

STATE OF CONNECTICUT  
SITING COUNCIL

DOCKET NO. 488 – Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at one of two sites: Kent Tax Assessor ID #M10, Block 22, Lot 38 Bald Hill Road or 93 Richards Road, Kent, Connecticut.

: APRIL 7, 2020

**INTERROGATORIES TO APPLICANTS**

The following Interrogatories are directed to the Applicants by the Intervenor, Planned Development Alliance of Northwest Connecticut, Inc. to Homeland Towers LLC and New Cingular Wireless PCS LLC (AT&T). The requests are joint and should be answered by the representative of the applicant best suited to provide the response.

1. Please disclose the information contained in AT&T's Site Acquisition Request Form (SARF) for Kent, Connecticut **and** any SARF designed for the Bald Hill/Richards Road area of Kent, Connecticut including the date of issuance.
2. If the answer to the previous question is that AT&T does not have a SARF for this locale please provide a description of the coverage objective, an estimated antenna height, coordinates of a search area centroid, and an image of a "search ring" in the form of a circle or polygon on a map or aerial photo.
3. Please state the transmitter characteristics for the nearest existing AT&T sites which would link to the Bald Hill and Richards Rd proposed sites including, but not limited to the site coordinates, antenna heights, equipment models, gains, EIRPs, azimuths, tilts, etc. such that accurate modeling of coverage characteristics may be verified independently.

4. Please provide a list of existing AT&T DAS and C-RAN deployments in Connecticut.
5. Have AT&T's engineers modeled existing coverage and proposed coverage from the Bald Hill and Richards Rd sites? If so, please provide the AT&T coverage maps.
6. Has AT&T modeled coverage from other prospective sites in Kent? If so, please provide coverage maps for those sites.
7. Did Homeland Towers, LLC consider small cell solutions for providing coverage in the area around Bald Hill and Richards Road in Kent? If not, why not?
8. Did New Cingular Wireless/AT&T consider small cell solutions for providing coverage in the area around Bald Hill and Richards Road in Kent? If not, why not?
9. Please state how the number of residences within the coverage area was calculated as stated in Table 1 of the Radio Frequency Analysis reports in the Application. For example, since the coverage area is not co-extensive with the Census Block, how were the number of homes within the projected coverage determined?
10. Please provide an antenna-height coverage comparison for each proposed tower site with the proposed antenna height plus antenna heights of 80 feet and 110 feet above ground. Provide this in the form of a single map for each site, if practicable, showing the coverage differentials in multicolor overlay format. The applicant should use the same settings used to produce the coverage maps in Attachment 1 of its application.

11. In the Site Search Summary (p.40-46) please submit for each site which was “rejected by AT&T’s engineers” the data upon which the site was rejected.

12. Has the Applicant performed any analysis of locating multiple towers just above the tree line to provide coverage for the same area instead of one large monopole which looms over the surrounding scenic and recreational area?

13. Has the applicant performed a minimum height analysis to determine the minimum antenna centerline that it requires to meet its alleged coverage needs?

14. What studies did you undertake to eliminate alternate technologies from consideration as a solution to the coverage objectives?

15. Were drive tests (“scan tests”) that would verify the results of the calculated plots conducted? If so, please provide the data sets which were generated by the tests and note whether the data needs to be corrected for variables including, but not limited to, antenna position, gain and line loss.

16. Has the applicant performed continuous wave (“CW”) tests from the proposed site or any other site either identified or considered?

17. How many residential parcels (as opposed to acres) will have year-round views of the proposed towers? Seasonal views?

18. Your visual impact analysis indicates that a portion of the visibility of the towers will occur over open water. Did you simulate any of the views from open water or in any way determine the impact to the scenic views of visitors and residents using the open water

for recreation?

19. Is either proposed site capable of establishing an in-vehicle "handoff" with existing AT&T sites? If so, provide coverage maps that demonstrate the necessary overlap with existing coverage.

Respectfully Submitted,

Planned Development Alliance of Northwest Connecticut, Inc.,

By \_\_\_\_\_

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## CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 7th day of April, 2020 and addressed to:

Ms. Melanie Bachman, Esq., Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic) (US Mail/electronic). [Siting.Council@ct.gov](mailto:Siting.Council@ct.gov)

And electronic copies to:

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Keith R. Ainsworth, Esq.