

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 TIM KEYES (SET ONE)

On January 6, 2024, Intervenor, Tim Keyes, 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 all interrogatory responders from Verizon Wireless take a sworn oath of truthfulness administered by the CT Siting council prior to answering the questions posed below?

Response

Cellco’s witnesses were sworn in and verified its exhibits at the end of the November 30, 2023, evidentiary hearing. The Council will give Cellco’s witnesses an opportunity to verify any additional exhibits, including responses provided below, at the continuation of the evidentiary hearing on January 23, 2024.

Question No. 2

Please explain in detail all information on the coverage maps – specifically the legends and significance of sequential maps (see “Verizon’s Coverage Plots”). What frequency level is the minimum required to solve any lack of coverage problem?

Response

Cellco intends to operate its wireless service in five different frequency ranges (700 MHz, 850 MHz; 1900 MHz, 2100 MHz and 3700 MHz (5G)) from the proposed Redding North Facility. Cellco has provided the Council with two plots in each of these frequency ranges. The first plot in each set depicts wireless service from Cellco's "existing" facilities around the proposed Redding North Facility. The second plot in each set depicts the wireless service from Cellco's "existing" facilities together with the service Cellco anticipates providing from the "proposed" Redding North Facility, in each of the five operating frequencies.

The wireless signal strength in each frequency is depicted using two colors. The GREEN area represents a signal strength of greater than or equal to Negative 95 dBm RSRP, a reliable signal level for "in vehicle" service. The BLUE area represents a signal strength of greater than or equal to Negative 85 dBm RSRP, a reliable signal level for "in building" service. Areas not colored GREEN or BLUE on the map are areas where Cellco's existing signal strength is Negative 96 dBm RSRP or worse. This represents service that Cellco describes as "unreliable".

Question No. 3

What is the significance of "RF rejected" in site determination (see "Summary of Site Search and List and Map of Existing Tower/Cell Sites")?

Response

See Cellco's Responses to Interrogatories from Intervenor Dottie DeLuca (Set One), Q5, dated November 20, 2023.

Question No. 4

Please explain why it is not possible for Verizon to use any of the numerous existing towers within a four-mile range of the proposed tower (existing adjacent towers; see "Summary

of Site Search and List and Map of Existing Tower/Cell Sites”). Are all of these locations at capacity utilization? How many of these were considered prior to the application for a tower on the Hoyt property?

Response

Cellco’s “existing” facilities that surround the proposed Redding North Facility and are depicted on the “existing” coverage plots included in Attachment 1 of the MCM Application include:

- Bethel CT – 38 Spring Hill Road in Bethel
- Bethel West – 11 Francis J. Clarke Circle in Bethel
- Danbury South – 144 Post Road (Moses Mountain) in Danbury
- Redding CT – 80 Lonetown Road in Redding
- Redding South CT – 28 Great Oak Lane in Redding
- Ridgefield 3 CT – 320 Old Stagecoach Road in Ridgefield
- Ridgefield 5 CT – 37 Danbury Road in Ridgefield
- Ridgefield CT – 76 East Ridge Avenue in Ridgefield
- Topstone CT – 100 Old Redding Road, Redding

Several of these sites also appear as “green pins” on the MCM Site Search map in Attachment 2 of the Application. None of the other tower sites listed would satisfy Cellco’s wireless service objective in northwest Redding because they are located too far from the Redding North search area.

Question No. 5

What is your response to the analysis submitted by Jason Jaffee after the public forum in November 2023?

Response

The locations selected by Mr. Jaffee were taken from the MCM visual analysis Attachment 5 in the MCM Application. These locations were selected by APT as a part of its evaluation of visual impacts of the proposed facility. There is no correlation between these photo log locations and Cellco's wireless service gaps in northwest Redding. That said, if you include the same "Photo Log" locations on Cellco's 700 MHz existing coverage plots, it shows, coincidentally, that there is some level of service (generally \geq Negative 95dBm, signal strength) at most if not all of these photo log locations. A copy of Cellco's 700 MHz plot with the photo log location shown is included as Attachment A to these responses. These same plots demonstrate, however, that significant gaps in service remain, throughout northwest Redding, particularly along Route 53 to the east of the proposed Redding North Facility.

Question No. 6

What specific problem is being addressed by the construction of a new cell tower within such close proximity to other towers, in a region where there has been demonstrated evidence (by Jason Jaffee) that there is sufficient coverage. Based upon what analysis, model or drive-by was the site determined? Does the gap in coverage comport with the coverage advertised publicly (or on the internet) by Verizon for the area in question?

Response

Cellco's "need" for improved wireless service in northwest Redding is well documented in the MCM Application narrative; depicted on the coverage plots in Attachment 1 and discussed in numerous responses to the Council's and the intervenors' interrogatories filed on November 20, 2023 and January 16, 2024. See Council Responses (Set One) Questions 5-12 and 16; DeLuca Responses (Set One) Questions 1, 2 and 5 and (Set Two) Questions 1-3; Fogel

Responses (Set One) Question 1 and (Set Two) Question 1; Villamizar Responses (Set One) Question 5 and (Set Two) Questions 5 and 6.

Question No. 7

What is Verizon's rate of application decline by the CT Siting Council over the last 5 years?

Response

Objection as to relevance.

Question No. 8

What federal funding is being used by Verizon Wireless on this project?

Response

Objection as to relevance.

Question No. 9

Does Verizon Wireless have a financial relationship with any party in this process other than with the applicant and potentially individual consumers?

Response

No.

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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ATTACHMENT A

**Existing Verizon Wireless 700 MHz Coverage
 Redding, Connecticut and Surrounding Area
 (*Map Scale is 1:12,000)**

