

From: [Bachman, Melanie](#)
To: [Baldwin, Kenneth](#); [Schaefer, Jon](#)
Cc: [Mayo, Rachel](#); [Brian Paul](#); "elizabeth.glidden@verizonwireless.com"; [CT4RT](#); [CSC-DL Siting Council](#)
Subject: RE: Docket No. 535 - 835 Norwich Turnpike (Route 169), Woodstock, CT - Supplemental Response to Council's Interrogatory No. 54, Response to Interrogatories from Intervenor P. Nayden & Supplemental Pre-Hearing Submission
Date: Friday, September 5, 2025 8:35:55 AM
Attachments: [image001.png](#)
[RE docket 535.msg](#)

Good morning, Attorney Baldwin.

Thank you for your response.

Given there is no objection from the applicant to Ms. Nayden's Request for Administrative Relief for a waiver of the submission of 15 copies, the request shall be granted, rendering Ms. Nayden's Alternative Motion moot.

As for Ms. Nayden's Motion to Continue/Reset Hearing Date, the Council will take that motion up at the continued evidentiary hearing on September 9, 2025. Please feel free to submit a written response to the Motion to Continue/Reset Hearing prior to the continued evidentiary hearing if time allows.

Also, please be advised that per the attached email request from Ms. Nayden on August 15, 2025, Ms. Nayden was provided with an additional copy of the Council's Continued Evidentiary Hearing Memo and Revised Schedule that were issued and distributed to the service list, including Ms. Nayden, on July 31, 2025.

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051
860-827-2951



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From: Baldwin, Kenneth <KBALDWIN@RC.com>
Sent: Thursday, September 4, 2025 6:00 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>; Schaefer, Jon <JSchaefer@rc.com>
Cc: Mayo, Rachel <rmayo@RC.com>; Brian Paul <brian.paul@verticalbridge.com>; 'elizabeth.glidden@verizonwireless.com' <elizabeth.glidden@verizonwireless.com>; CT4RT <ct4rt@protonmail.com>; CSC-DL Siting Council <Siting.Council@ct.gov>

Subject: RE: Docket No. 535 - 835 Norwich Turnpike (Route 169), Woodstock, CT - Supplemental Response to Council's Interrogatory No. 54, Response to Interrogatories from Intervenor P. Nayden & Supplemental Pre-Hearing Submission

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Attorney Bachman

This is in response to your email below and the two motions filed this afternoon by the Intervenor, Paska Nayden in Docket No. 535.

The Towers LLC does not object to the Intervenor's request for administrative relief and accommodation regarding the Council's acceptance of PDF documents in lieu of the "original" documents and the requirement for the hand-delivery fifteen (15) copies of said documents at 10 a.m. on the day of the continued evidentiary hearing.

The Towers LLC does however, object to the Intervenor's request to keep the evidentiary proceeding open for an additional 30-45 days to accept the applicant's responses to Intervenor's supplemental interrogatories. The Towers LLC filed those responses with the Council on Tuesday September 2, 2025, in accordance with the Council's detailed docket schedule. Electronic copies of those responses were also sent to the Intervenor.

The Towers LLC also objects to the Intervenor's request to screen share maps, figures and other electronic evidence. To the extent that these maps, figures and evidence are already a part of the Docket No. 535 record, there is no need to "screen share" that information. All parties will have access to that information during the hearing as it is already available in the Council's electronic data base. The deadline for the submission of new evidence has passed. The Towers LLC will object to any effort by the Intervenor introduce new evidence or exhibits at the September 9, 2025, evidentiary hearing.

Thank you for the opportunity to respond to these motions.

Kenneth C. Baldwin

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Stamford | Wilmington | Philadelphia | Los Angeles | Albany | www.rc.com

From: Bachman, Melanie <Melanie.Bachman@ct.gov>

Sent: Thursday, September 4, 2025 4:11 PM

To: Baldwin, Kenneth <KBALDWIN@RC.com>; Schaefer, Jon <JSchaefer@rc.com>

Cc: Mayo, Rachel <rmayo@RC.com>; Brian Paul <brian.paul@verticalbridge.com>;

'elizabeth.glidden@verizonwireless.com' <elizabeth.glidden@verizonwireless.com>; CT4RT <ct4rt@protonmail.com>; CSC-DL Siting Council <Siting.Council@ct.gov>

Subject: RE: Docket No. 535 - 835 Norwich Turnpike (Route 169), Woodstock, CT - Supplemental Response to Council's Interrogatory No. 54, Response to Interrogatories from Intervenor P. Nayden & Supplemental Pre-Hearing Submission



CAUTION:

EXTERNAL EMAIL

Good afternoon, Attorneys Baldwin and Schaefer.

Please see the attached email with two motions from Intervenor Paska Nayden filed this afternoon with the Council related to the Council's regulatory requirement for an original and 15 copies of any document submitted into the record to be mailed or hand-delivered to the Council on or before the deadline in the schedule for this matter.

Please indicate whether or not you have an objection to the Motion for Administrative Relief, which seeks acceptance of the pdfs of the Intervenor's supplemental interrogatories and other documents filed in this matter by the Intervenor as the "original" and a waiver of the 15 copy requirement, or in the alternative, hand delivery of the 15 copies at 10 AM on the day of the continued evidentiary hearing session.

If you and your client have no objection to the Motion for Administrative Relief, the Alternative Motion filed by Ms. Nayden would be rendered moot.

Please advise at your earliest convenience.

Thanks.

Melanie A. Bachman, Esq.
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860-827-2951



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From: Arguello, Karina I. <KArguello@rc.com>

Sent: Tuesday, September 2, 2025 12:25 PM

To: Bachman, Melanie <Melanie.Bachman@ct.gov>; CSC-DL Siting Council <Siting.Council@ct.gov>

Cc: Baldwin, Kenneth <KBALDWIN@RC.com>; Schaefer, Jon <JSchaefer@rc.com>; Mayo, Rachel <rmayo@RC.com>; Brian Paul <brian.paul@verticalbridge.com>;

'elizabeth.glidden@verizonwireless.com' <elizabeth.glidden@verizonwireless.com>; CT4RT <ct4rt@protonmail.com>

Subject: Docket No. 535 - 835 Norwich Turnpike (Route 169), Woodstock, CT - Supplemental

Response to Council's Interrogatory No. 54, Response to Interrogatories from Intervenor P. Nayden & Supplemental Pre-Hearing Submission

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Good afternoon,

Please see the attached correspondences:

- Supplemental Response to Council's Interrogatory No. 54
- Responses to Interrogatories from Intervenor, P. Nayden
- Supplemental Pre-Hearing Submission

Hard copies will be hand delivered to the Council this afternoon.

Thank you,
Karina

Karina I. Arguello (she/her/hers)
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From: [Fontaine, Lisa](#)
To: [Paska](#)
Cc: [CSC-DL Siting Council](#)
Subject: RE: docket 535
Date: Friday, August 15, 2025 12:06:23 PM
Attachments: [DO535-CouncilContinuationofEvidHearingMemo_a.pdf](#)
[image001.png](#)

Good Morning,

I am so sorry for the loss of your family member.

Attached is the Council's Continuation Memorandum for your review which lists deadline dates. With the granting of the extension, below is the most recent schedule. You can find the DO535 record on the Council website: portal.ct.gov/csc under the link "Pending Matters". Thank you.

Final Deadline for Exchange of Interrogatories between Parties and Intervenor	08/26/2025
Final Deadline for pre-filed testimony and responses to interrogatories	09/02/2025
Continued Evidentiary Session 2:00 p.m. via Zoom remote conferencing (refer to Hearing Information section on Docket 535 project webpage for Zoom remote conferencing log in/call in)	09/09/2025
Close of Evidentiary Record	TBD
Close of Public Comment Period	TBD
Draft Findings of Fact	TBD
Draft Findings of Fact, Opinion & Decision & Order	TBD
Deadline for Final Decision	09/04/2025
Deadline for Final Decision with Extension per Applicant's Consent	03/03/2026

From: Paska <PaskaAnn@proton.me>
Sent: Friday, August 15, 2025 7:59 AM
To: Fontaine, Lisa <Lisa.Fontaine@ct.gov>
Subject: docket 535

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Lisa, I'm checking in. I read the lower decision for 535 was set for March 2, 2026 - I don't want to miss any deadlines - please let me know by when should I submit my documents in light of this change. I have been dealing with a sudden death in my family so have been out of touch for entire week and still have out of state family here so whatever you need I can get out early next week.

Paska,

I hereby reject your offer to contract. I opt out of any agreement that is set forth by you in your attempt to recontract.

Sent with [Proton Mail](#) secure email.



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E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

July 31, 2025

TO: Service List, dated July 31, 2025

FROM: Melanie Bachman, Executive Director *NAB*

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), Woodstock, Connecticut.

Motions

During the evidentiary hearing session held on July 31, 2025 for the above-referenced matter, the Connecticut Siting Council (Council) ruled on the following motion and request:

1. **The Towers LLC Motion for Protective Order – Lease Agreement Financial Terms, dated April 21, 2025.**

The motion was granted.

2. **Paska Nayden Request for Intervenor Status, dated July 31, 2025.**

This request was granted.

Continuation of Evidentiary Hearing

The Council shall continue the evidentiary hearing for the above-referenced proceeding on **Tuesday, September 9, 2025**, via Zoom conferencing, beginning at **2:00 p.m.** A copy of the Instructions for Public Access to the Continued Evidentiary Hearing is attached.

The hearing shall commence with the continued appearance of the Applicant for cross examination on any new exhibits by the Council and concluding with cross-examination of the Applicant on any new exhibits by Intervenor Paska Nayden.

The hearing shall proceed with the appearance of Paska Nayden for cross examination by the Council and the Applicant.

To save the time and expense of the parties, intervenors and the public, and to conclude this proceeding in a timely fashion, the Council requests that all parties and intervenors submit additional interrogatories to the applicant and other parties and intervenors before the close of business on **August 26, 2025**. Interrogatory responses and additional pre-filed testimony should be submitted to the Council before the close of business on **September 2, 2025**. This includes the original and 15 hard copies.

Please be advised that the close of business at the Council office is 4:30 PM Monday through Friday.

Direct testimony at the hearings is not permitted. This applies to all parties and intervenors.

The **final deadline** for submission of pre-filed testimony and responses to interrogatories is **September 2, 2025**.

Council Request for Extension of Time to Render a Final Decision

The current deadline for a final decision on the above-mentioned application is September 4, 2025. Due to the scheduling of the continued evidentiary hearing, the Council will need additional time to render a final decision.

Connecticut General Statutes (CGS) §16-50p(a) states, in part, “The Council’s decision shall be rendered... Not later than one hundred eighty days after the filing of an application... provided the Council may extend such period by not more than one hundred eighty days **with the consent of the applicant.**” (Emphasis added).

Pursuant to CGS §16-50p(a), the Council hereby requests consent from the applicant for an extension of the final decision deadline in Docket No. 535 until March 3, 2026. Please respond in writing by **August 6, 2025**.

We thank you in advance for your timely response to this matter.

If you have any questions about Council procedures, please do not hesitate to contact me at the Council office at 860-827-2935.

Thank you.

MAB/ANM/laf

Enclosures: Schedule, dated July 31, 2025
 Instructions for Public Access to Docket No. 535 Continued Evidentiary Hearing
 Session

c: Council Members
 A Plus Reporting Service, LLC



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REVISED SCHEDULE

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), Woodstock, Connecticut.

Application received	04/07/2025
Completeness review	05/01/2025
Council Interrogatories	
• Set-One Issued	06/30/2025
• Set-One Responses due	07/14/2025
Pre-hearing conference via Zoom remote conferencing – 11:00 a.m.	06/25/2025
Deadline for Exchange of Interrogatories between Parties and Intervenors	07/17/2025
Deadline for pre-filed testimony and responses to interrogatories	07/24/2025
Deadline for State Agency Comments	07/24/2025
Deadline for Municipal Comments	07/24/2025
Deadline to request Party/Intervenor status	07/24/2025
Public Hearing 2:00 p.m. evidentiary session and 6:30 p.m. public comment session via Zoom remote conferencing	07/31/2025
Final Deadline for Exchange of Interrogatories between Parties and Intervenors	08/26/2025
Final Deadline for pre-filed testimony and responses to interrogatories	09/02/2025
Continued Evidentiary Session 2:00 p.m. via Zoom remote conferencing (refer to Hearing Information section on Docket 535 project webpage for Zoom remote conferencing log in/call in)	09/09/2025
Close of Evidentiary Record	TBD
Close of Public Comment Period	TBD
Draft Findings of Fact	TBD
Draft Findings of Fact, Opinion & Decision & Order	TBD
Deadline for Final Decision	09/04/2025



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**Instructions for Public Access to Docket No. 535 Continued Evidentiary
Hearing Session – September 9, 2025 – 2 PM**

PLEASE NOTE:

- Interested persons may join the continued evidentiary session to listen, but **no public comments will be received** during the continued evidentiary session. Public comments may be submitted to the Council by email at siting.council@ct.gov or by regular mail.
- Any person may be removed from the remote continued evidentiary session at the discretion of the Council.
- All participants are requested to mute sound notifications on their computer, smartphone or tablet. Telephones are often equipped with a “do not disturb” feature for the dial-in option.

Access to Continued Evidentiary Hearing Session

1. Attendees can join by clicking (or entering) the following link:
<https://us06web.zoom.us/j/89933729539?pwd=SIBSFv9fjX3FKmSAcsyIbIiGTu4gi.1>
2. from a computer, smartphone, or tablet. No prior software download is required.
Meeting ID: 899 3372 9539 and **Passcode:** gfb1bB
3. For audio-only participation, attendees can join by dialing in at **1 (929) 205 6099 (not toll free)** and then enter the **Meeting ID:** 899 3372 9539 and **Passcode:** 545067 from a telephone.
4. All microphones will be muted upon entry into the meeting and will be turned on in the order of party appearances and cross examination governed by the Hearing Program.
5. **No public comments will be received during the continued evidentiary hearing session.**