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January 16, 2024

***Via Hand Delivery and Electronic Mail***

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

**Re: Docket No. 517 – MCM Holdings, LLC Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at the Boy Scouts of America Camp Hoyt, 288 Simpaug Turnpike (Parcel No. 12-29), Redding, Connecticut**

**Responses to Interrogatories from Intervenors, Tim Keyes (Set One), Dottie DeLuca (Set Two), JoAnn Villamizar (Set Two) and Susan Fogle (Set Two)**

**Submission of a Supplemental Pre-hearing Submission of Cellco Partnership d/b/a Verizon Wireless**

Dear Attorney Bachman:

Enclosed please find the original and fifteen (15) copies of Cellco's responses to interrogatories from the Intervenors, Tim Keyes, Dottie DeLuca, JoAnn Villamizar and Susan Fogle. Electronic copies of these responses were also sent to the Council today.

Also attached, is a Supplemental Pre-hearing Submission of Cellco Partnership d/b/a Verizon Wireless listing the additional exhibits that Cellco intends to have admitted at the continuation of the evidentiary hearing on January 23, 2024.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

Enclosure

Copy to:

Parties and Intervenors on Record

28642380-v1

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
 :  
 :  
 MCM HOLDINGS, LLC APPLICATION FOR : DOCKET NO. 517  
 A CERTIFICATE OF ENVIRONMENTAL :  
 COMPATIBILITY AND PUBLIC NEED FOR :  
 THE CONSTRUCTION, MAINTENANCE :  
 AND OPERATION OF A :  
 TELECOMMUNICATIONS FACILITY :  
 LOCATED AT THE BOY SCOUTS OF :  
 AMERICA CAMP HOYT, 288 SIMPAUG :  
 TURNPIKE (PARCEL NO. 12-29), :  
 REDDING, CONNECTICUT : JANUARY 16, 2024

SUPPLEMENTAL 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 supplemental list of 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. Elizabeth Glidden, Real Estate/Regulatory Specialist, Verizon Wireless

B. Exhibits to be offered

Cellco intends to offer the following Exhibits:

1. Cellco’s Responses to Pre-Hearing Interrogatories (Set One) from the Council dated November 1, 2023.
2. Cellco’s Responses to Pre-Hearing Interrogatories from Intervenor Dottie DeLuca (Set One) dated November 20, 2023.
3. Cellco’s Responses to Pre-Hearing Interrogatories from Intervenor Suzanne Fogle (Set One) dated November 20, 2023.

4. Cellco's Responses to Pre-Hearing Interrogatories from Intervenor JoAnn Villamizar (Set One) dated November 20, 2023.
5. Cellco's Responses to Pre-Hearing Interrogatories from Intervenor Dino Trevisani (Set One) dated November 20, 2023.

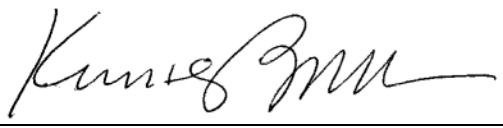
Supplemental Exhibits

6. **Cellco's Responses to Pre-Hearing Interrogatories from Intervenor Dottie DeLuca (Set Two) dated January 16, 2024.**
7. **Cellco's Responses to Pre-Hearing Interrogatories from Intervenor Suzanne Fogle (Set Two) dated January 16, 2024.**
8. **Cellco's Responses to Pre-Hearing Interrogatories from Intervenor JoAnn Villamizar (Set Two) dated January 16, 2024.**
9. **Cellco's Responses to Pre-Hearing Interrogatories from Intervenor Tim Keyes (Set One) dated January 16, 2024.**

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.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS

By: 

Kenneth C. Baldwin, Esq.  
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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 16<sup>th</sup> day of January 2024, a copy of the foregoing was sent,  
via electronic mail, to:

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Kenneth C. Baldwin