

September 2, 2025

***Via Hand Delivery and Electronic Mail***

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

Re: **Docket No. 535 – The Towers, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility and associated equipment located at 835 Norwich Worcester Turnpike (Route 169) in Woodstock, Connecticut**

**Responses to Interrogatories from Intervenor – Paska Nayden**

Dear Attorney Bachman:

Enclosed please find the original and fifteen (15) copies of Cellco's responses to interrogatories from the Intervenor, Paska Nayden. Electronic copies of these responses were also sent to the Council and all parties and intervenors of record this afternoon.

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

Sincerely,



Kenneth C. Baldwin

Enclosure

Copy to:

Parties and Intervenors on Record

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
: :  
APPLICATION OF THE TOWERS, LLC FOR A : DOCKET NO. 535  
CERTIFICATE OF ENVIRONMENTAL :  
COMPATIBILITY AND PUBLIC NEED FOR THE :  
CONSTRUCTION, MAINTENANCE AND OPERATION :  
OF A WIRELESS TELECOMMUNICATIONS :  
FACILITY AT 835 NORWICH WORCESTER :  
TURNPIKE (ROUTE 169), WOODSTOCK, :  
CONNECTICUT : SEPTEMBER 2, 2025

RESPONSES OF THE TOWERS, LLC TO  
INTERROGATORIES FROM INTERVENOR PASKA NAYDEN

On August 26, 2025, The Tower LLC (the “Applicant”), received three separate emails from Paska Nayden, intervenor in Siting Council Docket No. 535. The first email, received at 6:48 p.m., included an attachment entitled “Docket No. 535 – Intervenor Add-On Interrogatories (Non-Duplicative)”. (“Intervenor Questions Part 1”). The second email, received at 6:43 p.m. included an attachment entitled “Pre-filed Testimony of Intervenor”. The third email, received at 9:40 p.m. included an attachment entitled “Docket No. 535- Intervenor’s Targeted Addendum: Interrogatories & Requests for Production (CTS site)”. (Intervenor Questions Part 2”). Many of the questions included in Intervenor Questions Part 1 are the same as those presented in Intervenor Questions Part 2, although presented in a different order. In the Applicant’s responses below, we have combined the duplicate questions presented in Intervenor Questions Part 1 and Intervenor Questions Part 2. New questions included in Intervenor Questions 2 were added to these responses and are included as Questions B.7., F.5., F.6. and F.7 below.

**A. RF Compliance, Signage, and Post-Activation Verification**

Question No. 1

Provide worst-case cumulative OET-65 modeling for all authorized transmitters/tenants (all bands and future tenants) with % of the general-public limit at the fence line, property lines, nearest residence/school/park/trail, and on a 5–10 m ground grid.

Response

As discussed on p. 8 of the Application, to demonstrate compliance with the FCC RF emissions safety standards, the Applicant has provided the Council with an RF emissions calculation for the proposed facility utilizing a Far Field formula, developed in accordance with the methodology prescribed in the FCC Office of Engineering and Technology (OET) Bulletin No. 65. This calculation indicates that the highest (worst case) exposure level for all of Cellco's frequencies would be 5.2% of the FCC Standard. This worst-case exposure level occurs at a distance of approximately 480 feet from the tower. The Far Field table, included as Attachment 14 of the Application, includes RF emissions levels at distances from the base of the tower to points more than 3,380 feet from the base of the tower. At all distance, the Far Field table demonstrates that the proposed facility will comply with the FCC Safety Standard.

Question No. 2

Submit a post-activation field measurement plan (within 30 days of full activation and upon material changes) and file the results to the docket.

Response

Objection. The regulation of RF emissions from communications facilities like that proposed in Docket No. 535 is subject to the exclusive jurisdiction of the Federal Communications Commission and is outside the scope of the Council's authority.

The Applicant is obligated to demonstrate that the proposed facility can comply with the FCC Safety Standards for RF emissions and has done so as stated above.

Question No. 3

Provide a signage and access-control plan compliant with 47 CFR §1.1307(b)(4) and ANSI Z535: sign locations, wording, symbol set, and mounting height 4–6 ft AGL sized for boundary-legibility.

Response

Objection. The regulation of RF emissions from communications facilities like that proposed in Docket No. 535 is subject to the exclusive jurisdiction of the Federal Communications Commission and is outside the scope of the Council’s authority. The Applicant is obligated to demonstrate that the proposed facility can comply with the FCC Safety Standards for RF emissions and has done so as stated above.

Question No. 4

Produce the CSV/XLSX grid behind the RF plots: PointID, lat, lon, height (m AGL), band, %MPE, and cumulative %MPE.

Response

Objection. The regulation of RF emissions from communications facilities like that proposed in Docket No. 535 is subject to the exclusive jurisdiction of the Federal Communications Commission and is outside the scope of the Council’s authority. The Applicant is obligated to demonstrate that the proposed facility can comply with the FCC Safety Standards for RF emissions and has done so as stated above.

Question No. 5

Certify harmonics/out-of-band suppression at the antenna after all filters, including 700 MHz 4th harmonic (--2.8 GHz), with manufacturer test data.

Response

Objection. The regulation of RF emissions from communications facilities like that proposed in Docket No. 535 is subject to the exclusive jurisdiction of the Federal Communications Commission and is outside the scope of the Council's authority. The Applicant is obligated to demonstrate that the proposed facility can comply with the FCC Safety Standards for RF emissions and has done so as stated above.

Question No. 6

Provide sign mockups/graphics for each gate/perimeter segment and confirm the post-activation protocol follows Exhibit M.

Response

Objection. The regulation of RF emissions from communications facilities like that proposed in Docket No. 535 is subject to the exclusive jurisdiction of the Federal Communications Commission and is outside the scope of the Council's authority. The Applicant is obligated to demonstrate that the proposed facility can comply with the FCC Safety Standards for RF emissions and has done so as stated above.

**B. Height, Alternatives, and Quantified Need**

Question No. 1

Provide height-sensitivity plots at 150/140/130/120 ft AGL using identical thresholds/extent and quantify population and road-mile coverage for each height.

Response

Cellco stands by its testimony and evidence in the record that an antenna centerline height of 145 feet is the minimum necessary to satisfy its coverage objectives in the area. *See* Cellco's Responses to Council Interrogatory Nos. 28, 30, 31 and 33.

Question No. 2

Provide side-by-side RF scenarios: (A) Docket 535 only, (B) sister site only (Docket 534), and (C) both sites together, with population/road-mile gains and any remaining gap.

Response

As described in the Applicant's response to Council Interrogatory No. 22, the facility proposed and currently under Council consideration in Docket No. 534 (Cellco's Woodstock South Facility) is 3.2 miles southeast of the Woodstock 2 Facility (Docket No. 535). Coverage from the two sites would overlap to allow for call/service hand-off. Coverage plots showing Cellco's wireless service from both the Woodstock 2 and Woodstock South facilities are attached as Exhibit 1 to these responses.

Question No. 3

Provide a collocation matrix for all macros within 5–8 miles (IDs, heights, structural capacity, azimuth clearances) and the predicted coverage delta if used instead of, or in addition to, this site.

### Response

Coverage maps included in the Application (Attachment 6) show all of Cellco's existing macro facilities within approximately four (4) miles of the proposed Woodstock 2 cell site. Sites beyond four (4) miles would not interact with the proposed Woodstock 2 coverage footprint and would not present as viable alternatives to the proposed facility.

### Question No. 4

Identify the carrier(s) on whose behalf the facility is proposed and produce the carrier drive-test package: tools, device models/firmware, test dates/times, routes, and KPIs (RSRP/RSRQ/SINR, VoLTE CSSR, drop/blocked call rates, P50/P90 throughput).

### Response

As stated in the Application, the proposed tower would provide service to Cellco customers living and working in and traveling through the Town of Woodstock. The tower would be shared with other carriers, municipal and emergency service communications entities if needed. Cellco did not perform a drive test from the proposed facility location. Evidence and information, including Key Performance Indicators ("KPIs"), on Cellco's need for the proposed facility is provided in the Application narrative, is depicted on the existing and proposed coverage plots included in the Application - Attachment 6, and is discussed in Cellco's Interrogatory Response Nos. 20-34.

### Question No. 5

Capacity support: last 12 months of sector KPIs for nearby sites (utilization/PRBs, RRC setup success, P95 latency/throughput, UL congestion) and a statement of active bands (700/850/1900/2100/CBRS/C-Band) at Pomfret East/West and Woodstock Relo, with reasons any bands are not yet active.

Response

Evidence and information, including KPIs, on Cellco's need for the proposed facility is provided in the application narrative, is depicted on the existing and proposed coverage plots included in the Application, Attachment 6, and is discussed in Cellco's Interrogatory Response Nos. 20-34.

Question No. 6

Provide the alternatives matrix in table form and technical (not financial) reasons for each rejection.

Response

The information requested is provided in the Site Search Summary, included in Application - Attachment 8.

Question No. 7 (Question D.3. from the Intervenor Questions Part 2)

Provide a small-cell expansion analysis for the Woodstock Fairgrounds (existing nodes), with costs/timing/coverage compared to the macro proposal.

Response

*See Applicant's response to Council Interrogatory No. 8. The Woodstock Fairground small cell facility consists of three small cell nodes attached to utility poles at heights between 28 and 33 feet above grade. As described in Cellco's Petition No. 1119, the small cells provide wireless service in Cellco's 700 MHz frequencies in southeast Woodstock, primarily to the Woodstock Fairgrounds property and the immediate surrounding area. Expanding small cell deployment at the fairgrounds would not eliminate the need for the Woodstock 2 Facility.*

**C. Wetlands/Access Consistency and Alternatives (keyed to Applicant Attachment 1)**

Question No. 1

Resolve the inconsistency between: (i) Environmental Assessment stating no wetlands in the used area (closest  $\approx$ 117 ft north) and (ii) Site Evaluation stating an existing farm road extends between two wetland areas. Provide flagged survey, soil test pits, dates/methods, and a plan overlay of compound/access/utilities vs. wetlands/upland review.

Response

Please refer to the Docket No. 535 Application – Attachment 11, Wetland Inspection Report which details the surveyed flag numbers, soil information, delineation methodology and dates, and plan overlay of compound, access, and utilities relative to flagged wetlands/upland review areas. Surveyed location of flagged wetlands can also be found within the Application – Attachment 1 Project Site Plans Sheet Z-2 Overall Site Plan revision date 2/18/25.

In regard to reconciling the various distances to wetland resources noted in the Site Evaluation and Environmental Assessment portions of the Application, the proposed access road extending from Route 169 generally follows an existing dirt farm road east to the proposed compound location. This existing farm road occurs within an extension of upland areas which bisect Wetland 1 to the north and south of the existing farm road crossing. As such, the proposed access road would not result in any direct impacts to Wetland 1 by utilizing the existing dirt farm road crossing. At its closest point, the proposed compound is located approximately 117 feet southeast of Wetland 1.

### Question No. 2

Provide at least two on-parcel alternative site layouts and access alignments that avoid/minimize wetlands crossings, with clearing lengths, culverts, temporary matting/boardwalk, and cost/impact comparison.

### Response

Refer to the Hearing Transcript from 2 p.m. on 7/31/25, Witness testimony in response to questions from Mr. Golembiewski and Mr. Nguyen starting on page 43, line 9 through page 44, line 17 and page 48, line 1 through page 50, line 15 detailing alternate site locations on the property which would result in increased visual impacts, direct wetland impacts, additional mature forest clearing, and/or Prime/State-Wide Important Farmland soils loss. Alternate site locations within and adjacent to the existing agricultural fields to east and south would result in increased impacts to Prime/State-Wide Important Farmland soils. Alternate Site locations beyond these existing agricultural fields to the north, east and south of the currently proposed facility location would result in increased mature forest clearing, and in certain cases reduced upland buffers to on-site wetland resources. Finally, alternate site locations proximate to Route 169 are anticipated to result in increased visual impacts due to a loss of intercepting vegetative buffers and proximity to residencies located along Route 169.

### Question No. 3

Quantify access length (930 ft), tree clearing (including the --'75 trees  $\geq 6$ " DBH), and grading volumes; submit DEEP Construction Stormwater GP, SWPPP, and E&S plans.

### Response

Refer to the Docket No. 535 Application – Attachment 1 Project Plans, Sheet Z-2 Overall Site Plan revision date 2/18/25. The proposed access driveway length extending from Route 169

to the compound location is approximately 930 ft. long. Construction of the Facility, including the access road, compound, and utility routing will not result in any direct impacts to wetland resource areas. As illustrated on the Project plans included in the Application – Attachment 1, Plan sheets Z-3 through Z-3.3, the Applicant anticipates the need to remove 75 trees, 6” or greater diameter at breast height. No new landscaping is proposed in the application.

CT DEEP requires authorization of construction project under the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (“Stormwater General Permit”) Section 3 (a), for project that result in a “total disturbance of one or more acres of land area on a site”. Construction of the proposed Facility would result in disturbance of 0.546 acres.

As construction of the proposed Facility would not exceed 1 acre of disturbance, authorization under the CT DEEP General Permit would not be required. A detail E&S plan will be developed as part of the Siting Council’s D&M phase.

#### Question No. 4

Provide the wetland delineation report (scientist name/credentials, flag dates, soils logs) and a plan overlay with flag numbers, access, utilities, compound, and erosion controls. Identify whether underground power/fiber from Route 169 crosses wetlands. If yes, provide trenchless options (boring/HDD), dewatering, and turbidity controls.

#### Response

Underground power/fiber routing from Route 169 will not result in any direct impacts to wetland resources. Upon further review of the proposed road improvements and following the discussion at the July 31, 2025 evidentiary hearing, the Applicant is proposing to relocate the underground utility route between Route 169 and the Facility compound. The Applicant now

intends to relocate utilities from the previously proposed route along the north side of the access roadway to the middle of the access roadway. This approach will minimize potential impacts to trees, transitional shrub ecotone, and stone walls along the northern side of the access driveway that may have occurred in some locations because of the utility trench construction. This approach will also minimize impacts to the upland buffer and limit potential indirect impacts to the wetlands north of the access roadway.

Question No. 5

State whether USACE authorization is required (e.g., Nationwide Permit). If yes, supply verification/PCN; if no, cite the exemption.

Response

USACE authorization is not required since no impacts to Waters of the United States would result from development of the proposed Facility.

Question No. 6

Provide CT DEEP NDDDB correspondence and any time-of-year restrictions.

Response

Refer to the Docket No. 535 Application – Attachment 10, USFWS/NDDDB Compliance Statement dated November 22, 2024. No known areas of State-listed species are currently depicted on the most recent DEEP/NDDDB Maps in the location of the proposed Facility. Therefore, no consultation with NDDDB is required in accordance with CT DEEP’s review policy.

**D. Floodplain Elevations and Visuals**

Question No. 1

Identify FEMA flood zone and BFE; state proposed platform elevations for radios/batteries/generator(s) and the max elevation required for the 1%-annual-chance event (with freeboard).

Response

*See Application p. 10 and Attachment 15.*

Question No. 2

Provide visual simulations from Route 169 and lake/pond vantage points showing any elevated equipment above the fence line and the proposed landscaping.

Response

Photo simulations of the proposed tower site are included in the Application - Attachment 9. The only equipment that may extend above the height of the compound fence is the carrier's ice-bridge. The ice-bridge may extend approximately one-foot above the eight-foot fence height. Due to existing vegetation on the subject parcel, views of the compound fence and any compound equipment would be adequately screened from public rights of way and adjacent properties.

Question No. 3

Provide a landscape plan (species, growth rates, mature heights) that screens the compound within 2–3 growing seasons; include maintenance commitments.

Response

Due to existing vegetation on the subject parcel near the proposed facility compound, no additional landscape screening has been proposed.

Question No. 4

Provide photo-sim methodology: camera height (--5 ft AGL), lens/FOV, GPS of viewpoints, leaf-on/leaf-off, date/time, lighting, and whether balloon/crane tests were used (height, tether location, GPS).

Response

*See Application – Attachment 9.*

Question No. 5

If any FAA lighting/marketing becomes required, provide revised simulations showing day/night effects before construction.

Response

FAA marking and lighting will not be required for the proposed facility tower. *See* Application p. 12, Attachment 17. Also included in Exhibit 2 to these responses is the FAA-1A Survey Certification and an Updated FAA Airspace Summary Report for the proposed facility.

**E. Waterways/Source-Water and Spill Prevention**

Question No. 1

State whether the project lies within the Little River source-water protection area; provide coordination/clearance with Putnam WPCA.

Response

*See Applicant's response to Council interrogatory no. 47.*

Question No. 2

Disclose on-site oil volumes; if aggregate AST  $\geq 1,320$  gal, file an SPCC Plan (40 CFR 112). If below, provide equivalent  $\geq 110\%$  containment and refueling protocols.

Response

Lubricating oil volumes associated with the backup generator do not exceed 1,320 gallons.

Question No. 3

Show stormwater flow paths and nearest catch basins/outfalls; identify protection measures during construction and operations.

Response

Stormwater flows away from the access driveway and toward the facility compound, where it infiltrates into the ground as it does today. Therefore, there is no need for any catch basins or outfalls as they are not required. *See Application – Attachment 1, Site Grading on Plan Sheets Z-3 through Z-3.3.*

Due to the generally flat terrain and the presence of an existing stone wall southeast of the access road, erosion and sediment control measures are not anticipated to be necessary during construction but could be incorporated into the final Development and Management plans if required by the Council. Post construction, the site has been engineered to prevent ponding near the structure by directing surface runoff away from the tower compound and along the access driveway utilizing drainage swales as shown on the project plans. Due to the substantial amount of undeveloped land surrounding the tower, no additional drainage measures are necessary.

Question No. 4

Identify fuel type/volume per generator, runtime, containment type/volume ( $\geq 110\%$ ), and refueling SOP (no fueling within 250 ft of waters).

Response

*See Application pp. i, 2; Attachment 7 and Cellco's responses to Council Interrogatory Nos. 35 – 40.*

**F. Noise and Operations**

Question No. 1

Provide octave-band noise predictions at the lease line and nearest residence for generator and all non-emergency equipment; demonstrate compliance with CT RCSA §22a-69.

Response

*See the Applicant's response to Council Interrogatory No. 48.*

Question No. 2

Provide O&M procedures for flood events (access control, spill kits, shutdown thresholds, refueling logistics).

Response

*See Application p. 10 and the Applicant's response to Council Interrogatory No. 58. The proposed Woodstock 2 Facility is located in Flood Zone X, an area outside the 500-year flood zone.*

Question No. 3

Provide ISO 9613-2 (or equivalent) modeling for day/night with ground absorption, barrier/fence effects, and tonal/impulse penalties; demonstrate compliance at the property line and nearest residence.

Response

*See the Applicant's response to Council Interrogatory No. 48.*

Question No. 4

Provide load-bank testing schedule and controls.

Response

Load bank testing schedules would be developed by Cellco's generator maintenance contractor if the Council approves the Application.

Question No. 5 (Question E.1. from Intervenor Questions Part 2)

Confirm generator make/model and sound rating (plans show ~65 dBA @ 7 m). Provide octave-band predictions at lease line and nearest residence ( $\approx 250$  ft), demonstrating compliance with CT RCSA §22a-69 day/night, including ground absorption/barrier effects and any tonal/impulse penalties.

Response

*See Application – Attachment 7 and the Applicant's responses to Council interrogatories questions nos. 35-40.*

Question No. 6 (Question E.2. from Intervenor Questions Part 2)

Disclose fuel capacity and containment (plans show UL-listed double-wall ~210 gal with 125% containment). Provide an SPCC Plan if aggregate on-site oil  $\geq 1,320$  gal; if below, provide  $\geq 110\%$  secondary containment and refueling SOP (no fueling within 250 ft of waters).

Response

*See Application – Attachment 7 and the Applicant's responses to Council interrogatories questions nos. 35-40. Any SPCC Plan requirements would be addressed through the Council's D&M Plan process if the tower site is approved.*

**Question No. 7 (Question E.3. from Intervenor Questions Part 2)**

Provide emergency shutdown and refueling logistics during flood events; identify spill kits and contractor contacts.

**Response**

All on-site equipment including the emergency backup generator is monitored and can be controlled remotely (shut down) by technicians at Cellco's mobile telephone switching office (MTSO) if necessary. As discussed in the Application (p. 15 and Attachment 15) the facility is located in Flood Zone X, an area outside the 500-year flood zone. Flooding of the facility compound is not anticipated. That said, Cellco will work with its contractors to ensure that all refueling operations will incorporate appropriate spill prevention measures.

**G. NEXRAD / KBOX**

**Question No. 1**

Provide NOAA ROC correspondence and engineering showing no harmful interference to KBOX(Taunton/Norton, MA), including path profiles and an emergency shut-down procedure if ROC reports interference.

**Response**

Objection. The question seeks information that is outside the scope of the Council authority and jurisdiction and is therefore not relevant to this proceeding.

**Question No. 2**

Provide WGS-84 coordinates and height AGL/AMSL used in ROC, and reconcile them with FAA/EME filings; attach ROC's written determination and any mitigation.

Response

*See Attached FAA-1A Survey Certification and Updated FAA Airspace Summary Report included in Exhibit 2.*

**H. Landowner Influence and Lease Terms**

Question No. 1

Provide a redacted lease summary (permitted height, rights to add tenants/equipment, expansion pads, fuel storage, environmental indemnity, and any incentives tied to height/tenant count).

Response

*See Application, Attachment 18.*

Question No. 2

Produce correspondence showing who selected the precise on-parcel location (landowner vs. carrier vs. tower co) and the reasons on-parcel alternatives were rejected.

Response

The selection of the proposed tower site on the subject parcel was selected by Applicant and the landowner cooperatively. *See also Applicant's response to Question C.2. above.*

Question No. 3

File the executed ground lease (payments redacted) and recorded access/utility easements, plus a lease summary of siting terms (height cap, tenant rights, generators/fuel limits, lighting limits, restoration/abandonment, environmental indemnity/insurance).

Response

*See Application, Attachment 18.*

**I. Coordinates, FAA & Consistency**

Question No. 1

Provide the final WGS-84 coordinates, AGL and AMSL of the tower centerline and lease corners; confirm these exact values were used for FAA Part 77 screening, ROC, EME, and all photo-sims.

Response

*See Attached FAA-1A Survey Certification and Updated FAA Airspace Summary Report included in Exhibit 2.*

Question No. 2

State whether FAA Form 7460 will be filed; if not, cite the specific 14 CFR § 77.9 exemption and the max height at which filing would be triggered.

Response

FAA form 7460 will be filed if the Application is approved by the Council.

**J. Construction Logistics & Vegetation**

Question No. 1

Provide construction hours, haul routes, and a traffic/safety plan; identify any night work.

Response

Plans related to construction details, haul routes (if any), construction hours and traffic safety plans (if necessary) would be developed if the Application is approved and incorporated into a Development and Management Plan if required by the Council.

Question No. 2

Provide a tree removal schedule (count by DBH class, species) and replacement/landscaping plan (species, spacing, growth rates, maintenance).

Response

*See Response C.3. above.*

**E. Generator, Noise, Fuel, and SPCC**

Question No. 1

Confirm generator make/model and sound rating (plans show ~65 dBA @ 7 m). Provide octave-band predictions at lease line and nearest residence (≈250 ft), demonstrating compliance with CT RCSA §22a-69 day/night, including ground absorption/barrier effects and any tonal/impulse penalties.

Response

Generator specifications are included in the Application – Attachment 7. Emergency backup generators are exempt from State noise standards.

Question No. 2

Disclose fuel capacity and containment (plans show UL-listed double-wall ~210 gal with 125% containment). Provide an SPCC Plan if aggregate on-site oil  $\geq 1,320$  gal; if below, provide  $\geq 110\%$  secondary containment and refueling SOP (no fueling within 250 ft of waters).

Response

*See Application – Attachment 7 and the Applicant’s responses to Council interrogatories questions nos. 35-40. Any SPCC Plan requirements would be addressed through the Council’s D&M Plan process if the tower site is approved.*

Question No. 3

Provide emergency shutdown and refueling logistics during flood events; identify spill kits and contractor contacts.

Response

All on-site equipment including the emergency backup generator is monitored and can be controlled remotely (shut down) by technicians at Cellco's mobile telephone switching office (MTSO) if necessary.

**F. Landowner Influence and Lease Terms**

Question No. 1

Produce a redacted lease summary identifying permitted height, rights to add tenants/equipment, expansion pads, fuel storage, environmental indemnity, and any incentives tied to tenant count/height.

Response

*See Application – Attachment 18.*

Question No. 2

Identify whether the on-parcel location was selected by landowner, carrier, or tower company; produce correspondence documenting on-parcel siting decisions.

Response

*See Applicant's response to Question H.2. above.*

Question No. 3

File the executed ground lease (payments redacted) and recorded access/utility easements, plus a one-page lease terms summary.

Response

*See Application – Attachment 18.*

**G. Coordinates, FAA & Consistency**

Question No. 1

Provide final WGS-84 coordinates (tower centerline and lease corners), AGL and AMSL; certify the same values were used for FAA Part 77, ROC, EME, and photo-sims.

Response

*See Attached FAA-1A Survey Certification and Updated FAA Airspace Summary Report included in Exhibit 2.*

Question No. 2

State whether FAA Form 7460 will be filed; if not, cite the 14 CFR §77.9 exemption and the maximum height at which filing would be triggered; commit to revised photo-sims if lighting/marketing becomes required.

Response

*See Applicant's response to Question I.2. above.*

**CERTIFICATION OF SERVICE**

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

Paska Nayden  
c/o 44 Jesse Lee Drive  
Easton, CT 06612  
[ct4rt@protonmail.com](mailto:ct4rt@protonmail.com)

September 2, 2025

Date



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Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
One State Street  
Hartford, CT 06103  
Telephone: (860) 275-8200  
Attorneys for The Towers, LLC

# **EXHIBIT 1**

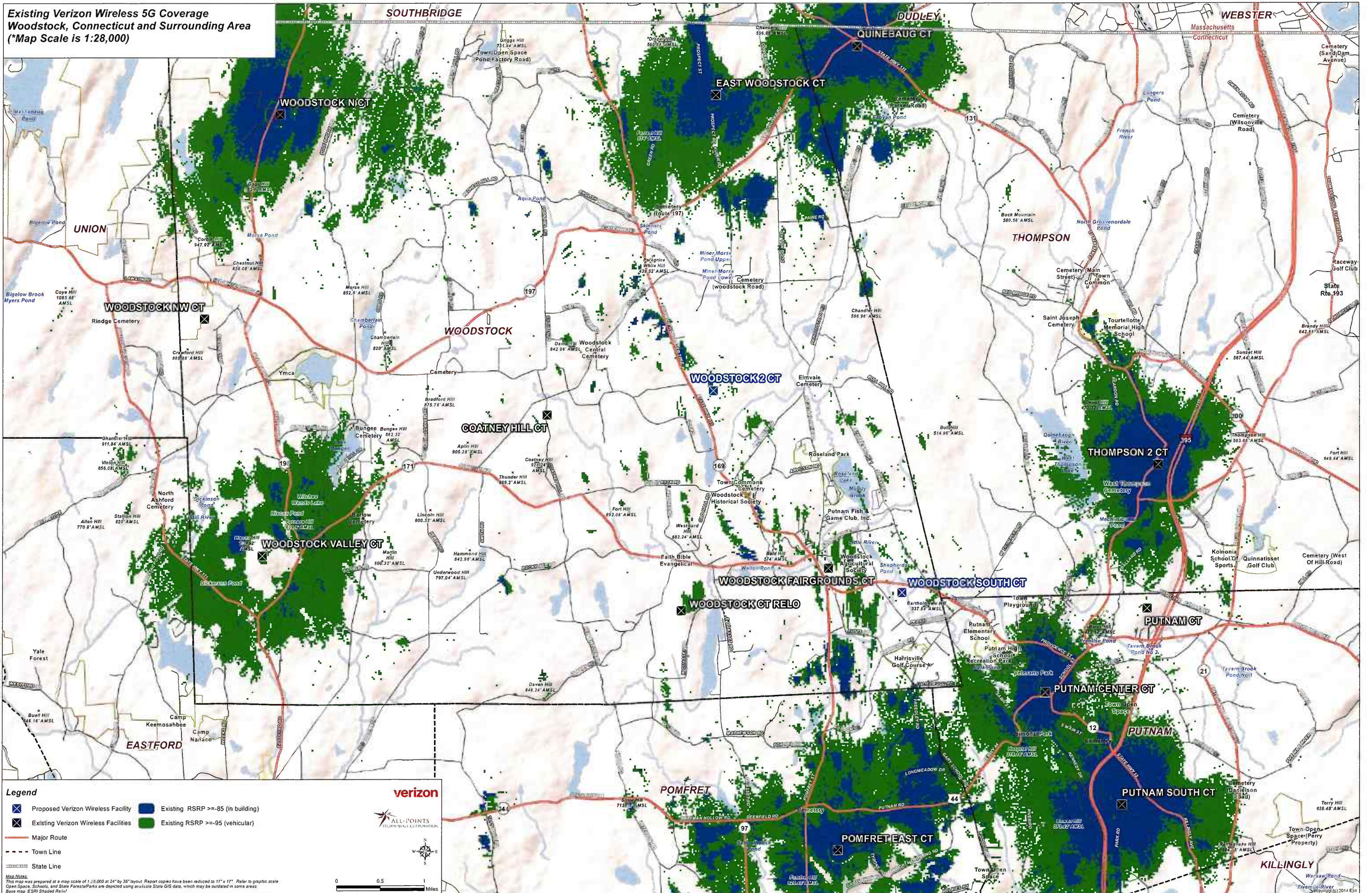








**Existing Verizon Wireless 5G Coverage**  
**Woodstock, Connecticut and Surrounding Area**  
 (\*Map Scale is 1:28,000)



- Legend**
- Proposed Verizon Wireless Facility
  - Existing RSRP >= -85 (in building)
  - Existing Verizon Wireless Facilities
  - Existing RSRP >= -95 (vehicular)
  - Major Route
  - - - Town Line
  - - - State Line

**verizon**

ALL-POINTS  
 COMMUNICATIONS CORPORATION



0 0.5 1 Miles

**Map Notes:**  
 This map was prepared at a map scale of 1:28,000 at 24" by 36" layout. Report copies have been reduced to 11" x 17". Refer to graphic scale.  
 Open Space, Schools, and State Forests/Parks are depicted using available State GIS data, which may be outdated in some areas.  
 Base map: ESRI Shaded Relief

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# **EXHIBIT 2**

# Northeast Tower Surveying

140 West Maplemere Road  
Williamsville, New York 14221  
Northeasttowersurveying@aol.com  
(716) 548-2894

## FAA-1A SURVEY CERTIFICATION

**Applicant:** Vertical Bridge, LLC  
750 Park of Commerce Drive, Suite 200  
Boca Raton, Florida 33487

---

**Site Name:** Woodstock 2 CT  
**Site Number:** US-CT-5040

**Site Address:** 835 Route 169  
Woodstock, Connecticut 06281

**Horizontal Datum Source (select all that apply):**

Ground Survey     GPS Survey     NAD 83

**Vertical Datum Source (select all that apply):**

Ground Survey     GPS Survey     NAVD 88

**Structure Type (select one):**

New Tower (Monopole)     Existing Tower (\_\_\_\_\_)     Roof Top     Water Tank  
 Smokestack     Other (describe): (\_\_\_\_\_)

**Latitude:** N 41°- 57'- 55.68" NAD83 / 41.9654653 NAD83  
**Longitude:** W 71°- 58'- 56.15" NAD83 / -71.9822639 NAD83  
**Ground Elevation:** 501.50 feet AMSL NAVD88

**CERTIFICATION:** I certify that the latitude and longitude are accurate to within +/- 20 feet horizontally and that the ground elevation is accurate to within +/- 3 feet vertically. The horizontal datum (coordinates) are expressed in terms of degrees, minutes, seconds and hundredths of seconds. The vertical datum (heights) are expressed in terms of feet.

**Surveyor Signature/Seal:**

**Printed Name:** Earle C. Newman, LS  
**Surveyor License No:** 15616  
**Company:** Northeast Tower Surveying, Inc.  
**Phone:** 716-548-2894  
**Date:** September 11, 2024



\*\*\*\*\*  
\* Federal Airways & Airspace \*  
\* Summary Report: New Construction \*  
\* Antenna Structure \*  
\*\*\*\*\*

Airspace User: Not Identified

File: US-CT-5040

Location: Woodstock, CT

Latitude: 41°-57'-55.68" Longitude: 71°-58'-56.15"

SITE ELEVATION AMSL.....502 ft.

STRUCTURE HEIGHT.....155 ft.

OVERALL HEIGHT AMSL.....657 ft.

#### NOTICE CRITERIA

FAR 77.9(a): NNR (DNE 200 ft AGL)

FAR 77.9(b): NNR (DNE Notice Slope)

FAR 77.9(c): NNR (Not a Traverse Way)

FAR 77.9: NNR FAR 77.9 IFR Straight-In Notice Criteria for C44

FAR 77.9: NNR FAR 77.9 IFR Notice for 3B0

FAR 77.9(d): NNR (Off Airport Construction)

NR = Notice Required

NNR = Notice Not Required

PNR = Possible Notice Required (depends upon actual IFR procedure)  
For new construction review Air Navigation Facilities at bottom  
of this report.

Notice to the FAA is not required at the analyzed location and height for  
slope, height or Straight-In procedures. Please review the 'Air Navigation'  
section for notice requirements for offset IFR procedures and EMI.

#### OBSTRUCTION STANDARDS

FAR 77.17(a)(1): DNE 499 ft AGL

FAR 77.17(a)(2): DNE - Airport Surface

FAR 77.19(a): DNE - Horizontal Surface

FAR 77.19(b): DNE - Conical Surface

FAR 77.19(c): DNE - Primary Surface

FAR 77.19(d): DNE - Approach Surface

FAR 77.19(e): DNE - Approach Transitional Surface

FAR 77.19(e): DNE - Abeam Transitional Surface

#### VFR TRAFFIC PATTERN AIRSPACE FOR: C44: TOUTANT

Type: A RD: 19652.59 RE: 756.1

FAR 77.17(a)(1): DNE

FAR 77.17(a)(2): Does Not Apply.  
 VFR Horizontal Surface: DNE  
 VFR Conical Surface: DNE  
 VFR Primary Surface: DNE  
 VFR Approach Surface: DNE  
 VFR Transitional Surface: DNE

VFR TRAFFIC PATTERN AIRSPACE FOR: 3B0: SOUTHBRIDGE MUNI

Type: A RD: 50186.66 RE: 689

FAR 77.17(a)(1): DNE  
 FAR 77.17(a)(2): DNE - Greater Than 5.99 NM.  
 VFR Horizontal Surface: DNE  
 VFR Conical Surface: DNE  
 VFR Primary Surface: DNE  
 VFR Approach Surface: DNE  
 VFR Transitional Surface: DNE

TERPS DEPARTURE PROCEDURE (FAA Order 8260.3, Volume 4)

FAR 77.17(a)(3) Departure Surface Criteria (40:1)  
 DNE Departure Surface

MINIMUM OBSTACLE CLEARANCE ALTITUDE (MOCA)

FAR 77.17(a)(4) MOCA Altitude Enroute Criteria  
 The Maximum Height Permitted is 1300 ft AMSL

PRIVATE LANDING FACILITIES

FACIL IDENT TYP NAME	BEARING To FACIL	RANGE IN NM	DELTA ARP ELEVATION	FAA IFR
64CT AIR WOODSTOCK	153.47	2.95	+192	

No Impact to Private Landing Facility.  
 DNE 200 ft AGL within 3 NM of Airport.

AIR NAVIGATION ELECTRONIC FACILITIES

FAC	ST	DIST	DELTA	GRND	
IDNT	TYPE	AT	FREQ VECTOR (ft)	ELEVA ST LOCATION	ANGLE
PUT	VOR/DME	R	117.4 95.6 37761	+5 CT PUTNAM	.01
ORH	RADAR WXL	Y	15.08 115644	-346 MA WORCESTER	-.17
PVD	RADAR ASR	I	2735. 130.57 137441	+91 RI THEODORE FRANCIS	.04
ORW	VOR/DME	I	110.0 181.78 149137	+347 CT NORWICH	.13
CEF	TACAN	R	114.0 299.98 170192	+417 MA WESTOVER	.14

PVD	VOR/DME	R	115.6	120.45	174343	+608	RI	PROVIDENCE	.20
BDL	RADAR ASR	I		266.82	190730	+421	CT	BRADLEY INTL	.13
HFD	VOR/DME	R	114.9	232.32	194209	-192	CT	HARTFORD	-.06
BAF	VORTAC	R	113.0	290.01	211772	+390	MA	BARNES	.11
GDM	VOR/DME	I	116.9	354.48	212525	-623	MA	GARDNER	-.17
KBOX	RADAR WXL	Y		91.15	229939	+433	MA	BOSTON WXL	.11

C-BAND 3.7-3.98 GHz COORDINATION ZONE

No Identified 5G conflict.

CFR Title 47, §1.30000-§1.30004

AM STUDY NOT REQUIRED: Structure is not near a FCC licensed AM station.  
 Movement Method Proof as specified in §73.151(c) is not required.  
 Please review 'AM Station Report' for details.

Nearest AM Station: WINY @ 10060 meters.

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