

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

APPLICATION OF OPTASITE TOWERS LLC
AND OMNIPOINT COMMUNICATIONS, INC.
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE AND
OPERATION OF A TELECOMMUNICATIONS
FACILITY AT 425 LITCHFIELD ROAD,
NEW MILFORD, CONNECTICUT

DOCKET NO. 342

Date: SEPTEMBER 4, 2007

PRE-FILED TESTIMONY OF SCOTT HEFFERNAN

Q1. Please summarize your professional background in telecommunications.

A. My career in the wireless industry has spanned the past eleven years. For the past two years, my responsibilities as a contractor for T-Mobile have included the design and integration of the T-Mobile wireless network. Prior to this period, I was responsible for the design, integration, optimization and management of network buildouts for commercial wireless carriers, including Nextel, AT&T Wireless, Cingular, and Voicestream (T-Mobile's predecessor). Additionally, I have been involved in network design for government entities such as the Department of Homeland Security, Department of the Army, Department of the Navy, and the United States Marine Corps.

Q2. What does your testimony address?

A. The purpose of my testimony is to provide information relating to T-Mobile's existing network in this area of the state and to describe the need for a

proposed facility in the area. This includes information on the general design of T-Mobile's network and the technical constraints in selecting proposed facilities.

Q.3. Please describe T-Mobile's wireless network in Connecticut.

A. T-Mobile's predecessor entities began building a wireless network to provide PCS service in Connecticut in the mid 1990s. T-Mobile is licensed by the Federal Communications Commission to provide PCS service using frequencies in the 1900 MHz range. T-Mobile operates approximately 550 sites in Connecticut. Current efforts are directed to providing signal to areas without coverage and meeting demand for additional capacity within areas already served. Each new site must be chosen to meet the need for coverage and/or capacity without creating RF interference among sites.

Q4. What requirements does the nature of wireless technology place on T-Mobile's selection of cell site locations?

A: Like all personal communications service providers, T-Mobile's wireless network is based on the principle of frequency reuse. Cell site locations must be chosen to provide for sufficient signal strength overlap to allow call hand-off between cells without creating unnecessary duplicative coverage and frequency interference. Terrain variations and local land use policies and development further limit cell site locations.

Technological advances in service, such as the availability of data and video services through customer handsets, are also significant factors in system

development. Increased customer demand and expectations resulting from those advances drive the need for additional sites.

T-Mobile's required lower limit threshold is -84 dBm, which is expected to provide reliable in-vehicle coverage. A higher threshold level of -76 dBm is the minimum required to provide reliable in-building coverage. At levels below the -84 dBm threshold, signal degradation would be expected to result in areas of unreliable service to T-Mobile customers for voice and data services. In addition, levels below -84 dBm would adversely affect T-Mobile's ability to provide reliable E-911 services as mandated by the federal government.

Q5. Please describe T-Mobile's need for the proposed site.

A. The interrelationship between the proposed site and T-Mobile's existing system (including recently approved but not yet on-air sites) is depicted in the propagation plots included in Exhibit G of the Application. As shown, this proposed site is needed primarily to provide new coverage along Litchfield Road (also known as Route 202) and the surrounding area.

Q6. How did T-Mobile analyze the proposed sites?

A. T-Mobile's RF engineers utilized propagation prediction tools to determine the potential effectiveness of the proposed locations in meeting the identified coverage need. That analysis took into account the coverage objective, T-Mobile's existing on-air sites in this area and the dramatic terrain that exists in this area. The analysis confirmed that the site would provide service to the target

area and would improve service generally within the area. The analysis also revealed that an antenna center line of 137' would allow T-Mobile to achieve the coverage objective levels in this area. At heights below 137', the coverage along Litchfield Road as well as the surrounding area starts to break apart and fall below the T-Mobile minimum required threshold of -84 dBm.

Q7. Please summarize the basis for the height of this proposed facility

A. Based upon the results of the analysis conducted for the proposed New Milford facility, the minimum height required to fully cover the intended coverage objective is 137' AGL. At heights below 137' AGL, the coverage within the target area of Litchfield Road starts to fall below the required minimum T-Mobile coverage threshold of -84 dBm. A minimum height of 137' at the Site to locate T-Mobile's antennas, will allow T-Mobile to provide adequate coverage within the targeted portion of Litchfield Road and the surrounding area.

Q8. Is T-Mobile's need for this Facility affected by the approval of Siting Council Docket 332?

A. No. The Cellco Partnership d/b/a Verizon Wireless site, as approved in Docket 332, is located in Washington, Connecticut and is located approximately two miles north of this proposed Facility. Given T-Mobile's existing coverage gap along Litchfield Road and the terrain in the area, co-locating on the approved Verizon Facility would not supplant T-Mobile's need for this proposed Facility.


09/04/07

Date



Scott Heffernan

Subscribed and sworn before me this __ day of August, 2007.

By: 

Notary

COMMISSIONER OF THE
SUPERIOR COURT