

# brownrudnick

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September 20, 2022

**VIA E-MAIL ([siting.council@ct.gov](mailto:siting.council@ct.gov)) ([melanie.bachman@ct.gov](mailto:melanie.bachman@ct.gov))  
& UPS**

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

**Re: DOCKET NO. 511 – Application by Barrett Outdoor Communications Inc. for a Certificate Of Environmental Compatibility And Public Need for the Construction, Maintenance and Operation of a Telecommunications Facility Located at 200 East Main Road Rear, Stratford, Connecticut**

**New Cingular Wireless PCS LLC's (AT&T) Response to Interrogatories**

Dear Attorney Bachman:

On behalf of New Cingular Wireless PCS, LLC (“AT&T”), please find enclosed an original and 15 copies of our response to the Siting Council’s Pre-Hearing Interrogatories.

Sincerely,

/s/ Thomas J. Regan  
Thomas J. Regan

Encl.

cc: Lynn Brady, AT&T  
Edward D. Pare, Jr.  
Kevin Mason, SAI  
C Squared Systems, LLC

64829163 v2-WorkSiteUS-024519/1653

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**IN RE:**

<b>APPLICATION BY BARRETT OUTDOOR COMMUNICATIONS INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE, AND OPERATION OF A TELECOMMUNICATIONS FACILITY LOCATED AT 200 EAST MAIN ROAD REAR, STRATFORD, CONNECTICUT</b>	<b>:</b>	<b>DOCKET NO. 511</b>
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	<b>:</b>	<b>September 20, 2022</b>
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**RESPONSES OF INTERVENOR NEW CINGULAR WIRELESS PCS, LLC  
d/b/a AT&T TO CONNECTICUT SITING COUNCIL PRE-HEARING  
INTERROGATORIES**

**General**

- Q1. What is the estimated cost of AT&T's equipment, including installation?
- A1. *\$364,000.*
- Q2. How would the cost of AT&T's installation/co-location at the proposed site be recovered?
- A2. *AT&T's costs are recovered as part of business operations and services provided.*

**Site Search**

- Q3. When did AT&T commence a site search for the proposed service area? Identify the approximate center and radius of AT&T's site search area.
- A3. *AT&T funded this search ring in May of 2013. The search ring center is 41.201392, -73.116099 and the radius was approximately 0.25 mile.*
- Q4. What other alternatives did AT&T examine besides the proposed site? Identify the alternative locations and the reasons for their rejection.
- A4. *Please see the attached Site Search Summary included in Attachment A.*

## Coverage/Capacity

- Q5. Referring to the AT&T Radio Frequency Analysis Report behind Tab 4 of the Application, Attachments 2, 3, and 4 are not legible. Provide a legible copy.
- A5. *Attached as **Attachment B** are legible copies of Attachments 2, 3, and 4 behind Tab 4 of the Application containing AT&T's Radio Frequency Analysis Report.*
- Q6. Provide a propagation model for existing 1900 MHz service and a propagation model for existing and proposed 1900 MHz coverage.
- A6. *Attached as **Attachment C** are propagation models for AT&T's existing 1900 MHz service and AT&T's existing and proposed 1900 MHz coverage.*
- Q7. Referring to the AT&T Radio Frequency Analysis Report, p. 4, Table 1, list the "Main Roads" that would be covered by the facility
- A7. *The "Main Roads" that will be covered by the proposed facility as referenced in AT&T's Radio Frequency Analysis Report on p. 4, Table 1 are:*

*Barnum Avenue Cutoff;  
E Main Street;  
Ferry Blvd;  
Huntington Road;  
Milford Point Road;  
Naugatuck Avenue;  
State Hwy 110; and  
State Hwy 113.*

- Q8. Would the site provide capacity relief at adjacent AT&T facilities? If yes, identify the facilities and the frequencies and sectors at or near exhaustion that would benefit from capacity relief.
- A8. *The proposed site would provide needed capacity relief to three sectors on adjacent sites:*

*CT2111 Gamma  
CT5028 Alpha  
CT2043 Beta*

*These sectors are exhausting capacity or rapidly approaching capacity exhaustion. The 700 MHz frequencies are most acutely affected. The users driving the 700 MHz capacity exhaustion are in areas that can only be served by greater reach of the 700 MHz frequencies, so the current sites cannot move those users to the upper bands (1900 MHz, 2100 MHz, 2300 MHz) to offload the 700 MHz frequencies. For this reason, the proposed site is needed to offload those sectors.*

Q9. What is the lowest height at which AT&T's antennas could achieve its wireless service objectives from the proposed facility?

A9. *The minimum height needed for AT&T's antennas is the height requested. Incremental coverage in the area would be reduced if the facility were to be ten (10) feet lower.*

Q10. Are there any FirstNet subscribers in Stratford/Bridgeport that would be served by AT&T's installation?

A10. *Yes. The City of Bridgeport is a FirstNet subscriber which includes approximately 1,180 subscribers (Police, Fire, DPW and the City). The Town of Stratford is also a FirstNet subscriber which includes approximately 160 subscribers (EMS and Police).*

### **Backup power**

Q11. Referring to Application Site Plan C1, identify the generator fuel storage capacity and estimated generator runtime before it would require refueling.

A11. *AT&T will utilize a Polar 15kW, 8220-100-D-15-03, diesel-fueled generator which holds 54 gallons of fuel in a double-walled-belly fuel tank and could run for approximately 53 hours before refueling is required.*

Q12. Would the backup generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

A12. *Yes, the proposed backup generator will be compliant with Regulations of Connecticut State Agencies Section 22a-174-3b.*

Q13. Would a battery backup (if applicable) be used by AT&T to provide uninterrupted power? How long could the battery backup alone supply power to the facility?

A13. *Battery backup will be used at the site and should provide power for 3-4 hours.*

### **Public Safety**

Q14. Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility by AT&T.

A14. *The applicable safety standards and codes include:*

*2015 International Building Code, as amended by the 2018 CT State Building Code.*

*2015 International Mechanical Code, as amended by the 2018 CT State Building Code.*



*2017 National Electric Code (NFPA 70)*  
*2018 CT State Fire Safety Code (CSFSC)*  
*2018 CT State Fire Prevention Code (CSFPC)*  
*ANSI/TIA-222-H “Structural Standard for Antenna Supporting Structures and  
Antennas and Small Wind Turbine Support Structures”*  
*Occupational Safety and Health Administration (OSHA)*

Q15. Would AT&T's equipment support text-to-911 service? Is additional equipment required for this purpose?

*A15. Yes, the proposed facility will support text-to-911 service. No additional equipment is required to provide the service.*

Q16. Would AT&T's antennas comply with federal E911 requirements?

*A16. Yes, AT&T's antennas will comply with federal E911 requirements.*

Q17. Would AT&T's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?

*A17. Yes, AT&T's installation will comply with the intent of the Warning, Alert and Response Network Act of 2006.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, September 20, 2022, an electronic copy of the foregoing was sent to the Connecticut Siting Council and the service list as of August 18, 2022:

<p><i>Applicant: Barrett Outdoor Communications, Inc.</i></p> <p><b>Updike, Kelly &amp; Spellacy, P.C.</b> Jesse A. Langer, Esq. One Century Tower 265 Church Street, 10th Floor New Haven, CT 06510 Phone: (203) 786-8310 <a href="mailto:jlanger@uks.com">jlanger@uks.com</a></p>	<p><i>Intervenor: Dish Wireless, LLC</i></p> <p><b>Cuddy &amp; Feder LLP</b> Daniel Patrick, Esq. Christopher B. Fisher, Esq. 445 Hamilton Avenue, 14th Floor White Plains, NY 10601 Phone: (914) 761-1300 <a href="mailto:dpatrick@cuddyfeder.com">dpatrick@cuddyfeder.com</a> <a href="mailto:cfisher@cuddyfeder.com">cfisher@cuddyfeder.com</a></p>
<p><i>Intervenor: Cellco Partnership d/b/a Verizon Wireless</i></p> <p>Robinson &amp; Cole LLP Kenneth C. Baldwin, Esq. 280 Trumbull Street Hartford, CT 06103-3597 Phone: (860) 275-8200 <a href="mailto:kbaldwin@rc.com">kbaldwin@rc.com</a></p>	

/s/ Thomas Regan  
Thomas J. Regan, Esq.

# **ATTACHMENT A**

## **ATTACHMENT A – SITE SEARCH SUMMARY**

AT&T identified and investigated five (5) alternative site locations in and around the Stratford, Connecticut site search area where attachment to an existing structure or the construction of a new tower might be feasible for radio frequency engineering purposes and to address AT&T's significant gaps in coverage. Descriptions of the sites investigated by AT&T are set forth below with the reasons for rejection.

**1. Replacement Light Pole, Penders Field - Longbrook Park, Glendale Rd., Stratford, CT 06804**

Map Block Lot: 50/11 3/3

Owner: Town of Stratford

Zoning District: RM-1 Multi-Family Residence

Parcel Size: 12.31 acres

Lat/Long: 41.203741, -73.126818

AT&T entered into a lease with the Town of Stratford dated July 15, 2014, to replace an existing 85' light pole with a 95' tower plus ground space for a proposed wireless facility. A Petition for Declaratory Ruling (Petition No. 1135) for the proposal was filed with the Connecticut Siting Council on January 9, 2015. That Petition was withdrawn on June 11, 2015, due to significant public opposition.

**2. Town of Stratford DPW, 550 Patterson Ave., Stratford, CT 06614**

Map Block Lot: 50/11 14/1

Owner: Town of Stratford

Zoning District: RS-4 One-Family Residence

Parcel Size: 5.77 acres

Lat/Long: 41.203511, -73.119211

The Town of Stratford initially indicated interest in leasing the property to AT&T for a wireless facility, and a site visit and site plan were completed. The Town of Stratford requested photo simulations of the proposed tower to evaluate the aesthetic impact. When AT&T attempted to schedule the balloon float to produce the photo simulations, the Town of Stratford was unresponsive, even after several attempts to follow up. Due to the lack of interest on the part of the Town of Stratford, AT&T abandoned this site candidate.

3. **Billboard, 28 Sidney St., Stratford, CT 06614**

Map Block Lot: 60/11 2/2

Owner: Barrett Outdoor Communications, Inc. n/k/a Jack's Company

Zoning District: RS-1 One-Family Residence

Parcel Size: .14 acres

Lat/Long: 41.201392, -73.116099

AT&T approached Barrett Outdoor Communications to install on the existing billboard which already supported two wireless carriers, Verizon and T-Mobile. Barrett responded that an additional carrier would visually overload the structure and diminish its effectiveness as an advertising platform and rejected AT&T's proposal.

4. **The Whiskey Barrell, 251 E. Main St., Stratford, CT 06614**

Map Block Lot: 60/11 2/2

Owner: 251 EM Stratford LLC (ground), ARX Wireless (tower)

Zoning District: RS-4 One-Family Residence

Parcel Size: .58 acres

Lat/Long: 41.203894, -73.118668

ARX Wireless, a tower developer, leased ground space on this parcel for a proposed 130' monopole. We understand that the Town of Stratford opposed a tower at this location so ARX abandoned this site candidate.

5. **100 E. Main St., Rear, Stratford, CT 06614**

Map Block Lot: 60/11 2/4

Owner: UB Stratford I, LLC

Zoning District: CA Retail Commercial District

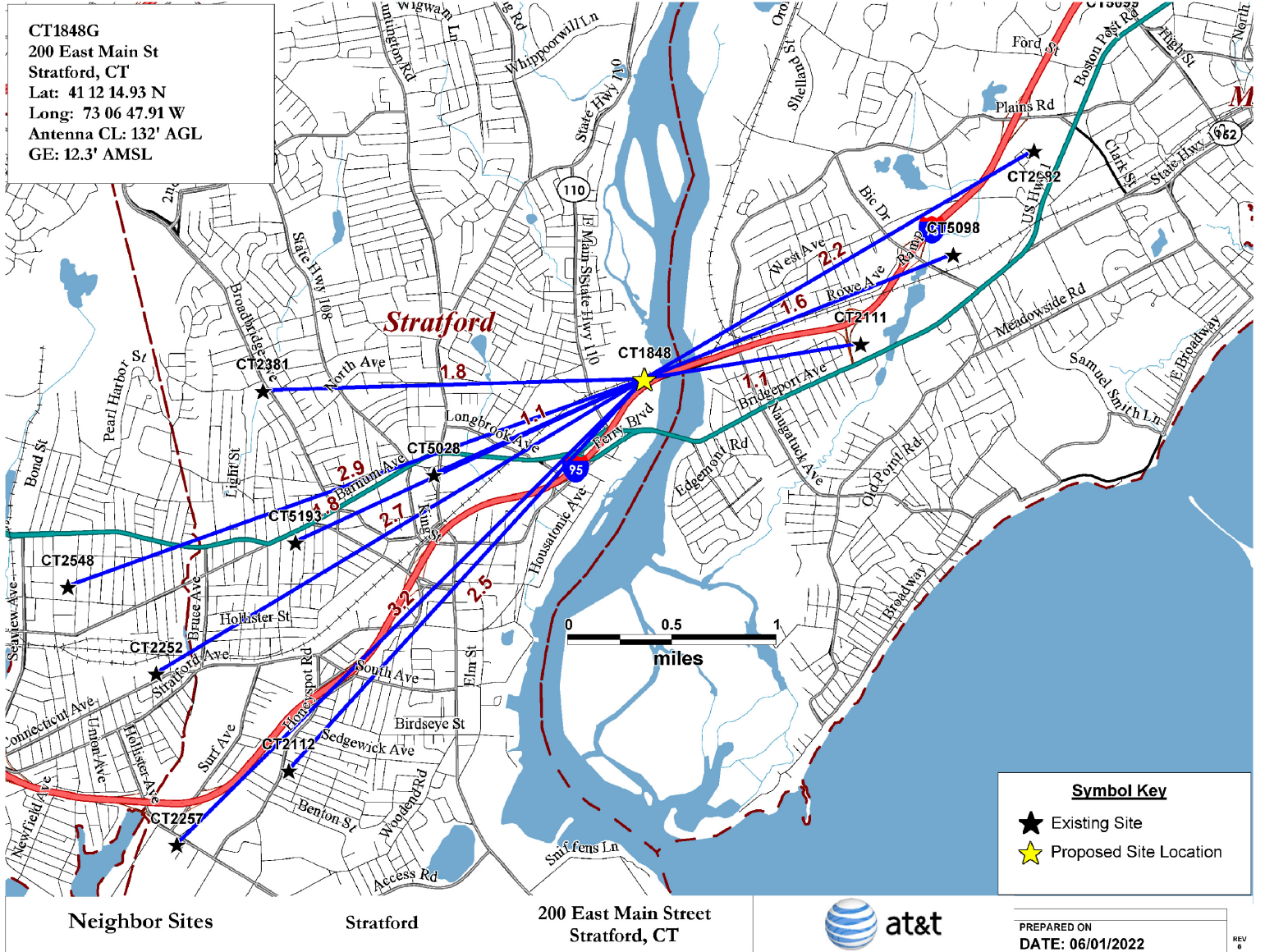
Parcel Size: 2.82 acres

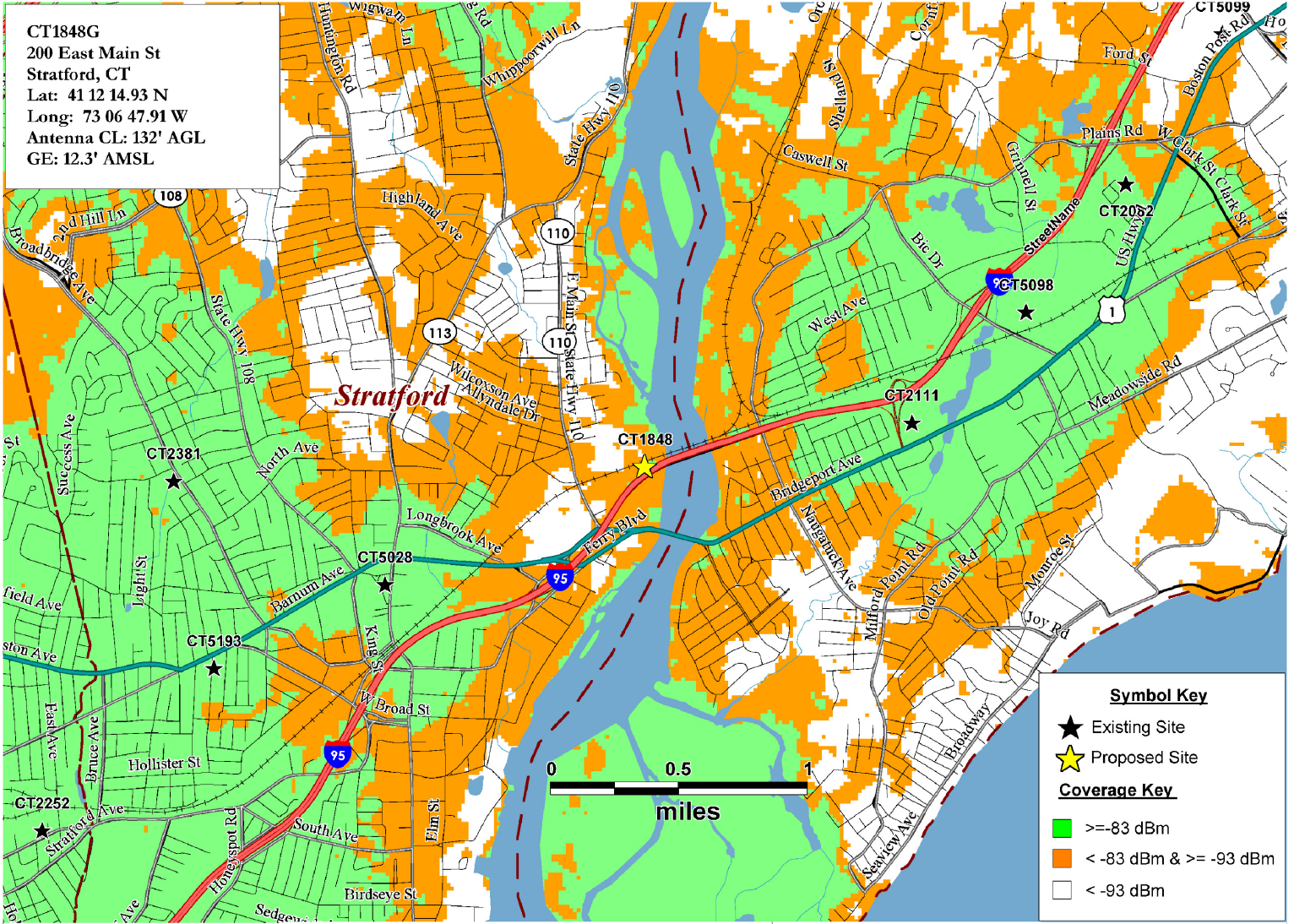
Lat/Long: 41.203077, -73.115930

This five-story commercial building is occupied by Extra Storage Co. AT&T's initial contact with this landlord was made by telephone and the inquiry was referred to the property owner's Leasing Dept. Subsequent voice messages were left with the owner and a certified letter dated 4/21/22 was sent to the owner. The owner did not respond so AT&T abandoned this site candidate.

# **ATTACHMENT B**

Attachment 2: CT1848 - Neighbor Site Data





Existing & Proposed  
700 MHz LTE Coverage

Stratford

200 East Main Street  
Stratford, CT



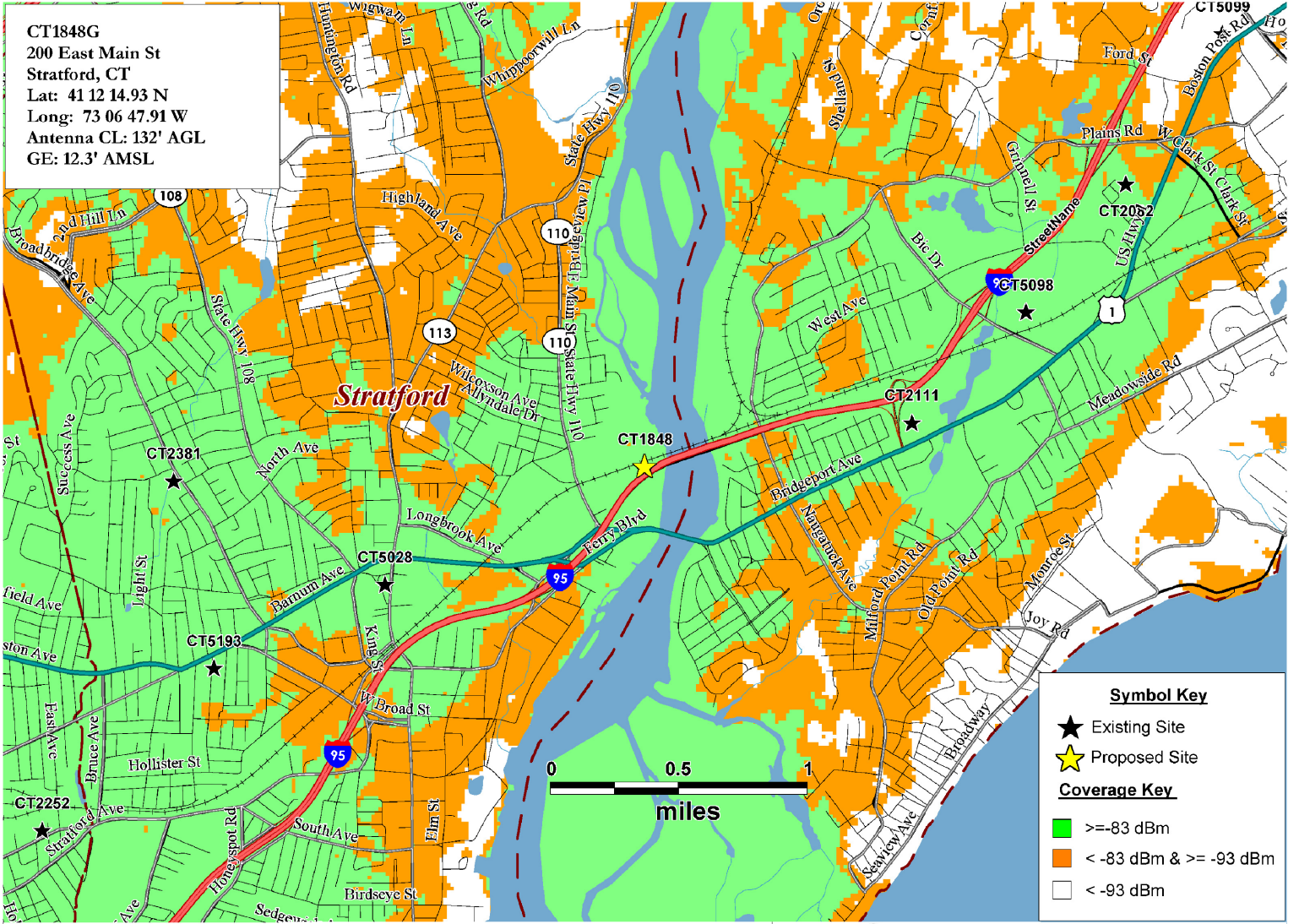
PREPARED ON  
DATE: 06/01/2022

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Attachment 3: CT1848 - Existing 700 MHz LTE Coverage for the Current AT&T Network



Attachment 4: CT1848 - Existing 700 MHz LTE Coverage with Proposed Site for the AT&T Network



Existing & Proposed 700 MHz LTE Coverage

Stratford

200 East Main Street Stratford, CT

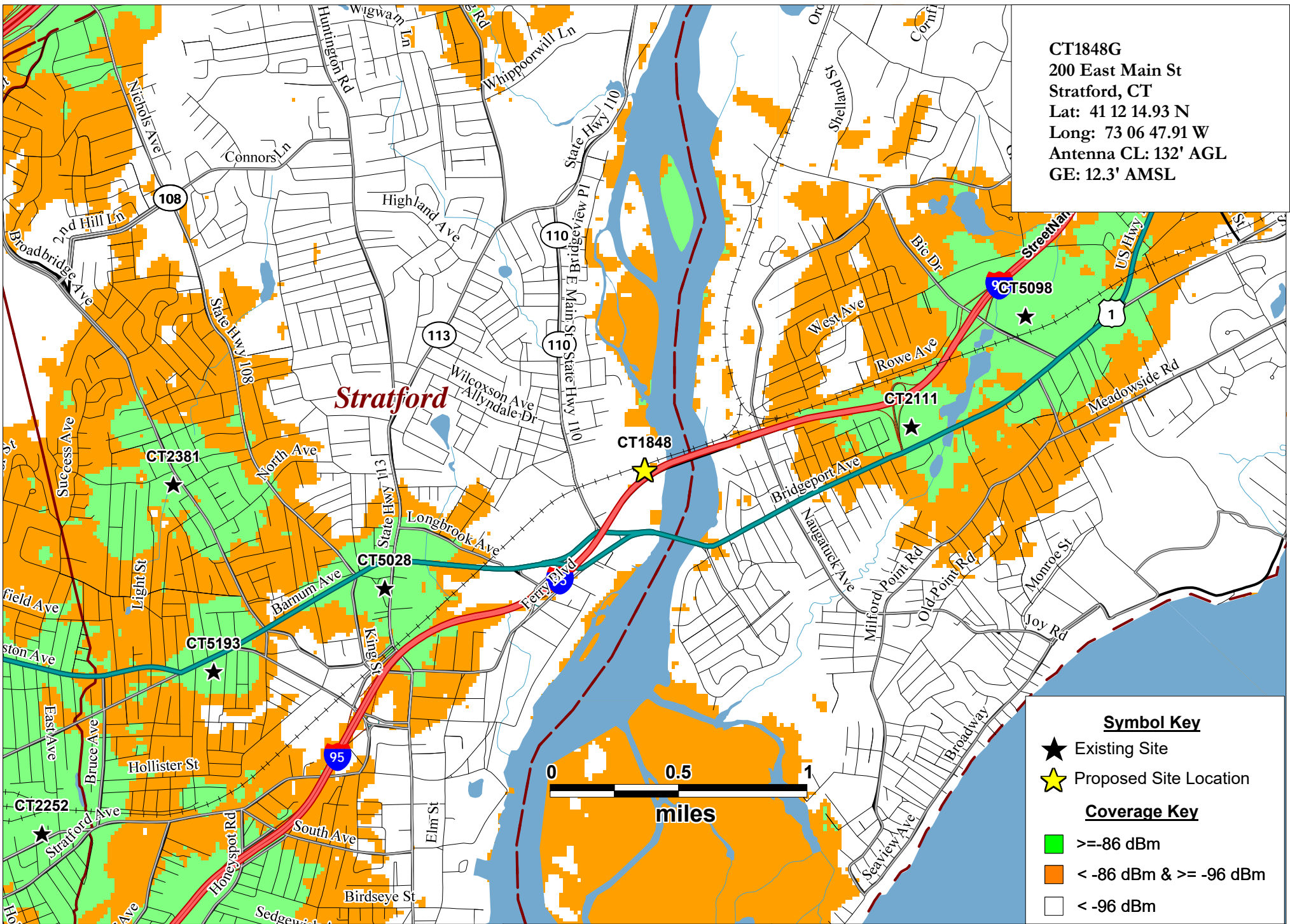


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# **ATTACHMENT C**

**CT1848G**  
 200 East Main St  
 Stratford, CT  
 Lat: 41 12 14.93 N  
 Long: 73 06 47.91 W  
 Antenna CL: 132' AGL  
 GE: 12.3' AMSL



**Symbol Key**

- ★ Existing Site
- ★ Proposed Site Location

**Coverage Key**

- $\geq -86$  dBm
- $< -86$  dBm &  $\geq -96$  dBm
- $< -96$  dBm

Existing Coverage  
1900 MHz LTE

Stratford

200 East Main Street  
Stratford, CT

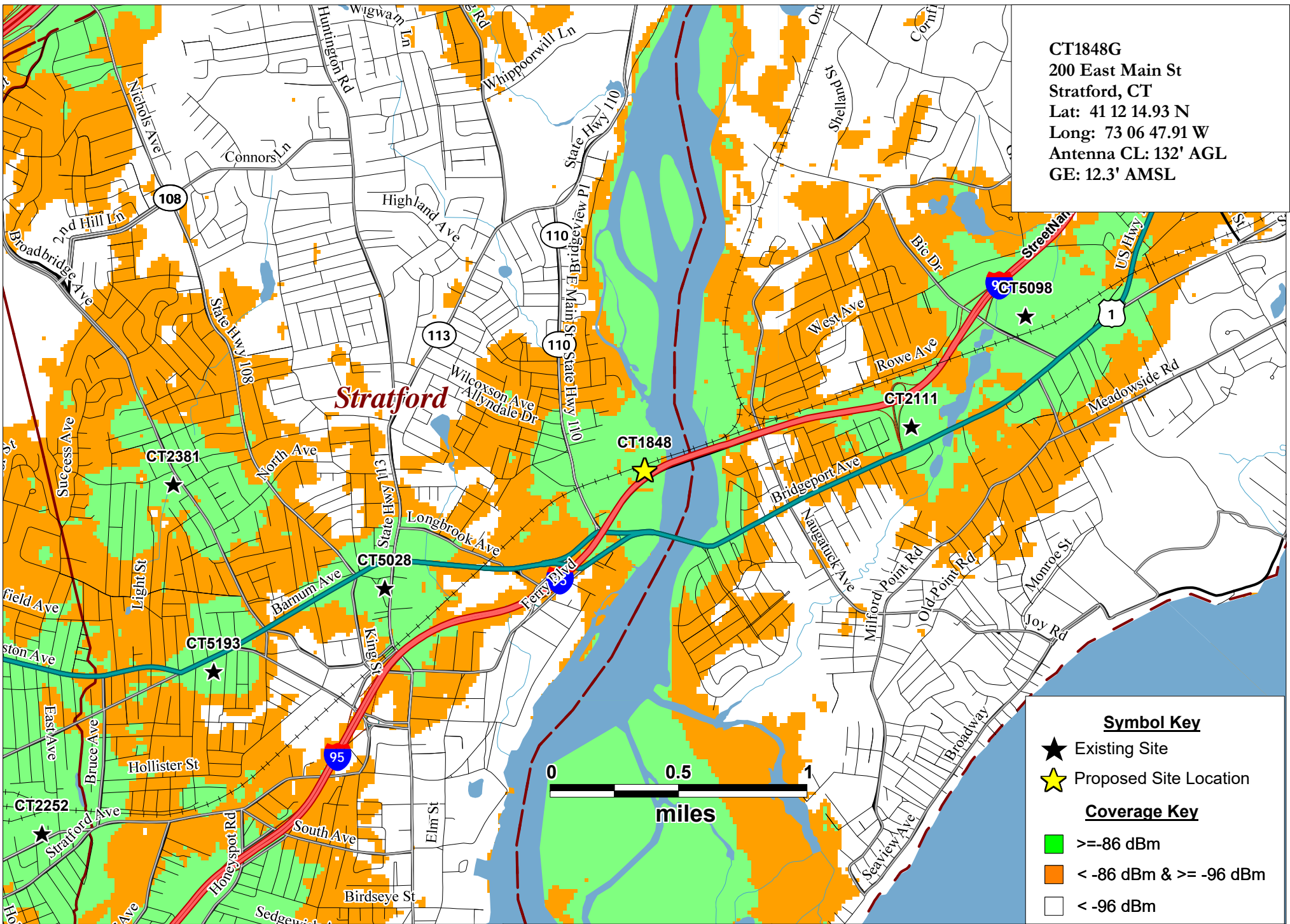


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 DATE: 09/13/2022

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**CT1848G**  
 200 East Main St  
 Stratford, CT  
 Lat: 41 12 14.93 N  
 Long: 73 06 47.91 W  
 Antenna CL: 132' AGL  
 GE: 12.3' AMSL



**Symbol Key**

- ★ Existing Site
- ★ Proposed Site Location

**Coverage Key**

- $\geq -86$  dBm
- $< -86$  dBm &  $\geq -96$  dBm
- $< -96$  dBm

Existing & Proposed  
700 MHz LTE Coverage

Stratford

200 East Main Street  
Stratford, CT



PREPARED ON  
 DATE: 09/13/2022

REV 0