

One State Street
Hartford, CT 06103
Main (860) 275-8200
Fax (860) 275-8299
kbaldwin@rc.com
Direct (860) 275-8345

Also admitted in Massachusetts

December 2, 2025

Via Electronic and U.S. Mail

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

Re: **Docket No. 543 – 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 17 Warren Road, Washington (New Preston), Connecticut**

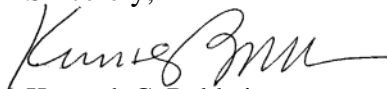
Revised Pre-Hearing Submission

Dear Attorney Bachman:

Enclosed please find the Applicant's Revised Prehearing Submission identifying a change to its witness panel of the December 4, 2025 evidentiary and public hearing sessions in Docket No. 543. Due to a recently discovered scheduling conflict, the Applicant will remove Kip Divito from its witness panel and replace him with Keith Vellante, Director of RF Services at C Squared Systems, LLC. A copy of Mr. Vellante's resume is attached.

If you have any questions or need any additional information regarding these matters, please contact me.

Sincerely,



Kenneth C. Baldwin

Copy to:
Parties and Intervenors of Record

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
THE TOWERS, LLC APPLICATION FOR A	:	DOCKET NO. 543
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A TELECOMMUNICATIONS	:	
FACILITY AND ASSOCIATED EQUIPMENT	:	
LOCATED AT 17 WARREN ROAD,	:	
WASHINGTON, CONNECTICUT	:	DECEMBER 2, 2025

REVISED PRE-HEARING SUBMISSION

The Towers, LLC (“The Towers”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Brian Paul, Project Manager, Vertical Bridge REIT, LLC
2. **Keith Vellante, Sr. Radio Frequency Engineer/Manager/Director of RF Services, C Squared Systems, LLC**
3. Elizabeth Glidden, Real Estate Regulatory Specialist, Verizon Wireless
4. Joseph Johnston, P.E., Vice President, Engineering, Airosmith Development Inc.
5. Jason Margelot, Project Manager, Airosmith Development Inc.
6. Dean Gustafson, Senior Soil Scientist and Director of Environmental Services,
All-Points Technology Corporation
7. Rick Landino, Senior Designer/Analyst, All-Points Technology Corporation

B. Exhibits to be offered

The Towers intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by The Towers, dated July 30, 2025.
2. Bulk file exhibits including:
 - a. The Tower's "Technical Report," dated March 19, 2025, filed with the Town of Washington;
 - b. Town of Washington Zoning Regulations;
 - c. Town of Washington Inland Wetlands and Watercourses Regulations; and
 - d. Town of Washington Plan of Conservation and Development.
3. Applicant's Affidavit of Publication filed with the Council on August 4, 2025.
4. Applicant's Sign Posting Affidavit filed with the Council on November 24, 2025.
5. Applicant's Responses to Council Interrogatories filed with the Council on November 26, 2025.

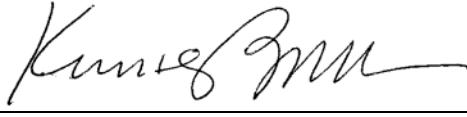
The Applicant reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties, or intervenors.

C. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, Kenneth C. Baldwin, Esq., will make a brief presentation describing the site features and proposed site improvements. Mr. Baldwin will refer to the Site Location Map, Site Schematic and Plan Sheet Z-4 included in Attachment 1 of the Docket No. 542 Application. Electronic copies of the Site Location Map, the Site Schematic and Plan Sheet Z-4 are attached to this filing.

Respectfully submitted,

THE TOWERS, LLC

By: 

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
One State Street
Hartford, CT 06103
Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of November 2025, a copy of the foregoing was sent,
via electronic mail, to:

The Honorable James L. Brinton
First Selectperson
Town of Washington
Bryan Memorial Town Hall
2 Bryan Hall Plaza
Washington Depot, CT 06794-0383
(860) 868-2259
Jbrinton@washingtonct.org

The Honorable Gregory M. LaCava
First Selectperson
Town of Warren
50 Cemetery Road
Warren, CT 06754
(860) 868-7881
selectman@warrenct.gov

David F. Sherwood, Esq.
Moriarty, Paetzold & Sherwood
2230 Main Street
P.O. Box 1420
Glastonbury, CT 06033
(860) 657-1010
dfsherwood@gmail.com

Joseph P. Mortelliti, Esq.
Cramer & Anderson LLP
30 Main Street, Suite 204
Danbury, CT 06810
(203) 744-1234
jmortelliti@crameranderson.com



Kenneth C. Baldwin



Keith Vellante
C Squared Systems, LLC
65 Dartmouth Drive
Auburn, NH 03032

Professional Profile:

- ❖ Radio Frequency (RF) & Telecommunications System Engineer since 2000
- ❖ 750/Cellular/PCS/AWS Coverage Design of 5G NR, 4G LTE, and 3G UMTS/CDMA networks
- ❖ Zoning Testimony for FCC licensed wireless carriers in MA, NH, ME, RI, NY, NJ
- ❖ Public Safety System Design
- ❖ GIS/Mapping and Data Analysis

Professional Experience:

Sr. RF Engineer/Manager/Director of RF Services

C Squared Systems, LLC (June 2009 – Present)

Manchester & Auburn, NH

- ❖ Serving a variety of technical needs for customers in the wireless/telecommunications industry
- ❖ Project Management of Zoning Support and EME Compliance Projects for wireless carriers
- ❖ RF System Design and Propagation Modeling, RF Exposure Compliance Analysis, IM Analysis
- ❖ Train new RF engineers

Sr. RF Engineer

PierCon Solutions, LLC (September 2000 – June 2009)

Lincoln Park, NJ

- ❖ RF Engineer for projects with clients such as Motorola, Sprint, and T-Mobile (detailed below)
- ❖ Lead Engineer on Wireless Broadband Projects

Motorola (July 2007 – May 2009)

Glen Rock & Montvale, NJ

- ❖ System Engineering consultant supporting design activities for the FDNY Public Safety System
- ❖ Responsible for system documentation updates (Audio Routing Drawings, Rack Drawings, Signal and Cross-connect Reports) reflecting design changes made to a legacy console system for integration of a new UHF Simulcast system
- ❖ Design equipment connections and wiring details to implement system modifications
- ❖ Support technicians implementing equipment changes/additions

Sprint-Nextel (Sept. 2000 – June 2007)

Mahwah, NJ & Burlington/Woburn, MA

- ❖ RF Engineering consultant to Sprint in support of their PCS CDMA network in the Boston MTA and New York MTA
- ❖ Lead Engineer responsible for data analysis and RF acceptance of new facilities
 - Sweep test analysis, post-processing and analysis of new facility drive test data, Recommendation of optimization changes to Performance Engineering Team
- ❖ CDMA representative for evaluating consolidation of CDMA & iDEN assets post-merger (Sprint PCS/Nextel)

Educational Background:

University of New Hampshire

Durham, NH

B.S. Electrical Engineering, 2000