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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 Cellco Partnership d/b/a Verizon Wireless
January 8, 2024

1. Please provide the estimated **number of people** in Redding who will benefit from the cell tower being located at Hoyt Boy Scout Camp? Excluding people not within the gap area determined, e.g. 60 people.

Please provide the estimated **number of people** in Bethel and in Danbury who will benefit?

2. Verizon is required to demonstrate a “good faith effort” to show why other cell towers and sites cannot be used. Do you think that the two or three word descriptions, and sometimes no description shown in the Site Search Summary in Attachment 2, satisfy the requirements of a “good faith effort”? (Two sites were “outside search area,” begging the question of why you went there at all.)

3. Do you think that the signing of the lease between MCM and the Boy Scouts “prior to the commencement of Cellco’s site search” could explain the apparent lack of enthusiasm for a more expansive “good faith effort” site search that might have included Bethel or Danbury?