

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC AND
NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T FOR
A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE, AND OPERATION
OF A TELECOMMUNICATIONS FACILITY AT
16 COOTE HILL ROAD, TOWN OF SHERMAN,
CONNECTICUT

DOCKET NO. 499

June 10, 2021

HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T
INTERROGATORIES TO INTERVENOR STAN GREENBAUM

- Q1. Identify the individuals from RCC Consultants that collaborated with AT&T in 2013 regarding AT&T's proposal for a wireless telecommunications tower facility in southern Sherman.
- Q2. Provide any documents or information confirming that AT&T's 2013 proposal for a wireless tower facility at 16 Coote Hill Road would meet the Town of Sherman's public safety communications objectives.
- Q3. Did the Town of Sherman adopt any of the recommendations in the 2013 RCC Consultants' powerpoint presentations to the Town for options on improving public safety communications?
- Q4. Were you involved in any communications on behalf of Naromi Land Trust regarding the leasing of any of their property for a wireless telecommunications facility after your term as Vice President? If so, provide details of these communications.
- Q5. Were the analyses that you assert Mr. Richard Tourjounian prepared in 2012 and 2013 updated by him or RCC? If so, provide a copy of the updated data, information and reports to the Town.
- Q6. Was an analysis performed for the tower in Patterson, NY owned by the Town of New Fairfield for providing commercial wireless telecommunications services? If so, provide the analysis and include the modeling software and inputs utilized for the analysis.

- Q7. What modeling software/modeling tool was utilized for the 2013 RCC Consultants presentation prepared for the Town regarding commercial wireless services?
- Q8. Was the 2013 RCC Consultants analysis of commercial wireless services optimized with any wireless network drive data?
- Q9. What inputs were used in the 2013 RCC Consultants analysis of commercial wireless services?
- Q10. Provide details and/or copies of any and all communications after June 1, 2020 with the owners of 16 Coote Hill Road and the owner of Coote Hill Road regarding the proposed wireless facility that is the subject of this proceeding. Include the date and time of the communication and a description of the content of the communication.
- Q11. In the May 13, 2021 Request and Comments, it is noted that Stan Greenbaum and an “ad hoc group” of other Sherman residents formed an organization named Sherman Citizens for Responsible Telecommunications Sites and this organization hired Richard Tourjounian. Provide the names of the members of this organization and clarify if the organization is seeking intervenor status in this proceeding.

CERTIFICATE OF SERVICE

I hereby certify that on this day one electronic copy of the foregoing was sent electronically to the Connecticut Siting Council with one electronic copy sent to the list below and one original and fifteen (15) hard copies were sent to the Connecticut Siting Council via overnight mail on June 9, 2021.

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June 10, 2021



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