Robinson+Cole

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Also admitted in Massachusetts and New York

May 12, 2025

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. 530 – Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless Petition for a Certificate of Environmental Compatibility and Public need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility at 196 East Haddam-Colchester Turnpike, East Haddam, Connecticut

Dear Attorney Bachman:

On behalf of Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless ("Cellco"), enclosed please find the original and fifteen (15) copies of Cellco's Responses to Council Cross Examination Questions related to Docket No. 530. Electronic copies of these responses have also been 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

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KCB/kia Enclosure

32143986-v1

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE: :

:

APPLICATION OF HOMELAND TOWERS, LLC : DOCKET NO. 530

AND CELLCO PARTNERSHIP D/B/A VERIZON

WIRELESS FOR A CERTIFICATE OF :

ENVIRONMENTAL COMPATIBILITY AND

PUBLIC NEED FOR THE CONSTRUCTION, :

MAINTENANCE AND OPERATION OF A :

WIRELESS TELECOMMUNICATIONS FACILITY :

AT 196 EAST HADDAM-COLCHESTER :

TURNPIKE, EAST HADDAM, CONNECTICUT : MAY 12, 2025

RESPONSES OF HOMELAND TOWERS, LLC AND CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO CONNECTICUT SITING COUNCIL CROSS EXAMINATION QUESTIONS

This filing is made on behalf of Homeland Towers, LLC ("Homeland") and Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant"), relating to Docket No. 530. During the evidentiary hearing of April 24, 2025, the Connecticut Siting Council ("Council") made four requests for additional information regarding the proposed telecommunications facility proposed at 196 East Haddam - Colchester Road. The Applicant's responses to those requests are provided below.

Question No. 1

Provide information regarding dropped calls for the sites surrounding the proposed East Haddam – Bashan Lake facility.

Response

Last 30 Days -700 carrier				
SITE	ENODEB	EUTRANCELL	Voice Call Drop%	Voice Call_Drops Count
COLCHESTER_SOUTH_CT	64034	2	1.24	176
HADDAM_CT	64165	1	2.92	1020
EAST_HADDAM_2_CT	64644	1	1.06	181
EAST_HADDAM_2_CT	64644	2	2.79	195

As demonstrated in the table above, the percentage of dropped calls from the adjacent Colchester South (Beta Sector), Haddam (Alpha Sector), East Haddam 2 (Alpha Sector) and East Haddam 2 (Beta Sector) facilities, far exceed Cellco's network design standard for reliable service, which the company has set at 0.6 % for dropped calls. The level of dropped calls from these adjacent antenna sectors far exceeds the company's "standard" for reliable service.

Question No. 2

What are the noise level at the nearest property line for Cellco's equipment on the proposed tower site.

Response

In response to interrogatory no. 49, the Applicant stated that noise from the proposed generator would reach levels of 50 dB at a distance of three feet (3) from the generator unit.

Utilizing the Inverse Square model, the noise level from the generator at the closest property line 63 feet to the west, noise levels from the generator would be 30.4 dB, which is below the residential noise standard. We should also point out that, as the Council has recognized in prior dockets, noise from emergency backup generators is exempt from these standards.

Noise from Cellco's equipment cabinets is equally negligible. At 5 feet, the noise levels from this equipment is 65 dB. Using the same Inverse Square mythology, noise levels from the radio and battery equipment cabinets at the nearest property line, 63 feet to the west, would be

42.99 dB, also well below the residential standard.

Question No. 3

What is the distance to the closest State-designated Scenic Road?

Response

East Haddam – Moodus Road (State Route 149) is located approximately 2.5 miles to the southwest of the proposed East Haddam – Bashan Lake tower site.

Question No. 4

Provide information regarding the November 7, 2024, Public Information Meeting including number of attendees; topics discussed; and requests for additional information provided.

Response

Homeland Towers hosted a public information meeting on November 7, 2024. Notice of the meeting was published in the East Haddam News and was sent to all abutting property owners. Approximately 35 residents attended the meeting. Public officials in attendance were East Haddam's First Selectwoman, Irene Haines and the Town's Land Use Administrator, Jim Ventres. During the meeting Mr. Ventres agreed to act as a "clearing house" for any new information presented by the Applicant and promised to share that information with residents and post the information on the Town's web site.

Attorney Ken Baldwin with Robinson & Cole and Ray Vergati with Homeland Towers presented the project and discussed features of the proposed tower site, including Cellco's need for the facility and the projects potential environmental effect, including visual impacts. Of the 35 residents in attendance, 15 residents spoke and asked various questions including but not limited to, the potential impact on property values in the area, noise from the proposed facility,

visibility, health effects related to radio frequency emissions and impacts to wildlife. One abutter also raised a concern that the tower could fall onto their adjacent parcel. Residents were also assured that the proposed tower would not require any type of FAA marking or lighting.

In addition to the technical issues referenced above, a number of residents asked Cellco and Homeland to consider installing antennas on one of several existing towers in the area, in lieu of building a new tower at the 196 East Haddam – Colchester Road. These "alternative" sites included the existing SBA tower at the Town's transfer station at 39 Nichols Road, the State DESPP tower at 194 Mount Parnassus Road and an existing CTI tower at 126 Parker Road in East Haddam. Attorney Baldwin mentioned that Verizon had already received Council approval to use the DESPP tower off Mount Parnassus Road and still needed the proposed tower at 196 East Haddam - Colchester Road. Cellco also provided Mr. Ventres with information and coverage plots showing how neither the Parker Road tower nor the SBA tower at the Town's transfer station would satisfy Cellco coverage objectives in the area. These additional plots are included in Attachment 16 of the Application, and show "existing" Cellco coverage in the area with the coverage from the Parker Road tower with antennas at the 290-foot level and the Town's transfer station tower with antennas at the 160-foot level and the 195-foot level if the tower were extended. In each case, the plots demonstrate that Cellco still needs the proposed East Haddam - Bashan Lake tower.

CERTIFICATION OF SERVICE

I hereby certify that a copy of the forgoing was sent electronically to the following:

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Brian L. McCann, Esq. Zabel Schellenberg, PLLC 36 Old Tavern Road, Unit 622 Orange, CT 06477 (203) 864-4511 Bmccann@zslawct.com

The Honorable Irene M. Haines First Selectwoman Town of East Haddam 1 Plains Road, P.O. Box 385 Moodus, CT 06469 (860) 873-5021 Irene.haines@easthaddam.org

May 12, 2025

Date

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Partnership d/b/a Verizon Wireless

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