STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	DOCKET NO. 545
ARX WIRELESS INFRASTRUCTURE, LLC AND NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T 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 306 FLANDERS ROAD, EAST LYME, CONNECTICUT	:	February 24, 2026

ARX WIRELESS INFRASTRUCTURE, LLC
AND NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T
LATE-FILED EXHIBITS DATED FEBRUARY 24, 2026

1. Provide a noise study for the projected cumulative noise levels at the property boundaries that accounts for AT&T and Cellco equipment, including, but not limited to the walk-in equipment cabinets

   Included as Attachment 1 is a Noise Study prepared by Noise Control Engineering dated February 23, 2026.

2. Provide the approximate noise reduction in dB resulting from the installation of the noise attenuation cover for AT&T and Cellco's proposed backup diesel generators.

   Please see the Nosie Study included as Attachment 1.

RESPECTFULLY SUBMITTED,

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By:_____

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CERTIFICATION OF SERVICE

I hereby certify that on this day the foregoing was sent electronically and sixteen (16) hard copies were sent overnight mail to the Connecticut Siting Council and sent electronically to the parties on the service list as noted below.

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ATTACHMENT 1

NCE Report 2026-013

306 Flanders Road, East Lyme, CT – Cell Tower Noise Study

Noise Evaluation

Revision 0

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2/23/2026

NCE Job No. 26504.01

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REVISION HISTORY

Rev	Date	Summary of Changes
0	2/23/2026	Original Issue

Contents

1.0 INTRODUCTION

Noise Control Engineering, LLC (NCE) was retained by SAI Group (SAI) to perform a noise evaluation of the proposed cell tower facility at 306 Flanders Road in East Lyme, CT (henceforth the "site").

The proposed site consists of equipment skids for two cellular providers: Verizon and AT&T. The Verizon equipment will be located along the west side of the site and will consist of one (1) Generac SD050 diesel generator and two (2) AC equipment cabinets. The AT&T equipment will be located in the southwest corner of the site and will consist of one (1) Polar Power natural gas generator and one (1) AC equipment cabinet. This report presents the results of predictions of far-field noise due to the noise-producing equipment.

2.0 NOISE REQUIREMENTS

The project site is evaluated against the noise regulations in the Connecticut General Statutes (CGS) Title 22a Chapter 442, §22a-69[1] and is discussed in detail in the following section. A summary of the noise limits is provided below.

- **Broadband noise limits** for residential (class A), commercial (class B), and industrial (class C) properties, and
- **Prominent Discrete tone penalty** of 5 dB to be subtracted from the broadband noise limit if the noise emitter has a prominent discrete tone.

All limits are to be applied at the nearest receiving property line. The AC equipment cabinets are expected to operate 24 hours a day and therefore are required to meet both the daytime and nighttime limits.

The emergency generators are exempt during an emergency condition and also exempt during routine maintenance per Connecticut Department of Energy and Environmental Protection (DEEP) Noise Control Standards § 22a-69-1.8(f). However, for informational purposes only, noise levels were predicted for these conditions and compared against the daytime limits.

2.1 CT General Statutes (CGS) Chapter 442, §22a-69

Section §22a-69-3.5 of the CT Noise Code provides maximum broadband sound pressure levels for both residential (class A), commercial (class B), and industrial (class C) properties based on the time of day and zoning type of the noise emitting property. These limits are reproduced in Table 1, with daytime hours between 10:00 p.m. and 7:00 a.m. and nighttime hours between 10:00 p.m. and 7:00 a.m.

Table 1: Broadband Noise Limits, CT Noise Code Sec. 22a-69-3.5

	Receptor			
	C	B	A (Day)	A (Night)
Class B Emitter to	62 dB(A)	62 dB(A)	55 dB(A)	45 dB(A)

[1] State of Connecticut, "Connecticut General Statutes, Title 22a, Chapter 442: Noise Pollution Control" dated 2024

Additionally, section §22a-69-3.3 of the CT Noise Code states the following:

"Continuous noise measured beyond the boundary of the Noise Zone of the noise emitter in any other Noise Zone which possesses one or more audible discrete tones shall be considered excessive noise when a level of 5 dBA below the levels specified in Section 3 of these Regulations is exceeded."

Cabinet data supplied to NCE did not include any spectral or tonal information about the equipment; therefore, the **5 dBA penalty is applied to all limits in Table 1** in order to ensure the site meets the regulations as it is unknown whether the equipment will emit an audible discrete tone.

2.2 Zoning within the Study Area

Figure 1 presents the understood zoning of the project study area. The site is surrounded by commercial (Class B) properties which have a day/night noise limit of 57 dB(A). The nearest residential (Class A) property is the Faylor Apartments located 200 ft northwest of the site, which has a daytime limit of 50 dB(A) and a nighttime limit of 40 dB(A) (see receivers R05 and R06 below).

Figure 1: Zoning Map of Study Area

3.0 NOISE PREDICTION MODEL

Noise predictions were performed using the environmental modeling software CadnaA by DataKustic® to predict the sound pressure levels throughout the site. The model was configured to use the international standard ISO 9613-2[2] to calculate sound propagation using spherical spreading, reflections, and acoustic shielding for large equipment, and elevation contours. The general layout of the site was acquired from the provided drawing set dated January 15, 2026, which was imported into the model and scaled to the correct physical dimensions through georeferencing.

Figure 2 shows the locations of all modeled equipment, as well as the nearby property lines, receiver locations, and elevation contour lines. Four discrete receiver locations were modeled at the property lines, accounting for north, east, south, and west edges of the site. Twelve additional receiver locations were added throughout the surrounding area to predict the noise levels at nearby properties, shown in Figure 3. All results were predicted at 5 feet above grade as overall A-weighted sound pressure levels.

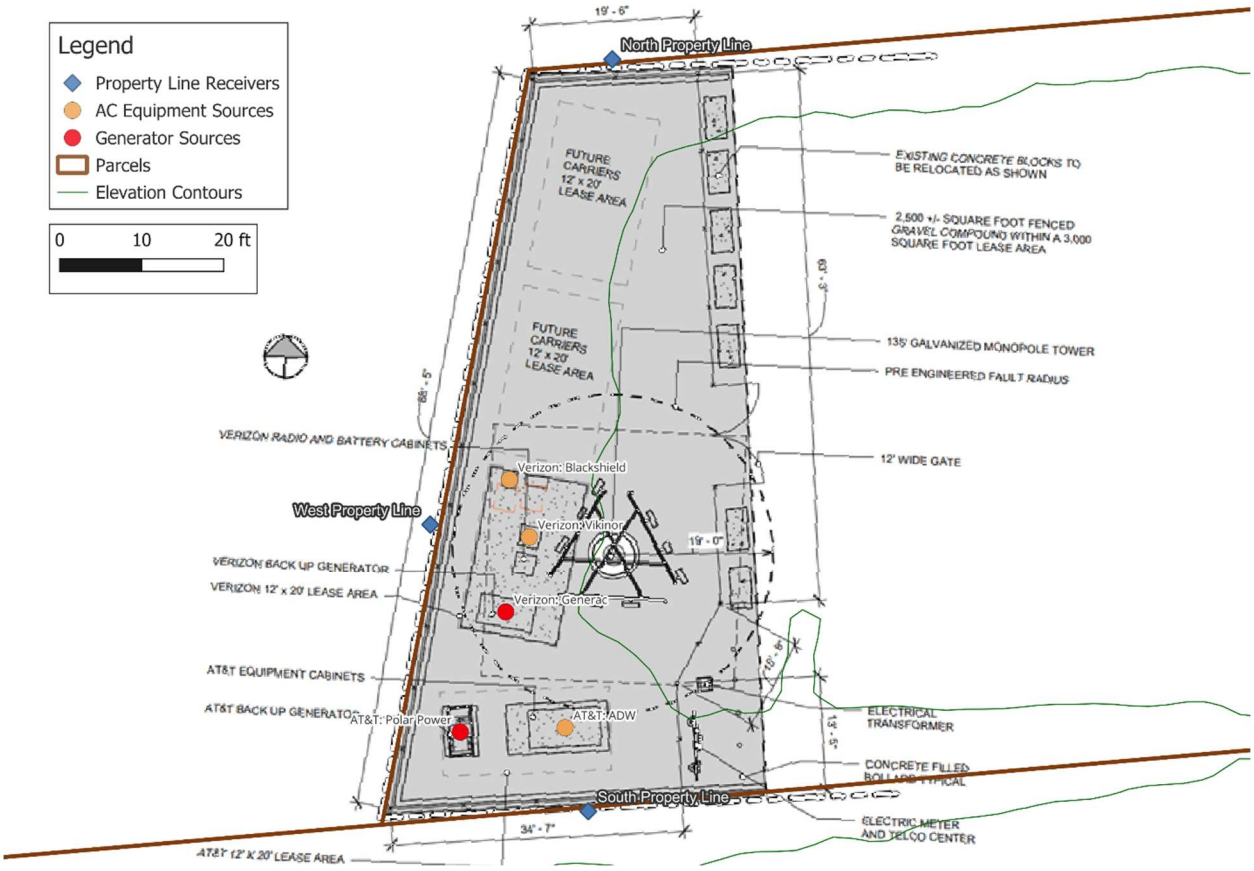

Figure 2: Existing Cell Tower Site Layout

[2] "ISO 9613-2:1996 - Acoustics - Attenuation of Sound during Propagation Outdoors - Part 2: General Method of Calculation." ISO - International Organization for Standardization

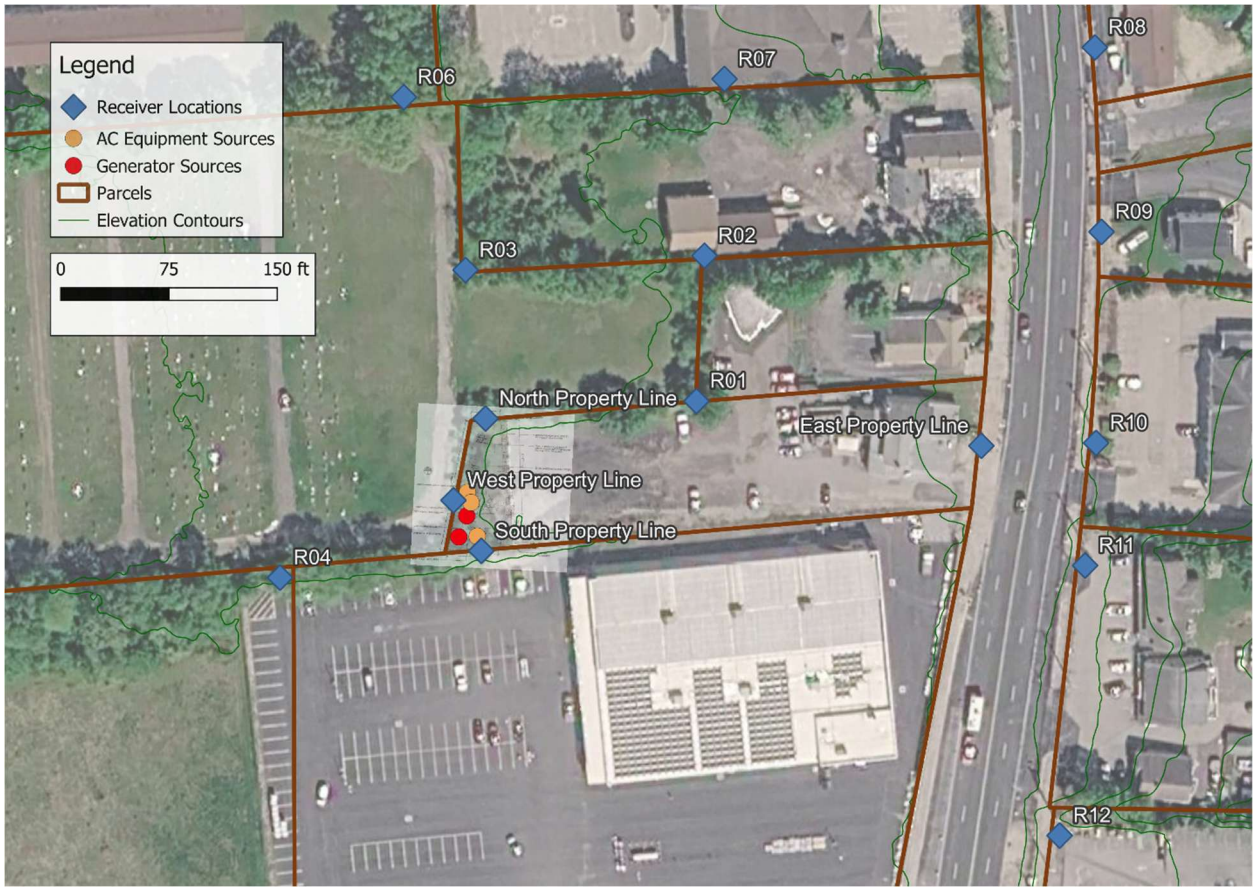

Figure 3: Modeled Receiver Locations

3.1 Model Topography

Ground topography was developed from 1-meter elevation contours for the surrounding area retrieved from United States Geological Survey (USGS). To account for the various ground types of the surrounding area (pavement, soil, foliage, etc.), the ground factor throughout the model was set to a generally conservative mixed-use value (G = 0.5).

3.2 Model Sources

3.2.1 Verizon Equipment

The Verizon equipment skid consists of one (1) Generac SD050 diesel generator and two (2) AC equipment cabinets located on a concrete slab, 5 feet from the western property line. The two AC sources were modeled as point sources located at the geometric center of each piece of equipment.

Sound pressure levels taken at four locations around the diesel generator were provided through vendor furnished information from Generac[3]. Note the sound pressure levels provided for sound enclosure have been assumed to include all noise from the engine casing and exhaust.

[3] Generac Power Systems, Inc. "Level 2 Sound Attenuated Enclosure: D4.5L SD050," Rev A, May 18, 2020

Sound power levels were then developed using the methods described in ISO 3744:2010[4], shown in Table 2**,** which were then directly input as source levels for the generator point source.

Table 2: Generac SD050 Diesel Generator Sound Power Levels, dB re 1pW

	Octave Band Center Frequency, Hz									dB(A)
	31.5	63	125	250	500	1000	2000	4000	8000	
Generac SD050 (Diesel)	94	113	105	94	90	83	79	77	73	94

A directivity pattern for the generator was also developed from the sound pressure levels provided and applied to the point source. From the provided drawings, it is unclear whether the front side of the generator is oriented towards the east or west. As a conservative measure, both orientations were modeled, with the higher level reported for each location.

The primary noise source within each AC equipment cabinet are the air conditioning units and cooling fans. The northern cabinet is equipped with a Blackshield DC1000A3 air conditioning unit while the southern cabinet is equipped with a Vikinor VAF-400-DC compact air conditioners. Maximum broadband sound pressure levels were provided in the user manual for the Blackshield unit, and levels surrounding the unit at eight locations were provided for the Vikinor unit in vendor furnished information. An overall broadband level was developed for the Vikinor unit following ISO 3744:2010. Equal energy octave band noise levels were then calculated for both units, as no spectral or tonal information was provided. Table 3 provides the A-weighted broadband sound power level for both air conditioners.

Table 3: AC Cabinet Colling Unit Sound Power Levels at 1 kHz, dB re 1 pW

Unit	dB(A)
Blackshield DC1000A3	72
Vikinor VAF-400-DC	82

A directivity pattern was developed for the Vikinor unit based upon eight provided measurement locations, and the unit was oriented with the loudest side pointing south, which is conservative. The Blackshield unit was modeled as an omnidirectional source.

3.2.2 AT&T Equipment

The AT&T equipment skid consists of one (1) Polar Power 20 kW natural gas generator and one (1) AC equipment cabinet located 5.5 feet from the western property line and 7.5 feet from the southern property line. The two sources were modeled as point sources located at the geometric center of each piece of equipment.

The orientation of the generator is understood to be flexible. For modeling purposes, the engine side of the generator was oriented towards the southern property line, which is conservative. Sound pressure levels taken at eight locations around the Polar Power generator were provided in

[4] "ISO 3744:2010 – Acoustics – Determination of Sound Power Levels and Sound Energy Levels of Noise Sources Using Sound Pressure – Engineering Methods for an Essentially Free Field over a Reflecting Plane." ISO – International Organization for Standardization

vendor furnished information[5]. Note the sound pressure levels provided for both sound enclosures have been assumed to include all noise from the engine casing and exhaust.

Sound power levels were developed from the provided data using the methods described in ISO 3744:2010, which were then directly input as source levels for the generator point source. These levels are presented in Table 4. A directivity pattern for the generator set was also developed from the sound pressure levels provided and applied to the point source.

Table 4: Natural Gas Generator Sound Power Levels, dB re 1pW

	Octave Band Center Frequency, Hz									dB(A)
	31.5	63	125	250	500	1000	2000	4000	8000	
Polar Power 20 kW (Natural Gas)	99	101	86	78	82	79	75	77	75	85

The AC equipment cabinet for the AT&T site is an Andrew® 3 Bay Walk Up Cabinet (WUC). As with the cabinets on the Verizon skid, the primary noise source is air conditioning and cooling fans within the unit. Broadband sound pressure levels at eight locations surrounding the unit were provided in a vendor furnished information[6]. From these, an overall broadband level was developed following ISO 3744:2010. This was then converted to equal energy octave band noise levels, provided in Table 5, as no spectral or tonal information was provided.

Table 5: AC Equipment Cabinet Sound Power Levels at 1 kHz, dB re 1 pW

Unit	dB(A)
Andrew® 3 Bay WUP	91

A directivity pattern was developed for the Andrew® unit based upon eight provided measurement locations, and the unit was oriented with the loudest side facing the southern property line, which is conservative.

4.0 RESULTS

Results were predicted at 16 discrete locations: the project site property lines to the north, south, east, and west, 2 residential properties, and 10 commercial properties. All results were predicted at 5 ft above grade. Four (4) conditions were modeled:

(1) Baseline Condition (No Mitigation) – AC Equipment Cabinets Only
(2) 8-foot Barrier Wall – AC Equipment Cabinets Only
(3) 8-foot Barrier Wall – AC Equipment Cabinets & AT&T Gas Generator
(4) 8-foot Barrier Wall – AC Equipment Cabinets & Verizon Diesel Generator

All predicted receptor results are tabulated together in Appendix A in broadband A-weighted levels and unweighted octave band levels.

[5] Polar Power, Inc., "Sound Test 01: V027G500TE003 Build 02," March 14, 2022
[6] Morris, S., *"Sound Level Test for 3 Bay WUC",* Andrew®, January 22, 2026

4.1.1 Baseline Condition (No Mitigation) – AC Equipment Cabinets Only

The baseline condition, where no mitigation measures are present and all the AC equipment cabinets are operating (both AT&T and Verizon), is predicted to have broadband sound pressure levels that exceed the CT Noise regulation at multiple adjacent properties. The predicted noise levels and excesses are presented in Table 6. Note the limits for each location are the strictest day/night noise limits *with* a 5 dB penalty applied for assumed discrete tones. Figure 4 provides a contour plot of the predicted noise levels. Excesses up to 15 dB are predicted to occur in the adjacent commercial properties to the south and west of the site (cemetery and Ace Hardware).

Table 6: Predicted Sound Pressure Levels Throughout Study Area (No Mitigation)

Location	Limit, dB(A)	Prediction, dB(A)	Excess, dB
South Prop	57	72	15
West Prop	57	61	4
North Prop	57	51	0
East Prop	57	37	0
R01	57	44	0
R02	57	40	0
R03	57	43	0
R04	57	47	0
R05	40	32	0
R06	40	37	0
R10	57	35	0

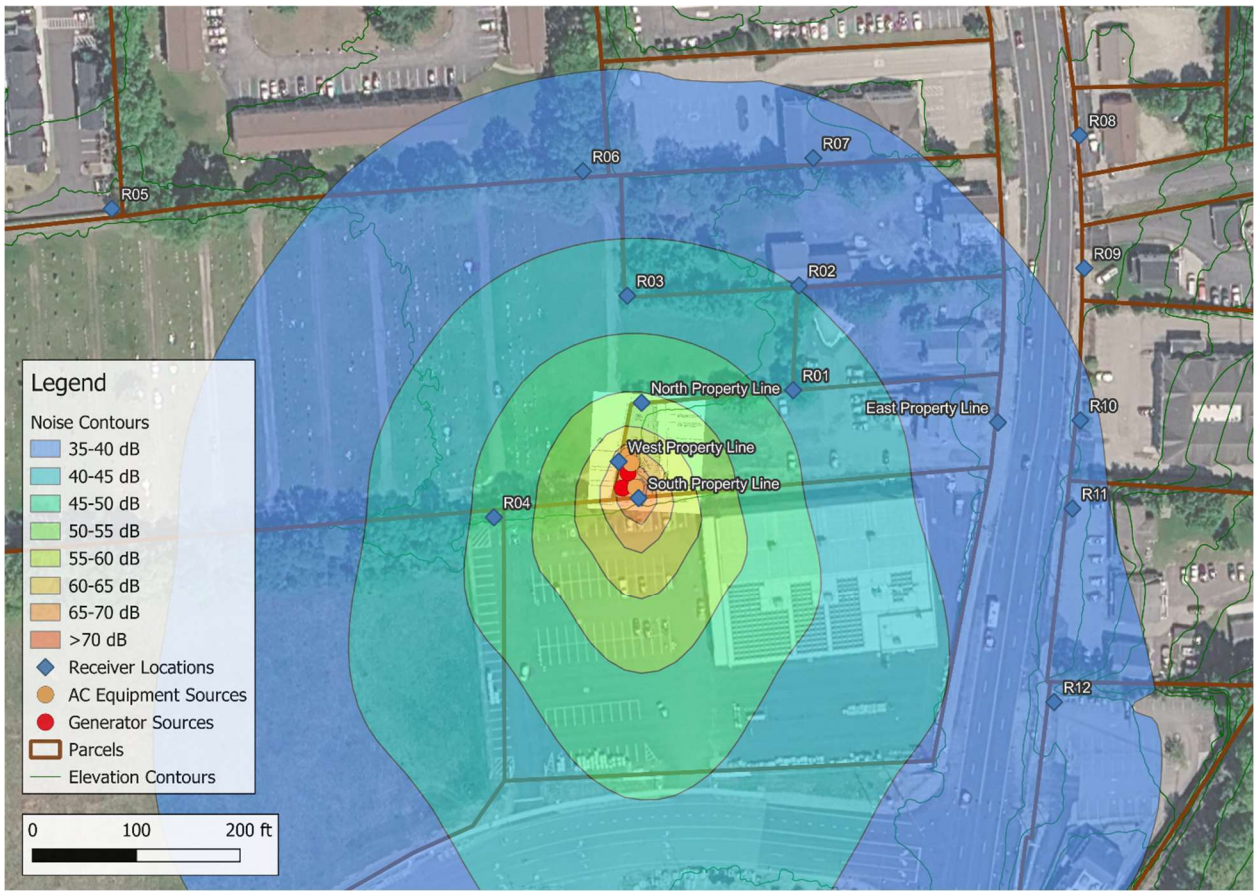

Figure 4: CadnaA Noise Predictive Model of Site (No Mitigation)

4.1.2 8-foot Barrier Wall – AC Equipment Cabinets Only

With the addition of an 8-foot absorptive barrier wall around the site, noise levels from the AC equipment cabinets operating (both AT&T and Verizon), noise levels are predicted to meet the CT Noise regulation at all locations. The predicted levels are presented in Table 7. Figure **5** provides a contour plot of the predicted noise levels. No excesses are predicted to occur, with the loudest location being along the southern and western property lines.

Table 7: Predicted Sound Pressure Levels Throughout Study Area (8-foot Barrier Wall – AC Equipment Cabinets Only)

Location	Limit, dB(A)	Prediction, dB(A)	Excess, dB
South Prop	57	55	0
West Prop	57	46	0
North Prop	57	34	0
East Prop	57	28	0
R01	57	33	0
R02	57	31	0
R03	57	35	0
R04	57	35	0
R05	40	23	0
R06	40	29	0
R10	57	27	0

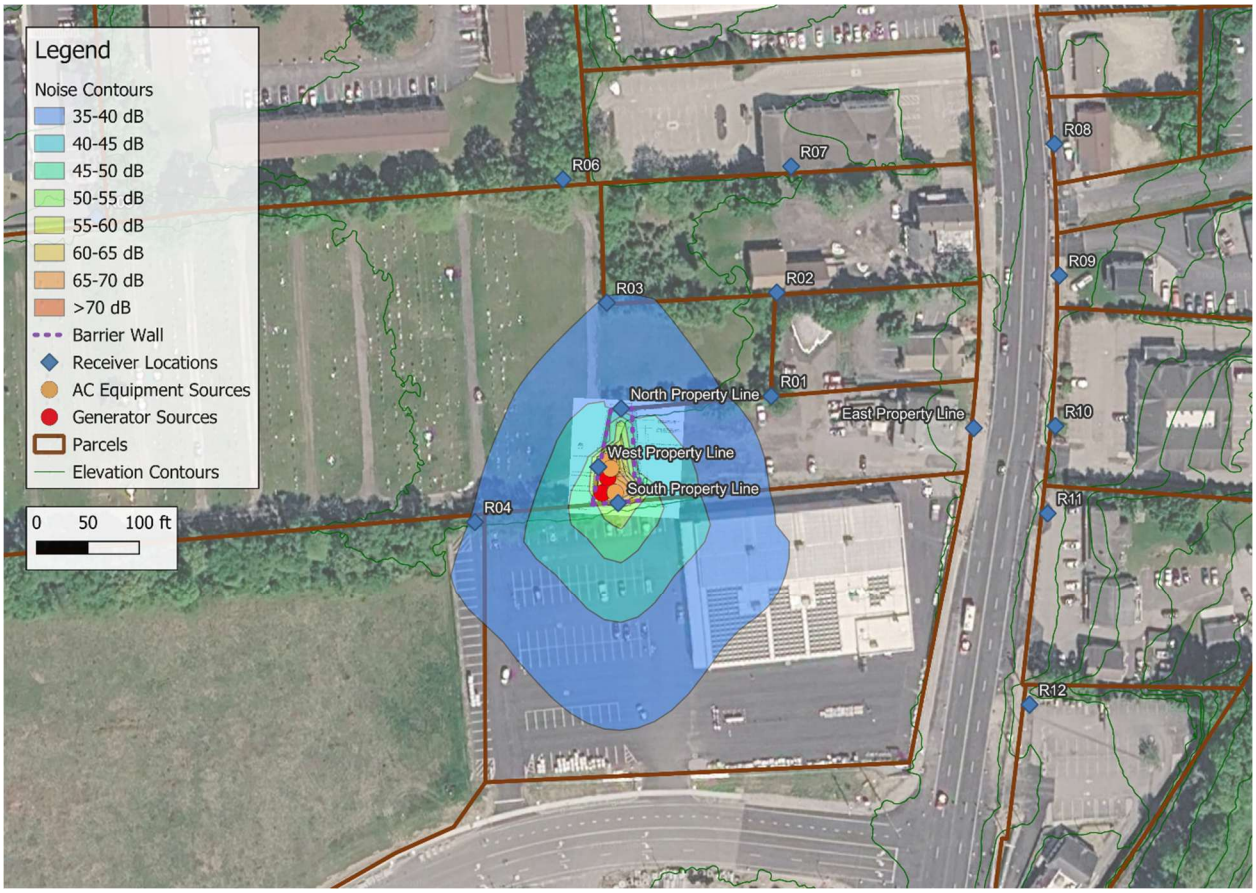

Figure 5: CadnaA Noise Predictive Model of Site (8-foot Barrier Wall – AC Equipment Cabinets Only)

4.1.3 8-foot Barrier Wall – AC Equipment & AT&T Generator

The next condition included the same 8-foot absorptive barrier wall as the previous condition, but includes the AT&T generator (Polar Power 20kW) operating in addition to the AC equipment cabinets. Broadband sound pressure levels for this condition are also predicted to meet the CT Noise regulation at all locations. The predicted noise levels are presented in Table 8. Note the noise limits for the residential receptors have increased to 50 dBA under this condition as it is understood the generators will only operate for preventative maintenance during the daytime and are not subject to noise requirements. Figure 6 provides a contour plot of the predicted noise levels. No excesses are predicted to occur.

Table 8: Predicted Sound Pressure Levels Throughout Study Area (8-foot Barrier Wall – AC Equipment Cabinets & AT&T Generator)

Location	Limit, dB(A)	Prediction, dB(A)	Excess, dB
South Prop	57	56	0
West Prop	57	49	0
North Prop	57	37	0
East Prop	57	31	0
R01	57	36	0
R02	57	33	0
R03	57	37	0
R04	57	37	0
R05	50	25	0
R06	50	31	0
R10	57	29	0

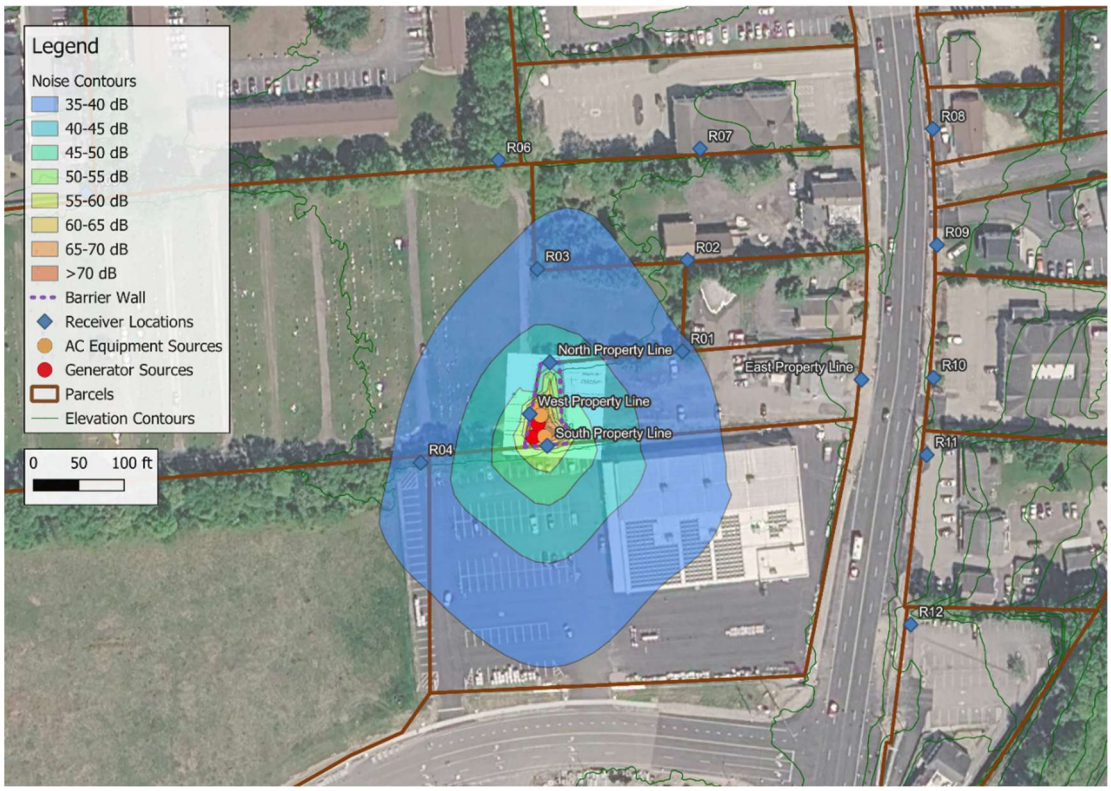

Figure 6: CadnaA Noise Predictive Model of Site (8-foot Barrier Wall – AC Equipment Cabinets with AT&T Generator)

4.1.4 8-foot Barrier Wall – AC Equipment & Verizon Generator

The last condition included the 8-foot absorptive barrier wall and AC equipment cabinets operating (both AT&T and Verizon), but with the Verizon generator (Generac SD050) operating. During this condition, broadband levels are predicted to exceed the limit by 4 dB at the western property line and 1 dB at the southern property line. The predicted noise levels are presented in Table 9, with excesses identified. Note the noise limits for the residential receptors have increased to 50 dBA under this condition as it is understood the generators will only operate for preventative maintenance during the daytime and are not subject to noise requirements. Figure **7** provides a contour plot of the predicted noise levels.

Table 9: Predicted Sound Pressure Levels Throughout Study Area (8-foot Barrier Wall – AC Equipment Cabinets & Verizon Generator)

Location	Limit, dB(A)	Prediction, dB(A)	Excess, dB
South Prop	57	58	1
West Prop	57	61	4
North Prop	57	48	0
East Prop	57	39	0
R01	57	44	0
R02	57	42	0
R03	57	45	0
R04	57	45	0
R05	50	34	0
R06	50	39	0
R10	57	37	0

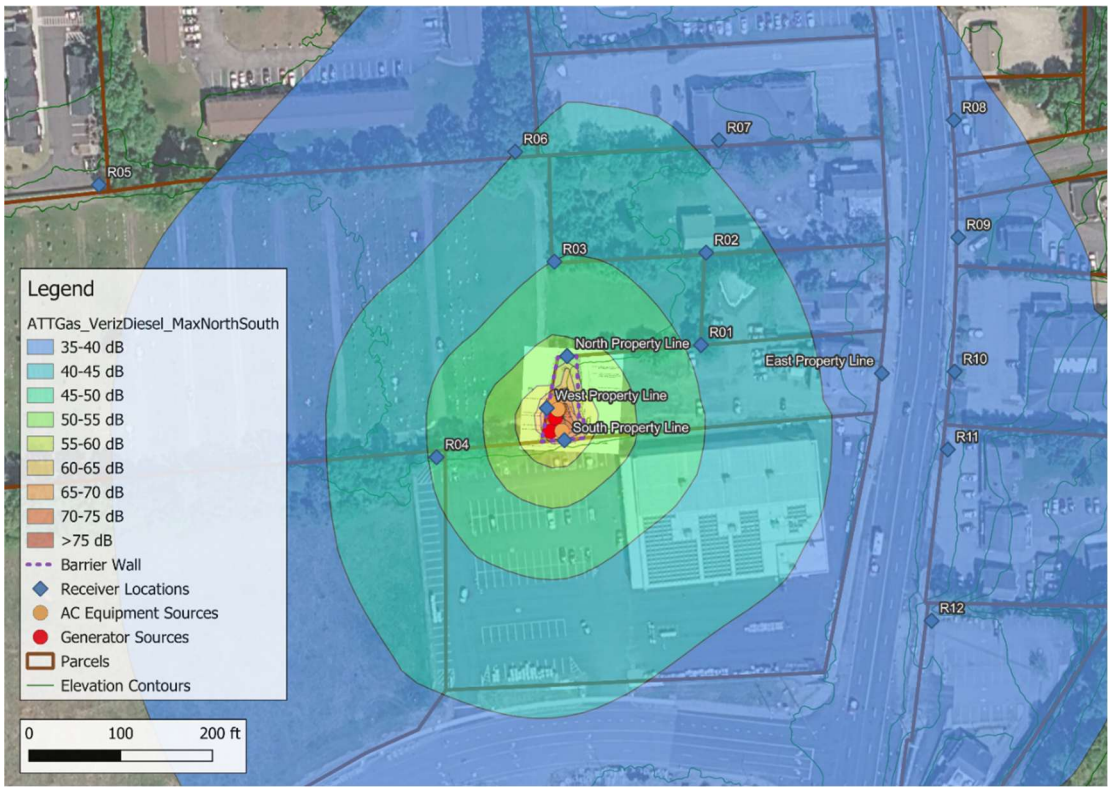

Figure 7: CadnaA Noise Predictive Model of Site (8-foot Barrier Wall – AC Equipment Cabinets with Verizon Generator)

5.0 CONCLUSIONS

Based on the computerized noise propagation model with the provided equipment sound power levels, the proposed project is estimated to exceed the CT Noise Code if no mitigation measured were considered. In lieu of spectrum data for the AC cabinets, a 5 dB(A) penalty was added to the overall broadband limit.

The addition of an 8-foot-tall barrier wall around the site was modeled for the default operating condition and is predicted to provide enough attenuation such that the site will be in compliance with the noise limits. *NOTE: To achieve the predicted results, it is critical that the barrier added is an absorptive barrier as the sound absorption is expected to provide additional attenuation necessary to be in compliance with the state requirements.* See Appendix B for an example of noise barrier material that can be affixed to a security chain-link fence.

For informational purposes, noise levels were predicted for two additional conditions with the AT&T and Verizon emergency generators operating, respectively. For the latter condition, excesses are predicted at the southern and western property lines.

If the cabinets are installed and found to not have a prominent discrete tone, the 5 dB(A) penalty would not apply and the project would only further be in compliance. If the generators do not have prominent discrete tones, then the Verizon emergency generator condition would also no longer predict excesses.

APPENDIX A: PREDICTED UNWEIGHTED OCTAVE BAND LEVELS FOR MODELED RECEPTORS

Table A1: Predicted Sound Pressure Levels at All Receptors (No Mitigation – AC Equipment Cabinets Only)

Location	Predicted Octave Band Level, dB re 20 µPa									dB(A)
	31.5	63	125	250	500	1000	2000	4000	8000	
South	67	67	66	65	65	65	66	65	65	72
West	55	55	54	53	53	54	54	54	53	61
North	47	47	45	42	43	45	45	44	43	51
East	35	35	33	27	27	32	32	30	21	37
R01	40	40	38	34	34	37	38	37	32	44
R02	37	37	35	29	30	34	35	33	26	40
R03	39	39	37	33	34	37	37	36	31	43
R04	43	43	41	37	38	40	41	40	36	47
R05	31	31	28	21	22	27	27	23	8	32
R06	35	35	32	27	27	32	32	30	22	37
R07	34	34	32	26	27	31	31	29	20	36
R08	31	32	28	22	23	28	28	24	10	33
R09	33	33	30	23	24	29	29	26	13	34
R10	34	34	31	25	26	30	31	27	16	35
R11	34	34	31	25	26	31	31	28	17	36
R12	36	36	33	27	27	32	32	29	18	37

Table A2: Predicted Sound Pressure Levels at All Receptors (8-foot Barrier Wall – AC Equipment Cabinets Only)

Location	Predicted Octave Band Level, dB re 20 µPa									dB(A)
	31.5	63	125	250	500	1000	2000	4000	8000	
South	61	59	56	54	51	49	46	45	45	55
West	50	49	47	44	42	40	38	35	33	46
North	40	39	35	32	29	28	25	25	23	34
East	30	30	27	25	24	23	22	17	5	28
R01	35	35	32	31	29	28	27	23	16	33
R02	32	32	29	28	27	26	24	20	12	31
R03	35	34	32	31	30	30	29	26	19	35
R04	38	37	35	33	31	30	29	25	19	35
R05	26	26	22	20	19	18	16	10	*<0*	23
R06	30	30	27	26	25	24	23	19	8	29
R07	30	30	27	25	24	24	23	18	7	29
R08	27	27	23	21	20	20	18	12	*<0*	24
R09	28	28	25	23	21	21	19	14	*<0*	26
R10	29	29	26	24	23	22	20	15	2	27
R11	30	29	26	24	23	22	21	16	3	27
R12	31	31	27	25	24	24	22	18	5	29

Table A3: Predicted Sound Pressure Levels at All Receptors (8-foot Barrier Wall – AC Equipment with AT&T Generator)

Location	Predicted Octave Band Level, dB re 20 µPa									dB(A)
	31.5	63	125	250	500	1000	2000	4000	8000	
South	69	70	58	54	52	49	46	46	45	56
West	68	70	53	46	45	42	39	36	34	49
North	57	59	41	33	32	29	26	26	23	37
East	47	49	33	27	27	25	22	18	6	31
R01	51	54	37	32	32	29	27	24	17	36
R02	49	52	35	29	30	27	25	22	12	33
R03	51	55	39	33	33	31	30	27	19	37
R04	54	55	40	34	33	31	29	25	19	37
R05	43	45	27	21	20	18	16	10	*<0*	25
R06	47	50	33	27	27	25	23	19	8	31
R07	47	50	32	26	27	25	23	20	8	31
R08	44	47	29	22	23	21	19	14	*<0*	27
R09	45	47	30	24	25	22	20	15	0	28
R10	46	47	32	26	26	24	21	16	2	29
R11	46	47	32	26	26	24	21	17	3	30
R12	44	46	31	26	26	25	23	18	5	30

Table A4: Predicted Sound Pressure Levels at All Receptors (8-foot Barrier Wall – AC Equipment with Verizon Generator)

Location	Predicted Octave Band Level, dB re 20 µPa									dB(A)
	31.5	63	125	250	500	1000	2000	4000	8000	
South	64	78	68	57	53	49	46	46	45	58
West	67	85	74	60	55	47	41	38	35	61
North	54	69	61	45	40	33	28	27	24	48
East	43	61	51	37	33	27	23	18	6	39
R01	48	64	57	43	39	33	29	25	17	44
R02	44	61	54	40	37	31	26	22	12	42
R03	48	64	58	43	40	34	31	27	20	45
R04	50	67	58	44	39	33	30	26	19	45
R05	40	58	46	32	27	21	17	10	*<0*	34
R06	43	60	51	37	33	27	24	20	9	39
R07	42	59	52	38	35	29	25	20	8	40
R08	39	56	48	34	30	25	20	14	*<0*	36
R09	41	58	49	35	31	25	21	15	0	37
R10	42	60	50	36	32	26	22	17	2	37
R11	42	61	50	37	33	27	23	17	3	38
R12	42	60	49	36	33	28	24	19	5	37

APPENDIX B: ACOUSTIFENCE ABSORPTION CORE (ABSORBENT) NOISE BARRIER

The product is new, and no marketing material is available, see photos of the product below. The product has been tested by Riverbank Labs with results in Test RAL-A24-200 and RAL-TL24-236.