

February 12, 2021

## VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Ms. Melanie A. Bachman, Esq., Executive Director Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

Re: DOCKET NO. 496

Dear Attorney Bachman:

This office represents T-Mobile Northeast LLC ("T-Mobile"). In accordance with General Statutes § 16-50n and § 16-50j-15 of the Regulations of Connecticut State Agencies, T-Mobile submits the enclosed Petition to Intervene in the above-captioned Docket with an additional hardcopy.

Please do not hesitate to contact me with any questions.

Very truly yours,

Jesse A. Langer

**Enclosures** 

# STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

**DOCKET NO. 496** 

APPLICATION OF TARPON TOWERS II, LLC FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A TELECOMMUNICATIONS FACILITY AT 800 PROSPECT HILL ROAD IN THE TOWN OF WINDSOR, CONNECTICUT

February 12, 2021

### PETITION TO INTERVENE

In accordance with General Statutes § 16-50n and § 16-50j-15 of the Regulations of Connecticut State Agencies, T-Mobile Northeast LLC, ("T-Mobile"), respectfully seeks to be designated as an intervenor in the above-captioned Docket concerning an application by Tarpon Towers II, LLC ("Tarpon"). T-Mobile's participation as an intervenor shall furnish assistance to the Connecticut Siting Council ("Council") in resolving the issues in the proceeding, is in the interests of justice and will not impair the orderly conduct of the proceedings. Regs., Conn. State Agencies, § 16-50j-15(d); General Statutes § 4-177a.

#### I. Petitioner Contact Information

T-Mobile is a wireless provider licensed by the Federal Communications Commission. T-Mobile has a business address of 12920 SE 38<sup>th</sup> Street, Bellevue, Washington, 98006. Communications concerning this matter can be directed to the undersigned.

#### II. Basis For Intervenor Status

T-Mobile is the anchor tenant on the proposed telecommunications facility ("Facility"). As set forth in Tarpon's Application, the proposed Facility is an integral component of T-Mobile

wireless network in the subject area of the Town of Windsor ("Town"). (Application, p. 5;

Attachment 5.) The proposed Facility is necessary for T-Mobile, in conjunction with other existing

telecommunications facilities within the Town and surrounding areas, to provide reliable services

to the public.

Through witness testimony, along with the written submissions associated with Tarpon's

Application, T-Mobile can offer specifics about its wireless network, the important role the

proposed Facility would play in that network, and its expertise and experience as a wireless

provider in Connecticut. T-Mobile has also participated in numerous other proceedings before the

Council. Ultimately, T-Mobile's participation in this proceeding would aid the Council in

determining whether a public need exists in accordance with General Statutes §§ 16-50g, 16-50p

as well as the Telecommunications Act of 1996 and the various rulings of the FCC concerning the

need to ensure the rapid deployment of and universal access to wireless services.

WHEREFORE, T-Mobile respectfully requests permission to participate in the above-

captioned Docket as an intervenor.

Respectfully submitted by,

T-MOBILE NORTHEAST LLC

By:

Jesse A. Langer

Updike, Kelly & Spellacy, P.C.

8 Frontage Road

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### **CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing document was sent via electronic mail to the service list for Docket No. 496 on February 12, 2021:

Jesse A. Langer Updike, Kelly & Spellacy, P.C. 8 Frontage Road East Haven, CT 06512 (203) 786-8310 Email: jlanger@uks.com

Bv:

Jesse A. Langer

Updike, Kelly & Spellacy, P.C.