

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

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

Intervenor Villamizar. submission of Exhibit IV-A attached hereto.

Pre-Hearing Interrogatories to MCM Holdings, LLC
November 8, 2023

1. 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?
2. What other properties were evaluated but not listed?
3. Please indicate the location of the leased Parcel and monopole thereon on Exhibit IV-A as it depicts the various camp sites and trails in an easier pictorial view than the Exhibit submitted by MCM. Please indicate on Exhibit IV-A the fall zone for the monopole in the event of a catastrophic failure.
4. Please provide the distance from the (1) fenced area and (2) the monopole for each of the following areas listed on Exhibit IV-A:

Blue Trail
Lincoln Council Ring
Garfield Camp Site

5. Did MCM 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 over and above those previously utilized by MCM in other locations in light of the proposed cell tower being erected on a scout camp site?
6. When did MCM begin a search for properties and/or hire a third party to search for properties in West Redding and what was the center and radius of the search?
7. 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?
8. Please advise as to the significance of the 250' distance from a commercial child-care center or school?
9. Please provide a definition of a commercial child-care center as used in the application.
10. MCM states in the application that additional information regarding Verizon's need will be provided when Cellco intervenes in the proceedings. Please advise as to what additional information has been provided in support of establishing a need for additional service in West Redding other than Cellco's unsubstantiated assertions of need.
11. MCM states in the application that at this time there are no known existing tower sites or structures in the northwest Redding area that would meet the technical requirements and/or are available for lease or acquisition for construction of a tower site that could support a wireless facility. Are there such sites or structures in Southwest Bethel or southern Danbury that could accommodate a wireless facility?
12. Please define a "vacant residential property" and is that reference being applied to the property at 235 Simpaug? What other properties in the surrounding area does MCM consider as vacant residential property? What is the significance of the adjective "vacant" to the building of the facility?

13. 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 MCM have any liability and, if yes, what is the extent of the liability?
14. Does or did MCM have any other agreements with the Parcel owner either oral or written, including but not limited to an option agreement in light of the Site Plan dated October 16, 2014 and the November 16, 2016 date of the Lease Agreement? If yes, please provide a copy thereof or, if oral, the terms and conditions.
15. Was the Simpaug Turnpike access road to the Parcel paved when the site was first seen by MCM or a third party on their behalf? If no, did MCM directly or indirectly support the paving of the driveway? If yes, please elaborate and provide any documents related thereto.

Exhibit IV-A

