

**Connecticut Siting Council**

**Re: Docket No. 535 — The Towers, LLC — Proposed Wireless Facility at 835 Norwich  
Worcester Turnpike (Route 169), Woodstock, CT**

Dear Council Members and Parties:

Please find enclosed Intervenor's Supplemental Interrogatories and Requests for Production for the above-referenced docket. These items are tailored to the Christmas Tree Shop site and include cross-docket comparative requests in the event a related nearby site is pending. Intervenor requests that the Applicant and any participating carriers provide the requested materials by the applicable deadline so the record reflects carrier-grade 'significant gap' evidence, least-intrusive-means analysis, cumulative RF compliance, and protections for wetlands, floodplain, source-water, and NEXRAD.

Intervenor incorporates by reference the mapping exhibits and will promptly submit any additional exhibits referenced herein as needed.

Respectfully submitted,

Paska Nayden

Intervenor/Founder CT4RTPMA  
CT4RT@protonmail.com

**Pre-Filed Testimony of Intervenor**  
**Docket No. 535 — The Towers, LLC — Wireless Facility at 835**  
**Norwich Worcester Turnpike (Route 169), Woodstock, CT**

Date: August 26, 2025

**Executive Summary**

Intervenor requests that the Council deny the application for lack of carrier-grade proof of a significant gap in personal wireless service and because the proposal is not the least-intrusive means given existing macros and feasible alternatives. Alternatively, if the Council considers approval, Intervenor requests adoption of the filed Proposed Conditions (cumulative RF compliance with post-activation measurements and signage, NEXRAD coordination, source-water/DEEP SWPPP, SPCC/containment, NDDB, and height minimization).

**Key Findings (record citations omitted for brevity)**

- **No demonstrated carrier-grade gap:** The record lacks recent, route-based drive tests (RSRP/RSRQ/SINR, call setup/retain, drops/blocks) showing a coverage/quality gap around the site.
- **Overlapping macro footprints:** Multiple existing macros overlap the site area; adding another 150-ft macro is unlikely to be the least-intrusive remedy for localized performance issues.
- **Parcel siting & wetlands:** Applicant's filings are internally inconsistent regarding wetlands near the access road; a ~930-ft road, trenching, and removal of ~75 trees are proposed where on-parcel alternatives appear feasible.
- **Flood/visual risk:** If equipment platforms require elevation for flood protection, the visual profile increases; targeted landscaping and height minimization are necessary conditions at minimum.
- **Waterways & source-water sensitivity:** Shepherds' Pond and Roseland Lake lie within 2–3 miles; construction stormwater and spill prevention must be robust and verified with local water authorities.
- **Two-site narrative:** If the sister site (Docket 534) is advanced, the Applicant must show quantified need for this site alone and comparative A-only / B-only / A+B scenarios before any approval here.



**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

Docket No. 535 — The Towers, LLC — Proposed Wireless Telecommunications Facility at  
835 Norwich Worcester Turnpike (Route 169), Woodstock, CT

**INTERVENOR'S MOTION FOR ORDER — NOAA ROC (KBOX)  
COORDINATION**

Intervenor respectfully moves the Council, pursuant to its authority to develop the record and impose protective conditions, to order the Applicant to coordinate with the National Weather Service's NOAA Radar Operations Center (ROC) regarding potential interference to the KBOX NEXRAD radar (Taunton/Norton, MA) and to file ROC's determination in this docket.

**Grounds**

1. The proposed facility includes RF transmissions that can, in certain configurations, pose interference risks to nearby NEXRAD systems. KBOX provides critical weather surveillance to Connecticut and adjoining regions.
2. ROC is the responsible engineering body for NEXRAD. A brief engineering review can resolve risk or identify simple mitigations (e.g., filters, power management, azimuth/tilt adjustments).
3. Coordination now will avoid post-construction disputes and ensure the public interest is protected.

**Requested Relief**

Intervenor requests that the Council issue an order directing the Applicant to:

- a) Submit a complete ROC coordination package for the Docket 535 site to NOAA ROC;
- b) File ROC's determination (and any recommended mitigations) in Docket 535 by [insert date or "prior to construction"]; and
- c) Implement any ROC-requested mitigations and temporarily cease operation of the offending emissions if ROC reports harmful interference until remedied.

**Proposed Order**

A one-page Proposed Order suitable for the Council's use is attached.

Respectfully submitted,

Paska Nayden

Intervenor/Founder CT4RTPMA

August 26, 2025

**Certificate of Service**

I certify that a copy of the foregoing has been served via electronic mail this date upon the Connecticut Siting Council and all parties and intervenors of record for Docket 535 as reflected on the Council's service list.

Paska Nayden

Intervenor/Founder CT4RTPMA



## **Intervenor Exhibit Index — Docket 535 (Proposed Structure)**

Paska Nayden, Intervenor/Founder CT4RTPMA

August 26, 2025

Exhibit A. Current Telecommunication Facilities/towers in Relationship to Proposed Docket 535 and Sister Docket 534:

Exhibit B: Overview Map of Existing in relationship to the Proposed Docket 535 (Yellow circle 1.5 Miles and Proposed Docket 534 (Green Circle):

Exhibit C. Existing macros (5-mi translucent) + proposed sites

Exhibit D. Local Woodstock Waterways within the Tower Zones:

Exhibit E: Core path of Taunton MA NEXRAD over Quiet Corner

Exhibit F. FAA Airspace Screening (PDF).

Exhibit G. NOAA ROC Coordination Request

Exhibit H. RF Signage & Access-Control Checklist

Exhibit I. Proposed Certificate Conditions

Exhibit J. §6409 Baseline & “No Substantial Change” Guide (DOCX).

Exhibit K. Proposed Findings of Fact & Conclusions of Law (DOCX).

Exhibit L. EME Post-Activation Measurement Protocol (1-page).

## INTERVENOR EXHIBITS

*Woodstock, Connecticut — Wireless Telecommunications Facility*

Docket 535

Intervenor: Paska Nayden, Founder CT4RTPMA

Exhibit A: Current Telecommunication Facilities/towers in Relationship to Proposed Docket 535 and Sister Docket 534:

Woodstock\_distances\_to\_keysites

	Name/Address	Latitude	Longitude	To Chase (mi) Docket 534	To Christmas Tree (mi) Docket 535
1	65 Ide Perrin Rd (Solair Recreation League)	42.02621	-72.07119	9.32	6.2
2	87 West Quassett Rd	41.92977	-71.98931	2.52	2.49
3	445 Prospect Street	42.01722	-71.98361	6.26	3.58
4	40 / 117 Sherman Road	41.97865	-72.09444	8.53	5.83
5	39 North Gate Road	41.93714	-71.95532	0.83	2.4
6	Woodstock Fair – 281 Route 169 (proxy at North Gate entrance)	41.93732	-71.95563	0.85	2.38
7	215 Coatney Hill Road	41.96205	-72.01804	4.48	1.85
8	156 Lebanon Hill Road	42.02703	-72.03592	8.16	5.07
9	Eastford Road (1825 Route 198)	42.01225	-72.07744	8.93	5.86
10	Pomfret Center Tower A	41.8901	-71.95503	3.03	5.39
11	Pomfret Center Tower B	41.8901	-71.95503	3.03	5.39



Exhibit B: Overview Map of Existing in relationship to the Proposed Docket 535 (Yellow circle 1.5 Miles and Proposed Docket 534 (Green Circle):

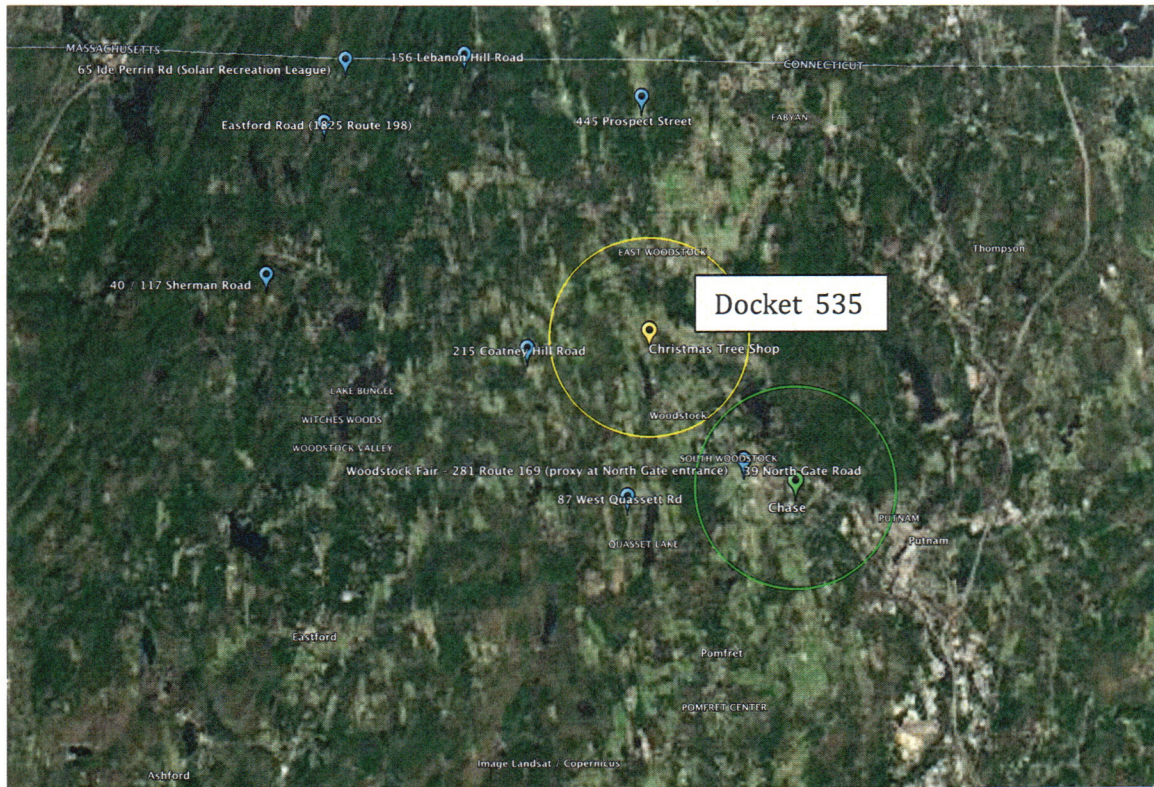
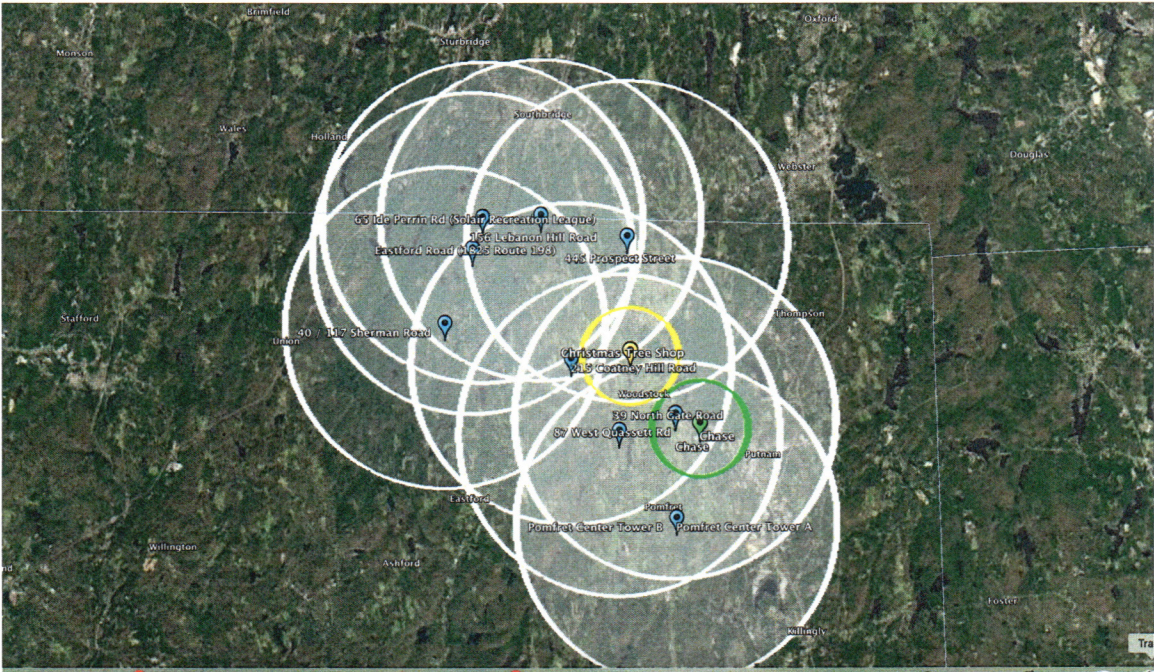




Exhibit C. Existing macros (5-mi translucent) + proposed sites





Black Pond - YMCA summer camp, lots of children swim and sail

Bungee lake - residents around that whole lake with a public beach

Roseland Lake - residents around that whole lake and our town's public park, playground, camping, fishing, little league, kayaking, etc.

Shepherds' Pond - fed from Roseland into Little River and then Putnam's drinking water. This is lined with homes and people fish and hike along this pond and river source.

Muddy Pond - Local town beach with lots of swimming and fishing and residents

Quasset lake - residents, local private schools use it for rowing practice and racing, swimming and water sports.

Existing macro overlap and proximity to lakes (orange circles.). Yellow and Green Radius 1.5 Miles, all other 5 Miles.

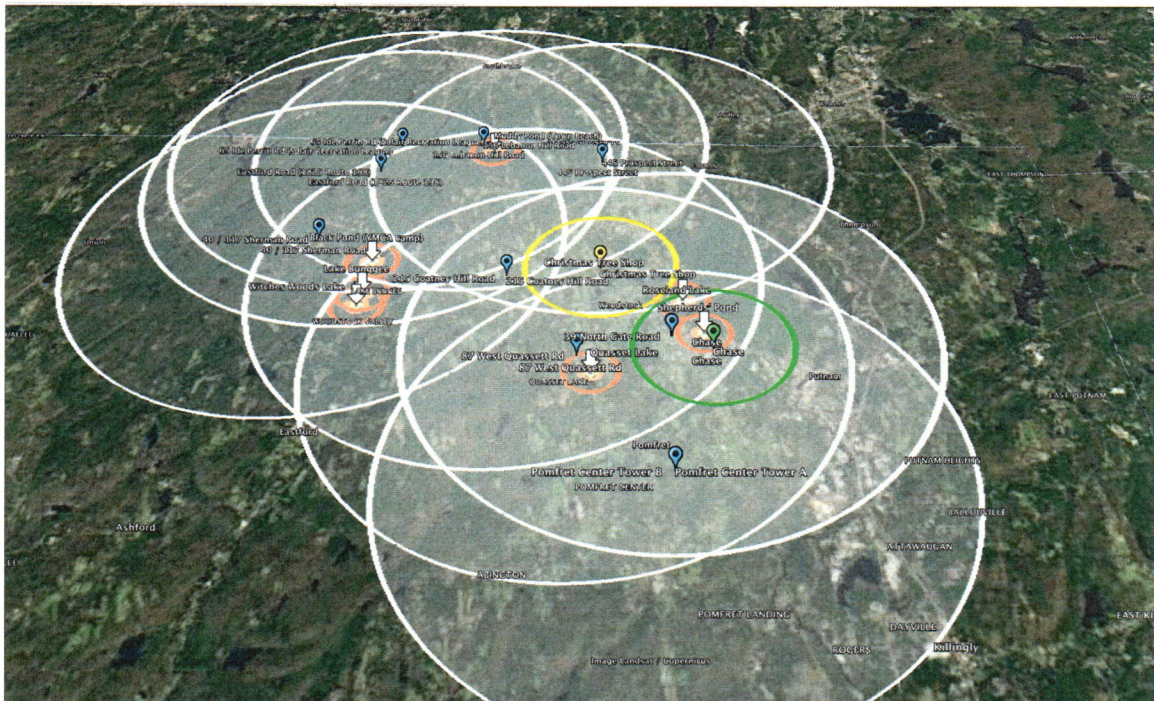
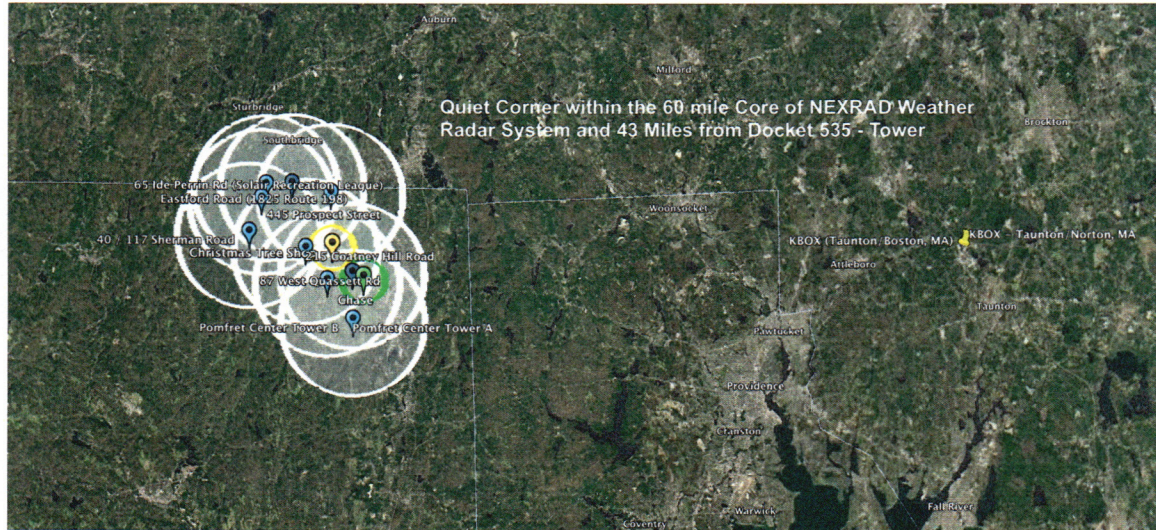




Exhibit E: Core path of Taunton MA NEXRAD over Quiet Corner

Location of **KBOX NEXRAD (WSR-88D)** in Taunton/Norton, MA, shown relative to the **Docket 535 Christmas Tree Shop** site in Woodstock, CT. NEXRAD operates in **S-band (~2.7–3.0 GHz)**; the proposed LTE/NR bands are **not co-channel**. This image is provided for **due-diligence context** only.





\*\*\*\*\*

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

\*\*\*\*\*

Airspace User: Not Identified

File: US-CT-5040

Location: Woodstock, CT

Latitude: 41°-56'-57.11" Longitude:  
71°-58'-16.94"

SITE ELEVATION AMSL.....477 ft.

STRUCTURE HEIGHT.....155 ft.

OVERALL HEIGHT AMSL.....632 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 LZD

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: 22195.64 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: LZD: DANIELSON

Type: A RD: 49869.06 RE: 231.4

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

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	BEARING	RANGE
IDENT TYP NAME	To FACIL	IN NM
ELEVATION IFR		
64CT AIR WOODSTOCK	153.47	1.86
+167 No Impact to Private Landing Facility. DNE 200 ft AGL within 3 NM of Airport.		
31CT HEL QUIET CORNER	161.22	5.99
+364 No Impact to Private Landing Facility Structure is beyond notice limit by 31396 feet.		

AIR NAVIGATION ELECTRONIC FACILITIES									
GRND	FAC		ST			DIST	DELTA		
ANGLE	APCH	IDNT	TYPE	AT	FREQ	VECTOR	(ft)	ELEVA	ST LOCATION
BEAR									
	PUT	VOR/DME	R		117.4	86.2	34701	-20	CT
PUTNAM			-.03						
	ORH	RADAR WXL	Y			12.99	120678	-371	MA
WORCESTER			-.18						
	PVD	RADAR ASR	I		2735.	129.43	131372	+66	RI THEODORE
FRANCIS			.03						
	ORW	VOR/DME	I		110.0	183.04	143339	+322	CT
NORWICH			.13						
	PVD	VOR/DME	R		115.6	119.21	168847	+583	RI
PROVIDENCE			.20						
	CEF	TACAN	R		114.0	301.17	175759	+392	MA
WESTOVER			.13						
	HFD	VOR/DME	R		114.9	234.25	193083	-217	CT
HARTFORD			-.06						
	BDL	RADAR ASR	I			268.61	193504	+396	CT BRADLEY
INTL			.12						
	KBOX	RADAR WXL	Y			89.11	226992	+408	MA BOSTON
WXL			.10						

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 @ 8186 meters.

Airspace® Summary Version 24.7.703

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**NOAA Radar Operations Center (ROC) — Coordination Request  
KBOX (Taunton/Norton, MA) — Docket No. 535**

August 26, 2025

Subject: Coordination request re potential NEXRAD interference — Proposed Wireless Facility at 835 Norwich Worcester Turnpike (Route 169), Woodstock, CT (Docket 535)

Dear ROC Engineering Team,

Intervenor respectfully requests ROC review of the proposed wireless facility referenced above for potential impacts to the KBOX NEXRAD (Taunton/Norton, MA). We seek either a letter of no-objection or recommended mitigations to avoid harmful interference.

**Project Summary**

- Site name & address: Christmas Tree Shop site, 835 Norwich Worcester Turnpike (Route 169), Woodstock, CT
- Coordinates (WGS84): LAT \_\_\_\_\_, LON \_\_\_\_\_ (decimal degrees)
- Structure: monopole; proposed overall height \_\_\_\_\_ ft AGL (AMSL \_\_\_\_\_ ft)
- Antenna centerline(s): \_\_\_\_\_ ft AGL; azimuths: \_\_\_\_\_ ° / \_\_\_\_\_ ° / \_\_\_\_\_ °; downtilt(s): \_\_\_\_\_ °
- Antenna model(s) & pattern files: (attach)
- Transmit bands & tech: e.g., 700/850/1900/2100/3700 MHz; LTE/NR; channelization & occupied bandwidth (attach)
- EIRP/ERP per band & sector (dBm and watts); duty cycle assumptions
- Emissions mask / out-of-band & harmonic suppression specifications (attach)
- Back-up power: generator make/model; any auxiliary RF emitters (microwave links, public safety, etc.)

**Geometry to KBOX**

- Distance/azimuth from site to KBOX radar: \_\_\_\_\_ miles / \_\_\_\_\_ ° (attach path profile & line-of-sight analysis)
- Terrain/clutter notes along path: \_\_\_\_\_

- Any known co-channel or harmonic relationships with S-band NEXRAD front end:
- 

### **Requested ROC Output**

- 1) Determination whether the proposed facility poses risk of harmful interference to KBOX.
- 2) Any recommended mitigations (filters, power management, antenna orientation/tilt, scheduling).
- 3) Preferred point of contact for urgent reports and an emergency shut-down/mitigation protocol.

### **Attachments (suggested)**

- Site plan with tower/compound and access alignment
- Topographic map and aerial imagery (1–5 mi radius)
- Antenna datasheets and pattern files
- RF configuration tables (bands, carriers, EIRP per sector)
- Terrain path profile and line-of-sight plot to KBOX
- Cumulative OET-65 modeling summary (public access points)

Thank you for your review and guidance.

Sincerely,

Paska Nayden

CT4RT@protonmail.com

**RF Signage & Access-Control Checklist — 47 CFR §1.1307(b)(4) / ANSI Z535**

- Boundary-readable signs at pedestrian eye level (\*\*4–6 ft AGL\*\*), Category 2/3/4 zones marked.
- Sign content: symbol, hazard, consequence, avoidance action, responsible party contact.
- Fencing & locks at compound; ladder and climbing deterrents; rooftop PPE/notice protocols (if applicable).
- Post-activation survey: verify MPE boundaries and sign placements; update after changes or co-locations.



**Proposed Certificate Conditions — Intervenor (Docket 535)**

- **Cumulative RF Compliance.** Demonstrate worst-case cumulative compliance with FCC OET-65 (all authorized transmitters/tenants) at the fence line, property lines, nearest residence/school/park/trail, and on a 5–10 m ground grid, and file post-activation field measurements within 30 days of full activation and after material changes.
- **RF Signage & Access Control.** Install boundary-readable signage compliant with 47 CFR §1.1307(b)(4) and ANSI Z535, mounted 4–6 ft above grade, with marked Category 2/3/4 boundaries.
- **NEXRAD & Atmospheric Propagation.** (a) ROC Coordination (KBOX): Prior to construction, submit a coordination package to NOAA ROC and file ROC's determination; implement any mitigations. If ROC reports harmful interference, temporarily cease operation of the offending emissions until remedied. (b) Emissions/Harmonics Certification: File manufacturer test data and engineering certification that cumulative out-of-band emissions and harmonics meet FCC limits at the antenna after all filters, including demonstration of worst-case 700 MHz 4th harmonic (~2.8 GHz) suppression. (c) Ducting-Event Protocol: Maintain a 24/7 POC and written steps to reduce power/reconfigure/shut down the implicated sector/band during reported inversion events, with a corrective-action memo filed within 5 business days.
- **FAA/Part 77 & Lighting.** If as-built height/location changes trigger 14 CFR §77 notice, the Certificate Holder shall file FAA Form 7460 and obtain a Determination of No Hazard prior to construction. Any FAA-required lighting/markings shall be incorporated into revised photo simulations submitted to and accepted by the Council before construction. The Holder shall certify final WGS-84 coordinates used across FAA, ROC, and EME filings.
- **DEEP Stormwater & Erosion Controls.** File Construction Stormwater GP registration, SWPPP, and E&S plan; implement phasing, dewatering, and turbidity controls.
- **SPCC/Containment & Fueling.** If aggregate on-site oil  $\geq 1,320$  gal, file PE-certified SPCC; otherwise provide  $\geq 110\%$  secondary containment; no fueling within 250 ft of surface waters; maintain spill kits and contractor contact.
- **NDDB/Species Protection.** Implement CT DEEP NDDB conditions and seasonal constraints if applicable.
- **Height Minimization.** Limit to the lowest height demonstrated by the record (height-sensitivity plots) to meet the stated carrier service objective.
- **Visual Screening.** Install and maintain landscaping (species, spacing, growth rates) to screen equipment, including any elevated platforms; replace dead plantings for the life of the facility.
- **§6409 Baseline.** Record the approved height, appurtenances, and the 35'×45' site boundary as the baseline for modifications under 47 U.S.C. §1455 (47 C.F.R. §1.6100).

- Lease & Easements Filing (Pre-Construction). Prior to construction, the Certificate Holder shall file with the Council: (i) the executed ground lease and any amendments/options or master lease applicable to the site, with monetary consideration and commercial rates redacted; (ii) all recorded access and utility easements (metes-and-bounds/legal descriptions and allowed widths); and (iii) a concise lease summary identifying: the site boundary (e.g., 35'×45'), maximum permitted structure height and appurtenances, co-location/tenant rights and any incentives tied to height or tenant count, permitted generators/fuel/tank volumes, noise/lighting limits, restoration/abandonment obligations, and environmental indemnity/insurance provisions. Any later lease or easement amendment that would alter height, site boundary, fuel storage, number of cabinets/generators, or lighting shall be filed within 10 days. Council conditions control over any conflicting lease provision.



**Exhibit J — §6409 Baseline & “No Substantial Change” Guide**  
**Docket No. 535 — 835 Norwich Worcester Turnpike (Route 169), Woodstock, CT**

For purposes of future applications under 47 U.S.C. §1455 (Section 6409) and 47 C.F.R. §1.6100, the baseline is the approved height (145 ft AGL overall), appurtenances, and site boundary (35'×45' lease area as shown on Sheet Z-1). Any §6409 request must not exceed the “no substantial change” thresholds for height, appurtenance protrusion, cabinets, excavation (including the 30-ft rule for towers outside the public right-of-way), or defeat concealment/conditions, as defined in §1.6100(b)(7).

**Quick numeric thresholds (tower outside public ROW)**

- Height increase:  $\leq$  the greater of 10% of current height or one additional antenna array ( $\leq 20$  ft).
- Appurtenance protrusion:  $\leq 20$  ft from the tower.
- Ground cabinets:  $\leq 4$  new (and consistent with the technology).
- Excavation/deployment: not beyond the current site boundary;  $\leq 30$  ft allowance for towers outside the public ROW.
- Concealment/conditions: cannot defeat concealment or violate prior conditions.

**Examples — eligible vs. not eligible under §6409**

<b>Eligible (must be approved)</b>	<b>Not eligible (substantial change — local review allowed)</b>
Add AT&T at 136 ft AGL; +8 ft height; 2 new cabinets inside fence; antennas protrude 5 ft.	Raise top to 162 ft AGL (+17 ft) — exceeds 10%/one-array limit.
Swap same-size antennas/panels; no change to concealment; no digging outside site.	Add platform that protrudes 22 ft from monopole — exceeds 20-ft appurtenance limit.
Add 3rd cabinet and fiber tray inside existing fenced 35'×45' site; no new pad outside.	Add 5 new ground cabinets — exceeds 4-cabinet cap.
	Pour new generator pad 35 ft outside lease area — exceeds 30-ft outside-site allowance.



	Change from flush-mounted to large T-bar that defeats concealment promised in approval.
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*Note: The examples assume a 145-ft monopole outside the public right-of-way. Exact determinations follow 47 C.F.R. §1.6100(b)(7). The Council's order should identify the approved height/appurtenances and the 35'×45' site boundary as the §6409 baseline.*

**Proposed Findings of Fact & Conclusions of Law**

**Docket No. 535 — Woodstock, CT — 835 Norwich Worcester Turnpike (Route 169)**

Submitted by: Paska Nayden, CT4RTPM (Intervenor) — Founder

August 26, 2025

**Findings of Fact**

- Applicant has not produced carrier-grade evidence (recent drive-tests showing RSRP/RSRQ/SINR, VoLTE call setup/retain, drops/blocks) to prove a significant gap in personal wireless service in the project area.
- Multiple existing macros overlap the Chase / Christmas Tree Shop areas; Applicant has not shown why collocation, lower heights, or on-parcel relocations would fail technically.
- The proposed access road (~930 ft) and removal of ~75 substantial trees would occur notwithstanding feasible on-parcel alternatives with lower wetlands/visual impacts (per Applicant's own filings).
- The record lacks a height-sensitivity study (150/140/130/120 ft AGL) and comparative RF for A-only / B-only / A+B scenarios needed to justify the proposed height and the specific parcel location.
- The site lies within 2–3 miles of Shepherds' Pond and Roseland Lake; robust stormwater controls and spill containment are necessary regardless of outcome.
- At ~155 ft AGL the FAA airspace screen indicates no Part 77 notice required; however, any increase to  $\geq 200$  ft AGL or relocation would trigger notice and potential lighting/marketing updates.
- Seasonal temperature inversions can induce tropospheric ducting; while cellular bands are not co-channel with KBOX NEXRAD, prudent NOAA ROC coordination and harmonics/OOBE certification are warranted.

**Conclusions of Law**

- The Applicant has not met its burden to show a significant gap in personal wireless service or that the proposal is the least-intrusive means (§332(c)(7)).
- Visual/neighborhood impacts and environmental prudence (wetlands, tree removal, flood/erosion, source-water) support denial or, at minimum, strict conditions.
- Because 47 U.S.C. §1455 (Section 6409) constrains later review, the Council should establish a clear baseline (height/appurtenances/site boundary) in any approval.



## **Requested Order**

Deny the application for failure to prove a carrier-grade significant gap and least-intrusive means; or, alternatively, approve only with the conditions below.

- Cumulative RF compliance with post-activation field measurements.
- RF signage per 47 CFR §1.1307(b)(4) and ANSI Z535 (4–6 ft mounting; boundary legibility).
- NEXRAD (KBOX): NOAA ROC coordination; harmonics/OOBE certification (incl. 700 MHz 4th harmonic); ducting-event protocol with 24/7 POC.
- FAA/Part 77 & lighting: file FAA 7460 if triggered; update photo sims; certify final WGS-84 coordinates across FAA/ROC/EME filings.
- DEEP stormwater SWPPP/E&S, SPCC containment; NDDDB species protection; height minimization to the lowest proven workable height.
- §6409 baseline recorded (height/appurtenances/35'×45' site) and Lease & Easements Filing (executed lease redacted for payments, recorded easements, lease summary).

Respectfully submitted,

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Paska Nayden  
Founder, CT4RTPM  
CT4RT@protonmail.com

**Exhibit L — EME Post-Activation Measurement Protocol (1-Page)**  
**Docket No. 535 — 835 Norwich Worcester Turnpike, Woodstock, CT**

Prepared by: Paska Nayden, Founder CT4RTPM (Intervenor)

August 26, 2025

**Purpose**

Verify post-activation compliance with FCC RF exposure limits (47 CFR §1.1307(b)/§1.1310; OET-65), accounting for cumulative emissions from all authorized transmitters/tenants, and set/confirm RF signage & access boundaries.

**References**

- FCC OET Bulletin 65 (Edition 97-01); 47 CFR §1.1307(b), §1.1310
- IEEE C95.1-2019 good practice for methods/uncertainty

**Instruments & Setup**

- Calibrated broadband isotropic E-field meter with datalogging ( $\geq 100$  kHz–6/8/40 GHz), tripod at 1.5 m AGL; factory calibration  $\leq 24$  months; uncertainty budget recorded.
- Max-power downlink state: all active sectors/bands at maximum permitted configuration; record carrier, band, EIRP, antenna model/tilt/azimuth.
- Weather: dry, wind  $< 15$  mph; avoid precipitation; record temperature, humidity, and date/time.

**Measurement Points (ground-level unless noted)**

- Fence line: every  $\sim 10$  m around compound and at each gate; verify Category 3/4 boundaries near public road/trail sectors.
- Property lines: public-facing edges and nearest residence/school/park/trail ( $\geq 5$  points per location).
- Radials from tower: along three sector boresights (0–150 m) with points at 5, 10, 20, 50, 100, 150 m.
- Hot-spot scan: hand scan accessible areas to locate peaks; verify at 1.0 m and 1.8 m AGL if warranted.
- Rooftop (if applicable): access hatch, parapet near sector edges, and marked walkways.

**Method & Compliance Calculation**

- Apply FCC time-averaging by area type (general public vs. occupational); document duty-cycle assumptions.



- Record V/m or % of MPE at each point. Compute cumulative exposure across bands:  
 $\Sigma(E_i/E_{i\_limit}) \leq 1.00$  (sum of %MPE  $\leq 100\%$ ).
- If any public-accessible point exceeds 50% of general-public MPE, adjust signage/boundaries so Category 2/3/4 lines are clearly demarcated.
- If any point exceeds the applicable MPE, immediately reduce power/shut down the implicated band/sector and re-test after mitigation.

### **Reporting (file within 30 days of full activation)**

- Map with all measurement points (lat/lon), sector azimuths, and final Category 2/3/4 boundaries.
- Table: point ID, coordinates/height, bands active, measured field, % of MPE, and cumulative sum.
- Photos of boundary signage/markers and any adjustments made.
- Engineer statement of compliance including instrument model/SN, calibration date, and uncertainty estimate.

### **Change Management**

- Repeat this protocol after any material change (new tenant, antenna/tilt/EIRP changes, or platform elevation) and file an updated as-built/signage plan within 30 days.

**Certificate of Service — Docket No. 535**

I certify that on the date below a copy of the foregoing was served via electronic mail to the Connecticut Siting Council and to all parties and intervenors of record for Docket 535 as reflected on the Council's service list.

Date: 8.26.25

Kenneth C. Baldwin, Esq.  
Jonathan Schaefer, Esq.  
Robinson & Cole LLP  
One State Street  
Hartford, CT 06103  
(860) 275-8345  
kbaldwin@rc.com  
jschaefer@rc.com

Brian Paul  
The Towers, LLC  
c/o Vertical Bridge REIT, LLC  
750 Park of Commerce Drive  
Boca Raton, FL 33787  
Brian.Paul@verticalbridge.com

Elizabeth Glidden  
Cellco Partnership d/b/a Verizon  
Wireless  
20 Alexander Drive  
Wallingford, CT 06492  
elizabeth.glidden@verizonwireless.com

Paska Nayden  
Intervenor/Founder CT4RTPMA  
CT4RT@protonmail.com