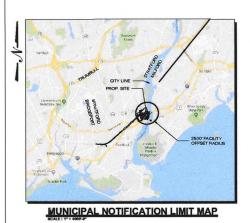


ATTACHMENT 2

(Revised Site Plan Sheet C-2)

BARRETT OUTDOOR COMMUNICATIONS, INC.

"DOCK SHOPPING CENTER" WIRELESS COMMUNICATIONS FACILITY 200 EAST MAIN ST. REAR STRATFORD, CT 06614





VICINITY MAP

DRAWING INDEX

T-1 TITLE SHEET & INDEX

A1 TELECOMMUNICATIONS EASEMENT MAP (1 OF 2)

A2 TELECOMMUNICATIONS EASEMENT MAP (2 OF 2)

R-1 ABUTTERS MAP

SP-1 SITE PLAN

C-1 PARTIAL SITE PLAN & ELEVATION

C-2 SECTION

SITE INFORMATION

SITE NAME: "DOCK SHOPPING CENTER"

SITE ADDRESS: 200 EAST MAIN ST. REAR,

STRATFORD, CT 06614

SITE TYPE/DESCRIPTION: INSTALLATION OF A 135'± AGL MONOPOLE (WITH FUTURE 20 EXTENSION) AND ELEVATED WIRELESS COMMUNICATIONS EQUIPMENT PLATFORM WITHIN 4,210'± SF

COMPOUND/EASEMENT AREA

PROPERTY OWNER: UB RAILSIDE LLC 321 RAILROAD AVE. GREENWICH, CT 06830

APPLICANT: BARRETT OUTDOOR COMMUNICATIONS INC.

381 HIGHLAND STREET WEST HAVEN, CT 06516

LEGAL/REGULATORY COUNSEL: JESSE A. LANGER

UPDIKE KELLY & SPELLACY P.C. ONE CENTURY TOWER
265 CHURCH STREET, 10th FLOOR
NEW HAVEN, CT 06512=0
(203) 786-8317

ENGINEERING CONTACT: ALL-POINTS TECHNOLOGY CORPORATION, P.C.

567 VAUXHALL STREET EXTENSION - SUITE 31

WATERFORD, CT 06385 860 663-1697

LATITUDE: N41*12'14.92' (41.2041144) (NAD 83) LONGITUDE: W73*06'47.91* (-73.113308) (NAD 83) ELEVATION: 12.9'± AMSL

ZONING DISTRICT: CA (RETAIL COMMERCIAL DISTRICT)

COASTAL BOUNDARY (CMA; C.G.S. 22a-113)

COORDINATES & GROUND COORDINATES & GROUND ELEVATION INDICATED HEREIN WERE ESTABLISHED FROM AN FAA 1-A SURVEY CERTIFICATION AS PREPARED BY CODESPOTI & ASSOCIATES, P.C., DATED JULY



BARRETT OUTDOOR

COMMUNICATIONS, INC 381 HIGHLAND STREET WEST HAVEN, CT 06516 OFFICE: (203) 932-4601

PERMITTING DOCUMENTS

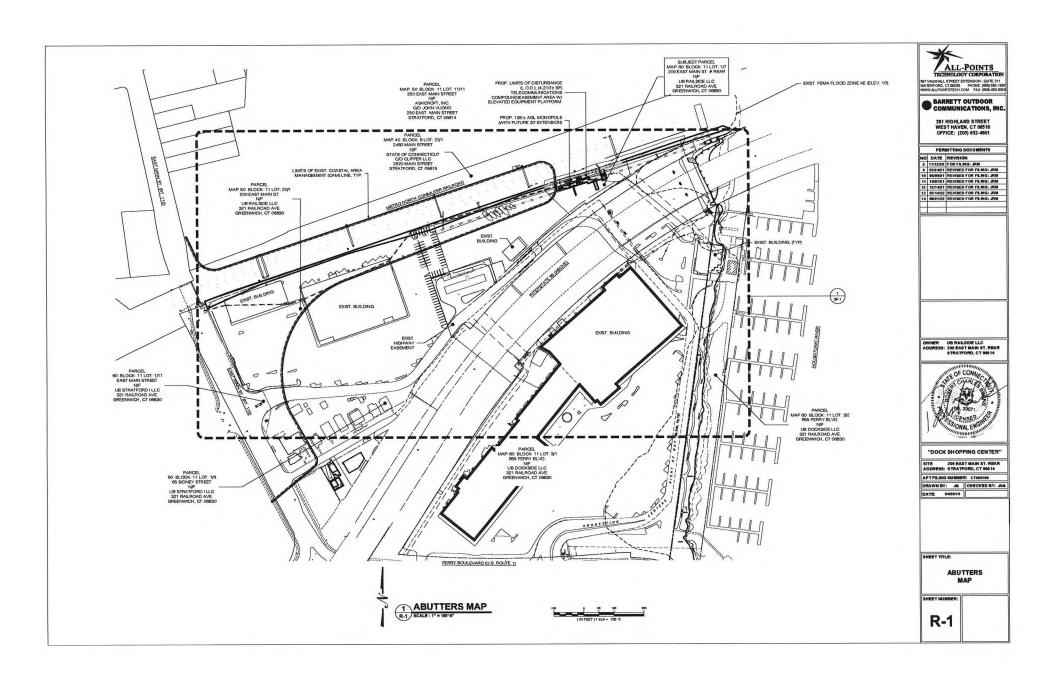


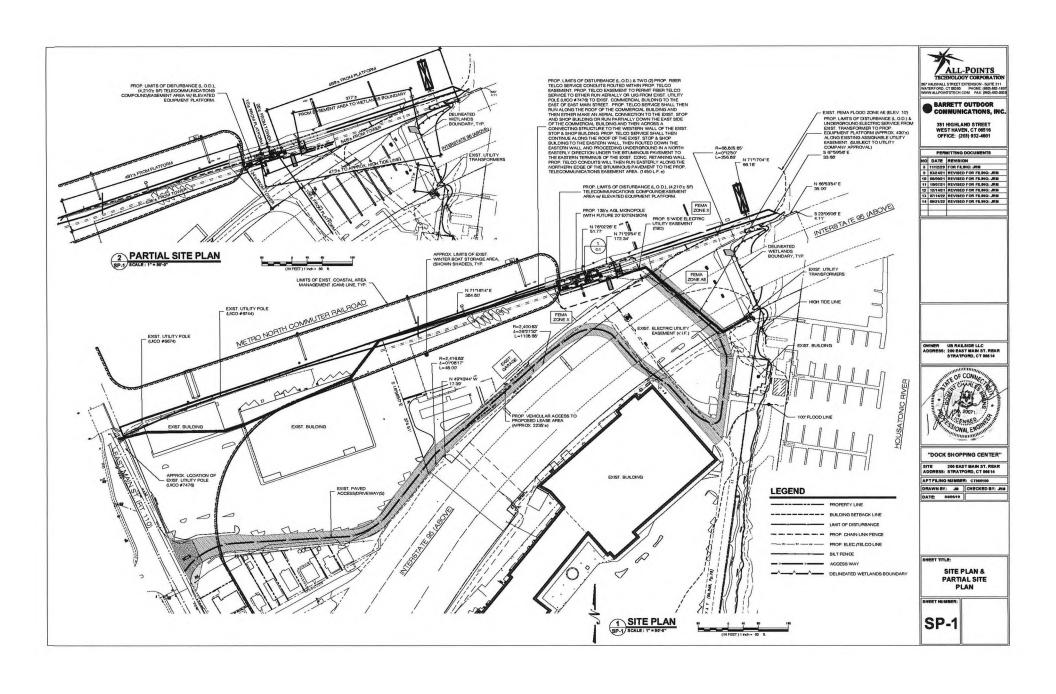
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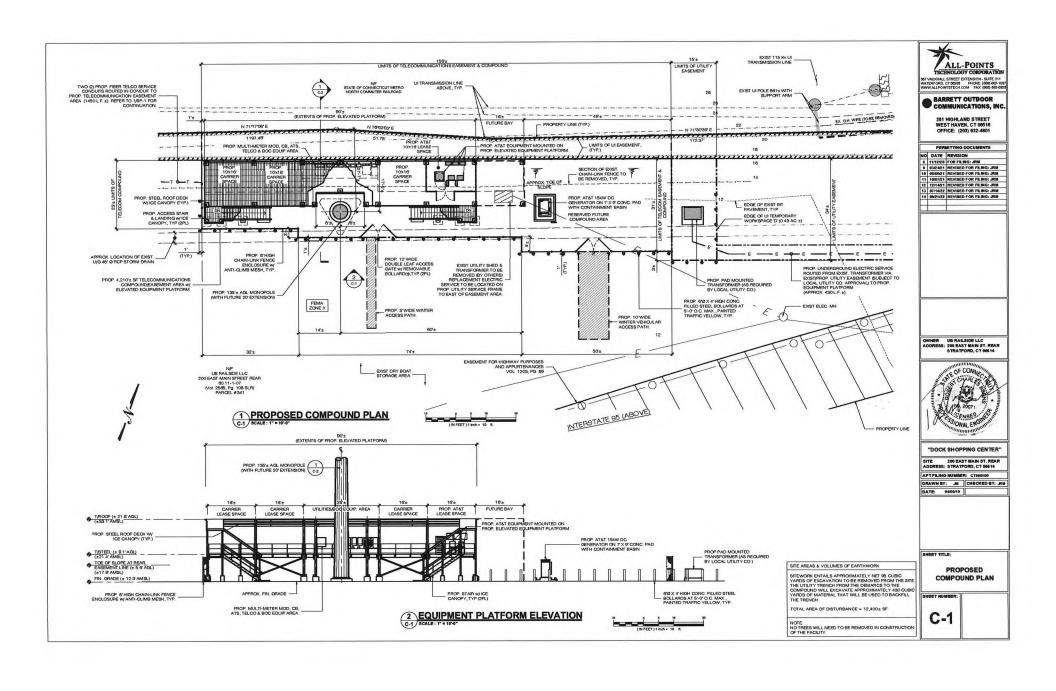
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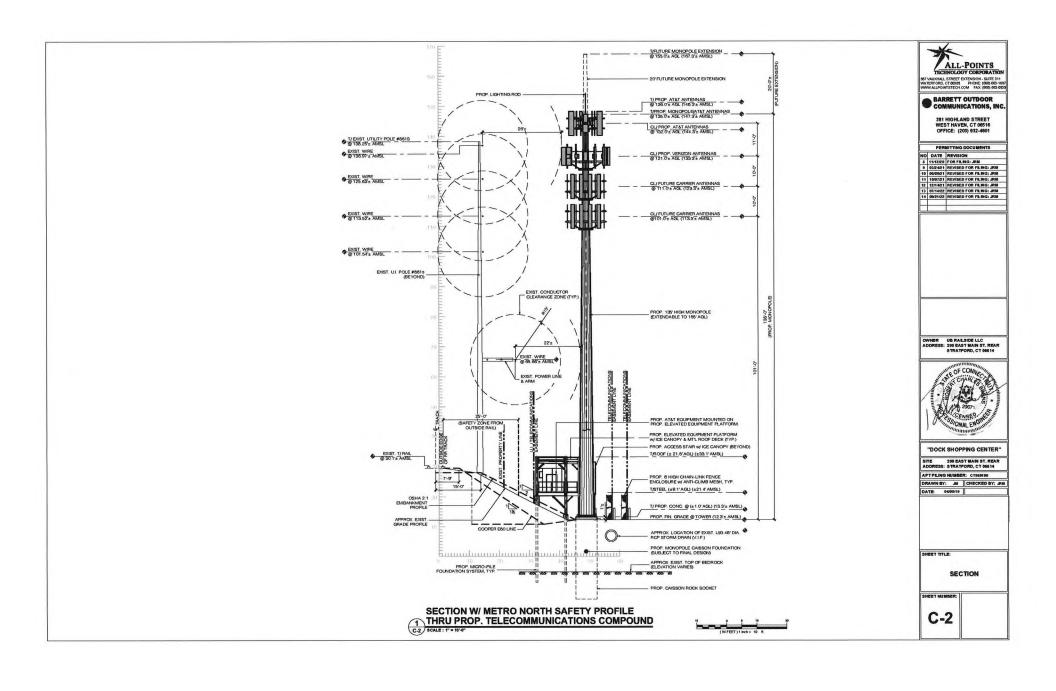
TITLE SHEET & INDEX

T-1



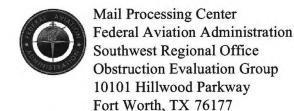






ATTACHMENT 3

(FAA Extension Approval)



Aeronautical Study No. 2020-ANE-4904-OE Prior Study No. 2019-ANE-5308-OE

Issued Date: 02/24/2022

Mr. John E Barrett Barrett Outdoor Communications 381 Highland Street West Haven, CT 06516

** Extension **

A Determination was issued by the Federal Aviation Administration (FAA) concerning:

Structure: Monopole Dock Shopping Center

Location: Stratford, CT

Latitude: 41-12-14.93N NAD 83

Longitude: 73-06-47.91W

Heights: 12 feet site elevation (SE)

155 feet above ground level (AGL)167 feet above mean sea level (AMSL)

In response to your request for an extension of the effective period of the determination, the FAA has reviewed the aeronautical study in light of current aeronautical operations in the area of the structure and finds that no significant aeronautical changes have occurred which would alter the determination issued for this structure.

Accordingly, pursuant to the authority delegated to me, the effective period of the determination issued under the above cited aeronautical study number is hereby extended and will expire on 08/24/2023 unless otherwise extended, revised, or terminated by this office. You must adhere to all conditions identified in the original determination.

This extension issued in accordance with 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77, concerns the effect of the structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this extension will be forwarded to the Federal Communications Commission (FCC) because the structure is subject to their licensing authority.

If we can be of further assistance, please contact our office at (816) 329-2525, or natalie.schmalbeck@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2020-ANE-4904-OE.

Signature Control No: 449104964-514028053 Natalie Schmalbeck

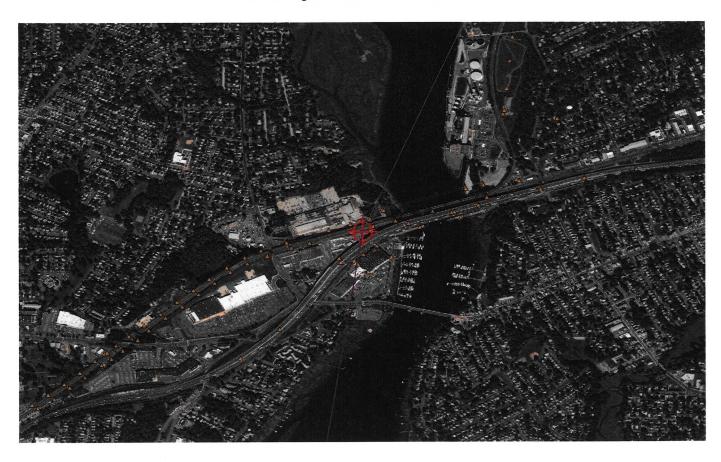
(EXT)

Technician

Attachment(s) Map(s)

cc: FCC

Verified Map for ASN 2020-ANE-4904-OE



CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing document was sent via electronic mail to the service list for Docket No. 511 on September 22, 2022:

Counsel for Dish Wireless, LLC
Daniel Patrick
Christopher B. Fisher
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
Phone: (914) 761-1300
dpatrick@cuddyfeder.com
cfisher@cuddyfeder.com

Counsel for Cellco Partnership d/b/a Verizon Wireless Kenneth C. Baldwin Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 Phone: (860) 275-8200 kbaldwin@rc.com

Counsel for New Cingular Wireless PCS, LLC d/b/a AT&T Thomas J. Regan
Brown Rudnick LLP
185 Asylum Road Hartford, CT 06103
Phone: (860) 509-6527
tregan@brownrudnick.com

By:

Jesse A. Langer

Updike, Kelly & Spellacy, P.C.