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January 13, 2026

Via Electronic Mail and Hand Delivery

Melanie A. 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, Connecticut**

Responses to Council Interrogatories

Dear Attorney Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless ("Cellco"), enclosed please find the original and fifteen (15) copies of Cellco's Responses to Council Interrogatories related to Docket No. 545. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Emily C. Deans

Emily C. Deans

Enclosures

33673236-v1

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on the 13th day of January 2026, a copy of the foregoing was sent, via electronic mail, to:

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Emily C. Deans

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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN 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, CONNECTICUT	:	JANUARY 13, 2026

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
CONNECTICUT SITING COUNCIL INTERROGATORIES

On December 23, 2025, the Connecticut Siting Council ("Council") issued Pre-hearing Interrogatories to Cellco Partnership d/b/a Verizon Wireless ("Cellco"), relating to Docket No. 545. Below are Cellco's responses.

Site Search

Question No. 1

Did Cellco Partnership d/b/a Verizon Wireless (Cellco) examine other alternative locations besides the proposed site? If yes, identify the locations and the reasons for their rejection. When did Cellco begin a site search in the area?

Response

Yes, Cellco examined other locations besides the proposed site, including the following locations identified below along with the reasons for their rejection:

- 90 Foster Road, Waterford, CT 06340 – Undeveloped Parcel
  - Located too far east from the coverage objective.
- 14 Church Lane, East Lyme, CT 06333 – Undeveloped Parcel

- Located further to the west and not in the direct area of the coverage objective.

- 279 Flanders Road, East Lyme, CT 06357 – Eversource Transmission Tower
  - Location presented potential access issues. This location would also require a power shutdown to perform construction and maintenance, and equipment replacement cannot be accomplished as quickly as with non-transmission tower locations.
- 269 Flanders Road, East Lyme, CT 06357 – Undeveloped Parcel
  - Coverage objectives comparable to the proposed site.
- 30-1 Ancient Highway, East Lyme, CT 06333 – Amateur Radio Tower
  - Distance from Route 161 (Flanders Road) decreases coverage overall, especially at the AWS/PCS/C-Band frequencies.

Cellco began a site search in the area starting in March 2016. Cellco was made aware of the ARX proposed tower shortly after Docket No. 545 was filed with the Council on October 15, 2025 and determined that the proposed site would satisfy its search area coverage objectives.

<u>Question No. 2</u>

Are small cells a feasible alternative to Cellco's proposed installation on a new tower? Estimate the number of pole-mounted small cells that would be required for reliable service within the proposed service area. Would certain frequencies be limited through the use of small cells? What would be the cost of each small cell for both the use of existing utility poles and new poles specific for small cells. What type of equipment would be attached to each pole?

<u>Response</u>

It may be theoretically and technically possible to install a large number of small cells or

Distributed Antenna System (DAS) nodes in the area that could closely match the coverage footprint of the proposed Waterford 3 Facility (macro cell). Such an approach, however, is not practically nor economically feasible and is not consistent with good RF Engineering practice. Typically, small cell facilities or DAS nodes involve the installation of a single cannister antenna, an individual radio head, and related electrical and fiber optic connections. Small cells would utilize existing infrastructure (i.e., electric distribution poles) along public rights of way in areas where coverage and/or capacity problems exist. These existing utility poles are often encumbered by other electric or communications equipment (i.e., transformers, streetlights, CATV boxes, risers, primary power lines). Pole attachment rules, established by the pole owners (e.g., Eversource, Frontier) limit or restrict Cellco's use these encumbered poles. Structural limitations of the existing poles could also limit Cellco's ability to deploy all the equipment needed to provide service in all of its operating frequencies. Providing some form of back-up power to small cells or DAS nodes is also very difficult and, in many cases, impossible, making the service even more vulnerable to power outages caused by storms or traffic accidents.

In areas where existing utility poles are not available, for example, along private roads, in State Parks, on private and municipal properties, or in public and private nature preserves, property rights would need to be acquired, and new utility poles would need to be installed. The actual number of small cell facilities that would be needed to provide service comparable to that from the proposed Waterford 3 Facility tower site is not known but would be significant given the overall size of the area that Cellco is attempting to serve with the proposed Waterford 3 Facility. Individual small cells would be capable of providing service in some but not all of Cellco's operating frequencies, further limiting network capacity in the area around the proposed Waterford 3 Facility. Cellco estimates the cost for each small cell installation to be approximately $75,000 to $80,000. Typically, a small cell installation would include a cannister antenna attached to a utility pole 25 to 35 feet above grade, and a radio head attached to the pole approximately 8 to 10 feet above grade.

Question No. 3

Referencing Wireless Solutions/Ancient Highway Towers, LLC request for intervenor status dated December 9, 2025, would the 30-1 Ancient Highway, East Lyme facility meet Cellco's wireless service objectives? Explain.

Response

See response to Question No. 1.

Proposed Facility and Associated Equipment

Question No. 4

What is the approximate cost of Cellco's proposed installation? How would the cost be recovered?

Response

Cellco estimates the cost of its cell site to be approximately $335,000. The costs associated with providing Cellco customers with the nation's most reliable wireless service network, including the cost for development of network infrastructure (small cells and macro-cells), are paid for by the individuals, corporations and government entities that purchase Cellco's wireless service.

Question No. 5

Referencing Application Exhibit G – Sheet C-102, what are the approximate dimensions of the Cellco's equipment pad?

Response

The dimensions of Cellco's equipment pad are 12 feet by 20 feet.

Question No. 6

Referencing Application Exhibit G – Sheet C-102, identify the type of antenna mounts proposed by Cellco.

Response

Cellco proposes to install a low-profile antenna platform at the 120' level.

Proposed Wireless Services- Cellco

Question No. 7

Describe Cellco's wireless service objectives for the facility. What areas and roads have substandard service?

Response

The primary objective of the proposed facility is to provide coverage to Cellco customers along Flanders Road (Route 161), I-95 (Governor John Davis Lodge Turnpike), and Route 1 (Boston Post Road), Upper Pattagansett Road, New Frontage Road, King Arthur Road, Chapman Woods Road, as well as other roads in the area and in the vicinity of the proposed location, including in-building coverage to various commercial and industrial uses in the area. To provide the in-building service needed, Cellco needs to increase its wireless signal strength in the area from Neg 95 dBm RSRP to Neg 85 dBm RSRP. The proposed tower site allows Cellco to achieve this objective. The proposed tower site will also provide capacity relief to Cellco's existing East Lyme CT (Alpha Sector) cell site.

Question No. 8

If 700 MHz service is being deployed, does the 700 MHz frequency act as the "base frequency" of the network where most of the wireless traffic occurs? How do the other frequencies interact in Cellco's wireless system?

Response

Yes, the 700 MHz frequency service has been referred to as Cellco's "base frequency" as it is the frequency with the largest coverage footprint. Once a user enters an area where other frequencies are available (e.g., 850 MHz, 1900 MHz, 2100 MHz or 3700 MHz) the user will enter "carrier aggregation" where the mobile device would utilize all the available frequencies together to enhance data speeds to provide higher quality wireless service overall. The network also tries to manage capacity by allowing devices to use all or some frequencies depending on traffic load and need. Meaning, if the 700 MHz frequencies are too busy, customers can be moved if other frequencies become available in order to alleviate the 700 MHz usage. The network would then attempt to make adjustments in order to maintain an acceptable service level.

Question No. 9

Would any of the proposed frequencies provide 5G services?

Response

Initially the C-band frequencies (3700 MHz) will be utilized to provide 5G service followed by other frequency bands in the future.

Question No. 10

Provide a table that lists Cellco's proposed wireless service on area roads and land area, as represented in the example below:

Street Name	700 MHz	850 MHz	1900 MHz	2100 MHz	3700 MHz
Route 82	0.5	1.0	0.7	0.5	1.5
Route 154	2.6	2.6	2	1.5	2.5
Road Total	3.1	3.6	2.7	2.0	4.0
Overall Coverage Footprint (Square Miles)	1.0	3.5	2.0	0.7	4.5

Response

Street Name	700 MHz	850 MHz	1900 MHz	2100 MHz	3700 MHz
I-95 (Gov. John Davis Lodge Turnpike)	2.7	2.4	1.9	1.7	1.5
Route 1 (Boston Post Road)	1.6	1.5	1.1	1.1	1
Flanders Road (Route 161)	2.1	1.9	1.6	1.4	1.2
Road Total (mi):	6.4	5.8	4.6	4.2	3.7
Overall Coverage Footprint (Square Miles)	4.1	3.3	1.4	1.2	0.9

Question No. 11

Identify Cellco's adjacent sites with which the proposed facility would hand off signals. Include the address, antenna height, structure type, and the distance/direction to each site.

Response

The primary adjacent sites with which the proposed facility would interact are:

Site Name	Address	Antenna Height	Structure Type	Distance/Direction
East Lyme North CT	2 Arbor Crossing, East Lyme	86'	Silo	1.7 miles west
East Lyme CT	93 Roxbury Rd., Niantic	149'	Lattice tower	1.9 miles south

Montville 2 CT	45 Fargo Rd., Montville	173'	Monopole	2.7 miles northeast

Question No. 12

Would the site provide capacity relief at adjacent Cellco facilities? If yes, identify the Cellco facilities and the frequencies and sectors at or near exhaustion that would benefit from capacity relief.

Response

As stated in the Response to Question No. 7, the primary objective of the proposed facility is to provide coverage to Cellco customers. The proposed facility will also provide capacity relief to the East Lyme CT facility; however, that facility is not currently in exhaust and any capacity relief benefit would be secondary.

Question No. 13

Can coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect coverage needs and/or capacity relief within the service area. What specific area requires the need for antennas at the proposed height?

Response

Cellco can achieve its coverage objectives by installing antennas at the 120-foot level on the proposed 135-foot tower. Going any lower on the proposed tower will reduce Cellco's coverage footprint and result in coverage gaps opening in the industrial and commercial areas along I-95 (Governor John Davis Lodge Turnpike), Flanders Road (Route 161), and Route 1 (Boston Post Road), as well as reduced service along Upper Pattagansett Road, New Frontage Road, King Arthur Road, and Chapman Woods Road.

Emergency Backup Power

Question No. 14

Referencing Application p. 8, Cellco would install a 50-kW diesel backup generator. What is the estimated run time under full load conditions based on its fuel tank capacity?

Response

The 50kW diesel generator can run for approximately 50 hours before refueling is required.

Question No. 15

If natural gas service were provided to the compound, what is the approximate difference in cost for Cellco for a 50-kW natural gas fueled generator versus the proposed 50-kW diesel generator?

Response

The cost for Cellco for a 50-kW natural gas fueled generator versus the proposed 50-kW diesel generator is similar. However, the cost of site preparation related to the installation of a natural gas generator is significantly more than a diesel generator. The overall cost to install a natural gas fueled generator can range from $30,000 to $100,000 more than to install a diesel generator depending on various site conditions, including the need for a separate gas-designated trench and fee to connect to the main line. It is also worth noting that natural gas supply is susceptible to outages that are outside of Cellco's control.

Question No. 16

Referencing Application p. 8, would a battery backup be used by Cellco to provide uninterrupted power? How long could the battery backup alone supply power to the facility?

Response

Yes, Cellco will install an on-site battery system. Cellco's backup battery system can power its facility for up to 8 hours before recharging is required.

Question No. 17

Would Cellco's 50-kW diesel backup generator run periodically (exercised) for maintenance purposes? If so, at what frequency and duration? Would this be scheduled for daytime hours?

Response

Typically, Cellco remotely tests its diesel generators as often as twice a month, mid-late morning on a weekday and occur for approximately 20 minutes. The Applicant can typically accommodate specific requests for a fixed schedule generator testing is requested by the Council.

Question No. 18

Would the backup generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

Response

Yes.

Public Health and Safety

Question No. 19

Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility by Cellco.

Response

- 2021 International Building Code (IBC), with the 2022 Connecticut State Building Code amendments.

- ANSI/TIA-222-H “Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures”.
- Occupational Safety and Health Administration (OSHA).

Question No. 20

Would Cellco's equipment support text-to-911 service? Is additional equipment required for this purpose?

Response

Yes.

Question No. 21

Would Cellco’s antennas comply with federal E911 requirements?

Response

Yes.

Question No. 22

Would Cellco’s installation comply with the intent of the Warning, Alert and Response Network Act of 2006?

Response

Yes.

Question No. 23

Referencing Application p. 8, does Cellco’s proposed 50-kW backup generator include a noise attenuation cover?

Response

Yes.