

Melanie A. Bachman, Esq.  
Executive Director/Staff Attorney  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051  
Re: MCM Holdings, LLC  
Proposed Wireless Telecommunications Tower Facility  
288 Simpaug Turnpike (Parcel 12-29), Redding, Connecticut  
Docket 517  
Intervenor Dottie DeLuca Interrogatories  
Pre-Hearing Interrogatories to Cellco Partnership d/b/a Verizon Wireless  
January 8, 2024

1. Upon use of a Wilson Pro Cellular network scanner at the interior of my building, at 4 Long Ridge Rd Redding CT, I was able to confirm that the scanner shows significant coverage and no lack there of as claimed by Cellco Partnership. See exhibit 1-5 below.  
The scanner pulled up 8 antenna's showing coverage. The majority of the 8 antenna's were Verizons. It would most likely pull in even more antennas outside. So with this factual proof that there is no lack of coverage as claimed by Cellco how can Cellco claim there is a lack of coverage?
2. Can Cellco provide actual documented proof of a lack of coverage for the past year 2023?  
The coverage maps in the application are not current which is not factual or up to date so should be thrown out. Can you provide actual CW Drive Test results to prove no coverage?
3. Why does Verizon's own current coverage map for the area on their own website show no lack of coverage?
4. What specific reason was the West Redding Firehouse not a suitable location for the proposed cell tower? The Fire house did not deny the use of their land. Instead they were told the Boy Scout Camp was more viable. Please explain in specific detailed terms why the Boy Scout Camp was more viable? Is it because a lease was already signed?
5. Please explain in detail the Term RF Rejected. What exactly constituents RF rejected?
6. If the monopole is to be 150' tall and the trees are only 85' tall then how is the tree cover to "limit overall visibility" as stated in the application? The monopole will still be 65' above the trees therefore not limiting overall visibility.
7. Can you guarantee that a tower will improve service to the area in West Redding once it is erected?  
If so please show actual data here.

8. Please provide in detail the exact pdf model and make specifications and speed for each and every antenna proposed. Please provide the amount of power per transmitter and the direction of the transmitting beam?

9. Why isn't Cellco providing any proof of insurance for this project? Is it because no one will insure it? Not even Lloyds of London?

10. How many of Cellco's applications have been denied by the siting council in the past 5 years?

And how much income in application fees has the Siting Council been paid by Cellco in the past 5 years?

11. Since The Boy Scouts of America will be profiting from such cell tower are they required to pay local or state taxes on that income?

12. Will Cellco provide a sound assessment measurement before or after installation of all equipment? Will there be a third party to secure compliance with the FCC?

13. What is the source of funding from the State for H.R 3557 the Federal American Broadband Bill/Act? Are local taxpayer dollars paying for this cell tower?

14. Section 2 of the application site summary states: "both MCM and Verizon seek to avoid the unnecessary proliferation of towers and to reduce potential adverse environmental effects of a needed facility. Since they do admit there can be adverse affects, how has Cellco avoided the unnecessary proliferation when they are trying to force an unnecessary tower in a children's camp site?"

15. How is the need for this cell tower greater than the needs of our taxpaying community and our sacred environment? The 10<sup>th</sup> amendment constitutes our right to protect our land and health so is this not a violation of the 10<sup>th</sup> amendment? Also the second circuit states we have such rights so is this cell tower in violation of the second circuit court? Most importantly the Telecommunications ACT of 1996 has not updated its safety guidelines so isn't this in violation of our 10<sup>th</sup> amendment rights again? And finally since 5G is NOT included in the TCA of 1996 then doesn't this tower violate our 10<sup>th</sup> amendment rights?

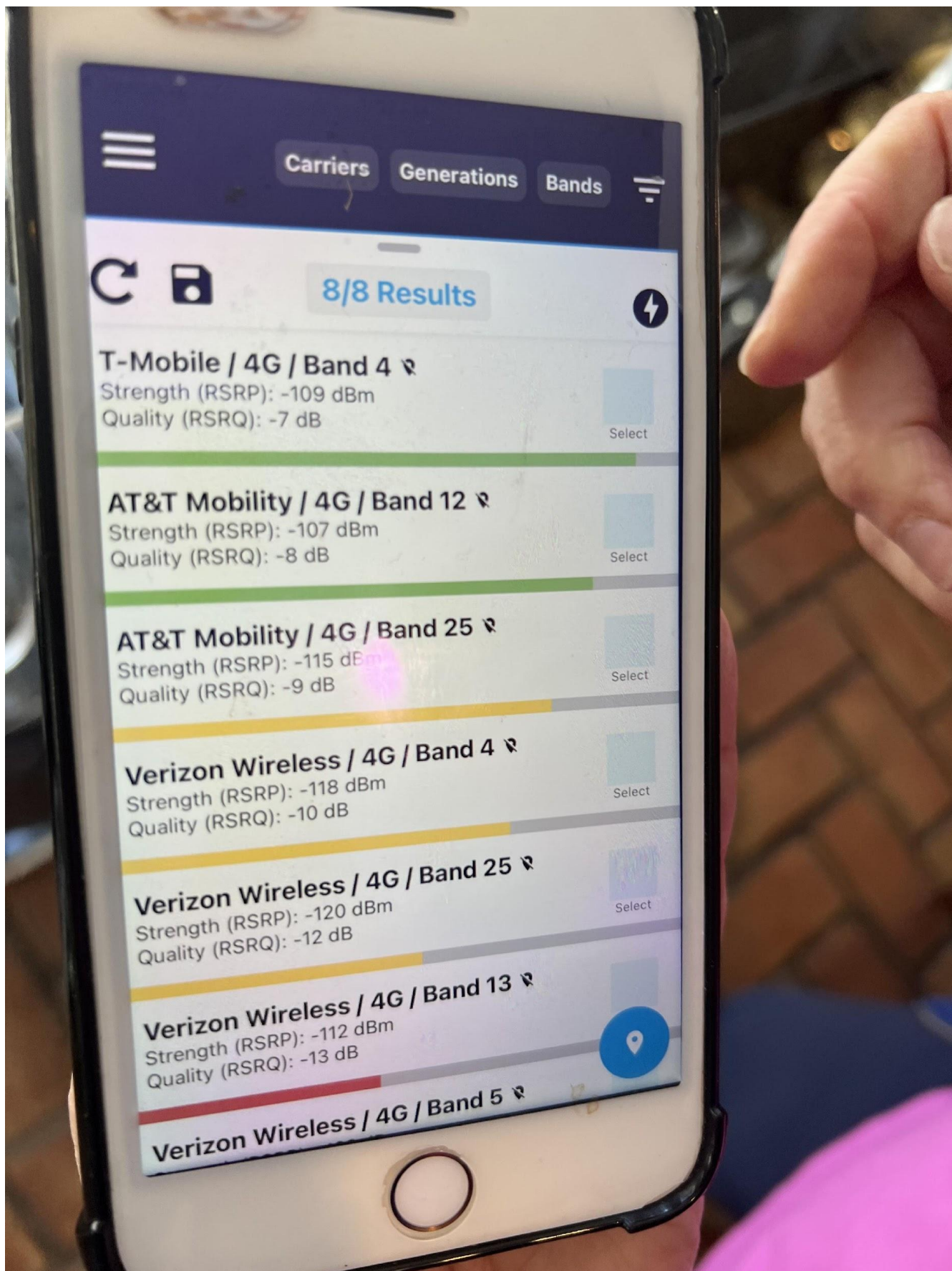


Exhibit 1

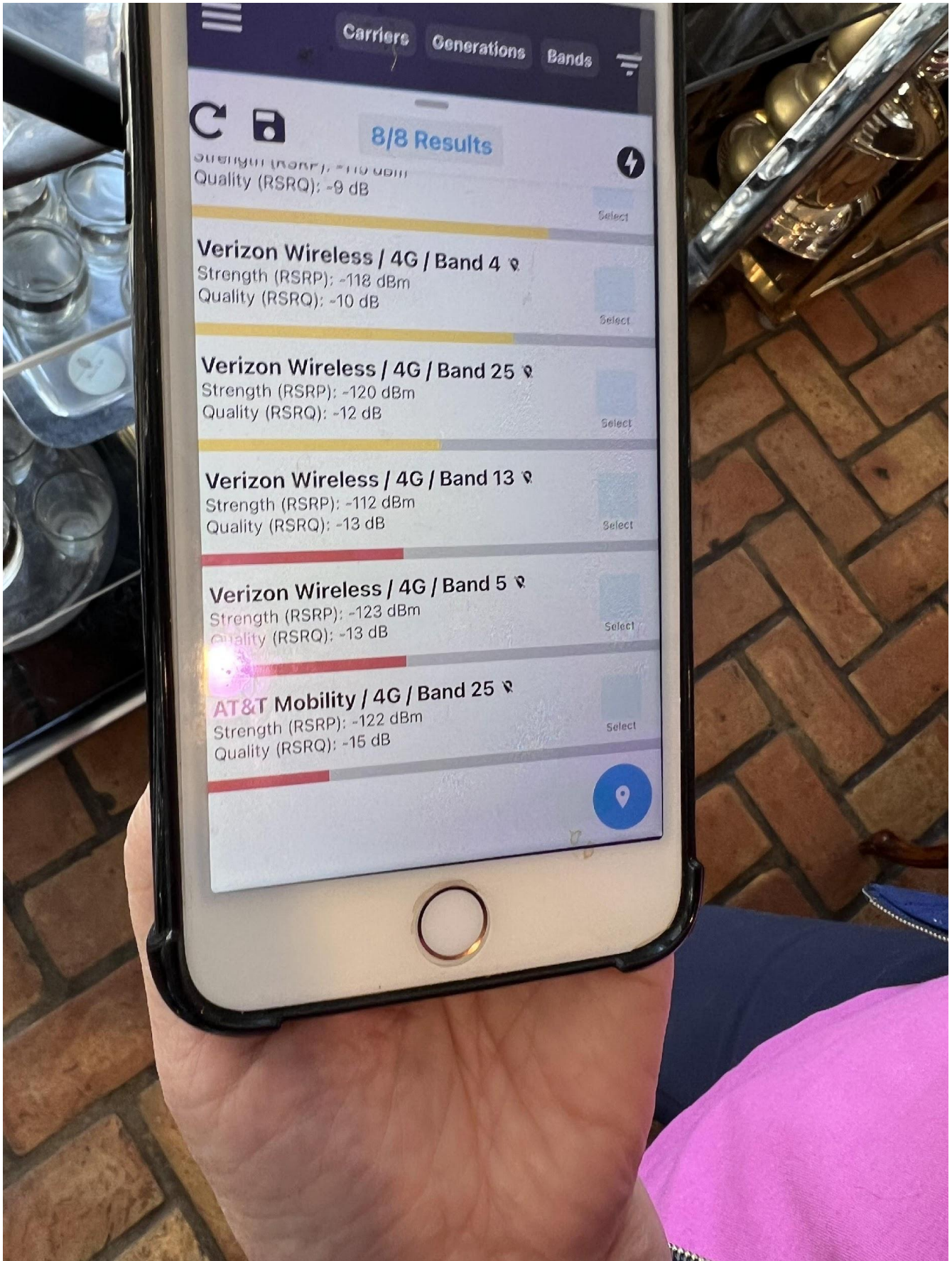


Exhibit 2.



Exhibit 3

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