

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
MCM HOLDINGS, LLC APPLICATION FOR A : DOCKET NO. 517
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

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
INTERROGATORIES FROM INTERVENOR DOTTIE DELUCA (SET TWO)

On January 9, 2024, the Intervenor, Dottie DeLuca issued Interrogatories (Set Two) to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Docket No. 517. Below are Cellco’s responses.

Question No. 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 by 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?

Response

Cellco cannot speak to the proper use or accuracy of the network scanner referenced. That said, the property at 4 Long Ridge Road in Redding is adjacent to Photo Location 22 in the

APT Visual Assessment. As shown on Attachment A of Cellco's January 16, 2024, responses to Tim Keyes, and the Existing 700 MHz wireless service plot in the MCM Application, shows that Cellco does currently provide some wireless service at this location today (Signal Strength \geq Neg 95 dBm RSRP). This might explain the readings referenced in the question. This information does not address however, the overwhelming need for wireless service to the north and east of 4 Long Ridge Road, particularly along State Route 53. The second plot in Attachment 1 of the MCM Application shows existing and proposed 700 MHz wireless service after the Redding North Facility is activated. The coverage gaps shown throughout northwest Redding and southern portions of Danbury and Bethel shown on the "Existing 700 MHz" plot are eliminated, including the substantial gaps in service along Route 53, thereby satisfying Cellco's wireless service objectives in the area.

Question No. 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?

Response

The coverage maps provided in the MCM Application accurately depict current wireless service conditions in northwest Redding. Cellco did not perform a drive test from the proposed cell site at the Hoyt Boy Scout Camp.

Question No. 3

Why does Verizon's own current coverage map for the area on their website show no lack of coverage?

Response

The coverage maps provided in the Docket No. 517 Application accurately depict current wireless service conditions in northwest Redding in the operating frequencies that it intends to deploy at this location.

Question No. 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?

Response

See Cellco's response to Council Interrogatory Q.3.

Question No. 5

Please explain in detail the Term RF Rejected. What exactly constitutes RF rejected?

Response

Please see Cellco response to your Set One Interrogatory Q.5, dated November 20, 2023.

Question No. 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.

Response

Cellco did not perform the visual assessment and cannot speak on issues of visibility.

Question No. 7

Can you guarantee that a tower will improve service to the area in West Redding once it

is erected? If so, please show data here.

Response

Please see Cellco's response to your Set One Interrogatory Q.11 dated November 20, 2023.

Question No. 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?

Response

Please see Cellco response to your Set One Interrogatory Q.12 dated November 20, 2023.

Question No. 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?

Response

The Council does not require MCM, the Applicant or Cellco, the intervenor, to submit "proof of insurance" for the proposed facility. Cellco, as a matter of good business practice maintains insurance that would cover its cell site locations, across the nation.

Question No. 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?

Response

Objection as to relevance.

Question No. 11

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

Response

Cellco cannot speak to the Boy Scout's local and/or state tax obligations.

Question No. 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?

Response

Cellco is confident that its equipment, located no closer than 235 feet from the nearest property boundary, will comply with the State and/or local noise standards. It is important to note that the closest adjacent parcel to the south is owned by the New Pond Foundation and is not used for residential purposes. That said, if required by the Council in its approval of the Application, Cellco could provide a post-installation analysis to confirm compliance with the appropriate noise standards.

Question No. 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?

Response

Objection as to relevance. Notwithstanding this objection, taxpayers are not paying Cellco's shared use of the proposed Redding North tower.

Question No. 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 effects, how has Cellco avoided the unnecessary proliferation when they are trying to force an unnecessary tower in a children's camp site?

Response

As discussed at length in its response to Tim Keyes Interrogatories Q.4, Cellco currently maintains nine (9) existing cell sites in Redding and the surrounding communities. As depicted on the coverage maps and discussed at length in the evidentiary record for this Docket, Cellco cannot satisfy its wireless service objectives in northwest Redding from any of these existing sites. The coverage maps provided in the MCM Application illustrate this point very clearly.

Question No. 15

How is the need for this cell tower greater than the needs of our taxpaying community and our sacred environment? The 10th amendment constitutes our right to protect our land and health so is this not a violation of the 10th 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 10th amendment rights again? And finally, since 5G is NOT included in the TCA of 1996 then doesn't this tower violate our 10th amendment rights?

Response

The Council's job is to balance the need for the proposed facility against the environmental effects of the proposed facility. Cellco objects to the remaining questions presented as they call for legal conclusions and are not proper questions to ask Cellco's witnesses.

CERTIFICATE OF SERVICE

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

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