

November 1, 2022

Melanie Bachman, Esq.
Executive Director and Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 511 – Application of 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 Street (Rear), Stratford, Connecticut

Dear Attorney Bachman:

On behalf of intervenor New Cingular Wireless PCS, LLC d/b/a AT&T (“AT&T”), please accept this letter in support of the above-referenced Application for the construction, operation and maintenance of a new telecommunications facility located at 200 East Main Street (Rear) in Stratford, Connecticut. This letter is submitted in lieu of a Post-Hearing Brief.

Barrett Outdoor Communications, Inc. (the “Applicant”) filed an application with the Connecticut Siting Council (the “Council”) on July 25, 2022 for a Certificate of Environmental Compatibility and Public Need (the “Application”) for the construction, operation and maintenance of a new wireless telecommunications facility (the “Facility”) at 200 East Main Street (Rear) in the Town of Stratford, Connecticut (the “Site”). The Site is used as a boat storage yard and is owned by UB Railside LLC.

The Council granted AT&T intervenor status in Docket No. 511 on August 19, 2022. If the Council renders a favorable decision and approves the Facility, AT&T intends to share the Facility by collocating antennas on the tower and installing associated equipment on an elevated platform near the base of the tower.

The Facility

The Applicant proposes to install a 135’ above ground level (“AGL”) monopole-style tower within a proposed compound area measuring 4,210 square feet, along with a 1,498 square foot elevated equipment platform upon which AT&T will install its equipment and emergency backup power generator. AT&T will install antennas at the 132’ AGL antenna centerline height on the proposed monopole. The Facility will be accessed via East Main Street across a portion of the existing parking lot and storage area. Standard utilities will be drawn from existing service along East Main Street along with an existing transformer on the Site.

Standard of Review

AT&T respectfully asserts that it has provided sufficient evidence into the record of Docket No. 511 clearly demonstrating the need for wireless services in this area of Stratford, especially along Route I-95 and other roads in the area. AT&T does not currently have a wireless facility in the immediate area and is not located on the existing billboard structure at the Site where two competing carriers are located. Additionally, the record contains sufficient evidence to allow the Council to conclude that any probably environmental impacts which may be attributed to the Facility, will not be significant and will not outweigh the need for the Facility.

Public Need

AT&T has a significant gap in AT&T's wireless communications network along Route 95, as well as along the other roads and the general area in the vicinity of the Site. AT&T does not currently have a wireless facility in the immediate area of the Site and is not located on the existing billboard structure at the Site which contains the wireless facilities of two of AT&T's competitors. AT&T's significant gap in coverage cannot be addressed by using the existing billboard structure, which we understand is due to be removed from the Site. Due to terrain characteristics and the distance between the area of the gaps and AT&T's existing sites, AT&T's options to provide service in the area of the Site are very limited. Analysis of AT&T's propagation modeling in Stratford reveal that in order for AT&T to fill coverage gaps and improve network reliability in Stratford, a new facility is needed in the area of the Site and AT&T's collocation upon the Facility will help address those gaps in coverage.

Additionally, the Facility will provide much needed capacity relief to three existing AT&T sites: CT2111 in Milford; and CT5028 and CT2043, both in Stratford. Evidence in the record indicates that one sector of each of these three AT&T sites is exhausting capacity or rapidly approaching capacity exhaustion. We also note that AT&T provided evidence in the record that the Town of Stratford and the City of Bridgeport are both FirstNet subscribers.

Environmental Impacts

The Applicant has submitted evidence in the record sufficient to allow the Council to conclude that any potential environmental impacts which may be attributed to the Facility, will not be significant. Evidence in the record supports that the Facility will have no significant, adverse effects on: historic or archeological resources; the natural environment; ecological balance; public health and safety; scenic and recreational values; forests and parks; air and water purity and fish; aquaculture and wildlife; federal or state listed endangered, threatened species or species of special concern; wetlands or watercourses near the Site; farmland; and air navigation. AT&T's installation will comply with all applicable requirements relating to radio frequency emissions.

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Conclusion

AT&T respectfully asserts that substantial evidence is contained in the record which clearly demonstrates a public need for the Facility and that the Facility would not have significant adverse environmental effects.

Sincerely,

/s/ Thomas J. Regan
Thomas J. Regan

Encl.
cc: August 18, 2022 Service List

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