

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC  
AND NEW CINGULAR WIRELESS PCS, 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 AT ONE OF  
TWO SITES IN THE TOWN OF KENT,  
CONNECTICUT

DOCKET NO. 488

August 6, 2020

HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T  
LATE-FILED EXHIBITS

Homeland Towers, LLC and AT&T (the “Applicants”) respectfully submit the following late-filed exhibits and information in response to the Connecticut Siting Council’s request at the July 23, 2020 evidentiary hearing for the above-referenced proceeding:

- a) Provide more specific coverage gap information for the proposed sites in relation to the data presented in Application Attachment 1.

*Please see the map included in Attachment 1. The blue cross-hatched area on this map illustrates the coverage gap in the eastern and southern portions of the Town of Kent and comprises approximately 42.6 square miles. This map and the existing coverage gap statistics provided in Attachment 1 of the Application are not precise numbers but rather estimations intended to illustrate that a gap in reliable wireless service exists in this area. As demonstrated in the record and through testimony at the evidentiary hearing, due to the lack of infrastructure, the coverage gap in this area of the state is significant and more than one macro site will be required to provide reliable wireless services to address this coverage gap. Thus, the Proposed Facility at Site A or Site B is the first of other sites needed to address the lack of reliable wireless service.*

- b) Indicate if AT&T would be willing to accept a 125-foot tower at either site, and if so, provide revised coverage area information. If a 125-foot tower is not acceptable, provide specific reasons as to what specific coverage deficiencies necessitate a taller tower.

*As noted above and in the record in this proceeding, given the size of the coverage gap in this area of the state, AT&T is seeking to provide as much reliable wireless service as possible from the Proposed Facility. To maximize the coverage and address the request to lower the facility height, AT&T can accept a tower of height of 135' AGL (with an antenna centerline mounting height of 131') at either proposed Site. Included in Attachment 2 are statistics showing the loss in coverage at the lower height of 135' (131' antenna centerline mounting height). For each proposed Site, three tables are provided: 1) the anticipated coverage for a 135' tall facility; 2) the coverage loss between the proposed height 150' antenna centerline height and 131' antenna centerline height for -83; -93 and -108 dBm; and 3) the percentage loss between the proposed height 150' antenna centerline height and 131' antenna centerline height for -83; -93 and -108 dBm. As demonstrated in these tables, the 19' height reduction will result in coverage losses to an area where a significant coverage gap exists. It is also noteworthy that the coverage losses will also impact the service provided by FirstNet for first responders as explained by Dan Stebbins – FirstNet services are not available if the wireless service is not available.*

- c) Indicate the feasibility of a potential re-location of the Site B (Richards Road) tower to an area along the southern property line, or in another area of property. If such re-location is feasible, discuss the potential impact on tower visibility.

*The location of the Site B tower and facility compound was selected to avoid conflicts with the property owner's current use of the site and to avoid the existing steep slopes in the southeast portion of the site. Given these circumstances, relocation is not feasible. As testified by Mr. Libertine at the July 23<sup>rd</sup> evidentiary hearing, even if the Site B tower was relocated to the south on the Site, visibility of the Proposed Facility would not be improved. (7/23/20 evidentiary hearing transcript pgs. 70-71).*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day the foregoing was sent electronically to the Connecticut Siting Council and to the service list below with one hard copy sent to the Connecticut Siting Council via first class mail in accordance with Connecticut Siting Council directives:

Keith R. Ainsworth, Esq.  
Law Offices of Keith R. Ainsworth, Esq.  
51 Elm Street, Suite 201  
New Haven, CT 06510-2049

Anthony F. DiPentima, Esq.  
Michael D. Rybak, Jr., Esq.  
Guion, Stevens & Rybak, LLP  
93 West Street  
P.O. Box 338  
Litchfield, CT 06759

Daniel E. Casagrande, Esq.  
Cramer & Anderson, LLP  
30 Main Street, Suite 204  
Danbury, CT 06810  
(203) 744-1234  
dcasagrande@crameranderson.com

Daniel S. Rosemark, Esq.  
Rosemark Law, LLC  
100 Mill Plain Rd., Third Floor  
Danbury, CT 06811  
(203) 297-8574  
daniel@rosemark.law

August 6, 2020

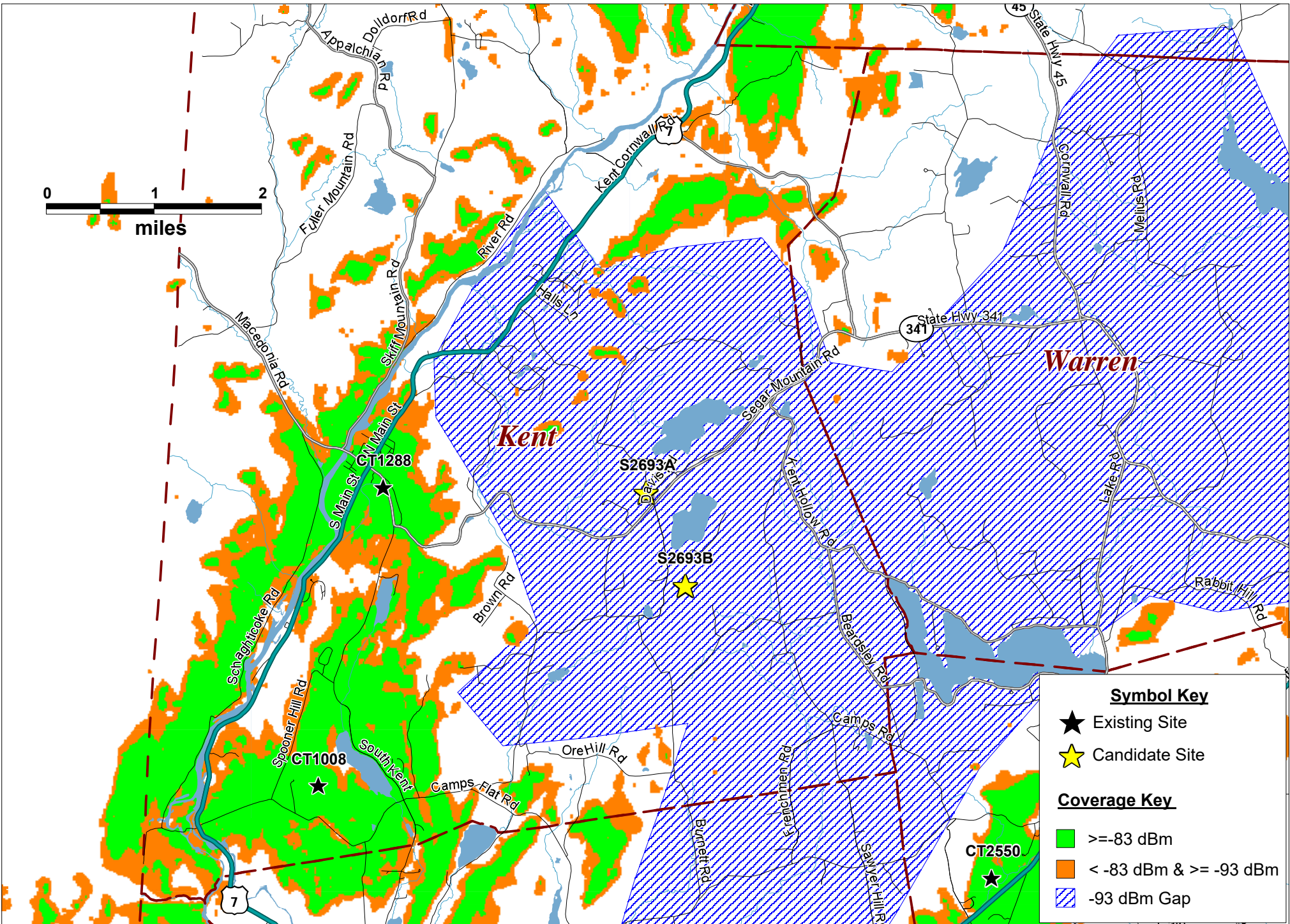


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Lucia Chiochio  
Cuddy & Feder LLP  
445 Hamilton Ave, 14<sup>th</sup> Floor  
White Plains, NY 10601  
(914)-761-1300  
Attorneys for the Applicants

cc: Homeland Towers; AT&T; APT; C Squared

ATTACHMENT 1



Existing -93 dBm Gap  
700 MHz LTE Coverage

Kent



PREPARED ON  
DATE: 08/04/2020

REV  
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**Symbol Key**

- ★ Existing Site
- ★ Candidate Site

**Coverage Key**

- $\geq -83$  dBm
- $< -83$  dBm &  $\geq -93$  dBm
- ▨ -93 dBm Gap

ATTACHMENT 2

	<b>Coverage Site A @ 131' AGL</b>	
<b>Population:<sup>1</sup></b>	(≥ -83 dBm)	148
	(≥ -93 dBm)	270
	(≥ -108 dBm)	638
<b>Business Pops:<sup>2</sup></b>	(≥ -83 dBm)	9
	(≥ -93 dBm)	26
	(≥ -108 dBm)	96
<b>Area (mi<sup>2</sup>):</b>	(≥ -83 dBm)	3.03
	(≥ -93 dBm)	6.10
	(≥ -108 dBm)	15.82
<b>Roadway (mi):</b>	Main (-93 dBm):	1.9
	Secondary (-93 dBm):	8.1
	<b>Total (-93 dBm):</b>	10.0
	Main (-108 dBm):	4.9
	Secondary (-108 dBm):	19.7
	<b>Total (-108 dBm):</b>	24.6

<sup>1</sup> Population figures are based upon 2010 US Census Block Data

<sup>2</sup> Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	<b>Coverage Loss: Site A 150' vs 131'</b>	
<b>Population:<sup>3</sup></b>	(≥ -83 dBm)	19
	(≥ -93 dBm)	65
	(≥ -108 dBm)	341
<b>Business Pops:<sup>4</sup></b>	(≥ -83 dBm)	0
	(≥ -93 dBm)	1
	(≥ -108 dBm)	11
<b>Area (mi<sup>2</sup>):</b>	(≥ -83 dBm)	0.32
	(≥ -93 dBm)	0.63
	(≥ -108 dBm)	1.97
<b>Roadway (mi):</b>	Main (-93 dBm):	0.2
	Secondary (-93 dBm):	0.9
	<b>Total (-93 dBm):</b>	1.2
	Main (-108 dBm):	1.0
	Secondary (-108 dBm):	5.6
	<b>Total (-108 dBm):</b>	6.7

<sup>3</sup> Population figures are based upon 2010 US Census Block Data

<sup>4</sup> Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.



	<b>Coverage Loss: Site A 150' vs 131'</b>	
<b>Population:<sup>5</sup></b>	(≥ -83 dBm)	11%
	(≥ -93 dBm)	19%
	(≥ -108 dBm)	35%
<b>Business Pops:<sup>6</sup></b>		
<b>Business Pops:<sup>6</sup></b>	(≥ -83 dBm)	0%
	(≥ -93 dBm)	4%
	(≥ -108 dBm)	10%
<b>Area (mi<sup>2</sup>):</b>		
<b>Area (mi<sup>2</sup>):</b>	(≥ -83 dBm)	10%
	(≥ -93 dBm)	9%
	(≥ -108 dBm)	11%
<b>Roadway (mi):</b>		
<b>Roadway (mi):</b>	Main (-93 dBm):	12%
	Secondary (-93 dBm):	10%
	<b>Total (-93 dBm):</b>	<b>10%</b>
	Main (-108 dBm):	17%
	Secondary (-108 dBm):	22%
	<b>Total (-108 dBm):</b>	<b>21%</b>

<sup>5</sup> Population figures are based upon 2010 US Census Block Data

<sup>6</sup> Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	<b>Coverage Site B @ 131' AGL</b>	
<b>Population:<sup>7</sup></b>	(≥ -83 dBm)	318
	(≥ -93 dBm)	678
	(≥ -108 dBm)	2,382
<b>Business Pops:<sup>8</sup></b>	(≥ -83 dBm)	32
	(≥ -93 dBm)	99
	(≥ -108 dBm)	260
<b>Area (mi<sup>2</sup>):</b>	(≥ -83 dBm)	6.71
	(≥ -93 dBm)	14.80
	(≥ -108 dBm)	33.79
<b>Roadway (mi):</b>	Main (-93 dBm):	5.5
	Secondary (-93 dBm):	25.0
	<b>Total (-93 dBm):</b>	30.5
	Main (-108 dBm):	11.5
	Secondary (-108 dBm):	59.4
	<b>Total (-108 dBm):</b>	70.9

<sup>7</sup> Population figures are based upon 2010 US Census Block Data

<sup>8</sup> Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	<b>Coverage Loss: Site B 150' vs 131'</b>	
<b>Population:<sup>9</sup></b>	(≥ -83 dBm)	78
	(≥ -93 dBm)	336
	(≥ -108 dBm)	646
<b>Business Pops:<sup>10</sup></b>	(≥ -83 dBm)	8
	(≥ -93 dBm)	10
	(≥ -108 dBm)	19
<b>Area (mi<sup>2</sup>):</b>	(≥ -83 dBm)	0.43
	(≥ -93 dBm)	0.73
	(≥ -108 dBm)	1.70
<b>Roadway (mi):</b>	Main (-93 dBm):	0.1
	Secondary (-93 dBm):	1.8
	<b>Total (-93 dBm):</b>	<b>1.9</b>
	Main (-108 dBm):	0.4
	Secondary (-108 dBm):	6.1
	<b>Total (-108 dBm):</b>	<b>6.5</b>

<sup>9</sup> Population figures are based upon 2010 US Census Block Data

<sup>10</sup> Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	<b>Coverage Loss: Site B 150' vs 131'</b>	
<b>Population:</b> <sup>11</sup>	(≥ -83 dBm)	20%
	(≥ -93 dBm)	33%
	(≥ -108 dBm)	21%
<b>Business Pops:</b> <sup>12</sup>	(≥ -83 dBm)	20%
	(≥ -93 dBm)	9%
	(≥ -108 dBm)	7%
<b>Area (mi<sup>2</sup>):</b>	(≥ -83 dBm)	6%
	(≥ -93 dBm)	5%
	(≥ -108 dBm)	5%
<b>Roadway (mi):</b>	Main (-93 dBm):	2%
	Secondary (-93 dBm):	7%
	<b>Total (-93 dBm):</b>	<b>6%</b>
	Main (-108 dBm):	3%
	Secondary (-108 dBm):	9%
	<b>Total (-108 dBm):</b>	<b>8%</b>

<sup>11</sup> Population figures are based upon 2010 US Census Block Data

<sup>12</sup> Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.