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April 27, 2023

*Via Hand Delivery*

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

Re: **Docket No. 513 – Application of Cellco Partnership D/B/A Verizon Wireless for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility Off Mason Hill Road, Litchfield, Connecticut**

Dear Attorney Bachman:

In accordance to the Siting Council's directive, enclosed please find the following items filed in advance of the May 4, 2023 evidentiary and public hearing in Docket No. 513.

1. A Sign Posting Affidavit verifying that the public notice sign was posted of the subject property on April 17, 2023.
2. The Applicant's Prehearing Submission identifying its witnesses and exhibits.
3. The Applicant's Submission of Evidence and Information for a Proposed Alternative Tower Location on the subject parcel.

If you have any questions or need any additional information regarding these matters, please contact me.

Sincerely,



Kenneth C. Baldwin

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
 :  
 :  
 APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 513  
 D/B/A VERIZON WIRELESS FOR A :  
 CERTIFICATE OF ENVIRONMENTAL :  
 COMPATIBILITY AND PUBLIC NEED FOR :  
 THE CONSTRUCTION, MAINTENANCE :  
 AND OPERATION OF A WIRELESS :  
 TELECOMMUNICATIONS FACILITY OFF :  
 MASON HILL ROAD, LITCHFIELD, :  
 CONNECTICUT : APRIL 27, 2023

PRE-HEARING SUBMISSION OF  
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless (“Cellco”), an intervenor in this proceeding, hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Shiva Gadasu, Radio Frequency Engineer, Verizon Wireless
2. Timothy Parks - Real Estate/Regulatory Specialist, Verizon Wireless
3. Carlo F. Centore, P.E., Principal, Centek Engineering, Inc.
4. Brian Gaudet, Project Manager, All-Points Technology Corp. P.C.
5. Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp. P.C.

B. Exhibits to be offered

Cellco intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco Partnership d/b/a Verizon Wireless dated February 28, 2023.
2. Bulk file exhibits including:
  - a. Cellco's "Technical Report" dated October 25, 2023, filed with the Town of Litchfield;
  - b. Town of Litchfield Zoning Regulations;
  - c. Town of Litchfield Inland Wetlands and Watercourses Regulations; and
  - d. Town of Litchfield Plan of Conservation & Development.
3. Cellco's Affidavit of Publication dated March 3, 2023.
4. Cellco's Responses to Pre-Hearing Interrogatories (Set One) from the Council dated April 10, 2023.
5. Sign Posting Affidavit filed on April 27, 2023.
6. Cellco's Submission of Evidence and Information – Proposed Alternate Tower Location.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

C. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, the Applicant's attorney, Kenneth C. Baldwin, Esq., will make a brief presentation describing the site features and proposed site improvements. Attorney Baldwin will refer to Site Plan Sheets included in

Attachment 1 of the Docket No. 513 Application. Electronic copies of Plan Sheets are attached to this filing.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS

By: 

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