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Connecticut Siting Council  
10 Franklin Square  
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Re: MCM Holdings, LLC  
Proposed Wireless Telecommunications Tower Facility  
288 Simpaug Turnpike (Parcel 12-29), Redding, Connecticut  
Docket 517

Pre-Hearing Interrogatories to Cellco Partnership d/b/a Verizon Wireless  
November 8, 2023

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?
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?
3. Cellco coverage maps are dated 2014 so Cellco was aware of the alleged significant coverage gaps for almost 10 years and, thus, why only now has it become an issue? What is the exact date the coverage maps were done?
4. Why is Cellco relying upon data that is almost 10 years old?
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?

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