

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
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 AT 200 EAST MAIN STREET REAR, STRATFORD, CONNECTICUT	:	DOCKET NO. 511
	:	
	:	
	:	
	:	
	:	
	:	
	:	
	:	
	:	AUGUST 9, 2022

PETITION TO INTERVENE

Pursuant to Connecticut General Statutes (“C.G.S.”) Section 16-50n and Regulations of Connecticut State Agencies (“R.C.S.A.”) Section 16-50j-15, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby requests permission of the Siting Council (“Council”) to participate, as an intervenor, in the Docket No. 511 proceeding.

As the Council is aware, Cellco is a licensed provider of wireless services throughout Connecticut. The proposed telecommunications facility described in the Docket No. 511 application is designed to replace an existing Cellco billboard telecommunications facility nearby and will allow Cellco to provide improved wireless service in Stratford, particularly along I-95 and the Metro North rail line.

Cellco’s involvement in the Docket No. 511 proceeding would aid the Council in evaluating additional need considerations as set forth in C.G.S. § 16-50g. Cellco’s expertise and experience in designing, constructing, operating and maintaining a wireless telecommunications system in the State of Connecticut in accordance with the rules and regulations of the Council and the Federal Communications Commission, may be of benefit to the Council in resolving

issues presented in Docket No. 511. Cellco has been admitted as an intervenor in prior Siting Council dockets. Cellco proposes to participate in the Docket No. 511 proceeding and hearing, by cross-examining the Applicant's witnesses, offering oral and written testimony of its own witnesses, evidence and the filing of pre-hearing interrogatories.

For the above-stated reasons, Cellco seeks permission to participate in this docket as an intervenor.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS



By _____

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
(860) 275-8200
Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of August 2022, a copy of the foregoing was sent, via electronic mail, to:

Jesse A. Langer, Esq.
Updike, Kelly & Spellacy, P.C.
One Century Tower
265 Church Street, 10th Floor
New Haven, CT 06510
jlanger@uks.com

A handwritten signature in cursive script, appearing to read "Kenneth C. Baldwin", written in black ink.

Kenneth C. Baldwin