



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

June 23, 2023

Connecticut for Responsible
Technology of Brookfield
c/o Joan Polzin
Linda Arment
Jennifer Ramos-Marrero
joanpolzin@icloud.com

RE: **DOCKET NO. 512** - Homeland Towers, LLC Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 60 Vale Road, Brookfield, Connecticut. **Connecticut for Responsible Technology of Brookfield May 19, 2023 Motion to Reopen and Modify Final Decision.**

Dear Joan Polzin, Linda Arment, and Jennifer Ramos-Marrero:

At a public meeting held on June 22, 2023, the Connecticut Siting Council (Council) denied Connecticut for Responsible Technology of Brookfield's May 19, 2023 Motion to Reopen the Evidentiary Hearing and Modify the Council's February 2, 2023 Final Decision (Motion to Reopen) to issue a Certificate of Environmental Compatibility and Public Need to Homeland Towers, LLC in the above-referenced matter, on the basis that changed conditions do not exist under Connecticut General Statutes §4-181a(b) to reopen and modify the final decision.

Enclosed for your information is a copy of the staff report on this Motion to Reopen.

Please contact our office if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie A. Bachman".

Melanie A. Bachman
Executive Director

MAB/MP/laf

Enclosure: Staff Report, dated June 22, 2023

c: Service List dated September 23, 2022



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Web Site: portal.ct.gov/csc

DATE: June 22, 2023

TO: Council Members

FROM: Melanie A. Bachman, Esq. *MAPB*
Executive Director/Staff Attorney

RE: **DOCKET NO. 512** - Homeland Towers, LLC Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 60 Vale Road, Brookfield, Connecticut. **Connecticut for Responsible Technology of Brookfield May 19, 2023 Motion to Reopen and Modify Final Decision - Staff Report.**

On May 19, 2023, pursuant to the provisions of Connecticut General Statutes (CGS) §4-181a(b), Connecticut for Responsible Technology of Brookfield (CT4RT), filed a Motion to Reopen and Modify (Motion to Reopen) the Connecticut Siting Council's (Council) February 2, 2023 final decision to issue a Certificate of Environmental Compatibility and Public Need (Certificate) to Homeland Towers, LLC (HT) for the above-referenced telecommunications facility located in Brookfield, Connecticut, based on changed conditions.

Also on May 19, 2023, in accordance with CGS §4-181a(b), the Council requested parties and intervenors to the original proceeding to submit written comments with respect to whether the Motion to Reopen should be granted or denied by June 14, 2023. On June 12, 2023, HT and New Cingular Wireless PCS, LLC (AT&T) submitted comments in opposition to the Motion to Reopen based on the lack of any changed conditions or new information for consideration.

I. Procedural History

On August 10, 2022, HT and AT&T submitted an application for a Certificate to the Council for the construction, maintenance, and operation of a telecommunications facility located at 60 Vale Road in the Town of Brookfield (Town).¹ On September 15, 2022, the Council deemed the application complete and approved the public hearing schedule.² Legal notice of the date and time of the public hearing was published in the Danbury News-Times on September 17, 2022.³

On October 12, 2022, in accordance with the proceeding schedule, the Council held a pre-hearing conference to discuss the public hearing procedures and requirements for pre-filed testimony, exhibit lists, administrative notice lists, expected witness lists and filing of pre-hearing

¹ Docket 512, Record, available at https://portal.ct.gov/CSC/1_Applications-and-Other-Pending-Matters/Applications/4_DocketNos500s/Docket-No-512 (Finding of Fact ¶17 – “On August 11, 2022, the Council sent a letter to the Town as notification that the application was received and was being processed, in accordance with CGS §16-50gg. No comments were received.”)

² Finding of Fact ¶20.

³ Finding of Fact ¶22.

interrogatories.⁴ The pre-hearing conference memorandum was posted to the Docket 512 webpage one week in advance.

On October 19, 2022, HT installed a four-foot by six-foot sign along Vale Road at the entrance of the existing access drive for the host parcel. The sign presented information regarding the proposed telecommunications facility and the Council's public hearing.⁵

Between October 21 and November 2, 2022, Paska Nayden (Nayden), author of the written statements dated November 3, 2022 and December 21, 2022 that are attached as Exhibit C to CT4RT's Motion to Reopen, exchanged e-mail with the Council's Executive Director/Staff Attorney (ED/SA) related to the distinction between party/intervenor status and limited appearance statements. In a November 2, 2022 e-mail, Nayden opted to provide a limited appearance statement rather than request party/intervenor status in the Docket 512 proceeding. See Attached Exhibit 1 – "RE: Re Brookfield AT&T DOCKET NO. 512."

On November 3, 2022, the Council held a public hearing beginning with the evidentiary session at 2:00 p.m. and continuing with the public comment session at 6:30 p.m. During the evidentiary hearing session, the Council granted HT and AT&T's Motion for a Protective Order related to the disclosure of financial terms in the site lease agreement pursuant to CGS §1-210(b) and §16-50o.⁶

During the 6:30 p.m. public comment session, Nayden submitted her November 3, 2022 written limited appearance statement with the "Town of Brookfield Antenna Analysis" attached, and was among 10 persons who provided oral limited appearance statements.⁷ Limited appearance statements in this proceeding, whether oral or written, were not provided under oath nor subject to cross-examination.⁸

At the conclusion of the November 3, 2022 public hearing, the Council closed the evidentiary record and established December 3, 2022 as the deadline for public comments.⁹ On November 14 and 15, 2022, Nayden exchanged e-mail with the Council's ED/SA related to the applicability of provisions of the Federal Communications Commission (FCC) Telecommunications Act (TCA) in the proceeding. See Exhibit 2 – "RE Request for Clarification." On November 18, 2022, Nayden inquired about the final date for evidence. See Exhibit 3 – "RE final date for evidence for Docket 512."

On January 16, 2023, Nayden e-mailed an additional written statement with the "Town of Brookfield Antenna Analysis" attached. See Exhibit 4 – "FW Brookfield Additional Information Docket 512." On February 2, 2023, the Council issued its final decision to issue a Certificate to HT for the telecommunications facility. Also on February 2, 2023, Nayden exchanged email with the Council's ED/SA further related to the distinction between party/intervenor status and limited appearance statements. See Exhibit 5 – "FW Docket No. 512 Comments P Nayden."

On February 7, 2023, Nayden exchanged email with the Council's ED/SA related to evidence in an administrative proceeding. See Exhibit 6 – "RE Docket No. 512 Comments P Nayden."

⁴ Finding of Fact ¶28.

⁵ Finding of Fact ¶29.

⁶ Finding of Fact ¶25.

⁷ Finding of Fact ¶32.

⁸ Finding of Fact ¶31.

⁹ Finding of Fact ¶36.

On April 10, 2023, in compliance with Condition No. 2 of the Council’s Decision and Order (D&O), HT submitted a Development and Management (D&M) Plan for the telecommunications facility. The Council approved the D&M Plan on May 11, 2023. CT4RT submitted its Motion to Reopen on May 19, 2023.

II. CT4RT Motion to Reopen

CT4RT’s Motion to Reopen was submitted 197 days after the public hearing, 106 days after the Council issued its final decision and 8 days after the Council approved the D&M Plan. It claims that the following “changed conditions” warrant a “re-hearing”:

- (A) the Council violated and/or misapplied the Federal TCA in its final decision;
- (B) the oral and written limited appearance statements are “evidence” that must be considered by the Council in its final decision; and
- (C) new information related to the facility site location has surfaced since the Council rendered its final decision.

None of the above constitute “changed conditions” that warrant a “re-hearing” on the following bases:

A. The Council complied with the Federal TCA in its final decision.

CT4RT claims the Council violated and/or misapplied the Federal TCA in its final decision because the Council failed to *deny* the application based on a written record supported by substantial evidence, as required by the Federal TCA §332(c)(7)(B). (Emphasis added). The Council’s final decision to *approve* the application includes 174 Findings of Fact, an Opinion, and a D&O. It is based on a written record supported by substantial evidence.

Page 1 of the Council’s Opinion states, “The United States Congress recognized a nationwide need for high quality wireless services through the adoption of the Federal Telecommunications Act of 1996 and directed the Federal Communications Commission (FCC) to establish a market structure for system development and develop technical standards for network operations. FCC preempts state or local regulation on matters that are exclusively within the jurisdiction and authority of FCC, including, but not limited to, network operations and radio frequency emissions. Preservation of state or local authority extends only to placement, construction and modifications of telecommunications facilities based on matters not directly regulated by FCC, such as environmental impacts.”

The Council’s statutory charge is to balance the need for development of proposed wireless telecommunications facilities with the need to protect the environment. With respect to radio frequency emissions, the Council’s role is to ensure that the tower meets federal permissible exposure limits. Consistent with FCC preemption, under CGS §16-50p(b), there is a presumption of public need for personal wireless services and the Council is limited to consideration of a specific need for any proposed facility to be used to provide such services to the public. In its final decision, the Council considered the specific need for the facility consistent with federal preemption and state statute. Findings and determinations in the final decision include, but are not limited to, public need for service,¹⁰ AT&T’s existing and proposed wireless services,¹¹ public

¹⁰ Findings of Fact ¶47-62.

health and safety,¹² and environmental considerations.¹³ The Council complied with the Federal TCA in its final decision.

B. Limited appearance statements are not “evidence.”

CT4RT claims it presented “substantial written evidence” for the Council to consider while the application was pending. Paragraph 2 of the Motion to Reopen states, “we have presented substantial written evidence for the Council to consider *both prior to their decision and herein...*” (Emphasis added). At an agency hearing in a contested case, the Uniform Administrative Procedure Act affords each *party* the opportunity to respond, cross-examine other parties, intervenors, and witnesses, and to present evidence and argument on all issues involved (Emphasis added).¹⁴ In an email to the Council dated November 2, 2022, CT4RT opted not to become a party or intervenor. Rather, CT4RT opted to provide oral limited appearance statements during the public comment session of the hearing and written limited appearance statements after the 30-day public comment period concluded.¹⁵

Limited appearance statements in this proceeding, whether oral or written, were not provided under oath nor subject to cross-examination by the parties and the Council.¹⁶ Therefore, CT4RT’s oral and written limited appearance statements are not “evidence” as the statements were not made under oath and were not subject to cross-examination by the parties and the Council.

C. There is no new information related to the facility site location or otherwise.

CT4RT claims there is new information related to the facility site that warrants reopening of the Council’s final decision as follows:

1. **Lack of coverage gap evidence:** Paragraph 3 of CT4RT’s Motion to Reopen states, “We the Citizens of Brookfield have only recently learned that the cellular service gap analysis presented is a model and not an actual drive through, and that certain key facts, such as dropped calls, were not provided, or included in the analysis.” AT&T submitted a Radio Frequency Analysis Report with coverage plots in Attachment 1 to the application on August 10, 2022. AT&T submitted additional coverage plots in response to Council Interrogatory No. 20 on October 26, 2022. The Council evaluated AT&T’s Radio Frequency Analysis Report and coverage plots, cross-examined AT&T on the Radio Frequency Analysis Report and coverage plots during the evidentiary session of the public hearing and made findings on the Radio Frequency Analysis Report and coverage plots in its final decision.¹⁷ Referencing Paragraph 4 of CT4RT’s Motion to Reopen Exhibit C entitled, “Town of Brookfield Antenna Analysis,” *it has been submitted to the Council by CT4RT on three occasions* – November 3, 2022, January 16, 2023 and May 19, 2023. This is not new information.

¹¹ Findings of Fact ¶¶63-72.

¹² Findings of Fact ¶¶113-134.

¹³ Findings of Fact ¶¶135-174.

¹⁴ Conn. Gen. Stat. §4-177c (2023).

¹⁵ Finding of Fact ¶36 (Pursuant to CGS §16-50n(f), at the conclusion of the hearing session held on November 3, 2022, the Council closed the evidentiary record for Docket 512 and established December 3, 2022 as the deadline for public comments and the submission of briefs and proposed findings of fact).

¹⁶ Conn. Gen. Stat. §16-50n(f) (2023); Finding of Fact ¶31.

¹⁷ Findings of Fact ¶¶63-72.

2. **Site location is hazardous:** Paragraphs 5-7 of CT4RT’s Motion to Reopen claim the site is hazardous due to its location within 54 feet of a railroad upon which chemical tankers are transported. Specifically, CT4RT references the emergency backup generator and the propensity for electromagnetic pulse. The evidentiary record includes the Council’s findings with respect to public safety, including, but not limited to, an engineered yield point at the 129-foot level of the tower to ensure the tower setback radius remains within the boundaries of the host property.¹⁸ Containment measures for the proposed generator include a double-walled tank and secondary containment trench below the tank, and there is a site-specific Petroleum Materials Storage and Spill Prevention Plan.¹⁹ Furthermore, pursuant to CGS §16-50p(a)(3)(G), the facility would be constructed in accordance with the current Connecticut Building Code for tower design and in accordance with the currently adopted International Building Code.²⁰ This is not new information.
3. **Tower sharing compounds radiation.** Paragraphs 8-11 of CT4RT’s Motion to Reopen claim the sharing of towers compounds electromagnetic radiation with multiple frequencies. Pursuant to the state tower sharing policy, the Council shall examine whether the proposed facility may be shared with any public or private entity that provides service to the public, provided such shared use is technically, legally, environmentally and economically feasible and meets public safety concerns, and may impose reasonable conditions as it deems necessary to promote the immediate and shared use of telecommunications facilities and avoid the unnecessary proliferation of such facilities in the state.²¹ The proposed facility is designed to accommodate four wireless carriers and municipal antennas. The Town plans to share the tower.²² Furthermore, FCC preempts state and local authorities from regulating towers on the basis of RF emissions. For every tower share request under its jurisdiction, the Council must find that the cumulative RF emissions from all entities collocated on the tower comply with FCC maximum permissible exposure standards. This is not new information.
4. **There are no FCC guidelines for RF emissions.** Paragraphs 12-16 of CT4RT’s Motion to Reopen claim that there are no valid FCC RF “guidelines” based on a recent federal case where the court remanded the current RF emission standards back to FCC. CT4RT appears to believe that this case determined the FCC RF emission standards are no longer valid. This is incorrect. The current RF emission standards remain valid while FCC conducts its review. Page 5 of the Council’s Opinion states, “The Telecommunications Act of 1996 prohibits any state or local agency from regulating telecommunications towers on the basis of the environmental effects of radio frequency emissions to the extent that such towers and equipment comply with FCC’s regulations concerning such emissions. Potential harm to wildlife from radio frequency emissions, like the potential harm to human health from radio frequency emissions, is a matter of exclusive federal jurisdiction. The Council’s role is to ensure that the tower meets federal permissible exposure limits.” The cumulative worst-case maximum power density from the radio frequency emissions from the operation of AT&T’s antennas is 3.67% of the standard for the General Public/Uncontrolled Maximum Permissible Exposure, as adopted by the

¹⁸ Finding of Fact ¶122; D&M Plan, dated April 10, 2023; D&M Plan approval, dated May 11, 2023.

¹⁹ Finding of Fact ¶148 and D&O Condition No. 2.

²⁰ Finding of Fact ¶120.

²¹ Conn. Gen. Stat. §16-50p(b) and §16-50aa (2023).

²² Findings of Fact ¶88 and 170; D&M Plan, dated April 10, 2023; D&M Plan approval, dated May 11, 2023.

FCC, at a horizontal distance of 729 feet from the tower using the proposed antenna arrangement.²³ Furthermore, the Council's D&O Condition No. 5 states, "Upon the establishment of any new federal radio frequency standards applicable to frequencies of this facility, the facility granted herein shall be brought into compliance with such standards."²⁴ This is not new information.

5. **The tower violates Brookfield zoning.** Paragraphs 17-19 of CT4RT's Motion to Reopen claim the tower violates Brookfield zoning based on provisions for local rule under the Connecticut Constitution and Brookfield charter. The Council has exclusive jurisdiction over telecommunications facilities throughout the state based on the provisions of the Public Utility Environmental Standards Act. This is not new information.
6. **The lease agreement was withheld from public disclosure.** Paragraph 20 of CT4RT's Motion to Reopen claims it recently became aware of contractual arrangements between HT and the host property owner. Pursuant to CGS §16-50p(g), the Council shall in no way be limited by an applicant already having acquired land or an interest therein for the purpose of constructing a proposed facility.²⁵ In response to Council Interrogatory No. 3, and pursuant to CGS §1-210(b) and §16-50o, AT&T submitted a redacted and an unredacted copy of the lease agreement along with a Motion for Protective Order, which was granted by the Council during the public hearing held on November 3, 2022.²⁶ The Protective Order allows parties to a proceeding access to the protected financial information upon signing a Non-Disclosure Agreement. This is not new information.
7. **The town is entitled to funding for RF monitoring.** Paragraphs 21-22 of CT4RT's Motion to Reopen demand monthly funding, presumably from the Council, and a process for radio frequency emissions testing at the facility. The Council's final decision found the facility would comply, and *continue to comply*, with the FCC RF emission standards. Furthermore, the Connecticut Supreme Court held that funding a study of radio frequency emissions is beyond the statutory authority of the Council.²⁷ This is not new information.

III. Conclusion

Constitutional principles permit an agency to organize its hearing schedule so as to balance its interest in reasonable, orderly and nonrepetitive proceedings against the risk of erroneous deprivation of a private interest.²⁸ It is not unconstitutional for the Council, in good faith, to balance statutory time constraints against requests for more time to present objections.²⁹

CT4RT had a full and fair opportunity to participate in the proceedings held on this application when it was pending before the Council. CT4RT opted not to participate as a party. CT4RT opted to participate by providing oral and written limited appearance statements before, during and after the public comment period. The Council rendered its February 2, 2023 final decision to approve

²³ Finding of Fact ¶127.

²⁴ D&O Conditions 3 and 5 (Deployment of any 5G services must comply with FCC and Federal Aviation Administration guidance relative to air navigation, as applicable) and (Radio frequency access restriction and caution signage shall be installed at the site in compliance with FCC guidance.)

²⁵ Conn. Gen. Stat. §16-50p(g) (2023); *Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007).

²⁶ Finding of Fact ¶125.

²⁷ *Bornemann v. Conn. Siting Council*, 287 Conn. 177 (2008).

²⁸ *Concerned Citizens of Sterling v. Conn. Siting Council*, 215 Conn. 474 (1990).

²⁹ *Id.*

the facility based on a written record supported by substantial evidence. Condition No. 2 of the Council's D&O required HT to submit a D&M Plan specific to the facility. The Council approved the D&M Plan for the facility on May 11, 2023. It includes collocation of Town public safety equipment.

CT4RT submitted its Motion to Reopen on May 19, 2023. As evidenced above, no changed conditions or new information presented in the Motion to Reopen warrant reopening of the Council's final decision to issue a Certificate in Docket 512.

Therefore, staff recommends CT4RT's Motion to Reopen be denied.

MAB/lm

Exhibit 1

From: CT4RT <CT4RT@protonmail.com>
Sent: Wednesday, November 2, 2022 9:35 AM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Cc: Mathews, Lisa A <Lisa.A.Mathews@ct.gov>; CSC-DL Siting Council <Siting.Council@ct.gov>; Lucia Chiocchio, Esq. <lchiocchio@cuddyfeder.com>
Subject: RE: Re Brookfield AT&T DOCKET NO. 512

Good morning, I would like to give public comment on docket 512. I will also be submitting my oral comments with supporting facts and evidence.

Paska Ann

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Friday, October 28th, 2022 at 8:00 AM, Bachman, Melanie
<Melanie.Bachman@ct.gov> wrote:

Good morning, Paska.

Thank you for your email.

If you would like to request intervenor status in Docket 512, please submit the attached form to the Siting Council at siting.council@ct.gov and to the service list for Docket 512.

Here is a link to the Docket 512 service list: https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/1_MEDIA_DO500_600/DO512/ProceduralCorrespondence/DO512-20220810-SL-revised.pdf

Once the written request is received, we will add it to the hearing program for Docket 512 and take it up at the commencement of the hearing on 11/3/22. Please note that if you are granted intervenor status, you may not also speak during the public comment session at 6:30 PM.

If you have any questions, please feel free to contact us at your convenience.

Thanks. Have a great day and a nice weekend.

Melanie
Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
860-827-2951



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From: CT4RT <CT4RT@protonmail.com>
Sent: Thursday, October 27, 2022 4:54 PM
To: Mathews, Lisa A <Lisa.A.Mathews@ct.gov>
Cc: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: Re Brookfield AT&T DOCKET NO. 512

I would like to be an intervenor as suggested in the last email. I have evidence to submit. Do you suggest I have my affidavit notarized since I've never been an intervenor before, I'm new to the process. Thank you.

Paska Nayden
Co-Founder CT For Responsible Technology (c)
www.ct4rt.com
Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Friday, October 21st, 2022 at 9:04 AM, Mathews, Lisa A <Lisa.A.Mathews@ct.gov> wrote:

Paska Ann,

Here is a link to the record of Docket 512: https://portal.ct.gov/CSC/1_Applications-and-Other-Pending-Matters/Applications/4_DocketNos500s/Docket-No-512

The application materials contain the proposed antenna specifications.

Your request to speak at the Siting Council's DO 512 (Homeland Towers LLC/New Cingular-Brookfield) remote public comment session via Zoom conferencing at 6:30 p.m. on November 3, 2022 has been received.

Please see below for the Instructions for Public Access to the Remote Public Hearing. If you experience technical difficulties with Zoom the day of the hearing, you may send us written comments at your convenience.

Thank you for your interest in this very important matter.

Instructions for Public Access Docket No. 512 Remote Public Hearing

November 3, 2022

Evidentiary Session at 2 PM

Public Comment Session at 6:30 PM

PLEASE NOTE:

- Interested persons may join any session to listen, but **you must sign-up in advance to speak during the 6:30 p.m. public comment session**
 - Any person may be removed from the Zoom remote evidentiary session or public comment session at the discretion of the Council.
 - All participants are requested to mute sound notifications on their computer, smartphone or tablet. Telephones are often equipped with a “do not disturb” feature for the dial-in option.
- A. Evidentiary Session – 2 PM**
1. Attendees can join by clicking (or entering) the following link:
<https://us06web.zoom.us/j/89293902086?pwd=MHY0K0lpQXJaZEdEcFhpcitiQllvUT09> from a computer, smartphone, or tablet. **Meeting ID# 892 9390 2086 and Passcode: Kmczr9** No prior software download is required.
 2. For audio-only participation, attendees can join by dialing in at **1(929) 205-6099 (not toll free)** and then enter the **Meeting ID: 892 9390 2086 and Passcode: 475930** from a telephone.
 3. All microphones will be muted upon entry into the meeting and will be turned on in the order of party appearances and cross examination governed by the Hearing Program.
 4. **No public comments will be received during the 2:00 p.m. evidentiary session.**
- B. Public Comment Session – 6:30 PM**
1. Attendees can join by clicking (or entering) the following link:
<https://us06web.zoom.us/j/89293902086?pwd=MHY0K0lpQXJaZEdEcFhpcitiQllvUT09> from a computer, smartphone, or tablet. **Meeting ID: 892 9390 2086 and**
Passcode: Kmczr9 No prior software download is required.
 2. For audio-only participation, attendees can join by dialing in at **1(929) 205-6099 (not toll free)** and then enter the **Meeting ID: 892 9390 2086 and Passcode: 475930** from a telephone.
 3. **You must sign-up in advance to speak during the 6:30 p.m. public comment session.** Statements will be limited to 3 minutes.

- a. If you anticipate participating in the **6:30 p.m. public comment session by computer, smartphone or tablet**, please send an email to siting.council@ct.gov with your name, email address and mailing address by **November 2, 2022**.
 - b. If you anticipate participating in the **6:30 p.m. public comment session by telephone**, please leave a voicemail message at 860-827-2935 with your name, telephone number, and mailing address by **November 2, 2022**.
4. If the email and name of the person or the phone number and name of the person is not provided in writing to the Council in advance, they will not be admitted into the meeting.
 5. All microphones will be muted upon entry into the meeting and will be turned on in the order in which people are signed up to speak.

Public comments may also be submitted to the Council by email at siting.council@ct.gov or by regular mail. Such written comments will be given the same weight as if spoken during the remote public comment session.

Lisa A. Mathews
Office Assistant
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
Lisa.A.Mathews@ct.gov
(860) 827-2957

From: CT4RT <CT4RT@protonmail.com>
Sent: Friday, October 21, 2022 8:25 AM
To: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: Actual Antennas planned for Brookfield AT&T DOCKET NO. 512

Good morning, I would like to submit an affidavit in reference to Docket 512 but I can't locate the antenna specs proposed for that tower. I assume I can submit by today for the public hearing scheduled for Nov3. Also I would like too make public comments during the hearing and I know several other people from Brookfield would also like to make public comments. Please let me know how they can register.

Paska Ann
Co-Founder CT For Responsible Technology (c)
www.ct4rt.com
Sent with [Proton Mail](#) secure email.

Exhibit 2

From: Bachman, Melanie
Sent: Tuesday, November 15, 2022 4:24 PM
To: CT4RT <CT4RT@protonmail.com>; Mathews, Lisa A <Lisa.A.Mathews@ct.gov>
Subject: RE: Request for Clarification

Good afternoon, Paska.

Both the federal and state statutory references you seek are available from the federal and state websites, as well as from the Siting Council's website under "Resources" and the Siting Council's Administrative Notice List for Docket 512 for which you submitted both an oral and written limited appearance statement.

The section of the federal Telecommunications Act that prohibits state and local governments from regulating the construction of wireless facilities on the basis of health effects is 47 U.S.C. Section 332(c)(7)(B), entitled "Limitations."

The state statute that prohibits regulation on the basis of health effects is C.G.S. Section 22a-162.

Thank you. Have a nice evening.

Melanie

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
860-827-2951



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Docket No. 512
CT4RT Motion to Reopen
Page 13 of 29

From: CT4RT <CT4RT@protonmail.com>
Sent: Monday, November 14, 2022 10:59 AM
To: Mathews, Lisa A <Lisa.A.Mathews@ct.gov>; Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: Re: Request for Clarification

Good morning, not sure if you receive my initial request so I'm resubmitting. If you need a more formal or FOIA format, I will be happy to comply.

Paska Ann

----- Original Message -----

On Friday, November 4th, 2022 at 1:14 PM, CT4RT <CT4RT@protonmail.com> wrote:

Good afternoon, I'm requesting to know where in the Title 47 TCA is it explicitly stated that substantial health effects are not admissible in deciding on placement, modification, construction and operations of towers and wireless telecommunication facilities.

In addition what is if any theConnecticut Statute that would preclude a town from citing substantial health effects?

Thank you so much for your attention on this matter.

Paska Ann
Co-Founder CT For Responsible Technology (c)
www.ct4rt.com

Sent with [Proton Mail](#) secure email.

Exhibit 3

From: Bachman, Melanie
Sent: Friday, November 18, 2022 4:30 PM
To: CT4RT <CT4RT@protonmail.com>
Subject: RE: final date for evidence for Docket 512

Good afternoon.

The date by which the Council must render a final decision was extended to 2/3/23. The original final decision deadline date was 1/7/23.

The evidentiary record for this proceeding closed on 11/3/22.

However, the public comment record remains open until 12/3/22. Please feel free to submit written comments by 12/3/22.

Here is a link to the updated schedule: https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/1_MEDIA_DO500_600/DO512/ProceduralCorrespondence/DO512_scheduleV3_11162022.pdf

Thanks. Have a nice weekend, also.

Melanie

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
860-827-2951



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From: CT4RT <CT4RT@protonmail.com>
Sent: Friday, November 18, 2022 1:23 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: final date for evidence for Docket 512

Good afternoon, it appears the date for a decision has been moved to 2/3/2023, we were wondering what is the last date for evidence submission now based on that decision. Thank you and have a great weekend.

Paska Ann
Co-Founder CT For Responsible Technology (c)
www.ct4rt.com

Sent with [Proton Mail](#) secure email.

Exhibit 4

From: Bachman, Melanie <Melanie.Bachman@ct.gov>
Sent: Tuesday, January 17, 2023 12:31 PM
To: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: FW: Brookfield Additional Information Docket 512

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
860-827-2951



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From: CT4RT <CT4RT@protonmail.com>
Sent: Monday, January 16, 2023 3:45 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: Brookfield Additional Information Docket 512

Hi Melanie, hope you had a great holiday and happy New Year. Please accept my apology for not getting this to you sooner as I was recovering from a long illness.

Attached is additional analysis using Antenna scanning technology to determine service and access that I was requested to complete by the people of Brookfield. This supplements further the original analysis I provided to the council and to my public statement. I invoke my constitutional guaranteed rights to due process to provide additional testimony on docket 512.

The attached report shows no gap in service from 20 locations using the Wilson Pro scanner. The hill side and other topography will impact any amount of technology so by adding more it will not make it better - since solid hills and trees impact frequency distance. By adding more we are increasing pulsed modulated microwave radiation pollution levels which will be detrimental.

In addition, the substantial evidence of harmful effects as per the Telecommunications Act 47 U.S.C. Section 332(c)(7)(B)(iii) the people can deny any placement, modification, and construction when substantial evidence of harm as been provided and I believe we met that lawful threshold.

Lastly, if you are following the industry, their "guidance" is under attack and scrutiny by the International Commission on the Biological Effects of Electromagnetic Fields (<https://icbe-emf.org/activities>) thus validating our claims that the current guidelines are not relevant for today which also the DC Circuit Court in EHT et al vs FCC also supported thus making it most important for us in this state to stand together to halt

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deployment and take a precautionary stance. Harmful effects have been substantially provided to the council and if you need more evidence, please let me or Brookfield people know.

I ask respectfully that the council not ignore this controversy and demonstration of facts. Place a state wide moratorium and give the towns and cities time to develop a strong and protective zoning ordinance that protects people, animals and environment.

Please let me know if you have questions. Connecticut deserves the best in public protection.

Paska Ann
Co-Founder CT For Responsible Technology (c)

Exhibit 5

From: Bachman, Melanie <Melanie.Bachman@ct.gov>
Sent: Thursday, February 2, 2023 3:30 PM
To: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: FW: Docket No. 512 Comments P. Nayden

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
Office 860-827-2951
Cell 860-768-2548



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From: CT4RT <CT4RT@protonmail.com>
Sent: Thursday, February 2, 2023 3:14 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: RE: Docket No. 512 Comments P. Nayden

Melanie, you are right I did mistake the hearing process as being something of value but since it is quasi judicial, in what court in CT would decisions be heard for appeal? I am asking you specifically since you and those on the council are paid by tax payers funds to preform this job according to CGS 16-50g "...to assure the welfare and protection of the people of the state;"

To be honest I was shocked with all the controversy over this tower you and your group would approve while ignoring the will of the people and also the data provided which it seems either your group didn't know how to analyze the data or simply decided to ignore the data that according to the TCA if there is NO substantial gap in service there is no need which means the application should be declined.

So what is the appeals process and in what court?

Paska

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Thursday, January 19th, 2023 at 3:38 PM, Bachman, Melanie
<Melanie.Bachman@ct.gov> wrote:

Good afternoon, Paska.

Both your oral and written public comments, including the reports, have been shared with the Council members, even though the second set of comments was submitted over a month beyond the public comment deadline. Maybe you missed that part of my email below.

As previously explained, parties and intervenors to proceedings may submit exhibits and testimony that are required to be subject to cross examination by the other parties and intervenors in the proceeding and the Siting Council. You opted not to request intervenor status in this proceeding and instead opted to provide oral and written public comments that aren't subject to cross examination. Perhaps there is confusion between a legislative hearing and an administrative agency hearing? An administrative agency hearing is quasi-judicial.

Regarding the process in New York referenced below, there is no budget or fund allocation for parties and intervenors to a proceeding on a telecommunications facility application.

Also, the state standard for a final decision is the same as the federal standard for a final decision you pasted below. The draft findings of fact that were reviewed by the Siting Council today are based exclusively on the Docket 512 evidentiary record that includes, but is not limited to, exhibits and testimony provided under oath and subject to cross examination during the evidentiary hearing session held on November 3, 2022 . A draft final decision (in writing) will be reviewed at the next Siting Council meeting.

I hope this is helpful.

Thanks.

Melanie

Melanie A. Bachman, Esq.
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From: CT4RT <CT4RT@protonmail.com>
Sent: Thursday, January 19, 2023 2:26 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Cc: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: RE: Docket No. 512 Comments P. Nayden

Melanie, thank you for that explanation. I honestly thought my written report coupled with my statements would be shared.

I will in the future be an intervener for towers/antennas. And talking to other people such as from New York, they recently told me there is a budget allocated for interveners to access should we want 3rd party testing or expert witnesses. Is there a budget and process to request those funds for the great good of our communities.

I will be more than happy to answer any questions on the reports and the laws and cases documented in the first submission and the last. I can also invite a 3rd party specialist who is trained in antenna technology to answer the council's in-depth questions.

One thing I have not seen posted is 3rd party needs assessment survey . The document of findings reviewed today item #66. clearly states AT&T has 8 other facilities in the proximity so what makes them think 1 more will work. There is no proof adding a tower will fix their alleged gap and it must be noted according to law it must be substantial outside access - not inside Costco or BJ's whose buildings are built of iron and strong walls. They will place families and animals at risk due to the increase pollution emissions of microwave radiation:

they can't provide service but want a new tower – this is injustice if they are granted the tower placement by CT Siting

66. AT&T currently operates eight facilities within an approximate four-mile radius of the proposed site. None of these facilities provide reliable network services to the proposed service area (refer to Figure 4). (Applicants 1, Attachment 1, p. 8; Applicants 4, response 25)

The impact of heterodyning will be substantial at these distances further impacting the public health, public interest and environment. Heterodyning is not a concept it is fact when frequencies are close they harmonize and heterodyne to create a new additive frequency.

We have submitted substantial evidence but maybe it needs to properly submitted to you. Please advise on the submission of substantial evidence of harmful effects as provided in **47 U.S.C. Section 332(c)(7)(B)iii, entitled "Limitations.**

(iii) Any decision by a State or local government or instrumentality thereof to deny a request to place, construct, or modify personal wireless service facilities shall be in writing and supported by substantial evidence contained in a written record

Paska Ann
Co-Founder CT For Responsible Technology (c)
Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Thursday, January 19th, 2023 at 11:45 AM, Bachman, Melanie

<Melanie.Bachman@ct.gov> wrote:

Good morning, Paska.

Lisa forwarded your response to her email.

As indicated in the response letter Lisa sent to you yesterday, the Siting Council members will receive a copy of your additional comments on Docket 512 even though the public comment period expired on December 3, 2022 and the proposed final decision is on our meeting agenda this afternoon. The purpose of the public comment period deadline is to provide the Council members with a sufficient amount of time to review the public comments.

As described in the attached email from the day before the public hearing was held on Docket 512, you specifically opted to submit public comments rather than request intervenor status. Public comments are not evidence in any case because they are not submitted by a party or intervenor to the proceeding and they are not subject to cross examination by the parties, intervenors and the Siting Council. Public comments are not posted on our pending matters webpages. However, they are available in electronic and hard copy form upon request.

Thanks. Have a great day.

Melanie

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
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Cell 860-768-2548



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From: Mathews, Lisa A <Lisa.A.Mathews@ct.gov>
Sent: Wednesday, January 18, 2023 3:58 PM
To: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: FW: Docket No. 512 Comments P. Nayden

Lisa A. Mathews
Office Assistant
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
Lisa.A.Mathews@ct.gov
(860) 827-2957

From: CT4RT <CT4RT@protonmail.com>
Sent: Wednesday, January 18, 2023 3:55 PM
To: Mathews, Lisa A <Lisa.A.Mathews@ct.gov>
Subject: Re: Docket No. 512 Comments P. Nayden

Lisa, are you telling me that the report submitted will not be considered by the council? Also last I check the docket my original report was not loaded and that was sent the day of the hearing. Please advise.

Paska Ann
Co-Founder CT For Responsible Technology (c)
www.ct4rt.com

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Wednesday, January 18th, 2023 at 3:00 PM, Mathews, Lisa A
<Lisa.A.Mathews@ct.gov> wrote:
Please see the attached correspondence.

Lisa A. Mathews
Office Assistant
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
Lisa.A.Mathews@ct.gov
(860) 827-2957

Exhibit 6

From: CT4RT <CT4RT@protonmail.com>
Sent: Tuesday, February 7, 2023 5:31 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: RE: Docket No. 512 Comments P. Nayden

Melanie, thank you for the prompt reply.

If you and the others had read the report you would have noticed both reports were notarized affidavits. Under the law of evidence, a notarized document is considered self-authenticating. This means it may be submitted as evidence in a trial or hearing in this case without additional proof that it is what it appears to be. Therefore, a notarization allows the witness from having to be present, saving a great deal of time and money in the process. In particular that afternoon, for personal reasons I could not be available on zoom for that length of time not knowing when I would be called upon.

Since neither the first package nor the second was challenged or rebutted it stands as fact and truth in any court of law. My findings/report are evidence not standard public comment as you note. Also an administrative agency is unconstitutional and has zero authority to do anything outside the limited powers granted by the Constitutions to government officials which means you and the Siting Council people took oaths to the Constitutions, not to any administrative agency, and your first duty is to the protection of the rights of American people in your jurisdiction.

What is worse is that no one at the council actually cared enough to dig into the data to determine why the excessive power was being emitted at over 51% of the antennas not only from AT&T but all the other providers who are spewing dangerous levels of pollution onto the people of Brookfield and probably every other location since NO one is monitoring or assessing cumulative effects or the heterodyning impact of all the mixed and every growing higher levels of radio frequencies and their different wavelengths.

I am really confused because when I read about CT Siting's mission in CSG 16-50g, "...to assure the welfare and protection of the people of the state" it appears no one on the citing council is executing their job since you know the FCC has been challenged and remanded which has been documented to you and the council. The fact that substantial evidence of harmful effects were submitted and has been ignored by the council and the fact that NO ONE in the council has made arrangements to truly analyze the industry data, antenna actual ERP and interplay with the massive increase of antennas and radiation emission pollution to protect the people of Connecticut and those traveling through Connecticut.

My question is why not have scheduled an additional hearing in light of the community not approving this tower and the violations to their zoning by the council? There are many people in Brookfield that are being denied their due process to be heard on this mega tower. Do you need a list of names, do you need a petition? Clearly the town people who are aware of what is going on now have different reactions since NO ONE in Brookfield requires C-Band, 5G deployment that includes 9+to 36+ antennas in their community. C-Band and 5G have nothing to do with cellular service and that is fact based on industry documents and do not qualify under the TCA since the TCA only addresses Type 2 not type 1.

Paska Ann

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Monday, February 6th, 2023 at 9:38 AM, Bachman, Melanie
<Melanie.Bachman@ct.gov> wrote:

Good morning, Paska.

I hope you had a nice weekend.

Yes, the Siting Council members received copies of the reports you submitted as public comments in Docket 512. See attached. The Siting Council members also received copies of other written public comments submitted by other interested persons. You are welcome to come to our office to view the public comment file for this proceeding. Furthermore, the public comment session transcript that is posted on our website contains your statements and the statements of other interested persons that were provided during the evening public comment session on November 3, 2022.

As we discussed, had you opted to request intervenor status, appeared at the afternoon evidentiary hearing session, been put under oath and available for verification of the contents of the reports and for cross examination on these reports by the Applicants and the Siting Council during the evidentiary hearing session, the reports would have been evidence, or exhibits, for your case. For example, Applicants submitted responses to Siting Council interrogatories. The contents of the responses were verified by the Applicants' sworn witness, or author of the document, and subjected to cross examination by the Siting Council. Had you opted to request intervenor status, you would have had an opportunity to cross examine the Applicants on their exhibits during the evidentiary hearing session, too.

You opted to submit public comments. This is referred to as a limited appearance. Persons making public comments are not under oath and are not subject to cross examination. Thus, oral and written public comments, or limited appearance statements, are not evidence in the proceeding. They're comments.

If we required every member of the public seeking to comment on any proposed project to take an oath and subject themselves to cross examination, less people would comment. Although we have the capability to require interested persons to provide statements under oath and be subject to cross examination without becoming a party or intervenor by statute, such a requirement tends to limit rather than expand public participation in the quasi-judicial process. Hence, also by statute, there is party/intervenor status and limited appearance status (oral and written public comment). Interested persons opt for whatever level of participation is appropriate for them. We can't force any person to become a party or intervenor.

Our information guides to Siting Council procedures and types of participation in Siting Council proceedings are posted on our website. If you have any questions, please feel free to contact me.

Thanks. Have a great day.

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Melanie
Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
Office 860-827-2951
Cell 860-768-2548



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From: CT4RT <CT4RT@protonmail.com>
Sent: Sunday, February 5, 2023 2:36 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: RE: Docket No. 512 Comments P. Nayden

Melanie, please confirm that my two reports were never reviewed by you and the other members in approving the tower in Brookfield where we showed no gap in service and your decision even though you had the copies of the reports in your possession was not to have another hearing to further discuss or even rebut my findings. Again I didn't make up the numbers or model them, I took the readings at 20 locations especially in the areas that were alleged gaps by AT&T.

During the public comments, I stated very clearly and referenced the initial report since 3 minutes is not enough and you didn't clarify or provide any indication that the report was not admissible. I guess I will be reviewing your hearing guideline documents and ensure that going forward all people in CT become intervenors otherwise it is a waste of time. Lots of lessons learned here.

Paska Ann

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Friday, February 3rd, 2023 at 1:41 PM, Bachman, Melanie
<Melanie.Bachman@ct.gov> wrote:

Good afternoon, Paska.

I understand your disappointment. However, we discussed the difference between participating as a party/intervenor and providing public comments. I also forwarded you our Information Guide to Party and Intervenor Status and the Citizens Guide to Siting Council Procedures that are posted on our website.

Party/intervenor testimony and exhibits are subject to cross examination; public comments are not subject to cross examination. This is the quasi-judicial nature of the process. Below in our email exchange, there is reference to the standard that a decision must be in writing and based on a record of substantial evidence. In a judicial proceeding, evidence is subject to cross examination. In an administrative agency proceeding, evidence is subject to cross examination. If a report or statement is not subject to cross examination, it is not evidence that can be relied upon to render a decision. That would violate due process rights.

In response to your question, parties/intervenors have rights to appeal a decision; persons making public comments do not have rights to appeal a decision. This is called exhaustion of administrative remedies. Appeals from our decisions are taken to the Superior Court Administrative Appeals Division in New Britain.

Also, the Siting Council is not a General Fund agency. It is funded by fees and assessments levied upon the regulated industries similar to PURA and OCC.

If you have any further questions, please feel free to contact me at your convenience.

Thanks. Have a nice weekend.

Melanie

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From: CT4RT <CT4RT@protonmail.com>
Sent: Thursday, February 2, 2023 3:14 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: RE: Docket No. 512 Comments P. Nayden

Melanie, you are right I did mistake the hearing process as being something of value but since it is quasi judicial, in what court in CT would decisions be heard for appeal? I am asking you specifically since you and those on the council are paid by tax payers funds to preform this job according to CGS 16-50g "...to assure the welfare and protection of the people of the state;"

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So what is the appeals process and in what court?

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I hope this is helpful.

Thanks.

Melanie
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Sent: Thursday, January 19, 2023 2:26 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Cc: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: RE: Docket No. 512 Comments P. Nayden

Melanie, thank you for that explanation. I honestly thought my written report coupled with my statements would be shared.

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One thing I have not seen posted is 3rd party needs assessment survey . The document of findings reviewed today item #66. clearly states AT&T has 8 other facilities in the proximity so what makes them think 1 more will work. There is no proof adding a tower will fix their alleged gap and it must be noted according to law it must be substantial outside access - not inside Costco or BJ's whose buildings are built of iron and strong walls. They will place families and animals at risk due to the increase pollution emissions of microwave radiation:

they can't provide service but want a new tower – this is injustice if they are granted the tower placement by CT Siting

66. AT&T currently operates eight facilities within an approximate four-mile radius of the proposed site. None of these facilities provide reliable network services to the proposed service area (refer to Figure 4). (Applicants 1, Attachment 1, p. 8; Applicants 4, response 25)

The impact of heterodyning will be substantial at these distances further impacting the public health, public interest and environment. Heterodyning is not a concept it is fact when frequencies are close they harmonize and heterodyne to create a new additive frequency.

We have submitted substantial evidence but maybe it needs to properly submitted to you. Please advise on the submission of substantial evidence of harmful effects as provided in **47 U.S.C. Section 332(c)(7)(B)iii, entitled "Limitations."**

(iii) Any decision by a State or local government or instrumentality thereof to deny a request to place, construct, or modify personal wireless service facilities shall be in writing and supported by substantial evidence contained in a written record

Paska Ann
Co-Founder CT For Responsible Technology (c)
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Thanks. Have a great day.

Melanie
Melanie A. Bachman, Esq.
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Office 860-827-2951

Cell 860-768-2548



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From: Mathews, Lisa A <Lisa.A.Mathews@ct.gov>
Sent: Wednesday, January 18, 2023 3:58 PM
To: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: FW: Docket No. 512 Comments P. Nayden

Lisa A. Mathews
Office Assistant
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
Lisa.A.Mathews@ct.gov
(860) 827-2957

From: CT4RT <CT4RT@protonmail.com>
Sent: Wednesday, January 18, 2023 3:55 PM
To: Mathews, Lisa A <Lisa.A.Mathews@ct.gov>
Subject: Re: Docket No. 512 Comments P. Nayden

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Paska Ann
Co-Founder CT For Responsible Technology (c)
www.ct4rt.com
Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Wednesday, January 18th, 2023 at 3:00 PM, Mathews, Lisa A
<Lisa.A.Mathews@ct.gov> wrote:

Please see the attached correspondence.

Lisa A. Mathews
Office Assistant
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
Lisa.A.Mathews@ct.gov
(860) 827-2957