ATTACHMENT 1

Statement of Public Need

The proposed tower facility will provide reliable wireless communications services to the central portion of Kent. The facility is needed by AT&T in conjunction with other existing and proposed facilities to provide reliable services to the public that is not currently provided in this part of Kent. In addition to providing reliable wireless service to this area of the Town, AT&T's will also provide FirstNet services, which is the first broadband network dedicated to America's police, firefighters and emergency medical services (EMS). AT&T was selected by the First Responder Network Authority ("FirstNet") to build and manage the only broadband network dedicated to unify emergency communications to give first responders the technology they need to communicate and collaborate across agencies and jurisdictions. Thus, rather than relying on commercial networks that can become congested in an emergency, the FirstNet system will allow immediate and dedicated access to a communications network by first responders.[1] AT&T seeks to provide wireless service to key traffic corridors through residential areas of the Town. The proposed tower facility at either candidate site will bring the required coverage to significant portions of Route 341 (Segar Mountain Road), Richards Road, Bald Hill Road, Stonefence Lane, Spectacle Road and the residential neighborhoods and business/ retail areas near the proposed tower location. Attached are Radio Frequency Engineering Reports for Sites A and B with coverage plots depicting the "Current Coverage" provided by AT&T's existing facilities in this area of the state and "Proposed Coverage" as predicted from the proposed facility together with existing coverage from adjacent sites. Additional statistics regarding the overall area, population and roadway miles of expanded coverage in the community are included in the attached Radio Frequency Engineering Reports.

[1] *See* http://about.att.com/sites/first_net_powered_by_att for more information about FirstNet.

Radio Frequency Analysis Report

CT2693A
Bald Hill Road, Kent, CT

at&t

February 5, 2020

C Squared Systems, LLC
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Auburn, NH 03032

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Fax: (603) 644-2801
Support@csquaredsystems.com

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1. Overview

C Squared Systems was retained by New Cingular Wireless PCS, LLC ("AT&T") to evaluate the proposed wireless communications facility at Bald Hill Road, Kent, CT at 150 feet AGL, hereinafter referred to as "CT2693A".

AT&T is licensed by the FCC to provide wireless communications services throughout the State of Connecticut including the Town of Kent where the proposed facility would be located. The proposed facility has been selected as suitable for implementation of the National Public Safety Broadband Network ("NPSBN"), while also addressing a substantial gap in 4G LTE coverage for AT&T's network.

This report addresses AT&T's need for the proposed wireless facility and confirms that there are no other suitable existing structures that could address the coverage gaps in their wireless communications network.

The coverage analysis completed by C Squared Systems confirms: AT&T has a gap in reliable service in Kent, and that Candidate "CT2693A" provides AT&T with coverage in that service gap. Included as attachments in this report are coverage maps detailing the existing network and expected coverage from the proposed facility, pertinent site information, terrain and network layout maps.

2. Technology Advances & Design Evolution

AT&T provides digital voice and data services using 3rd Generation (3G) UMTS technology in the 800 MHz and 1900 MHz frequency band, and advanced 4th Generation (4G) services over LTE technology in the 700 MHz and 1900 MHz frequency bands as allocated by the FCC. These data networks are used by mobile devices for fast web browsing, media streaming, and other applications that require broadband connections. The mobile devices that benefit from these advanced data networks are not limited to basic handheld phones, but also include devices such as smartphones, PDA's, tablets, and laptop air-cards. 4G LTE services and devices have enabled AT&T customers to have even faster connections to people, information, and entertainment.

AT&T will also deploy FirstNet services from this facility. FirstNet is a federal agency with a mandate to create a nationwide, interoperable public safety broadband network for first responders. First responders across the country currently rely on more than 10,000 separate radio networks which oftentimes do not interoperate with one another. By deploying a nationwide broadband public safety network built specifically to meet the communications needs of first responders, the FirstNet network will provide a solution to the decades-long interoperability and communications challenges first responders have experienced, and which was highlighted by the 9/11 Commission's 2004 Final Report.

FirstNet selected AT&T to build, manage and operate the National Public Safety Broadband Network ("NPSBN") using FirstNet's Band 14 spectrum (Call Sign WQQE234, 20 MHz of the 700 MHz spectrum), together with AT&T's own wireless network. Using a combination of new and existing wireless facilities, AT&T provides prioritized, preemptive wireless services for first responders across Connecticut, New England and nationwide, while also improving 4G LTE coverage for AT&T customers.

It is important to note that with AT&T's migration from 3G to 4G services come changes in the base station infrastructure and resultant changes in the operating thresholds required by the LTE network. In the past, AT&T has presented receive signal thresholds of -74 dBm for their in-building coverage threshold and -82 dBm for their in-vehicle coverage threshold. Those thresholds were based on network requirements to support 2G/3G data speeds and past usage demand. Today, customers expect low latency and faster data speeds as evidenced by increasing data usage trends and customer demand.

AT&T's 4G LTE technology is designed to thresholds of -83 dBm and -93 dBm for their 700 MHz LTE and -86 dBm and -96 dBm for their 1900 MHz LTE.[1] The stronger thresholds (-83 dBm and -86 dBm) yield greater throughputs and improved customer experience. The -93 dBm and -96 dBm thresholds are the minimum acceptable levels required to meet customer expectations for 4G service.

3. Coverage Objective

There is a significant coverage deficiency in the existing AT&T wireless communications network along Segar Mountain Road, Richards Road and the neighboring residential and business/retail areas in Kent, referred to herein as the "targeted area". A deficiency in coverage is evidenced by the inability to adequately and reliably transmit/receive quality calls and/or utilize data services offered by the network. Seamless reliable coverage provides users with the ability to successfully originate, receive, and maintain quality calls and data applications throughout a service area. Appropriate overlapping coverage is required for users to be able to move throughout the service area and reliably "hand-off" between cells to maintain uninterrupted connections.

AT&T is expanding and enhancing their 4G LTE high-speed wireless broadband services throughout New England by filling in existing coverage gaps and addressing capacity, interference, and high-speed broadband issues. In addition to improving 4G LTE coverage for AT&T customers, AT&T is also building, managing and operating the National Public Safety Broadband Network using FirstNet's 700 MHz Band 14 spectrum, in order to provide prioritized, preemptive wireless services for first responders across Connecticut, New England and nationwide.

Due to terrain characteristics and the distance between the targeted coverage area and the existing sites, AT&T's options to provide services in this area are quite limited (maps of the terrain in this area and the distance to neighboring AT&T sites from the proposed site are included as Attachments 1 & 2, respectively.). AT&T's network requires deployment of antennas throughout the area to be covered. These antennas are connected to receivers and transmitters that operate in a limited geographic area known as a "cell." AT&T's wireless network, including their wireless handsets and devices, operate by transmitting and receiving low power radio frequency signals to and from these cell sites. The signals are transferred to and from the landline telephone network and routed to their destinations by sophisticated electronic equipment. The size of the area served by each cell site is dependent on several factors, including the number of antennas used, the height at which the antennas are deployed, the topography of the land, vegetative cover and natural or man-made obstructions in the area. As customers move throughout the service area, the transmission from the portable devices is automatically transferred to the AT&T facility with the best connection to the device, without interruption in service provided that there is overlapping coverage from the cells.

In order to define the extent of the coverage gap to be filled, both propagation modeling and real-world drive testing has been conducted in the area of Kent. Propagation modeling uses PC software to determine the network coverage based on the specific technical parameters of each site including, but not limited to, location, ground elevation, antenna models, antenna heights, and also databases of terrain and ground cover in the area. Drive testing consists of traveling along area roadways in a vehicle equipped with a sophisticated setup of test devices and receivers that collect a variety of network performance metrics. The data are then processed and mapped in conjunction with the propagation modeling to determine the coverage gaps.

[1] The threshold range differences between the 700 MHz and 1900 MHz frequency bands directly correlates to the type branch diversity receivers deployed in AT&T's receiver design.

Analysis of the propagation modeling and drive testing in Kent reveal that AT&T's network is unreliable throughout much of the area due to gaps in coverage, and that there is a service deficiency as a result. In order to fill in these coverage gaps and improve the network reliability to Kent, a new facility is needed in the area.

Table 1 below approximates the current coverage gap of AT&T's 700 MHz LTE technology in the vicinity of the proposed site.

	Existing 700 MHz LTE Coverage Gap	
Population:[2]	(≥ -83 dBm)	3,334
	(≥ -93 dBm)	2,608
Business Pops: [3]	(≥ -83 dBm)	466
	(≥ -93 dBm)	315
Area (mi²):	(≥ -83 dBm)	52.41
	(≥ -93 dBm)	42.59
Roadway (mi):	Main (-93 dBm):	95.3
	Secondary (-93 dBm):	23.2
	Total (-93 dBm):	**72.1**

Table 1: Estimated Existing Coverage Gap Statistics

[2] Population figures are based upon 2010 US Census Block Data
[3] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

Included in this report are Attachments 1 through 5, which are explained below to help describe AT&T's 4G network deployment in and around Kent, and the need for the proposed facility.

- Attachment 1: "*CT2693A Area Terrain Map"* details the terrain features around the area of deficient service being targeted by the proposed site in Kent. These terrain features play a key role in determining site designs and dictating the unique coverage achieved from a given location. This map is included to provide a visual representation of the ridges and valleys that must be considered when siting a wireless facility. The darker green, blue and purple shades correspond to lower elevations, whereas the orange, red and white shades indicate higher elevations.

- Attachment 1: "*CT2693A Neighbor Site Data"* provides site specific information of existing neighboring sites used to perform the coverage analysis provided in Attachments 1 and 4.

- Attachment 3: *" CT2693A Existing 700 MHz LTE Coverage" for the Current AT&T Network* depicts 700 MHz LTE coverage from existing sites and demonstrates that there are currently gaps in 700 MHz LTE coverage effecting service within the targeted area. The coverage shown is where the signal strengths are: > -83 dBm (minimum level required reliable, high quality service and performance at 700 MHz) and, > -93 dBm (minimum required for adequate level of service at 700 MHz). In an effort to provide the required levels of coverage to these areas, AT&T is proposing to install a wireless facility at the Bald Hill Road location.

- Attachment 4: *" CT2693A Existing 700 MHz LTE Coverage with Proposed Site"* shows how this proposed site would fill in the existing coverage gaps and improve AT&T's 700 MHz LTE network.

- Attachment 5: *Connecticut DOT Average Annual Daily Traffic Data* – Kent shows the available vehicular traffic volume data for the subject area from the Connecticut Department of Transportation. This data shows as many as 1,600 vehicles per day passing through Segar Mountain Road just south of the proposed site.

Table 1 below lists the coverage statistics compiled for the AT&T's 700 MHz 4G LTE network with the deployment of the Proposed Site.

	Incremental Coverage from Proposed Site (700 MHz)	
Population:[4]	(≥ -83 dBm)	167
	(≥ -93 dBm)	335
Business Pops: [5]	(≥ -83 dBm)	9
	(≥ -93 dBm)	27
Area (mi²):	(≥ -83 dBm)	3.35
	(≥ -93 dBm)	6.73
Roadway (mi):	Main (-93 dBm):	2.1
	Secondary (-93 dBm):	9.0
	Total (-93 dBm):	**11.1**

Table 2: Coverage Statistics

[4] Population figures are based upon 2010 US Census Block Data

[5] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

4. Conclusion

AT&T has identified an area of deficient coverage affecting a significant portion of Kent CT, including key traffic corridors through the residential and business/retail areas of the Town. Candidate "CT2693A" will bring the needed fill-in coverage to significant portions of Segar Mountain Road, Richards Road, and the residential neighborhoods and business/retail areas in the vicinity of the proposed location

No existing structures were identified and available that would be able to satisfy the coverage requirements needed for this area.

As discussed in this report and depicted in the attached plots, the proposed interim AT&T site will provide a substantial portion of the coverage being lost to the "Target Area" while maintaining effective connectivity to the rest of AT&T's existing network. In addition to providing improved LTE service to AT&T's customers to throughout the targeted areas of Kent, AT&T is providing enhanced services for first responders through the implementation of FirstNet's National Public Safety Broadband Network ("NPSBN").

5. Statement of Certification

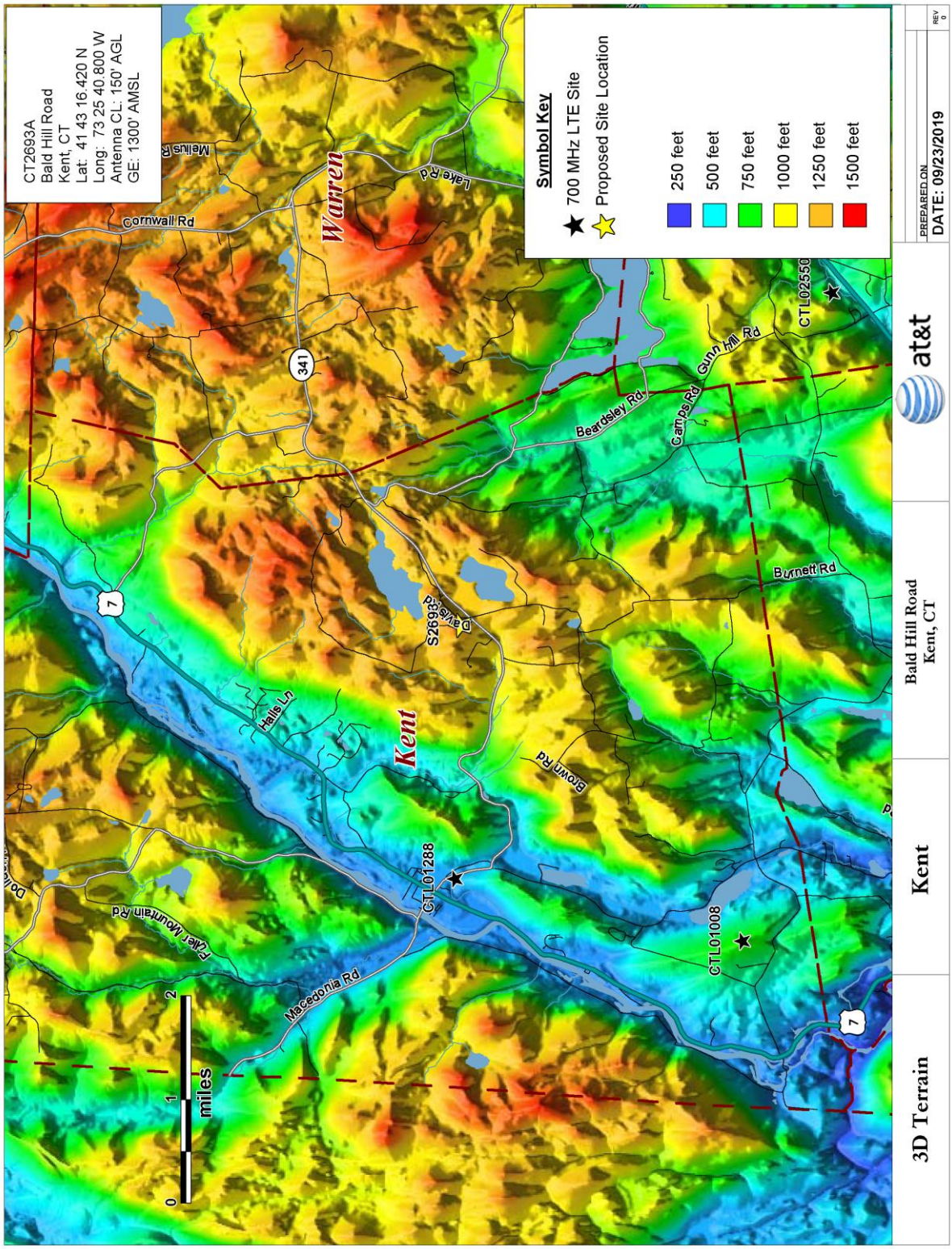
I certify to the best of my knowledge that the statements in this report are true and accurate.

February 5, 2020

Martin J. Lavin
C Squared Systems, LLC

Date

6. Attachments



Attachment 1: CT2693A Area Terrain Map

Site Name	Address	City/State	Location		Antenna Height (ft AGL)	Ground Elevation (feet)
			Latitude	Longitude		
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CT2550	6 Mountain Road	Washington	41.6691	-73.3653	167	705

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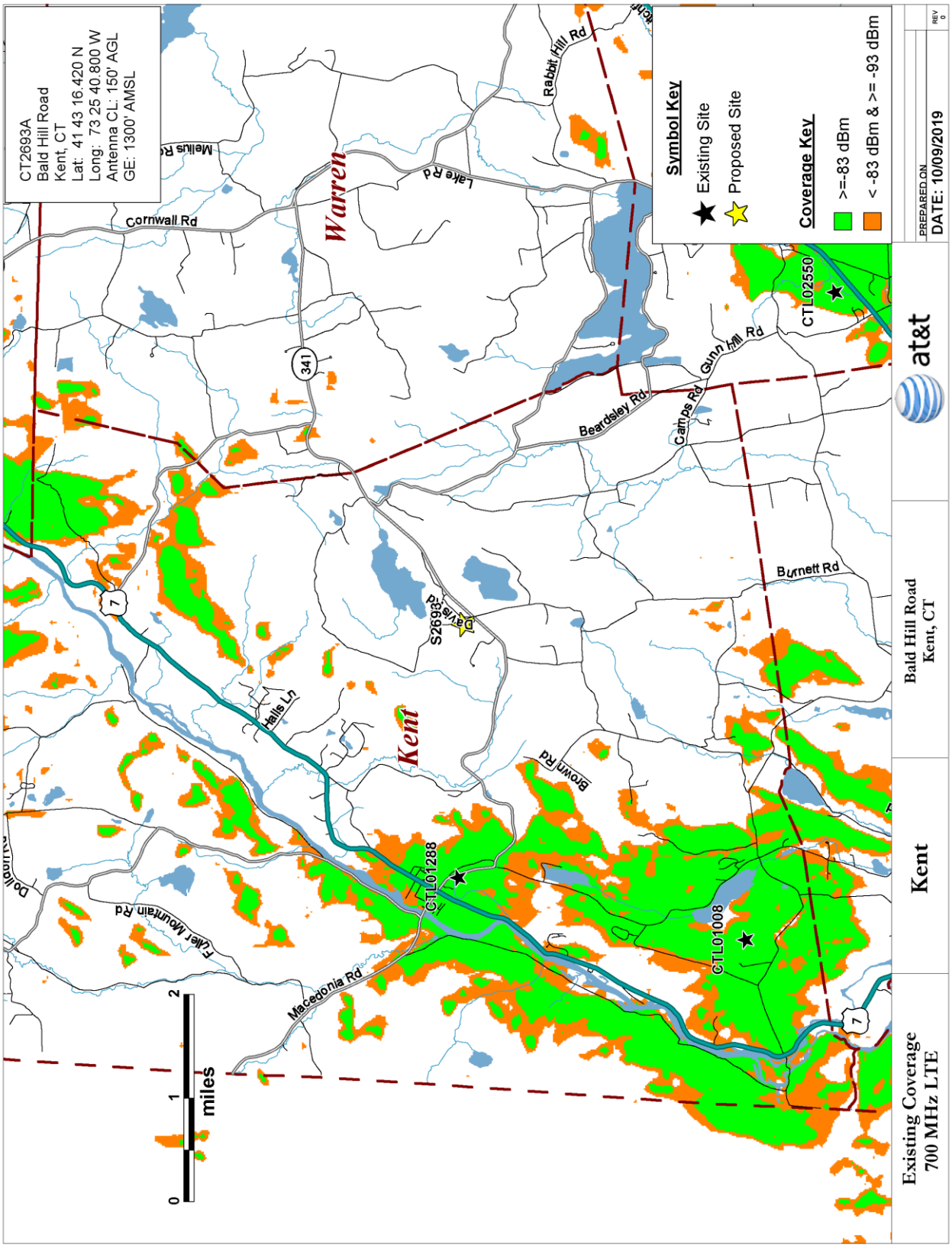

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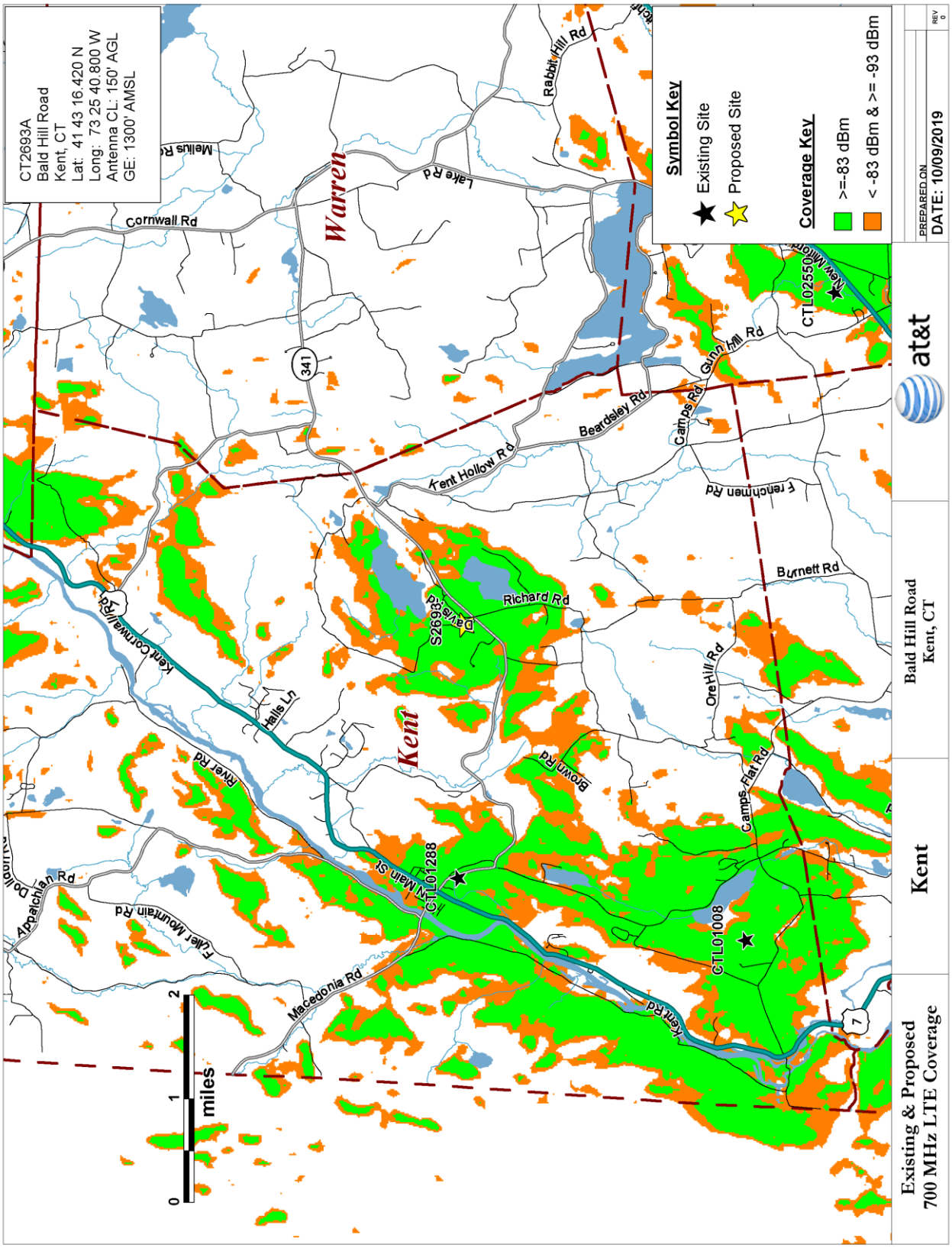

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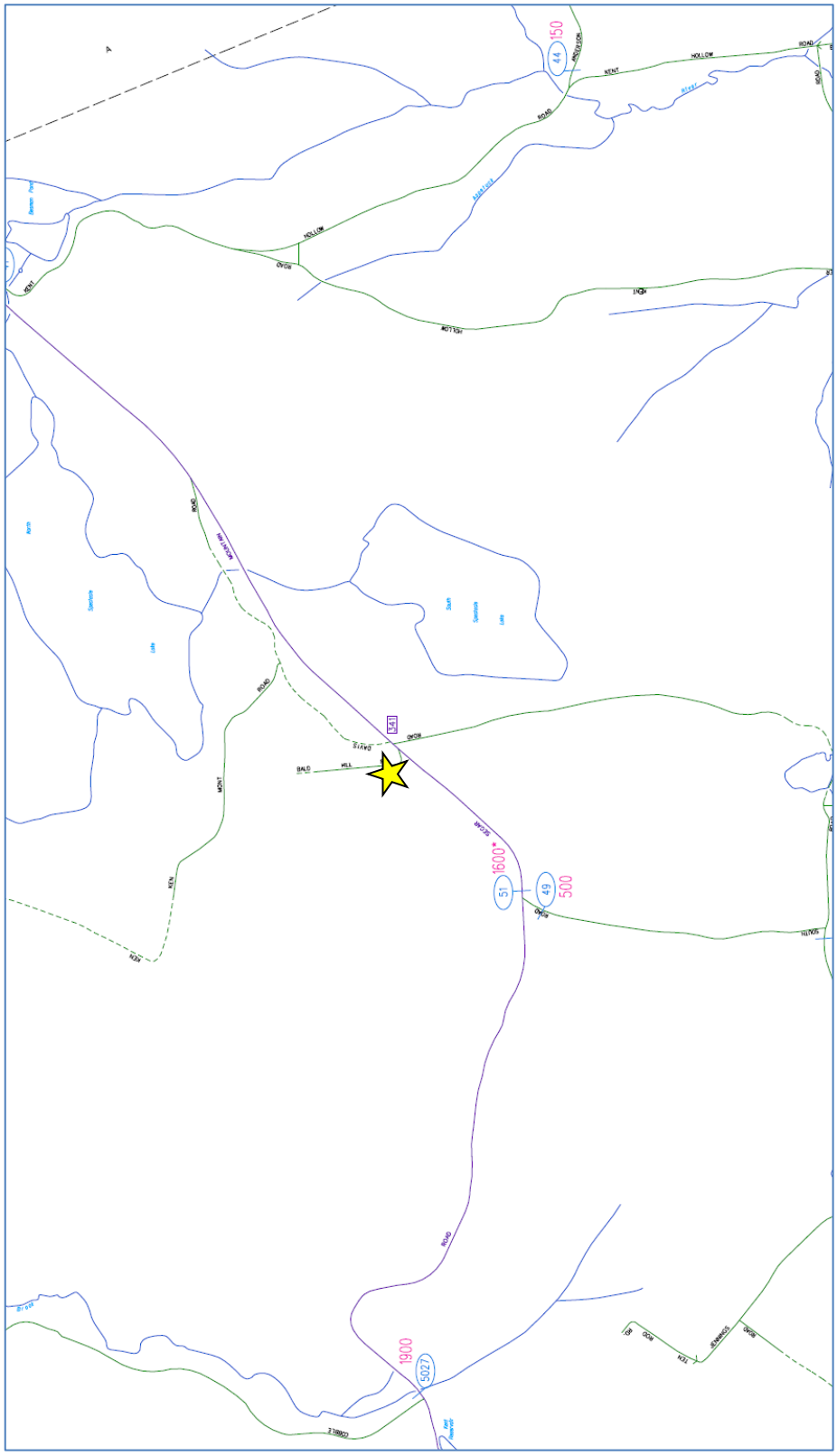

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Radio Frequency Analysis Report

CT2693B
93 Richards Road, Kent, CT

at&t

February 5, 2020

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Population:[4]	(≥ -83 dBm)	396
	(≥ -93 dBm)	1,014
Business Pops: [5]	(≥ -83 dBm)	40
	(≥ -93 dBm)	109
Area (mi²):	(≥ -83 dBm)	7.14
	(≥ -93 dBm)	15.53
Roadway (mi):	Main (-93 dBm):	5.6
	Secondary (-93 dBm):	26.9
	Total (-93 dBm):	**32.5**

Table 2: Coverage Statistics

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4. Conclusion

AT&T has identified an area of deficient coverage affecting a significant portion of Kent CT, including key traffic corridors through the residential and business/retail areas of the Town. Candidate "CT2693B" will bring the needed fill-in coverage to significant portions of Segar Mountain Road, Richards Road, and the residential neighborhoods and business/retail areas in the vicinity of the proposed location

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February 5, 2020

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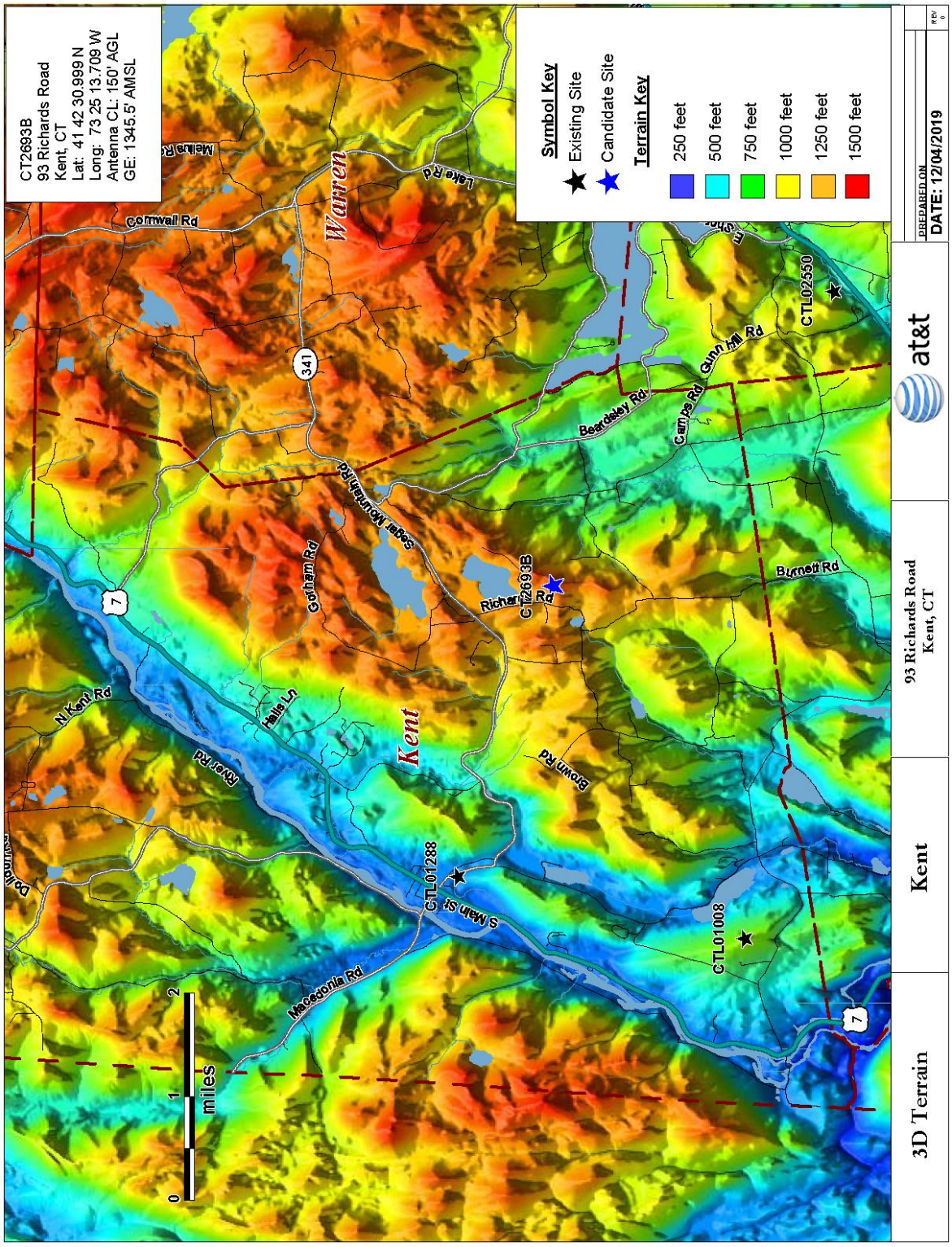

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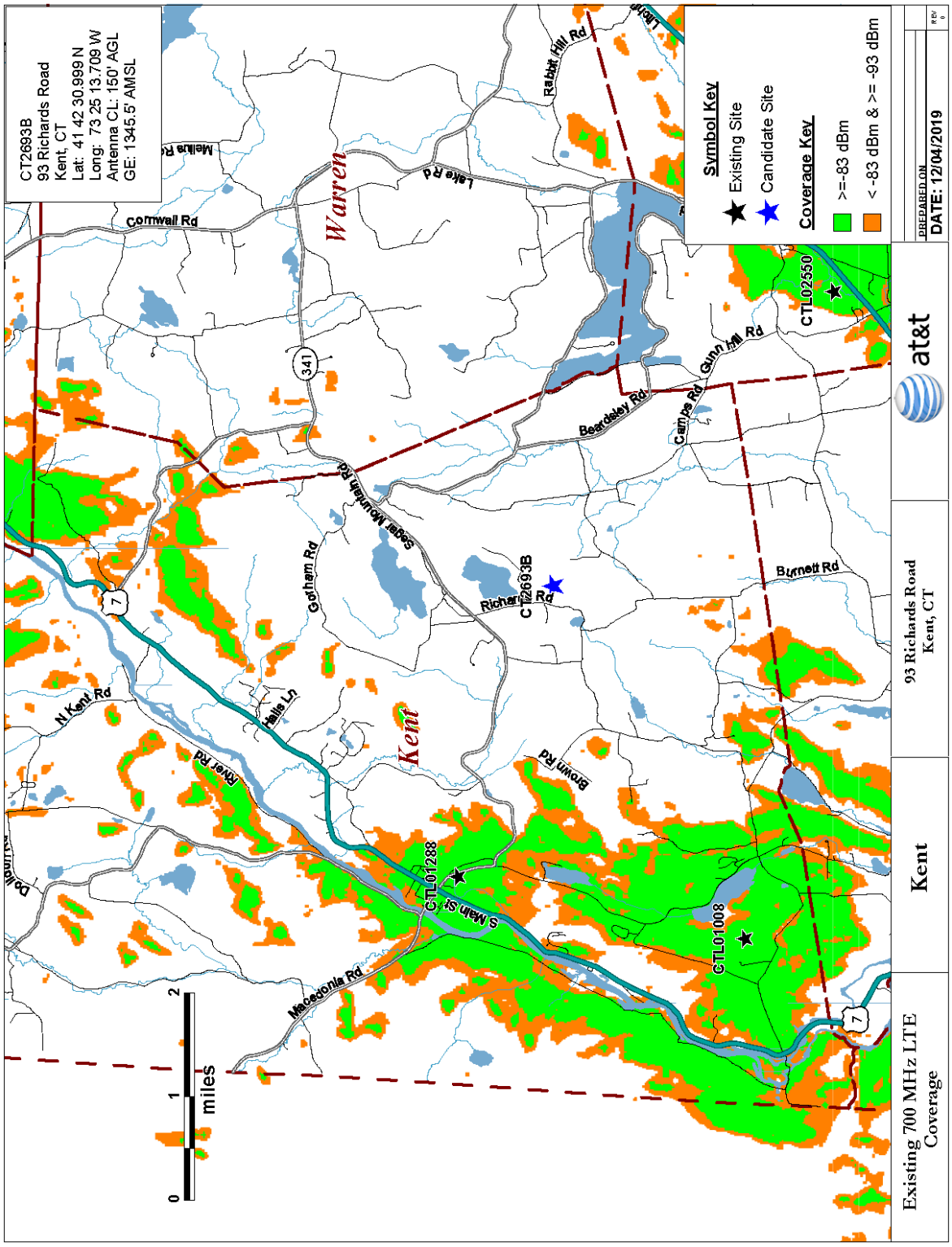

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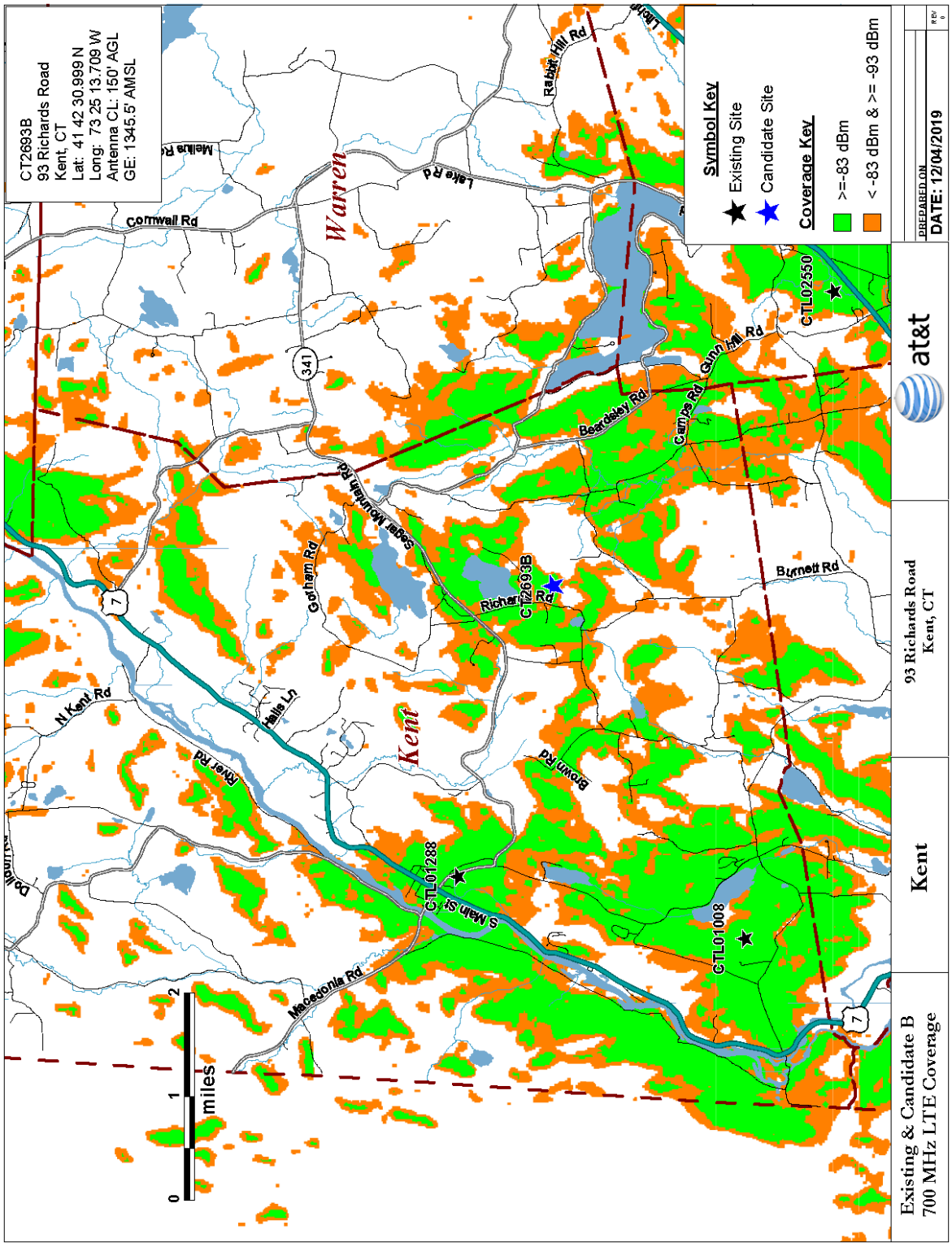
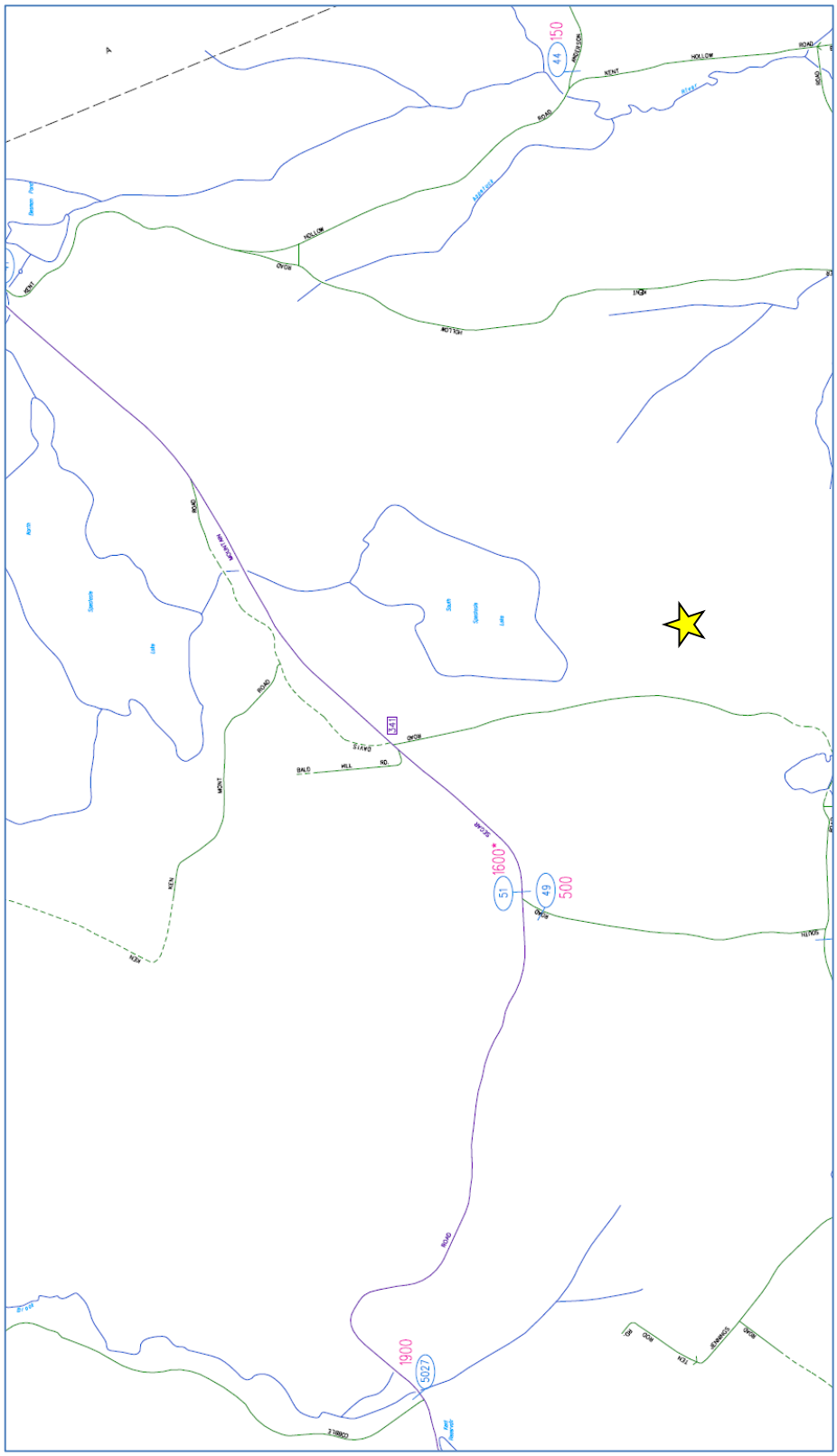


Attachment 4: CT2693B Existing 700 MHz LTE Coverage with Proposed Site for the AT&T Network



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