### STATE OF CONNECTICUT

#### CONNECTICUT SITING COUNCIL

### IN RE:

APPLICATION OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT 5151 PARK AVENUE, FAIRFIELD, CONNECTICUT DOCKET NO. 495

FEBRUARY 23, 2022

# REQUEST BY NEW CINGULAR WIRELESS PCS, LLC ("AT&T") TO INTERVENE IN THIS PROCEEDING

Pursuant to Section 16-50n of the Connecticut General Statutes and Section 16-50j-15a of the Regulations of Connecticut State Agencies, New Cingular Wireless PCS, LLC ("AT&T") respectfully requests permission of the Connecticut Siting Council ("Council") to participate, as an intervenor, in Docket No. 495. Cellco Partnership d/b/a Verizon Wireless ("Verizon") recently submitted a Motion to reopen the evidentiary hearing and modify the decision in Docket No. 495 (the "Docket") to allow for the relocation of the previously approved telecommunications facility to an alternative location on the Sacred Heart University ("SHU") Main Campus.

AT&T is licensed by the Federal Communications Commission ("FCC") to construct and operate a wireless communications system in various areas of the United States of America including the State of Connecticut in order to provide cellular and personal communication services to the public.

AT&T has a direct interest in the proceeding and is similarly situated to Verizon with respect to an existing leasehold interest and wireless facility located at SHU. AT&T needs to relocate its wireless facility from the temporary facility approved in Petition No. 1470 to the tower Facility

that is the subject of Docket 495 in order to continue to provide reliable wireless services. Thus,

AT&T proposes to share use of the tower facility which is the subject of Docket 495.

The Council has admitted AT&T as an intervenor in previous dockets and AT&T proposes to

participate in support of the need to install the proposed facility at SHU in an alternate location

to ensure continuity of service to AT&T customers and FirstNet users in this area of the State.

For all the foregoing reasons, AT&T respectfully requests that it be named an intervenor in this

proceeding.

Dated: February 23, 2022

White Plains, New York

New Cingular Wireless PCS, LLC ("AT&T")

By:

Lucia Chiocchio, Esq.

to be

Kristen Motel, Esq. Cuddy & Feder LLP

445 Hamilton Avenue, 14th Floor

White Plains, New York 10601

(914) 761-1300

(914) 761-5372 Fax

## CERTIFICATE OF SERVICE

I hereby certify that on this day, one original and fifteen (15) hard copies and one electronic version of the foregoing was sent to the Connecticut Siting Council and one electronic copy was sent to:

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200

Dated: February 23, 2022

Kristen Motel, Esq.

Cuddy & Feder LLP 445 Hamilton Avenue, 14<sup>th</sup> Floor White Plains, New York 10601 (914) 761-1300 (914) 761-5372 Fax

cc: Brian Leyden, AT&T SAI Group, LLC