



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

October 13, 2022

Lucia Chiocchio, Esq.
Daniel Patrick, Esq.
Cuddy & Feder, LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
lchiocchio@cuddyfeder.com
dpatrick@cuddyfeder.com

RE: **DOCKET NO. 512** - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 60 Vale Road, Brookfield, Connecticut.

Dear Attorneys Chiocchio and Patrick:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than October 27, 2022.

Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the October 27, 2022 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman
Executive Director

Attachment: Council RF Power Density Memo dated September 23, 2022

c: Service List dated August 10, 2022

Docket No. 512
Homeland Towers, LLC and New Cingular Wireless PCS, LLC
Pre-Hearing Interrogatories
October 13, 2022

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?
2. Referencing Application Attachment 11, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Describe any additional attempts to contact those property owners.
3. Pursuant to CGS §16-50o, please submit a copy of the unredacted lease for the proposed site.
4. Referencing Application p. 22, how is the construction cost of the facility recovered for both Homeland Towers, LLC (Homeland) and New Cingular Wireless PCS, LLC (AT&T)?
5. Referencing Application p. 22, how many residents attended the June 15, 2022, public information meeting? What concerns were raised by residents and town officials and how were these concerns addressed?

Site Search

6. Referencing Application Attachment 2 – Site Search Summary, when did Homeland and AT&T commence a site search for the proposed service area? Identify the approximate center and radius of the site search area.
7. Referencing Application Attachment 2 – Site Search Summary, please provide the distances from the sites investigated from the proposed site.

Site/Tower

8. What is the distance from the proposed tower center to the nearest railroad track?
9. Would any blasting be required to develop the site?
10. Would the tower be designed for EIA/TIA-222 structural standards version G, H, or both? Would the tower be designed for the 2022 Connecticut State Building Code (effective October 1, 2022)?
11. What is the maximum wind speed tolerance for antennas on the proposed monopole?
12. Referencing Application Attachment F, Sheet CP-1, what is the structural design standard applicable to the proposed antenna mount?
13. Would the tower and foundation be designed to accommodate an increase in tower height?

14. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
15. 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.
16. Have any other wireless carriers (other than AT&T) expressed an interest in co-locating on the proposed facility to date?
17. Does the proposed site contain any Farmland Soils? If so, what acreage of farmland soils would the facility and associated equipment be located on?

AT&T Coverage/Capacity

18. Are all frequencies used to transmit voice and data?
19. Would the proposed antennas be capable of offering 5G services? If yes, at what frequencies?
20. Referencing Application, Attachment 1 – Radio Frequency Analysis Report (RF Report), pages 10 and 11, provide existing and proposed coverage plots for any proposed frequencies other than 700 MHz.
21. Can AT&T's coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect coverage needs and/or capacity relief within the proposed service area.
22. Referencing page 12 of the Application, approximately how many small cells would be needed to replace the macro tower? And how much would that cost?
23. Referencing Application, Attachment 1 – Radio Frequency Analysis Report (RF Report), page 2, for proposed frequencies other than 700 MHz and 1900 MHz LTE, what is the signal strength for which AT&T designs its system? For in-vehicle coverage? For in-building coverage?
24. What are the existing signal strengths for 700 MHz and other proposed frequency bands within the area AT&T is seeking to cover from this site?
25. Referencing Application, Attachment 1 – RF Report, page 8, would the proposed facility interact with all 8 of the neighboring sites depicted? Explain.
26. Does AT&T have any statistics/indicators of substandard service in this area? If so, what are they and what do they indicate?
27. Provide existing coverage gaps in miles for the proposed frequencies for the nearby portion of the Route 7, Gray's Bridge Road and the surrounding local roads, the overall existing coverage footprints in square miles and the proposed coverage mileage and square miles as represented in the example below:

Street Name	700 MHz Coverage Gap	1900 MHz Coverage Gap	2100 MHz Coverage Gap
Route 2	2.5 miles	5 miles	4.5 miles
Route 32	1.0 mile	3 miles	2 miles
Route 87	0.5 mile	2.5 miles	1 mile
Interstate 395	2.5 miles	2.5 miles	2.5 miles
State Road Total	6.5 miles	13 miles	10 miles

Overall Coverage Footprint	49 square miles	6 square miles	7.5 square miles
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28. What is AT&T's existing and predicted coverage footprint from the proposed site (in square miles), at each frequency that would be installed?
29. Would AT&T's proposed co-location be needed for coverage, capacity, or both? If the project is needed for capacity, please respond to the following:
- What nearby AT&T wireless facilities (or sectors) are nearing capacity limits, and at what frequencies?
 - Please include a projected exhaustion date for each of these sectors.
 - Would the deployment of the proposed facility be sufficient to address AT&T's capacity concerns or would an additional facility be required in the near term to off-load traffic?

Backup Power

30. Would a battery backup (if applicable) be used to provide uninterrupted power? How long could the battery backup alone supply power to the facility in the event that the generator fails to start?
31. Referencing Application, Attachment 5, Environmental Assessment Statement, the emergency backup generator would be exercised once per week. For approximately how long would the generator run when it is exercised? Would this be scheduled for daytime hours?

Public Safety

32. Would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?
33. Would the deployment of FirstNet at this facility require additional equipment? Explain.
34. Referencing Attachment 7 of the Application, provide a cumulative far-field power density analysis per the Council's memo dated September 23, 2022. (See attached.) Include the Town's public safety antennas in this analysis if such data is available.

Environment

35. Referencing Application Attachment 8 - Visibility Assessment, estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed tower.
36. What, if any, stealth tower design options would be feasible to employ at this site? Please provide costs related to each stealth tower design.

37. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. site access and interior access road(s);
8. tower location/compound;
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.



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VIA ELECTRONIC MAIL

DATE: September 23, 2022

TO: Telecommunications Industry Representatives

FROM: Melanie A. Bachman, Executive Director *MAPB*

RE: Exempt Modification Requests, Tower Share Requests, Eligible Facility Requests and Petitions for Modifications to Existing Facilities – **Requirement for a cumulative far-field Radio Frequency Power Density Analysis**

Effective immediately, the Connecticut Siting Council (Council) requires all new requests for exempt modification, tower share requests and Eligible Facility Requests, and all new petitions for modifications to existing telecommunications facilities include a cumulative far-field Radio Frequency Power Density Analysis to take into account the antenna patterns and include the 6-foot height above ground level consideration to account for a person's height as outlined in the Federal Communications Commission (FCC) OET Bulletin 65.

A link to the FCC OET Bulletin is as follows:

https://transition.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet65/oet65.pdf

If there are any questions, please call our office at 860-827-2935 or e-mail us at siting.council@ct.gov.

Thank you for your attention to this matter.