STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF MCM HOLDINGS, LLC : DOCKET NO. 517

FOR A CERTIFICATE OF

ENVIRONMENTAL COMPATIBILITY :

AND PUBLIC NEED FOR THE :

CONSTRUCTION, MAINTENANCE AND :

OPERATION OF A TELE- :

COMMUNICATIONS FACILITY

LOCATED AT THE BOY SCOUTS OF

AMERICA CAMP HOYT, 288 SIMPAUG

TURNPIKE, REDDING, CONNECTICUT : AUGUST 15, 2023

PETITION TO INTERVENE

Pursuant to Connecticut General Statutes ("C.G.S.") Section 16-50n and Regulations of Connecticut State Agencies ("R.C.S.A.") Section 16-50j-15, Cellco Partnership d/b/a Verizon Wireless ("Cellco") hereby requests permission of the Siting Council ("Council") to participate, as an intervenor, in the Docket No. 517 proceeding.

As the Council is aware, Cellco is a licensed provider of wireless services throughout Connecticut. The proposed telecommunications facility described in the Docket No. 517 application would fit neatly into Cellco's network design for southwest Connecticut and provide Cellco with much needed wireless service in the northwest Redding.

Cellco's involvement in the Docket No. 517 proceeding would aid the Council in evaluating additional need considerations as set forth in C.G.S. § 16-50g. Cellco's expertise and experience in designing, constructing, operating and maintaining a wireless telecommunications system in the State of Connecticut in accordance with the rules and regulations of the Council

and the Federal Communications Commission, may be of benefit to the Council in resolving issues presented in Docket No. 517, including the evaluation and consideration of alternative tower locations. Cellco has been admitted as an intervenor in prior Siting Council dockets. Cellco proposes to participate in the Docket No. 517 proceeding and hearing, by cross-examining the Applicant's witnesses, offering oral and written testimony of its own witnesses, evidence and the filing of pre-hearing interrogatories.

For the above-stated reasons, Cellco seeks permission to participate in this docket as an intervenor.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

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Kenneth C. Baldwin, Esq. Emily C. Deans, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200

Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of August 2023, a copy of the foregoing was sent, via electronic mail, to:

Lucia Chiocchio, Esq. Cuddy & Feder LLP 445 Hamilton Avenue, 14th Floor White Plains, NY 10601 LChiocchio@cuddyfeder.com

Kenneth C. Baldwin

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