

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**PETITION OF CROWN CASTLE TOWERS 06-2 :  
LLC AND NEW CINGULAR WIRELESS PCS, : DOCKET NO. 546  
LLC d/b/a AT&T FOR A CERTIFICATE OF :  
ENVIRONMENTAL COMPATIBILITY AND :  
PUBLIC NEED FOR THE CONSTRUCTION, :  
MAINTENANCE, AND OPERATION OF A :  
TELECOMMUNICATIONS FACILITY AND :  
ASSOCIATED EQUIPMENT LOCATED AT 70 :  
UNIVERSAL DRIVE, NORTH HAVEN, : January 27, 2026  
CONNECTICUT :**

**RESPONSES OF JOINT APPLICANTS TO  
CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES**

**Notice**

1. Referencing Application Attachment 24, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners?
  - A. Counsel to the Applicants received certified mail receipts for all of the notices sent to abutting property owners except for the notice sent to Sunoco LLC with respect to the property located at 23 Universal Drive. Counsel for the Applicants has sent additional notices, by regular mail to three (3) additional mailing addresses for Sunoco LLC, including the physical address of 23 Universal Drive. Please see the attached Abutters Mailing Update (**Exhibit A**).

**Existing Facility and Site**

2. Referencing Application p. 12, when did Crown Castle Towers 06-2 LLC (Crown) become aware of the need to decommission its existing 120 Universal Drive facility?
  - A. Crown became aware that the existing tower may need to be decommissioned in June of 2023 based on discussions with the 120 Universal Drive property owner .
3. Provide a list of the tenants and associated antenna heights on the existing tower.
  - A. The tenants on the existing tower located at 120 Universal Drive include AT&T at 118' antenna centerline height and T-Mobile at 105' antenna centerline height. We note that intervenor Verizon Wireless is not collocated on the existing tower but has agreed to collocate on the proposed tower.

4. Does the existing facility have to be removed prior to the expiration of the lease at 120 Universal Drive? Is there an option for a temporary extension?
  - A. Crown is working with the property owner to maintain the existing wireless facility in place and operational until the new tower, if approved, is constructed and the existing wireless carriers on that facility are operational at the new facility.
5. If the proposed facility is approved, would the existing 120 Universal Drive facility remain in service until the new facility with AT&T antennas is on-air to maintain continuity of service? If not, would AT&T require any temporary wireless telecommunications facilities to maintain continuity of service in the interim? Explain.
  - A. Crown fully intends to maintain on-air continuity of service. Crown, in consultation with AT&T, would work cooperatively to provide a temporary facility to maintain continuity of service via a temporary tower or cell-on-wheels, as necessary.

### **Site Search**

6. Referencing Application p. 12, did Crown and AT&T each initiate a separate site search or was the site search a collaborative effort? When did the site search begin?
  - A. As a precautionary measure, Crown initiated a site search in September of 2022 in light of the expiration of the existing lease agreement and the uncertainty regarding the ability to maintain the existing telecommunications facility at 120 Universal Drive. AT&T did not conduct a separate site search due to Crown's efforts to find a replacement site.
7. Referencing Application p. 12, were any other sites examined for telecommunications use? If yes, provide site locations and reasons for rejection.
  - A. Yes. As noted above, Crown established a search ring for the area and retained a site acquisition firm to review potential locations in the area. No available and feasible existing towers were identified which could support the wireless facilities of AT&T and T-Mobile. The area surrounding the existing parcel consists of industrial parcels adjacent to the railyard to the west and I 91 to the east. Crown focused on the parcels adjacent to the existing site to maintain continuity of service. All of the industrial parcels in the area are developed to some extent, and some were not conducive to a tower facility given the size of the parcel and proximity to existing structures on those parcels. The owner of the proposed site was willing to enter into an agreement, and the proposed site was only approximately 800' from the existing tower and at a similar elevation – which presented a perfect solution for a replacement tower. Additionally, the proposed location would not require significant clearing, provides ease of access, availability of utilities and minimizes visual impacts due to its location. Lastly, the existing parking on the parcel would not be negatively impacted by the tower location selected.

Below is a list of alternative parcels considered by Crown with the reasons those parcels were not selected:

**A: Universal Drive LLC - 130 Universal Drive**

The property owner initially responded with some interest but upon further outreach and contacts, became non-responsive to inquiries in March 2023.

**B - Arscott Investments LLC – 120 Universal Drive**

Initially listed as a candidate but was the parcel containing Crown’s existing telecommunications tower.

**C - A M M B Associates LP - 150 Universal Drive**

This parcel is significantly developed, and the property owner was only interested in using the rear portion of the property which had limited space for a multi-carrier telecommunications tower and therefore was rejected.

**D - Corporate Drive Properties LLC - 222 Universal Drive**

After at least six (6) messages, the property owner’s assistant advised that the property owner was not interested.

**E - North Haven Property LLC – 70 Universal Drive**

This is the subject parcel for the proposed telecommunications facility.

**F- Andrew T Dixon – 78 Rebeschi Drive**

The property owner never responded to phone calls and text messages regarding the potential use of the property for a telecommunications tower.

**G - Town of North Haven – 170 McDermott Road**

The Town of North Haven indicated that there was no interest in using the parcel for a telecommunications tower, which is consistent with the letter of support from the Town submitted with this application and the Applicant’s discussions with the Town during the consultation process.

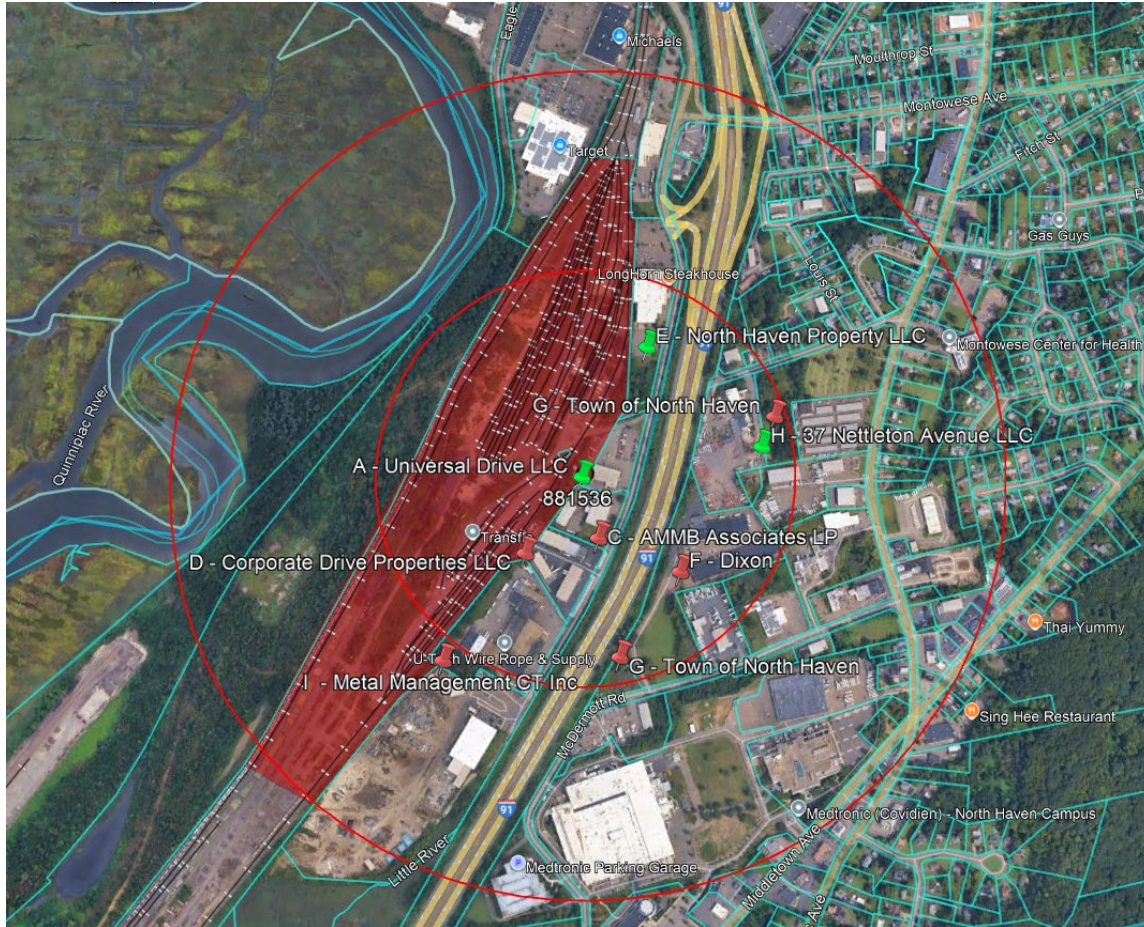
**H - 37 Nettleton Avenue LLC - 37 Nettleton Avenue**

Initially, the property owner requested that Crown postpone conversations regarding a potential agreement until September 2023. When contacted again after September 2023, the property owner never responded to the additional inquiries.

**I - Metal Management CT Inc - 250 Universal Drive**

The property owner indicated no interest in using the parcel for a telecommunications tower due to future plans and use of the parcel.

See map below of alternative parcels referenced above:



8. Referencing Application Attachment 15, an existing tower is shown at 90 Universal Drive.

a) is the tower located at 90 Universal Drive or 100 Universal Drive?

A. The tower appears to be located at 90 Universal Drive, although there is a tower parcel listed as 100 Universal Drive. We understand that Verizon Wireless uses an address of 100 Universal Drive for their telecommunication facility. See the Town of North Haven parcel maps below. It appears 100 Universal Drive may be contained within 90 Universal Drive.

**Property**

90 UNIVERSAL DR

Google Directions Zoom

View Details

Google Maps Link

Town of North Haven

Property Record Card

**Property**

Address 90 UNIVERSAL DR

ID 002 001

**Ownership**

Name NEW YORK CENTRAL LINES LLC

Address 500 WATER ST (J-910) JACKSONVILLE, FL 32202

**Valuation**

Total \$4,529,900

Land \$3,920,700

100 UNIVERSAL DR

Google Directions Zoom

View Details

Google Maps Link

Town of North Haven

Property Record Card

**Property**

Address 100 UNIVERSAL DR

ID 011 054

**Ownership**

Name BELL ATLANTIC MOBIL

Address P O BOX 2549 ADDISON, TX 75001

**Valuation**

Total \$632,400

Land \$0

Last Sale \$0 on 1997-10-01

47.00'

29.00'

51.00'

24.50'

41.344856,-72.871384

b) what is the height of the tower?

A. We understand from Verizon Wireless that the existing tower is 80' above ground level.

- c) What is the distance between the tower and the proposed tower?
- A. The existing tower at 90/100 Universal Drive is approximately 795' from Crown's proposed tower.
- d) is the tower suitable to host AT&T's equipment and provide coverage to the area?
- A. No. We understand that Verizon Wireless has been unable to modify or upgrade its wireless facility on the tower due to structural and space limitations of the tower. Verizon Wireless had sought to collocate at the existing Crown tower at 120 Universal Drive.
- e) is the 90 Universal Drive or 100 Universal Drive parcel a feasible alternative? Explain.
- A. No. We understand that Verizon Wireless has attempted to modify and upgrade its facility at the existing signal tower but had been unable to do so. Likewise, it appears there is limited space available for a multi-carrier telecommunications tower. Verizon Wireless, as intervenor, will explain further.
9. Did AT&T examine any electric transmission line structures and/or non-tower antenna array sites, including, but not limited to rooftops and steeples, in the area with coverage need? List what structures were considered and why they were rejected.
- A. Yes. After review of the surrounding area, there are no existing electric transmission line structures and/or non-tower sites, including, but not limited to rooftops, billboards, and steeples in the area which are of sufficient height and proximity to the existing tower that could provide the necessary coverage to replace and maintain AT&T's existing coverage in the area when AT&T's existing facility at 120 Universal Drive is decommissioned.
10. Are small cells a feasible alternative to 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?
- A. No. DAS systems or small cells are not a practical or feasible alternative for addressing the anticipated coverage gap in this area of North Haven. The coverage maps included in the Application clearly demonstrate a significant coverage gap in this area of North Haven will result with the decommissioning of AT&T's existing site at 120 Universal Drive. In addition to providing reliable wireless services to AT&T's customers, the proposed facility is being built as part of AT&T's FirstNet public safety network, where wide area coverage is of paramount importance. DAS or small cells cannot technologically provide reliable wireless services to cover this area of need. Small cells and DAS are best suited for specifically defined areas where capacity is necessary, such as more urban environments, shopping malls, stadiums and other densely populated areas. AT&T deploys small cells where they are appropriate. For example, AT&T does use small cells in Connecticut to

provide capacity relief in targeted areas. The Council is referred to PURA Docket No. 18-06-13, which includes over 200 small cells approved and either constructed or planned for deployment in urban/downtown areas and more densely populated areas of the State of Connecticut. AT&T's objective in proposing this facility is to maintain primary reliable coverage to this area, including I 91, to replace service from the decommissioned macro site. Small cells on utility poles are particularly inappropriate for bringing primary coverage to a wide area. There is no battery backup on small cells, so if small cells were used instead of the proposed tower, the only coverage in this area would be lost in a power outage. Widespread power outages are often the result of major weather events (ice storms, hurricanes, etc.), so the primary coverage is most likely to be lost when it is needed the most. AT&T small cells are generally limited to PCS and AWS frequencies which further limits coverage and capacity for primary service. If 700 MHz is deployed on utility pole mounted small cells, then only 700 MHz can be deployed and only one of the two available 700 MHz carriers can be deployed due to equipment limitations. This also results in significant reductions in available capacity. In addition, small cell locations would need to be available where service is needed. Given all of these factors, it is simply not feasible to use small cells to provide reliable service within the area targeted for service by the proposed facility. The approximate capital costs per small cell node/facility range from \$50,000 to \$70,000 depending upon the amount of make-ready work including pole replacements. These costs do not include front haul fiber connection to the node, which averages \$50,000 to \$70,000 per node.

### **Proposed Site**

11. Pursuant to CGS §16-50o, submit a copy of the unredacted lease for the proposed site. A Motion for Protective Order may be filed for any proprietary/confidential information.
  - A. Crown is willing to share a copy of the unredacted lease for the proposed site and has simultaneously filed a Motion for Protective Order consistent with the Council's prior guidance. If the Motion for Protective Order is granted, Crown will submit a copy of the unredacted lease agreement to the Council.
12. Referencing Application Attachment 1, provide a revised aerial image showing the location of the proposed site and the existing site.
  - A. Please see attached revised aerial map (**Exhibit B**) showing the location of the proposed site and the existing site.
13. Was an environmental site assessment conducted within the proposed limits of disturbances (e.g. Phase 1, Phase 2)? If yes, summarize the findings. If not, would one be conducted?
  - A. Yes. Crown conducted Phase I and Phase II environmental site assessments. The assessments concluded that the historic use of the property has not resulted in elevated contamination to on-site project area soil; however, there may be on-site groundwater impacts in the project area due to elevated metals warranting the implementation of a Health and Safety Plan and Groundwater Management Plan for future excavation.

14. Referencing Application Attachment 7 – Sheet SP-1, where would the 125 cubic yards of excavated material be disposed of? Would this material be tested to determine waste characterization prior to disposal?
- A. A Health and Safety Plan and Soil and Groundwater Management Plan will be implemented for this project. Pursuant to the plans, non-saturated and saturated soils will be segregated and any saturated soils and groundwater will be disposed of at an appropriate designated disposal facility, unless determined not to be contaminated as a result of testing.
15. What is the distance of the proposed tower to the nearest publicly accessible area on the host parcel?
- A. The distance from the proposed tower to the nearest accessible area, which is the existing parking lot, is approximately 35’ from the tower as noted on Sheet CP-1 of the plans. As noted in the Application on page 9, the proposed tower will be set back approximately 109’ from the property line to the east (Universal Drive).
16. What is the distance of the tower to the nearest portion of active railroad tracks?
- A. The distance of the proposed tower to the nearest portion of the active railroad tracks is approximately 130’.

### **Proposed Facility and Associated Equipment**

17. Is the facility, or any portion of the facility, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
- A. No.
18. How is the construction cost of the facility recovered for both Crown and AT&T?
- A. Crown will recover the costs for the facility from contributions and rents from its tenants at the facility. A&T anticipates recovering its costs from customers and normal business operations
19. Would the tower require regular maintenance? If yes, approximately how often and at what cost?
- A. Yes. Crown conducts annual or biannual ground-based inspections combined with a climbed inspection every five (5) years per Telecommunications Industry Association Standards. Annual maintenance costs are anticipated to be approximately \$5,000.

20. What is the applicable structural design standard and maximum wind speed tolerance for the antennas/antenna mounts on the proposed tower?
- A. Based on the review of the various antenna specifications, the wind speed is generally listed as 150 miles per hour, which exceeds the ANSI/TIA-222-H design wind speed of 125 miles per hour specific to the proposed facility.
21. What are the proposed construction hours and days of the week?
- A. Crown proposes construction hours from 7:00 am to 7:00 pm, Monday through Saturday, noting the site is located in an industrial zoning district and between a rail yard and I 91.
22. Referencing Application Attachment 7 – Sheet CP-1, utility connection, what is the approximate height of the proposed utility pole above grade?
- A. The height of the proposed utility pole will be approximately 35’ above ground level.
23. Referencing Application p. 6 and Attachment 7, has T-Mobile expressed interest in relocating its facility from the 120 Universal Drive facility to the proposed 70 Universal Drive facility? At what anticipated height?
- A. Yes. T-Mobile has provided a Letter Agreement and Confirmation of Commitment agreement to relocate to the new facility. T-Mobile will be located at the 108’ antenna centerline height on the proposed monopole.

**Proposed Wireless Services – AT&T**

24. Referencing Application Attachment 17, Table 1, what are the “main” roads that would benefit from the proposed facility?
- A. With respect to Application Attachment 16, the “main” roads generally referenced that would benefit from maintaining AT&T’s coverage in the area are included in the chart below with approximate distances:

Street Name	Distance (mi)
I 91	0.52
US Hwy 5	0.68
Hartford Tpke	0.15
State Hwy 17	0.1
Quinnipiac Ave	1.87
Middletown Ave	1.19
Fitch St	0.7
Park Rd	0.2
Ridge Rd	0.2
Skiff St	0.11
Providence St	0.08
Cross St	0.07
N Frontage Rd	0.01

25. Application Attachment 17 indicates other frequencies will be installed in addition to the 700 MHz frequency. 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 AT&T’s wireless system?
- A. The 700 MHz frequency provides the widest area of coverage and therefore defines the coverage footprint of the AT&T wireless system. The other higher frequencies (850 MHz, PCS, AWS, etc.) provide a smaller coverage footprint and are used to provide additional capacity to the system. By serving users in the areas they can cover, these higher frequencies reduce the load on the 700 MHz system and increase the data speeds available to users that only have 700 MHz coverage.
26. Referencing Application Attachment 17, p. 2, it states 5G is being selectively rolled out on available frequencies. What frequencies will have 5G services at the time of AT&T’s deployment?
- A. 850 MHz will have 5G services at launch. PCS and AWS will have 4G and 5G.
27. Would the proposed facility provide capacity relief to adjacent AT&T sites? If yes, provide information tower, sector, and frequency.
- A. No. The primary purpose of the proposed facility is to replace and maintain the primary coverage from AT&T’s existing facility at 120 Universal Drive which will be decommissioned in light of the expiration of the underlying lease agreement. Without the proposed site, the capacity of the adjacent AT&T sites will be negatively impacted.
28. Would flush-mounted antennas provide the required coverage? Would the flush-mount configuration result in reduced coverage and/or necessitate greater antenna height with multiple levels of antennas? Explain.
- A. No. AT&T is installing three (3) antennas per sector. Flush mounting the antennas would require two (2) additional levels of antennas above the required 120’ AGL, raising the overall monopole height from 138’ to 158’. If the first collocator were also required to flush mount their antennas, this would possibly require adding at least an additional 20’ to the monopole height, resulting in a monopole height of 178’. If the second collocator were also required to flush mount their antennas, this would likely add at least an additional 20’ to the monopole height, resulting in a monopole height of 198’.
29. 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.
- A. No. The proposed facility is at the minimum height required to replace the service provided by AT&T’s current facility.

## **Emergency Backup Power**

30. Is natural gas service available along Universal Drive? If yes, is it possible to tie into the existing service as a fuel source for the proposed backup generator? If yes, approximately what would the incremental cost to Crown/AT&T to connect to existing natural gas service?
- A. Yes. Natural gas is available on Universal Drive, but it is unknown if there is sufficient capacity to service the backup power generators. The cost for a natural gas fueled generator is similar to the cost of the proposed propane fueled generator. However, the cost of site preparation related to the installation of a natural gas generator is significantly higher based on the location of the natural gas line as it relates to the compound, the need for a separate gas-designated trench, road repairs for the trench and connection fees. Further, the natural gas supply is susceptible to outages that are outside the carriers' control, while the propane supply is not.
31. Would the proposed backup generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?
- A. Yes.

## **Public Health and Safety**

32. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
- A. The facility will be surrounded by a security fence with a locked gate. AT&T's facility will also be monitored 24/7 at its state-of-the art Network Operation Center which can detect malfunction or tampering.
33. How would the site be secured during construction to ensure public safety?
- A. Crown would install a temporary security fence with locked gate and appropriate signage.
34. 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.
- A. The following are the applicable safety standards and codes for the facility:
- 2021 International Building Code;
  - National Electric Code (NFPA 70);
  - International Mechanical Code;
  - Connecticut State Fire Prevention Code;
  - Connecticut State Fire Safety Code (NPFA 101);
  - ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures"; and
  - Occupational Safety and Health Administration (OSHA).

35. Is night lighting proposed for the ground equipment at the facility? If so, for what purpose, and what type would be installed?
- A. Yes. AT&T's walk-up-cabinet is equipped with a motion sensor light for use during maintenance visits after dark.
36. Referencing Application Attachment 7 – Sheet SP-1, would the tower be designed with a pre-engineered yield point to ensure the tower setback radius remains on the host parcel?
- A. Yes. Please see Sheet CP-1 “Compound Plan & Elevation”. The tower is designed with a pre-engineered yield point at 69’.
37. In the event of a fire at the proposed facility, how would the power be turned off to de-energize the facility? What fire safety and management systems would be employed at the site?
- A. Power serving the proposed facility site can be shut off manually at the utility board adjacent to the fence compound. AT&T's radio equipment can be shut off remotely by technicians who are monitoring site operations at AT&T's Network Operations Center twenty-four hours a day, seven days a week. Other than shutting down power and operations, there are no other fire management systems in place.

### **Environmental Effects and Mitigation Measures**

38. Referencing Application Attachment 11 – Visibility Analysis, estimate the number of residences that may have seasonal and/or year-round views within 0.5 miles of the proposed tower.
- A. Approximately fifty-three (53) residences within 0.5 miles of the proposed facility may have seasonal views of the proposed tower and approximately five (5) residences within 0.5 miles of the proposed facility may have a combination of year-round and seasonal views of the proposed tower.
39. Referencing Application Attachment 22, the State Historic Preservation Office letter dated May 19, 2025 references a 144-foot monopole. Clarify.
- A. Based on Crown's review of its documents, it is not clear why the filing to the State Historic Preservation Office noted a monopole height of 144’. Verizon Wireless had requested an antenna centerline height of 132’ producing a tower height of 138’. It may have been an error or using a conservative potential height. As noted in the Application, Crown has requested a 138’ above ground level monopole.
40. Referencing Application Attachment 11, of the predicted seasonal and year-round visibility, how much of that area has visibility of the existing tower?
- A. Approximately 599 acres of year-round visibility associated with the proposed facility is predicted. Of this total, areas where the existing Crown tower located at 120 Universal

Drive may also be visible, include approximately 328 acres. These areas are generally located over undeveloped tidal marsh land to the northwest, west, and southwest of the proposed facility. Seasonal visibility associated with the proposed Facility is anticipated to occur over approximately 954 acres. Of this total, approximately 607 acres would occur over areas where seasonal views of the existing Crown tower located at 120 Universal Drive would be anticipated. These areas are located over and/or adjacent to undeveloped tidal marsh land to the northwest, west, and southwest as well as the areas of mixed land use within the immediate vicinity of the proposed Facility.

41. Submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

- a. wetlands, watercourses and vernal pools;
- b. forest/forest edge areas;
- c. agricultural soil areas;
- d. sloping terrain;
- e. proposed stormwater control features;
- f. nearest residences;
- g. Site access and interior access road(s);
- h. tower location/compound;
- i. clearing limits/property lines;
- j. mitigation areas; and
- k. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

A. Please see the Remote Field Review filed with this reply (**Exhibit C**).

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, January 27, 2026, an electronic copy of the foregoing was sent to the following.

<p><i>Intervenor: Cellco Partnership d/b/a Verizon Wireless</i></p> <p>Jonathan H. Schaefer, Esq. Emily C. Deans, Esq. Robinson &amp; Cole LLP One State Street Hartford, CT 06103 <a href="mailto:jschaefer@rc.com">jschaefer@rc.com</a> <a href="mailto:edeans@rc.com">edeans@rc.com</a> Phone: (860) 275-8200</p>	
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/s/ Thomas Regan  
Thomas J. Regan, Esq.