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Re: MCM Holdings, LLC  
Proposed Wireless Telecommunications Tower Facility  
288 Simpaug Turnpike (Parcel 12-29), Redding, Connecticut  
Docket 517

Intervenor Suzanne Fogle Interrogatories:

Pre-Hearing Interrogatories to Celco Partnership d/b/a Verizon Wireless  
November 7, 2023

1. Has MCM shown a significant gap in cell coverage in the Town of Redding? Is there any documented instance in anything MCM has submitted to the town of Redding residents suffering from poor cell reception/performance?
2. Does MCM's application include a detailed alternative-site analysis documenting all possible locations it had considered and evaluated? Has MCM shown that there's no feasible alternative to the Hoyt campground? If so, how and where is this documented?
3. Has the town council secured access to the un-redacted lease agreement between MCM and The Boy Scouts of America? Will that be made available to the public?
4. MCM says "the tower and foundation are not currently designed to accommodate any future height increase or extension," as per Docket #517. Could the tower, in the future, be modified to accommodate a height increase? If so, would a light then be required for the top of the tower, which would further increase the thread to migrating birds?
5. Was West Redding FD included in your site search? What evidence do you have that it was?
6. Would the greatest number of people benefiting from the installment of the cell tower at Hoyt be residents of Redding? Or would a greater number of people benefiting live in Bethel and/or Danbury?
7. How close will the proposed tower be to the nearest existing tower? What is the distance the Town or Redding or the State of Connecticut requires?
8. In the event you are granted approval for construction, will you be applying for a variance from the zoning board of appeals? How many variances will you be applying for?
9. How close will the tower be to the nearest residential structure? What is the distance required by the town?