## 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.

: MAY 11, 2020

# PDA OF CONNECTICUT RESPONSES TO COUNCIL INTERROGATORIES SET ONE

The following are responses to Interrogatories directed to the Intervenor, Planned Development Alliance of Northwest Connecticut, Inc. by the Council.

- 1. Referring to the Planned Development Alliance of Northwest Connecticut's Application to Intervene to the Council, dated March 3, 2020, please provide the following:
- a) Page 2 states in part, "..there are feasible and prudent alternatives to the coverage using alternative locations and/or smaller facilities..."

  What coverage analysis studies were performed to support this conclusion? Please provide.

#### **RESPONSE:**

PDA of Connecticut retained the services of Isotrope, LLC of Medfield, Massachusetts to model the coverage from a hypothetical small cell (DAS or CRAN) solution to the primary coverage target of the State Route 341 and environs. The coverage analyses for a 7-node small cell solution as well as coverage analyses of the proposed towers at lower heights are attached. The analyses indicate that the coverage objective can be met with a small cell solution which avoids the scenic impacts of either proposed tower and also that the tower height necessary for AT&T to provide coverage to the stated target area is significantly lower than the proposed height and only slightly

higher than the tree line.

The proposed small cell solution would also provide more robust coverage on Route 341 along the more pronounced hair pin turn on the western end of the coverage area. It is anticipated that a small cell solution, particularly a CRAN, would be feasible and prudent in that there exist utility poles and fiber optic cable along the roads and that the installation would be comparable in cost to a macro tower site if not less.

b) What alternative locations are available to the Applicant that will provide comparable wireless telecommunication services in this area?

#### **RESPONSE:**

Please see the response and maps above regarding the small cell solution alternative. Small cell solutions could be installed on existing utility poles in the coverage objective area or installed on new free-standing poles in the utility right-of-way along public roads.

c) Referring to page 3, Item 4 – Please describe the best available technology that can be used to reduce the visual impact of the proposed facilities.

## **RESPONSE:**

Please see the previous responses. Also, in the event a tower is installed, a 'mono-pine'- type tower closer to the tree line would mitigate visual and scenic impacts of a tower, albeit not as well as a small cell solution and not completely.

d) Did PDA take photographs of the publicly noticed balloon/crane test conducted by the Applicant that took place on January 18, 2020? If so, please submit.

## **RESPONSE:**

No, but PDA expects to take photographs of the balloon flight expected to occur on the day of the public hearing in Kent from locations of interest to the community.

Planned Development Alliance of Northwest Connecticut, Inc.,

By\_\_\_\_\_ Keith R. Ainsworth Law Offices of Keith R. Ainsworth, Esq. LLC 51 Elm Street, Suite 201 New Haven, CT 06510-2049 (203)435-2014 keithrainsworth@live.com

## 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 11th day of May 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

And electronic copies to:

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