

April 2, 2026

*Via Electronic Mail and Hand Delivery*

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

Re: **Docket No. 545 – Arx Wireless Infrastructure, LLC and New Cingular Wireless PCS, 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 306 Flanders Road, East Lyme, Waterford, Connecticut**

**Letter in Lieu of Post Hearing Brief**

Dear Attorney Bachman:

On behalf of intervenor Cellco Partnership d/b/a Verizon Wireless (“Cellco”), please accept this letter in lieu of a Post-Hearing Brief, in support of the above-referenced application for the construction, operation and maintenance of a wireless telecommunications facility at 306 Flanders Road, East Lyme, Connecticut (the “Property”).

**The Application**

On October 15, 2025, Arx Wireless Infrastructure, LLC and New Cingular Wireless PCS, LLC (“AT&T”) filed an application with the Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (the “Application”) to construct a wireless telecommunications facility at the Property (the “Facility”). On November 11, 2025, pursuant to RCSA Section 16-50j-15, Cellco filed a Request for Intervenor Status, which the Council approved on December 11, 2026.

The Facility would provide Cellco customers and emergency service providers in the area with improved wireless service along I-95 (Gov. John Davis Lodge Turnpike), Route 1 (Boston Post Road), Flanders Road (Route 161), Upper Pattagansett Road, New Frontage Road, King Arthur Road, and Chapman Woods Road, as well as other local roads in East Lyme. The evidence in the record confirms that Cellco’s service in this area is unreliable.

Melanie Bachman, Esq.  
April 2, 2026  
Page 2

## **Site Search**

Cellco established a site search in the area starting in March 2016. Cellco was made aware of the ARX proposed tower shortly after the Application was filed with the Council and Cellco determined that the proposed site would satisfy its search area coverage objectives. Cellco examined other locations besides the proposed site and did not find that any of these locations were more suitable when compared with the proposed Facility. The Facility would meet Cellco's service objectives.

Cellco's review included analysis of the Ancient Highway amateur radio tower located at 30-1 Ancient Highway. Cellco's RF Engineers determined that even at a height of 195 feet AGL, as compared to a height of 120 feet AGL at the Facility, co-locating at the Ancient Highway amateur radio tower would provide weaker overall coverage, including over two stretches of I-95 - the half-mile stretch of I-95 to the southwest of the proposed Facility and on the half-mile stretch of I-95 between the I-95 / US-1 split and the I-95 / I395 split to the northeast of the proposed Facility. Cellco also determined that locating on the Ancient Highway amateur radio tower would create serious issues of service redundancy with Cellco's existing East Lyme North site.

## **Public Need**

The unrefuted evidence in Docket No. 545 reflects that gaps in wireless service totaling 2.7 miles on I-95 (Governor John Davis Lodge Turnpike), 1.6 miles on Route 1 (Boston Post Road), and 2.1 miles along Flanders Road (Route 161) in Cellco's 700 MHz "base frequency" exist today in East Lyme. These gaps cannot be filled by service from Cellco's surrounding sites in East Lyme. Service from the Facility will fill these existing service gaps, provide capacity relief to Cellco's existing East Lyme CT (Alpha Sector) cell site, and will also allow Cellco to increase its wireless signal strength to provide improved in-building coverage to various commercial and industrial uses in the area.

## **Emergency Backup Power**

Cellco's proposed installation of an on-site battery system and 50 kW diesel generator is consistent with policies emphasizing continuity following storm events and other emergencies resulting in the loss of power. Cellco's backup battery system can power its equipment for up to 8 hours before recharging is required. The proposed 50kW diesel generator can run for approximately 50 hours before refueling is required. The proposed generator has a spill containment system built into its fuel storage tank to prevent spills. Although natural gas is available along Flanders Road, Cellco's preference is to install a diesel generator due to increasingly common delays, increased costs, and other issues related to the installation of

Melanie Bachman, Esq.

April 2, 2026


Page 3

natural gas service, including costs and delays related to site preparation, gas line interconnection, and related easement and legal fees. The use of a diesel generator will allow Cellco to ensure the Facility is constructed and activated as quickly as possible with reliable back up power.

### Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the Facility and that the improved service from the Facility will significantly benefit people in the East Lyme community. Cellco respectfully requests that the Council issue a Certificate of Environmental Compatibility and Public Need in the above-referenced docket.

Sincerely,



Emily C. Deans

**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the forgoing was sent electronically to the following:

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