

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 SUZANNE FOGLE (SET TWO)

On January 8, 2024, the Intervenor, Suzanne Fogle 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

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 Danbury who will benefit?

Response

Cellco objects to the question as it seeks the disclosure of confidential customer information and data. That said, it is important to remember that wireless service in any area provides communications services to customers living, working, playing in, or traveling through the coverage area of a particular cell site. It also provides vital service to emergency service providers and those requiring emergency assistance in that same coverage area. A wireless

facility in Redding cannot and should not be limited to provide wireless service only in the Town of Redding. It is important to remember that there are cell sites in the surrounding Towns of Bethel, Danbury and Ridgefield that also provide wireless service into the Town of Redding.

Question No. 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.)

Response

Cellco’s review of alternative sites in northwest Redding is discussed in the Application and in numerous responses to interrogatories from the Council (Q.1 and Q.2); Dottie DeLuca (Q.2 and Q.5) Suzanne Fogel (Q.2 and Q5) and JoAnn Villamizar (Q.1, Q.2, Q.3 and Q.6). Yes, Cellco believes that, in cooperation with MCM, it has made a good faith effort to review and consider alternative tower locations.

Question No. 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?

Response

See Cellco’s response to Q.2 above.

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:

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

Virginia King
MCM Holdings, LLC
40 Woodland Street
Hartford, CT 06105
vking@mcmgmt.com

Dorothy DeLuca
4 Long Ridge Road
Redding, CT 06896
info@fleurdelisct.com

Suzanne Fogle
44 Granite Ridge Road
Redding, CT 06896
sfged444@gmail.com

JoAnn Villamizar
235 Simpaug Turnpike
Redding, CT 06896
jlvilla56@aol.com

Danielle Caldwell
10 Fire Hill Lane
Redding, CT 06896
dcaldwell29@gmail.com

Meredith Miller
256 Umpawaug Road
Redding, CT 06896
metedithfordmiller@aol.com

Tim K. Keyes
16 Topledge Road
Redding, CT 06896
tajkeyes@optonline.net

Michael Ungerer
130 Topstone Road
Redding, CT 06896
SayNoToHoytCellTower@gmail.com

CLJ Lancaster
132 Topstone Road
Redding, CT 06896
clj@lancaster.org

Ann Taylor
Executive Director
New Pond Farm Education Center
101 Marchant Road
West Redding, CT 06896
ann@newpondfarm.org

Dino Trevisani
Marchant Farm, LLC
12 Marchant Road
Redding, CT 06896
marchantfarm@gmail.com



Kenneth C. Baldwin