

Docket No. 535 — Intervenor Add-On Interrogatories (Non-Duplicative)

These questions supplement, and are designed not to duplicate, the Council's Set-One Interrogatories.

Global Instructions. For every response: (i) provide WGS-84 coordinates and units; (ii) include native files(KMZ/KML, shapefiles/GeoJSON, CSV/XLSX) plus a 300-dpi PDF "reader"; (iii) identify software, model, clutter/morphology, map source and resolution; (iv) state date of analysis and engineer's name/credentials; and (v) if claiming confidentiality, file a public technical summary and request a protective order rather than refusing outright.

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

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.
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.
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.
4. Produce the CSV/XLSX grid behind the RF plots: PointID, lat, lon, height (m AGL), band, %MPE, and cumulative %MPE.
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.
6. Provide sign mockups/graphics for each gate/perimeter segment and confirm the post-activation protocol follows Exhibit M.

B. Height, Alternatives, and Quantified Need

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.
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.
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.

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

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

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.
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.
3. Quantify access length (\sim 930 ft), tree clearing (including the \sim 75 trees \geq 6" DBH), and grading volumes; submit DEEP Construction Stormwater GP, SWPPP, and E&S plans.
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.
5. State whether USACE authorization is required (e.g., Nationwide Permit). If yes, supply verification/PCN; if no, cite the exemption.
6. Provide CT DEEP NDDDB correspondence and any time-of-year restrictions.

D. Floodplain Elevations and Visuals

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

3. Provide a landscape plan (species, growth rates, mature heights) that screens the compound within 2–3 growing seasons; include maintenance commitments.
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).
5. If any FAA lighting/marketing becomes required, provide revised simulations showing day/night effects before construction.

E. Waterways/Source-Water and Spill Prevention

1. State whether the project lies within the Little River source-water protection area; provide coordination/clearance with Putnam WPCA.
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.
3. Show stormwater flow paths and nearest catch basins/outfalls; identify protection measures during construction and operations.
4. Identify fuel type/volume per generator, runtime, containment type/volume ($\geq 110\%$), and refueling SOP (no fueling within 250 ft of waters).

F. Noise and Operations

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.
2. Provide O&M procedures for flood events (access control, spill kits, shutdown thresholds, refueling logistics).
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.
4. Provide load-bank testing schedule and controls.

G. NEXRAD / KBOX

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.
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.

H. Landowner Influence and Lease Terms

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).
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.
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).

I. Coordinates, FAA & Consistency

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.
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.

J. Construction Logistics & Vegetation

1. Provide construction hours, haul routes, and a traffic/safety plan; identify any night work.
2. Provide a tree removal schedule (count by DBH class, species) and replacement/landscaping plan (species, spacing, growth rates, maintenance).