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November 20, 2023

Via Federal Express 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, Dino Trevisani, Dottie DeLuca, JoAnn Villamizar and Susan Fogle

Dear Attorney Bachman:

Enclosed please find the original and fifteen (15) copies of Cellco's Responses to each set of Interrogatories from Intervenors, Dino Trevisani, Dottie DeLuca, JoAnn Villamizar and Susan Fogle. Electronic copies of these responses were also sent to the Council today.

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

Sincerely,



Kenneth C. Baldwin

Enclosure

28328516-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 20, 2023

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
INTERROGATORIES FROM INTERVENOR JOANN VILLAMIZAR

On November 8, 2023, the Intervenor, JoAnn Villamizar issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Docket No. 517. Below are Cellco’s responses.

Question No. 1

Did Cellco take the concerns relative to the safety of the children into consideration relative to erecting the cell tower on Parcel 12-29? If yes, what was evaluated and what, if any, additional safety features are included in light of the location of the cell tower on a scout camp site?

Response

Cellco objects on the grounds that questions regarding health effects related to RF emissions are outside the scope of the Council’s jurisdiction in this proceeding. Notwithstanding its objection, as it relates to RF emissions and safety concerns, Cellco directs Ms. Villamirzar to the information provided on pp. 17-18 and in Attachment 7 of the Application. Cellco has demonstrated that the proposed facility will comply with the Maximum Permissible Exposure

safety standards adopted by the Federal Communications Commission.

Question No. 2

Cellco states in response to Siting Council interrogatory 1 that the original site search commenced in Q1 of 2016 which appears to be after the All Points Site Map dated October 16, 2014 which forms a part of the Lease Agreement for the Parcel. So, it appears that the search center and radius were established after the site was found, correct?

Response

Cellco's reference is specific to its site search effort. The cell site lease, between MCM and the Boy Scouts appears to have been signed prior to the commencement of Cellco's site search.

Question No. 3

Cellco coverage maps are dated 2014 so Cellco was aware of the alleged significant coverage gaps for almost 10 years and, this, why only now has it become an issue? What is the exact date the coverage maps were done?

Response

The 2014 reference in the bottom right corner of the coverage plots relates to the Copyright date for the Environmental Systems Research Institute, Inc. ("Esri") information used to produce the base mapping information (topography, roads, town boundaries, lakes and pond etc.) for the plots. Cellco's coverage information on the plots is current and depicts existing wireless service in northwest Redding.

Question No. 4

Why is Cellco relying upon data that is almost 10 years old?

Response

See Cellco's response to Question No. 3 above.

Question No. 5

As the significant need for service is on a 1.5-mile portion of Route 53 as stated by Cellco why was the search radius in an area where residents are not experiencing unreliable services and not on Route 53?

Response

As shown on the “Existing Verizon Wireless 700 MHz Coverage” plot in Attachment 1 of the Application, Celloc’s need for improved wireless service includes a significant portion of Route 53, areas east and west of Route 53 and other areas in northwest Redding closer to the proposed tower site. The proposed MCM tower site is appropriately located so that Cellco can satisfy most, if not all of its wireless service objective from a single tower location. It is also important to note that wireless service in northwest Redding Cellco’s 850 MHz, 1900 MHz, 2100 MHz and 5g frequencies is virtually non-existent. *See* MCM Application Attachment 1.

Question No. 6

Why was the property at 235 Simpaug Turnpike not listed as one of the alternate properties viewed as the property owner did take a representative of either MCM or Cellco or Allpoints Technology Corporation on behalf of MCM or Cellco or both on a tour? What other properties were evaluated but not listed?

Response

Cellco has no information in its site search file that indicates the parcel at 235 Simpaug Turnpike was visited by Cellco representatives prior to the filing of the MCM application. That said, this parcel is located approximately 0.6 miles southwest of the Hoyt Boy Scout and would not provide the same level of service, especially to the east, as the proposed tower site.

Question No. 7

As the most area of unreliable service exists on Route 53 which is in close proximity to

the West Redding Fire Station, please explain why this site will not address this deficiency as there does not appear to be a problem with cell service on Simpaug, Lonetown Road and Marchant that Intervenor Villamizar has experienced.

Response

See Cellco's response to Council Interrogatory No. 2.

Question No. 8

What Properties and/or cell towers were considered in the Southwestern Bethel and Southern Danbury to address any deficiency in these areas and, if none, why was the search so limited?

Response

Cellco did not evaluate any existing tower sites in southern portions of Bethel or Danbury. Cellco focused its search in northwest Redding, where a majority of the service problems exist.

Question No. 9

In the event that a child attending a function at the scout camp is injured climbing the fence and/or cell tower or injury sustained resulting from their trespassing into the site from other components of the facility, does Cellco have any liability and, if yes, what is the extent of the liability?

Response

Adequate safety and security measures are incorporated into MCM's cell site design features. Cellco's ground based equipment maintains silent intrusion alarms which are monitored by cell site technicians 24/7.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of November 2023, a copy of the foregoing was sent,
via electronic mail, to:

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