



Crown Castle
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Clifton Park, NY 12065

June 17, 2021

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

**MOTION TO REOPEN AND MODIFY
DOCKET NO. 242 DECISION AND ORDER**

Introduction:

AT&T (the “Petitioner”) respectfully requests that the Connecticut Siting Council (“Council”) reopen the evidentiary proceeding in Docket No. 242 and modify its Decision and Order (“D&O”) dated October 14, 2003 as included in Exhibit A. AT&T seeks the Council’s approval to modify Condition #2 of the D&O by eliminating the condition requiring antennas be attached to the tower via flush mount configurations so as to permit other types of mounting designs, including but not limited to platform mount systems. The approved modification to Condition #2 of the D&O will create no adverse environmental impacts but will in fact further the public interest by reducing barriers to tower sharing and avoiding the unnecessary proliferations of towers.

Background:

On January 29, 2003, AT&T Wireless PCS, LLC d/b/a AT&T Wireless (“AT&T”) applied to the Council for the construction, operation, and maintenance of a wireless telecommunications facility at one of two sites at the Andover Sportsmen Club, 122 Route 6, Andover, Connecticut. The property at 85 Quaker Farms Road is approximately 67.13 acres and is owned by ASC Real Estate Inc. By D&O dated October 14, 2003, the Council issued a CPCN to AT&T granting approval to construct at Site A, as defined in the original application.

After the issuance of the CPCN, the Council has acknowledged on two separate occasions AT&T’s notice of intent to modify the tower. See Exhibit B for copies of these acknowledgements.

Request to Modify:

On June 17, 2021, AT&T also submitted a Notice of Exempt Modification proposing to replace six (6) existing antennas with six (6) new antennas. This proposal included mount modifications primarily involving a change from the existing t-arm mount to a new platform mount. This Notice of Exempt Modification is submitted on the same day as the Motion to Reopen and Modify Docket No. 242 in an effort to preempt a notice of incomplete letter as AT&T is aware the proposed antenna design and mount

modification is currently inconsistent with Condition No. 2 of the D&O. Accordingly, AT&T now requests that the Council reopen the Docket No. 242 proceeding and modify its D&O to allow AT&T and other service providers to attach antennas to the existing monopole at the Jonathan Trumbull Highway property utilizing platform mounting systems in addition to flush mounts. In support of this request, AT&T offers the following additional information:

1. The current limitation on antenna mount design restricts wireless carriers', including AT&T's, ability to upgrade existing equipment. Flush mount configurations cannot support the additional antennas and supplementary equipment required by wireless carriers in order to provide state-of-the-art reliable wireless service. AT&T's existing flush mount configuration is unable to meet the increasing capacity and coverage demands due to the vast changes in AT&T's network and technology. For this particular site, AT&T can structurally accommodate a platform mount system which will enable AT&T to utilize the appropriate antennas/equipment to meet current capacity and coverage demands.
2. AT&T's requested modification to the D&O Condition No. 2 will not result in any significant nonuniformity or create substantial visual impact. As indicated on the photo simulations included in Exhibit C and the construction drawings for AT&T's proposal included as Exhibit D, the proposed platform mount does not constitute a significant change in the aesthetics of the existing facility.

Conclusion:

For the foregoing reasons, AT&T respectfully requests that the Council reopen Docket No. 242 and modify Condition No. 2 of the D&O eliminating the requirement that all antennas installed on the monopole utilize flush mount configurations.

Sincerely,

Anne Marie Zsamba
Project Manager - Site Acquisition
Crown Castle
Agent for Applicant, AT&T
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Certification of Service:

I hereby certify that a copy of the foregoing was sent via Fedex to all relevant parties associated with Docket No. 242, including:

Jeffrey J. Maguire, First Selectman
Town of Andover
Town Hall
17 School Road
Andover, CT 06232
860.742.7305

Jim Hallisey, Zoning Agent
Town of Andover
Town Hall
17 School Road
Andover, CT 06232
860.742.7305

Christopher B. Fisher, Esq.
Cuddy & Feder LLP
90 Maple Avenue
White Plains, NY 10601

Tower Ventures II, LLC
495 Tennessee Street
Suite 152
Memphis, TN 38103

T-Mobile
Mark Richard
35 Griffin Road South
Bloomfield, CT 06002

ASC Real Estate Inc, Property Owner
C/O Andover Sportsmans Club, Co-Owner
122 Route 6
Andover, CT 06232
860-742-6223

A notification along with a copy of this filing were also sent via FedEx to property owners whose land abuts the parcel at 122 Jonathan Trumbull Highway. A list of abutters, a sample letter, and copies of FedEx labels as proof of service are enclosed as Exhibit E.