

KENNETH C. BALDWIN

280 Trumbull Street
Hartford, CT 06103-3597
Main (860) 275-8200
Fax (860) 275-8299
kbaldwin@rc.com
Direct (860) 275-8345

Also admitted in Massachusetts
and New York

November 1, 2023

Via Electronic Mail and Federal Express

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**

Reponses to Council Interrogatories (Set One)

Dear Attorney Bachman:

Enclosed please find the original and fifteen (15) copies of Cellco's Responses to Council Interrogatories (Set One) in Docket No. 517. Electronic copies of these responses have also been filed with the Council earlier today.

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

Sincerely,



Kenneth C. Baldwin

Enclosure

28140157-v1

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 : NOVEMBER 1, 2023

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES

On October 19, 2023, the Connecticut Siting Council (“Council”) issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Docket No. 517. Below are Cellco’s responses.

Proposed Site

Question No. 1

Referring to Application p. 13, when did Cellco commence a site search for the proposed service area? Identify the approximate center and radius of Cellco’s site search area.

Response

According to Site Search records, Cellco’s original site search for a Redding North Facility commenced in Q1 of 2016. The approximate center of Cellco’s search ring was the intersection of Simpaug Turnpike and Long Ridge Road approximately one-half mile east of the proposed tower site. The search ring had a radius of approximately one mile.

Question No. 2

Besides the four land sites listed in Application Attachment 2 what other alternative

locations did Cellco examine? Identify the alternative locations and the reasons for their rejection.

Response

Cellco considered only two alternative locations for a tower site, (1) the West Redding Fire Station at 306 Umpawaug Road (Q1 2016); and (2) the proposed MCM tower site at 3 Marchant Road (288 Simpaug Turnpike), both of which are included in the MCM Site Search Summary. The West Redding Fire Station parcel is located approximately one mile southeast of the MCM tower site and would not provide adequate service to gaps to the north and west of the MCM tower site.

Question No. 3

Referencing Application Attachment 2, Existing Towers Considered, provide a coverage plot at 700 MHz from the existing 4 Dittmar Road, Redding and 66 Sugar Hollow Road, Danbury facilities. Indicate the signal strength and tower height modeled.

Response

The existing tower site at 4 Dittmer Road is located approximately 2.7 miles to the northeast of the proposed MCM tower. The tower at 66 Sugar Hollow Road is located approximately 2.0 miles to the northwest of the proposed MCM tower. Due to the overall distance between Cellco's Redding North search ring and these existing towers sites, detailed coverage plots were not prepared and were not needed to confirm that these existing towers would not satisfy Cellco's wireless service objectives in northwest Redding.

Question No. 4

How would the cost of Cellco's installation/co-location at the proposed site be recovered?

Response

The costs associated with providing Cellco customers with the nation’s most reliable wireless service network, including the cost for development of network infrastructure, are paid for by the individuals, corporations and government entities that purchase Cellco’s wireless service.

Proposed Wireless Services

Question No. 5

Referencing Application pp. 10-11, specifically describe Cellco’s wireless service objectives for the facility. For each frequency, include the name and mileage of roads served and square miles of the proposed service area.

Response

Cellco’s primary objective for the proposed Redding North Facility is to cover a significant portion of State Route 53 and local roads in northwest Redding. The proposed Redding North Facility will also improve coverage, overall, in northwest Redding, as well as easterly areas in Ridgefield and southern areas in Danbury.

Street Name	700 MHz coverage in miles		850 MHz coverage in miles		1900 MHz coverage in miles		2100 MHz coverage in miles		3700 MHz coverage in miles	
	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 95 dBm	RSRP - 95 dBm
RTE 53	1.6	2.6	0.3	1.9	0	0.4	0	0.2	0	0
Long Ridge Road	1.2	1.8	0.8	1.5	0	0.3	0	0.1	0	0.3
Simpaug Tpke	0.5	1	0.2	0.5	0	0.1	0	0.05	0.05	0.4
Umpawaug Road	0.5	1.4	0.2	1.3	0	0	0	0	0	0
Overall Coverage Footprint (Square Miles)	3.7 Sq Miles	9.2 Sq Miles	1.9 Sq Miles	5.6 Sq Miles	0.1 Sq Miles	1.2 Sq Miles	0.04 Sq Miles	0.9 Sq Miles	0.18 Sq Miles	0.75 Sq Miles

Question No. 6

Application Attachment 1 indicates multiple frequencies will be installed with the 700 MHz frequency having the largest coverage footprint. Does the 700 MHz frequency act as the “base frequency” of the network where most of the wireless traffic occurs? How do the other frequencies interact in Cellco’s wireless system?

Response

Yes, the 700 MHz frequencies do operate as Cellco’s “base frequencies” throughout its network. As depicted on the coverage plots included in the Application (Attachment 1), each of the other frequencies that Cellco intends to deploy in Redding will maintain a smaller coverage footprint and will provide Cellco customers with additional service capacity. Customers utilizing Cellco’s network will first use available channels in Cellco’s base (700 MHz) frequencies. If the 700 MHz frequencies are not available the user is directed, automatically, to other available frequencies in the same way a customer will utilize the base frequencies.

Question No. 7

What is the signal strength for which Cellco designs its system? For in-vehicle coverage?
For in-building coverage?

Response

Neg 85 dBm RSRP for in vehicle coverage.

Neg 95 dBm RSRP for in building coverage.

Question No. 8

Describe the reliability of existing Cellco service in this area. What level of service constitutes a coverage gap?

Response

Reliable service on Cellco's network is service provided at the signal strengths described above (Q. 7). Signal strength greater than -95 dBm RSRP would be considered, "unreliable".

Question No. 9

Provide statistics or other indicators of substandard service in this area.

Response

The primary and most reliable indicator of substandard service in the area around the Redding North Facility comes from the coverage plots provided in the Application. It is evident from the "Existing Verizon Wireless 700 MHz Coverage" plot (Attachment 1) that, in its "base frequencies" significant areas of unreliable service exist today in northwest Redding, including, perhaps most significantly, an approximately 1.5-mile portion of State Route 53, east of the proposed Redding North Facility. Most, if not all these 700 MHz service gaps will be eliminated once the Redding North Facility is "on-air". (See Cellco's Existing and Proposed 700 MHz plot also in Attachment 1). The Redding North Facility will also help offload 700MHz traffic from Cellco's Redding CT (Gamma Sector), Topstone CT (Alpha Sector) and Danbury S CT (Beta Sector) which are currently operating in exhaust as they are being overextended to fill many, but not all, of the coverage gap in the area around the proposed tower location.

Question No. 10

Would the site provide capacity relief at adjacent Cellco facilities? If yes, identify the facilities and the frequencies and sectors at or near exhaustion that would benefit from capacity relief.

Response

See Cellco's response to Q. 9 above.

Question No. 11

Can Cellco's coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect coverage needs and/or capacity relief within the proposed service area.

Response

No. Cellco's proposed antennas at the top of the 150-foot tower is the minimum height needed by Cellco to meet its wireless service objectives in the area. Installing antennas below the proposed centerline height, in this instance, will result in gaps in service opening along portion of Route 53 and local roads in northwest Redding, including those areas between the connecting sites identified as Bethel West CT to the north, Redding South CT to the east and Danbury S CT to the northwest.

Question No. 12

Are small cells a feasible alternative to Cellco's proposed installation on a new tower? Estimate the number of pole-mounted small cells that would be required for reliable service within the proposed service area. Would certain frequencies be limited through the use of small cells? What would be the cost of each small cell for both the use of existing utility poles and new poles specific for small cells. What type of equipment would be attached to each pole?

Response

It may be theoretically and technically possible to install a large number of small cells or Distributed Antenna System nodes in the area that could closely match the coverage footprint of the proposed Redding North Facility (macro cell). Such an approach, however, is not practically nor economically feasible and is not consistent with good RF Engineering practice. Typically, small cell facilities or DAS nodes would utilize existing infrastructure (i.e., electric distribution

poles) along public rights of way in areas where coverage and/or capacity problems exist. These existing utility poles are often encumbered by other equipment (i.e., transformers, streetlights and risers) that will limit Cellco's ability to use the pole. Structural limitations of the existing poles could also limit Cellco's ability to deploy all the equipment needed to provide service in all its operating frequencies. Providing some form of back-up power to small cells or DAS nodes is very difficult and, in many cases, impossible, making the service even more vulnerable to storm events. In areas where this existing infrastructure is not available, for example, along private roads or on private and municipal properties, property rights would need to be acquired and new poles would need to be installed. The actual number of small cell facilities that would be needed to provide a service comparable to that from the proposed Facility is not known but would be significant given the overall size of the area that Cellco is attempting to serve with the proposed facility. Individual small cell would be capable of providing service in some but not all of Cellco's operating frequencies further limiting network capacity in the area around the Redding North Facility. As reported in prior dockets, Cellco estimates the cost of small cell facilities to be between \$70,000 and \$75,000 and would typically involve the installation of a single cannister antenna, a remote radio heads and electrical and fiber connections on an existing or new electric distribution system.

Emergency Backup Power

Question No. 13

Referring to Application p. 14, what is the approximate run time of the emergency backup power generator before tank refilling is required?

Response

Cellco intends to install a 50-kW propane-fueled generator at the proposed tower site.

Under normal loading conditions, the proposed 50-kW generator could operate for approximately 86 hours (3.5 days) before refueling would be necessary.

Question No. 14

Would the emergency backup power generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

Response

Yes. Under normal operating conditions, Cellco's equipment at the Redding North Facility would generate no air emissions. During the loss of commercial power and periodically for maintenance purposes, Cellco would utilize a propane-fueled generator to provide emergency backup power to the proposed cell site. Cellco's backup generator will be managed to comply with the "permit by rule" criteria established by the Connecticut Department of Energy and Environmental Protection ("DEEP") Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b.

Public Health and Safety

Question No. 15

Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility by Cellco.

Response

- 2021 International Building Code (IBC), with the 2022 Connecticut State Building Code amendments.
- 2021 International Mechanical Code, with the 2022 Connecticut State Building Code amendments.

- ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures".

Question No. 16

Referencing Application p. 19 and 2018 Redding Plan of Conservation and Development p. 8-2, how could Verizon's installation at the proposed facility interact with the existing tower at the Redding Ridge Fire Department to relieve the "burgeoning need for more widespread reliable wireless communications for residents and public entities?" Is Verizon located on the Redding Ridge Fire Department tower?

Response

Cellco does currently share the tower at the Redding Ridge Fire Department, 186 Black Rock Turnpike, in Redding. The Redding Ridge Fire Department tower is located approximately 4.8 miles southeast of the proposed Redding North (MCM) Facility. Due to the distance between the two sites, the proposed Redding North Facility would not interact with the existing Redding Ridge Fire Department site. The proposed Redding North Facility would, however, address other significant needs for service in northwest Redding.

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of November 2023, 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

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