

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 14, 2021

Response to Interrogatories posed to Intervenor Stan Greenbaum by
HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T

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.

R1 Intervenor has no knowledge of individuals from RCC Consultants or any collaboration that may have occurred 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.

R2 Intervenor has no knowledge of the contents of 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 nor does the Intervenor know the details of what those objectives were at that time. See Exhibits Attachment 1 - Sherman Public Safety Communications: Report on Phase I, 01/24/13.

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?

R3 Intervenor is not familiar with a PowerPoint presentation made by RCC Consultants to the Town of Sherman in 2013 with respect to options on improving public safety communications and is, therefore, unaware of whether or not the Town of Sherman adopted any such recommendations.

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.

R4 The Intervenor was not involved in any communications on behalf of the Naromi Land Trust regarding the leasing of any of their property for a wireless telecommunications facility at any time.

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.

R5 The Intervenor has no knowledge of any updated analyses that were prepared by Mr. Richard Touroonjian in 2012 and 2013 by either himself or RCC.

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.

R6 The Intervenor has no direct knowledge as to whether an analysis was performed for the tower in Patterson, NY owned by the Town of New Fairfield, for providing commercial wireless telecommunications services. See Exhibit Attachment 2 - RCC Consultants' Cell Phone Coverage Analysis Presentation to Town of Sherman Board of Selectmen, 09/26/13.

Q7. What modeling software/modeling tool was utilized for the 2013 RCC Consultants presentation prepared for the Town regarding commercial wireless services?

R7 The Intervenor has no knowledge of 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?

R8 The Intervenor does not know whether the 2013 RCC Consultants analysis of commercial wireless services was optimized with any wireless network drive data.

Q9. What inputs were used in the 2013 RCC Consultants analysis of commercial wireless services?

R9 The Intervenor has no knowledge of any inputs that 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.
- R10. The Intervenor had no communications with the owners of 16 Coote Hill Road since June 1, 2020 regarding the proposed wireless facility that is the subject of this proceeding. The Intervenor has had no written communication with the owner of the road. In or about the latter part of April 2021 to mid-June 2021, the Intervenor, however, did have a few verbal communications with the owner of the road. The sum and substance of the first telephone conversation was the owner of the road communicating his concern with the Applicants' pressuring him in to signing an agreement for the use of his road, (reportedly stating to him that he had no choice in the matter and the agreement was being offered as a courtesy to him) and that the location of a cell phone tower was up to the Siting Council. He said was reassured that Don Lowe, First Selectman of Sherman, was at two meetings at his home with Mr. Vergati of Homeland Towers. The owner of the road also informed me that he had hired a lawyer to help him terminate the agreement with the Applicant. The sum and substance of the second telephone conversation occurred in late May after the owner of the road had successful surgery. The Intervenor called to inquire about the health of the road owner. The owner of the road said that the surgery was successful and he was feeling much better. On the occasions that the owner of the road met with Mr. Vergati in 2020, he had been ill and heavily medicated. The owner of the road was also recovering from the death of his mother. The sum and substance of a chance meeting when the owner of the road occurred while he was cleaning up debris near the entrance to Coote Hill Road in early June 2021. Again, there was a reiteration of his upset with the Applicants and feeling that he had created more easement issues for the property owners on Coote Hill Road whom he considers his friends and neighbors.
- 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 Tourjoonian. Provide the names of the members of this organization and clarify if the organization is seeking intervenor status in this proceeding.
- R11. The Intervenor wishes to take this opportunity to clarify the statement he made in his May 13, 2021 Motion for Continuance, listed in Docket #499 under Exhibits, titled Greenbaum Pre-filed Testimony, 05/18/21, regarding an "ad hoc group of other Sherman residents (has) formed an informal organization that we are calling Sherman Citizens for Responsible Telecommunications Sites." There is and was no organization in the traditional and formal sense. The term ad hoc was used and meant in the most informal manner, meaning like minded neighbors and community members who felt the same was as the Intervenor about the Application in Docket #499. Richard Touroonjian was hired at the initiative of the Intervenor. The Intervenor does not know of any other individual or group that 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, hard copy to follow.

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June 15, 2021

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