### STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

•

APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 495A

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 : MARCH 24, 2022

## PRE-HEARING SUBMISSION OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless ("Cellco") hereby provides the Connecticut Siting Council ("Council") with the following pre-hearing information available at this time regarding the above-referenced Application.

#### A. List of Witnesses

- 1. Anthony Befera, Principal Engineer Real Estate/Regulatory, Verizon Wireless
- 2. Shiva Gadsu, Radio Frequency Design Engineer, Verizon Wireless
- 3. Sylvester Bhembe, Project Manager, Hudson Design Group LLC.
- 4. Brian Gaudet, Project Manager, All-Points Technology Corp. P.C.
- Michael Libertine, LEP, Director of Siting and Permitting, All-Points Technology
  Corp. P.C.
- Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp. P.C.

#### B. Administrative Notice

Cellco asks the Council to take Administrative Notice of the following:

1. Record Evidence, Exhibits and Testimony from Docket No. 495.

#### C. Exhibits to be offered

Cellco intends to offer the following Exhibits:

- Motion to Reopen and Modify the Decision Due to Changed Conditions dated
  February 11, 2022.
- Cellco's Responses to Pre-Hearing Interrogatories from the Council dated March 17, 2022.
- 3. Sign Posting Affidavit filed on March 22, 2022.
- Cellco's Supplemental Response to Pre-Hearing Interrogatory No. 13 dated March 24, 2022.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

#### D. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, the undersigned attorney will make a brief presentation describing the site features and proposed site improvements. Attorney Baldwin will refer to the Site Schematic and Site Plan Sheets A-1, A-1.1 and A-2, attached to this filing. Electronic copies of the Site Schematic and Plan Sheets A-1, A-1.1 and A-2 are attached to this filing.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

By:

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 Its Attorneys

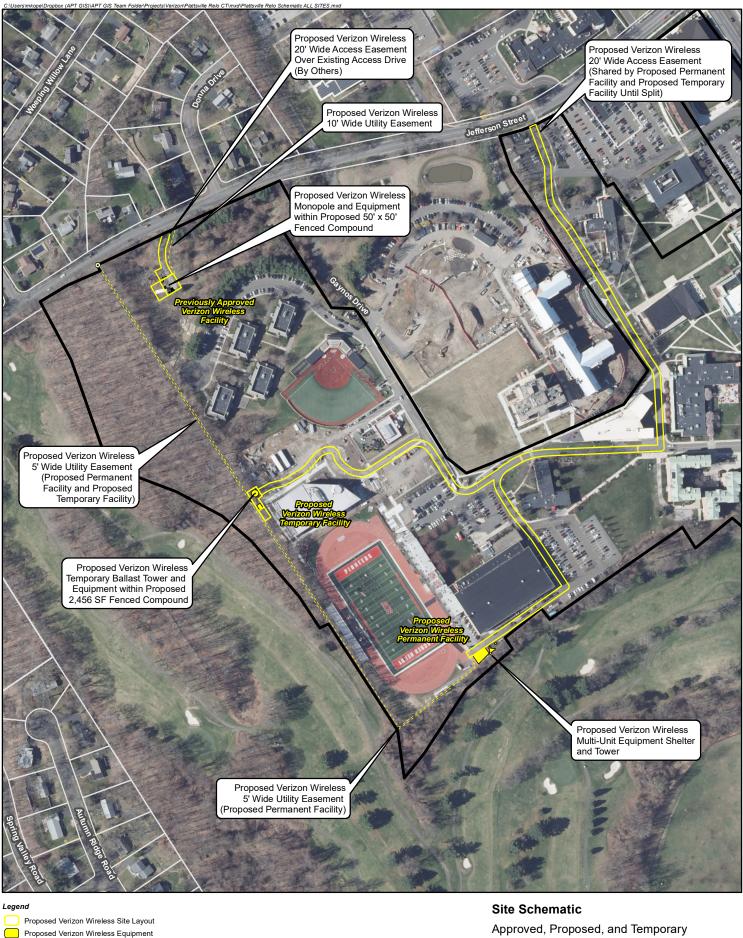
#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of March, 2022, a copy of the foregoing was sent, via electronic mail, to:

Lucia Chiocchio, Esq. Kristen Motel, Esq. Cuddy & Feder LLP 445 Hamilton Avenue, 14th Floor White Plains, NY 10601 LChiocchio@CuddyFeder.com KMotel@CuddyFeder.com

Kenneth C. Baldwin

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Proposed Verizon Wireless Utility Pole

Subject Property

Approximate Parcel Boundary

# 150

Wireless Telecommunications Facilities Plattsville Relo CT 5151 Park Avenue verizon/ Fairfield, Connecticut



