

**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 93 LAKE STREET  
MANCHESTER, CONNECTICUT

DOCKET NO. 351

Date: APRIL 1, 2008

**INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL  
FROM CO-APPLICANTS OPTASITE TOWERS LLC AND OMNIPOINT  
COMMUNICATIONS, INC.**

Co-applicants Optasite Towers LLC ("Optasite") and Omnipoint Communications, Inc. ("T-Mobile") submit the following responses to the interrogatories from the Connecticut Siting Council in connection with the above captioned Docket.

**Questions for Optasite:**

**Q1. Provide a map showing T-Mobile's existing coverage from all of the locations that would hand off to the proposed tower on Lake Street. These locations include 47 Main Street, Vernon; 60 Industrial Park Rd, Vernon; 130 Vernon Road, Bolton; 5 Glen Road, Manchester; 122 Route 6, Andover; 239 Middle Turnpike East, Manchester; 494 Main Street, Manchester; 63 Elm Street, Manchester; 55 Slater Street, Manchester; and 14-16 Carpenter Road, Bolton.**

A1. See propagation maps attached hereto as Exhibit 1. In order to include coverage from each of these surrounding sites, the scale had to be altered from the plots that appear in the Application. A copy of the plot with the revised scale is included, depicting each of these surrounding sites. In addition, a copy of the plot using the same scale is also included, which does not include the full coverage footprint from each of these listed sites.

**Q2. Indicate (preferably in graphic form, otherwise in a table) the extent of overlap between the coverage from each hand-off site and the coverage from the proposed tower.**

A2.

Site	Address	Overlap With CTHA075D
CT11177B	47 Main Street Vernon	No Handover at -84 dBm Design Threshold. Potential handover would be at on-street levels (fringe).
CT11140J	60 Industrial Park Dr, Vernon	No Handover at -84 dBm Design Threshold. Potential handover would be at on-street levels (fringe).
CT11180C	130 Vernon Rd, Bolton	No Handover at -84 dBm Design Threshold. Potential handover would be at on street levels (fringe). Site will hand to CTHA076D along Middle Turnpike before handing off to CT11180C.
CT11384D	5 Glen Rd, Manchester	No appreciable overlap at -84 dBm level. Potential handover would be at on street levels (fringe) just south of Middle Turnpike.
CT11501E	122 Rt6, Andover	No Handover at -84 dBm Design Threshold. Potential handover would be at on-street levels (fringe).
CT11365D	239 Middle Turnpike, Manchester	Approximately .75 Miles of coverage overlap at -84 dBm coverage thresholds.
CT11187D	494 Main Street, Manchester	No handovers at -84 dBm coverage levels. Calls will hand to CT11365D before handing off to CT11187D.
CT11320A	63 Elm Street, Manchester	No Handover at -84 dBm Design Threshold. Potential handover would be at on-street levels (fringe).
CT11377C	55 Slater Rd, Manchester	No Handover at -84 dBm Design Threshold. Potential handover would be at on-street levels (fringe).
CTHA076D	14 - 16 Carpenter Rd, Bolton	Approximately 0.25 miles of overlap at -84 dBm coverage thresholds.

**Q3. It appears as if the existing coverage from T-Mobile's site CT 11365D would extend into (overlap with) the two small areas to the west of the proposed tower that the T-Mobile says would be left uncovered if the tower were built at 97' instead of 107'. Is this correct? Please explain.**

A3. Correct. There was a layering problem with exporting out of MapInfo to Adobe PDF. This created white space on some overlap areas. Upon further examination of the data, it is correct to state that a handover would occur in the above stated area. However, at 97', there still exists an area along Middle Turnpike to the east

of the Site where coverage will still fall below T-Mobile's -84 dBm minimum design threshold prior to handing over the CTHA076D in this area. For that reason, T-Mobile's minimum required antenna height is 107' to fill its coverage gap in this area. A copy of the propagation map at 97' AGL is attached hereto as Exhibit 2.

**Q4. Please provide a coverage map for the existing lattice tower at 200 Boston Turnpike in Bolton, 1.03 miles to the east of the proposed site, showing what T-Mobile's coverage would be if it were to locate antennas at the highest available height on this tower. Please explain why this tower would not satisfy coverage objectives to the east along Hwy 6&44.**

A4. See propagation maps attached hereto as Exhibit 3. The existing tower at 200 Boston Turnpike is approximately 75 feet tall. Despite that, T-Mobile analyzed this tower at a height of 67' AGL. The coverage is very robust close to the site, however is blocked to the west by terrain from covering the T-Mobile coverage objective along Middle Turnpike west of this Site. Therefore, even if it was able to co-locate at 67' AGL, co-location on the 200 Boston Turnpike tower would not fill T-Mobile's existing coverage along Middle Turnpike.

**Q5. T-Mobile states that the existing lattice tower at 200 Boston Turnpike in Bolton will not satisfy (all) the company's objectives and will provide redundant coverage. If the coverage would be redundant, why couldn't that tower substitute for the proposed tower? Did T-Mobile explore with that tower owner the possibility of locating antennas there? Is there any possibility of reconfiguring that tower to meet T-Mobile's coverage needs in the area that would be covered from the Lake Street site? What are the physical constraints at that location? Please explain, with a coverage map, if necessary, why this tower would not satisfy coverage objectives at least to the east and west along Hwy 6 & 44.**

A5. When T-Mobile stated that the 200 Boston Turnpike tower would provide redundant coverage, this was in reference to existing coverage and approved coverage and not the Proposed Facility (CTHA075D) at the Site. Specifically, the 200 Boston Turnpike tower is over one mile to the east of the Proposed Facility in this Docket and co-location at the 200 Boston Turnpike tower would provide redundant coverage as that provided by the tower in Bolton approved in Docket 323 (CTHA076D). In addition, as can be seen from the propagation map attached hereto as Exhibit 2, even at a height of 67' AGL, which is not currently available on this tower, T-Mobile would still have an existing coverage gap along Middle Turnpike, there would still be no coverage along Lake Street and the majority of coverage provided from the 200 Boston Turnpike tower would be redundant. The 200 Boston Turnpike tower cannot be reconfigured to fill T-Mobile's coverage need, at any height, due to the proximity of this tower to the Bolton site approved in Docket 323.

Optasite did contact the owner of the 200 Boston Turnpike tower in order to determine if there was a possibility of co-locating T-Mobile's equipment on that tower. Optasite confirmed with the tower owner (Comcast) does not permit telecommunications co-location on this or any of its towers. Therefore, the tower at 200 Boston Turnpike is not available to T-Mobile for co-location.

**Q6. Please explain why coverage to the northeast of the proposed tower, over to and along Rt. 85, couldn't be met by a tower at the site on Box Mountain Drive about which Optasite is negotiating with the Town of Vernon and which T-Mobile has stated is part of its build-out plan.**

A6. As discussed above, the existing towers on Box Mountain are located at such a high ground elevation that it eliminates them from T-Mobile's design consideration due to the tremendous interference that would be created from a site located there. Therefore, since T-Mobile cannot utilize a site on top of Box Mountain, in order to fill its existing coverage gaps on either side of Box Mountain, it has proposed utilizing a site on either side of Box Mountain; one site is the Proposed Facility in this Docket and the second site is the site Optasite is in the process of negotiating with the Town of Vernon. This will allow for T-Mobile to utilize the terrain to contain the signal to a localized footprint. Therefore, the future Vernon site will not supplant the need for the Proposed Facility and, instead, will be filling a separate coverage gap that T-Mobile currently experiences.

**Q7. Are the towers at 269 and 296 Box Mountain Drive located such that they would cause the same amount of interference as the Marcus Communications Tower at 230 Box Mountain Drive? If not, could they satisfy coverage objections to the northeast of the proposed tower over to and along Rt. 85?**

A7. The towers located at 269 and 296 Box Mountain Drive are also located a such a high ground elevation that co-location there would create significant interference to T-Mobile's existing network, eliminating them as candidates to provide coverage to Route 85.

Respectfully Submitted,

By:  \_\_\_\_\_

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**Certification**

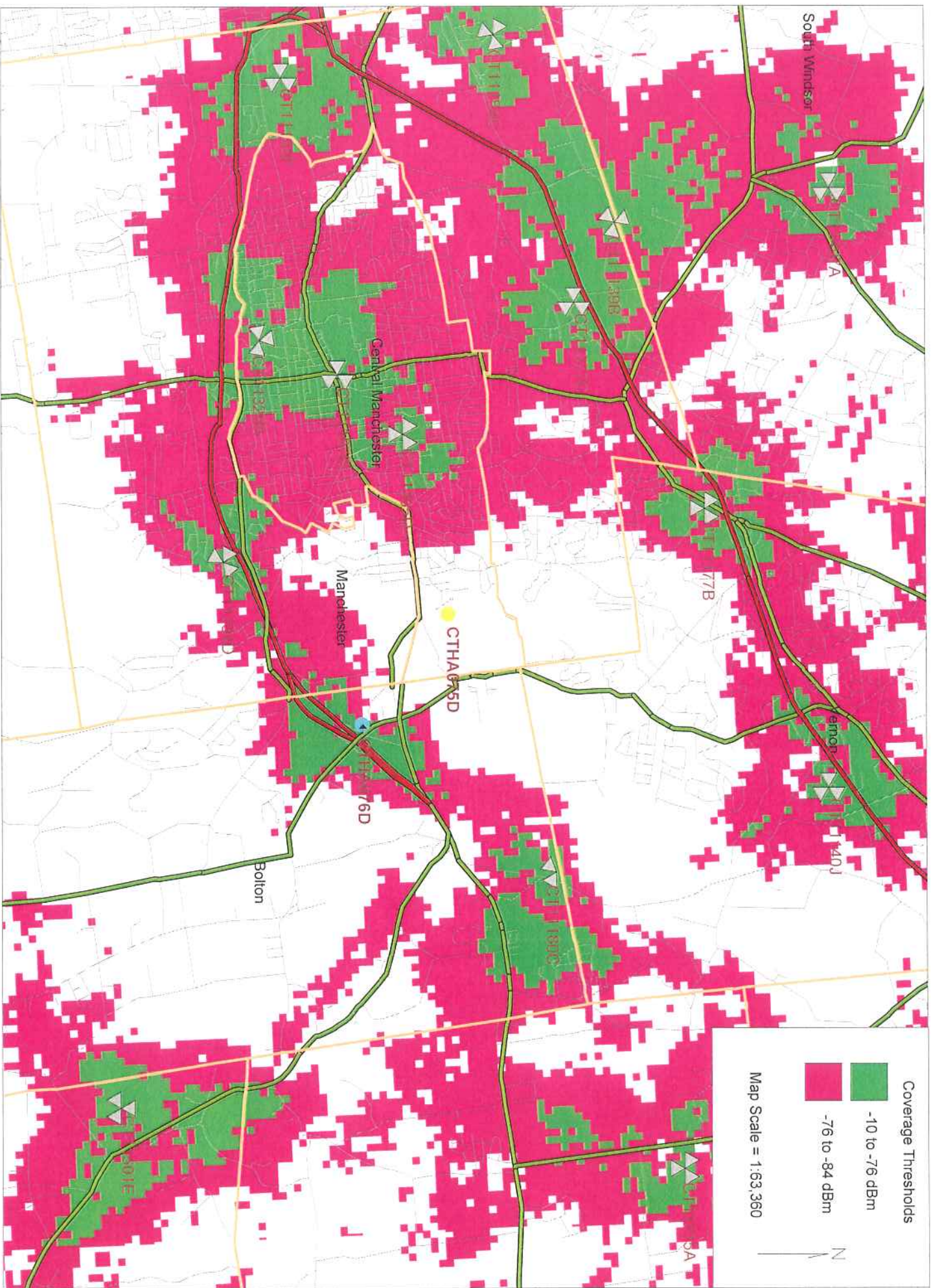
This is to certify that a copy of the foregoing has been mailed, this date to all parties and intervenors of record.

Laurie Morrone  
119 Lake Street  
Manchester, CT 06042



\_\_\_\_\_  
Carrie L. Larson

# **EXHIBIT 1**



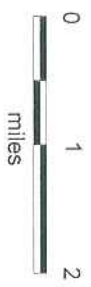
**Coverage Thresholds**

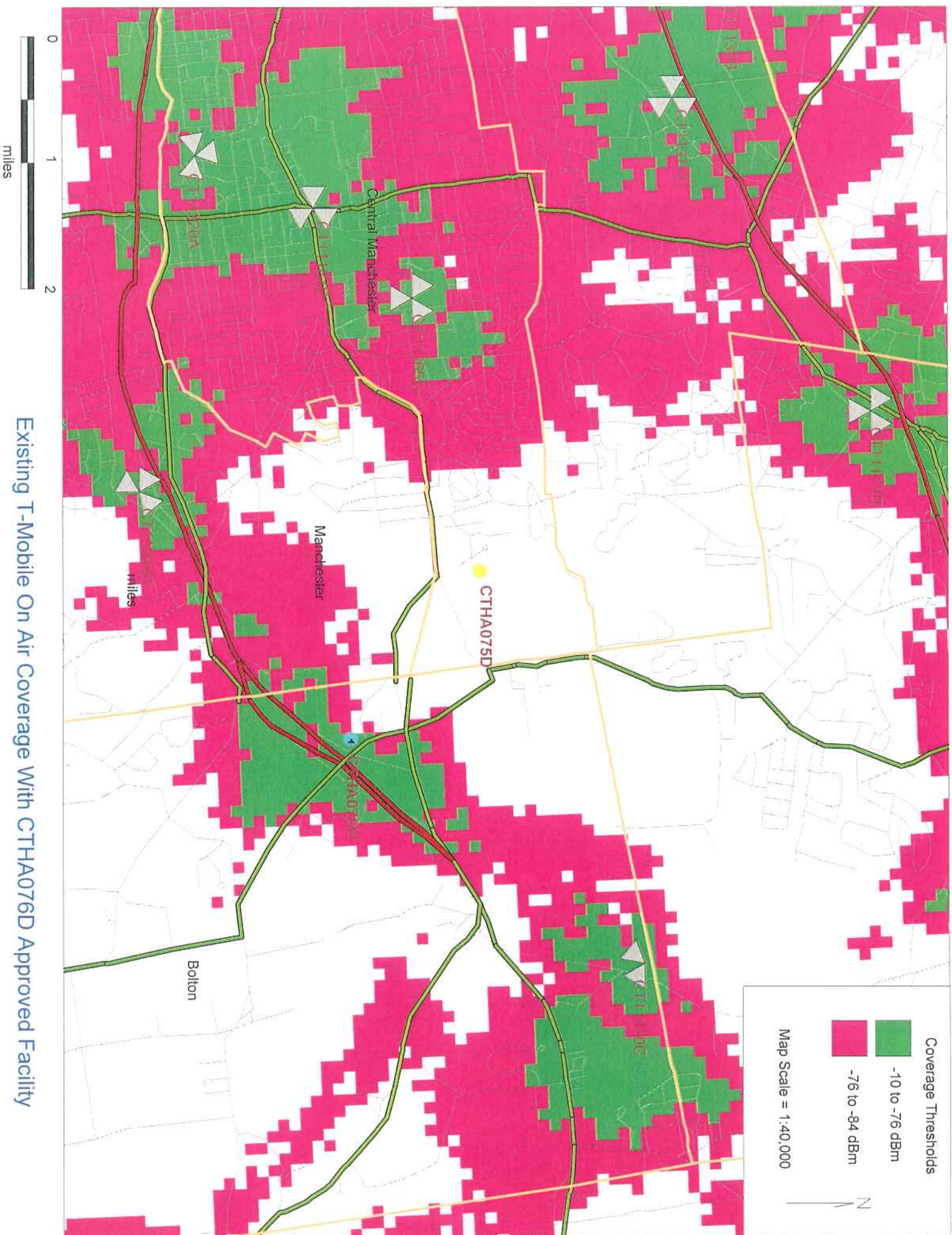
- 10 to -76 dBm
- 76 to -84 dBm

Map Scale = 1:63,360



Existing T-Mobile On Air Coverage With CTHA076D Approved Facility

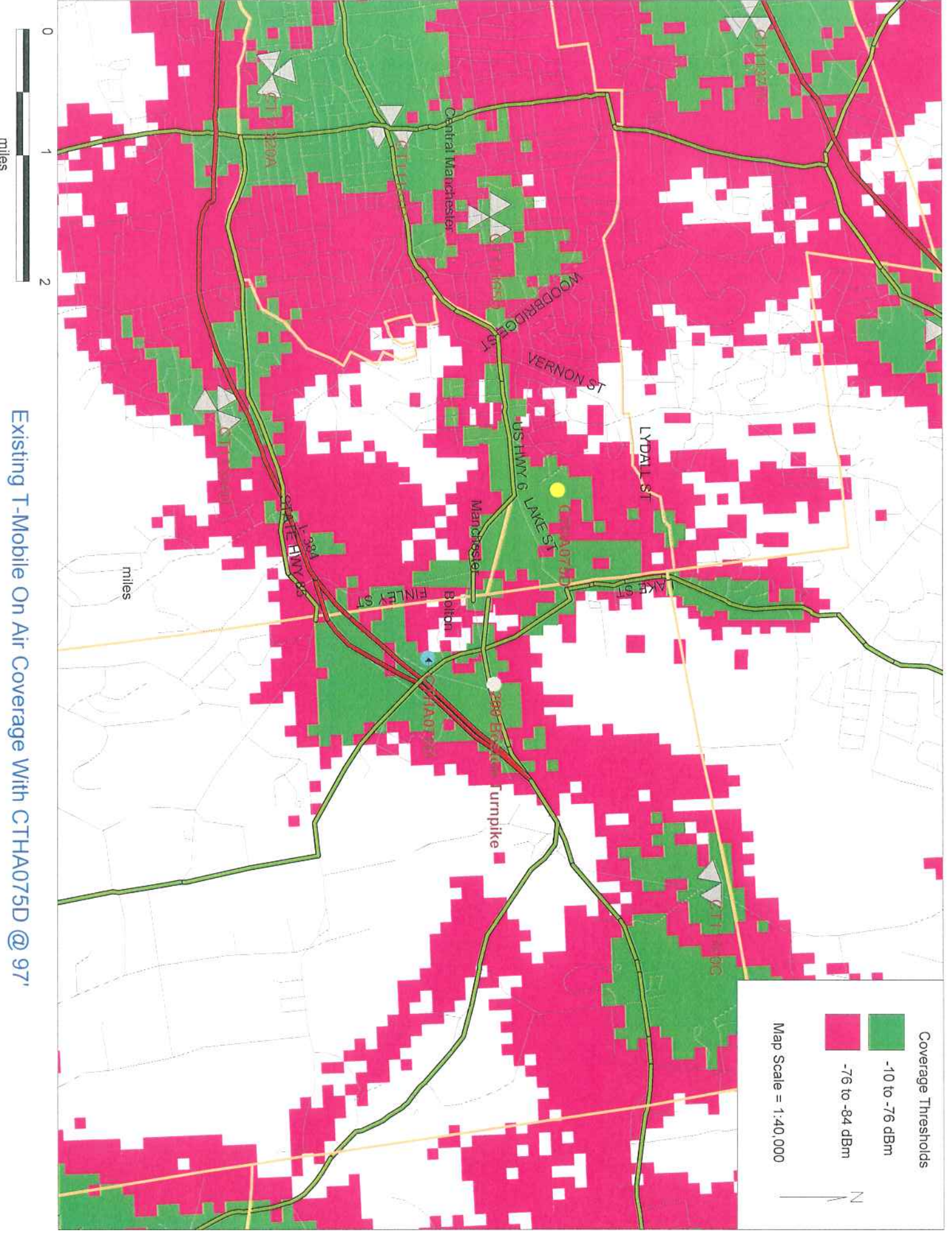




Existing T-Mobile On Air Coverage With CTHA076D Approved Facility

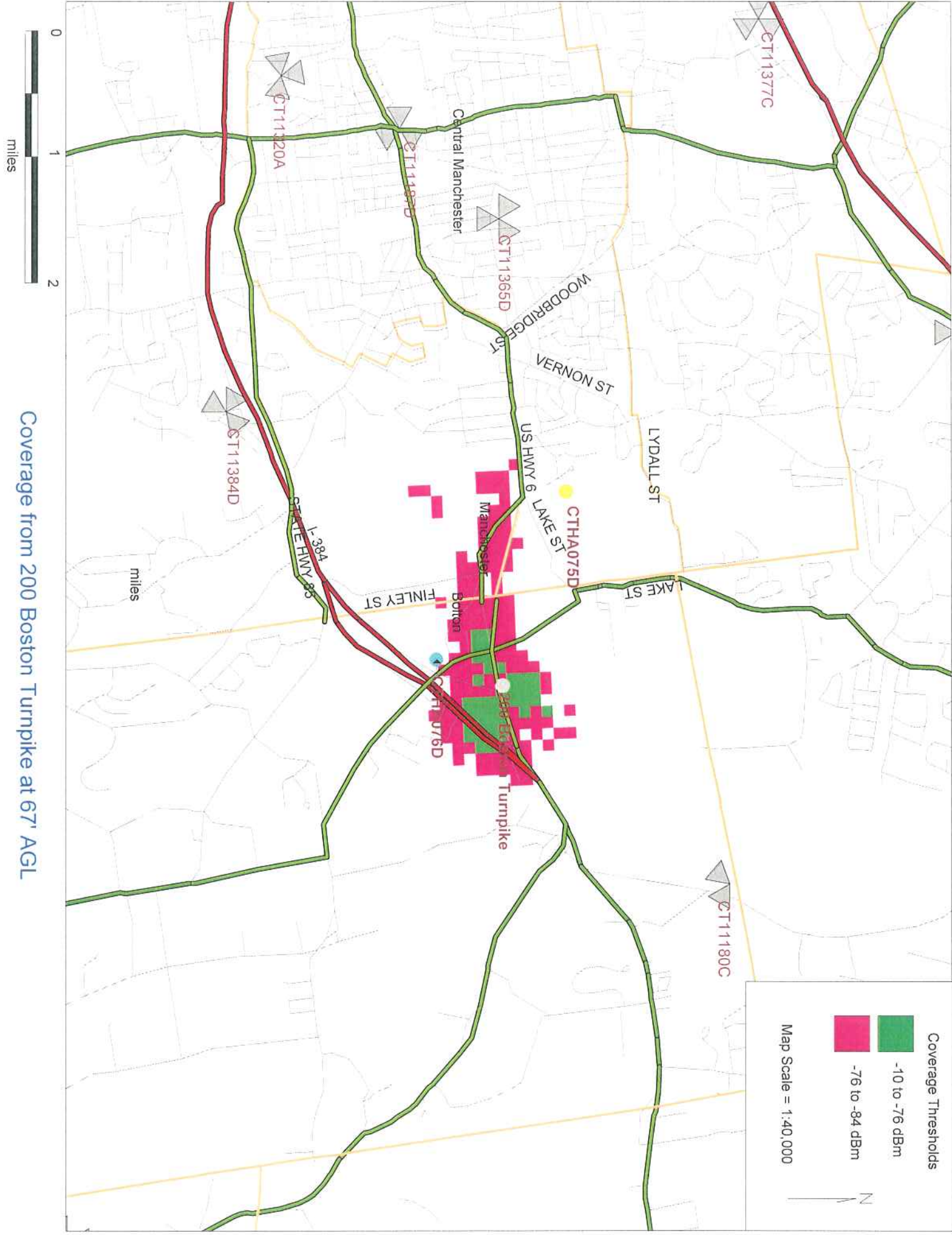


# **EXHIBIT 2**



Existing T-Mobile On Air Coverage With CTHA075D @ 97'

# **EXHIBIT 3**

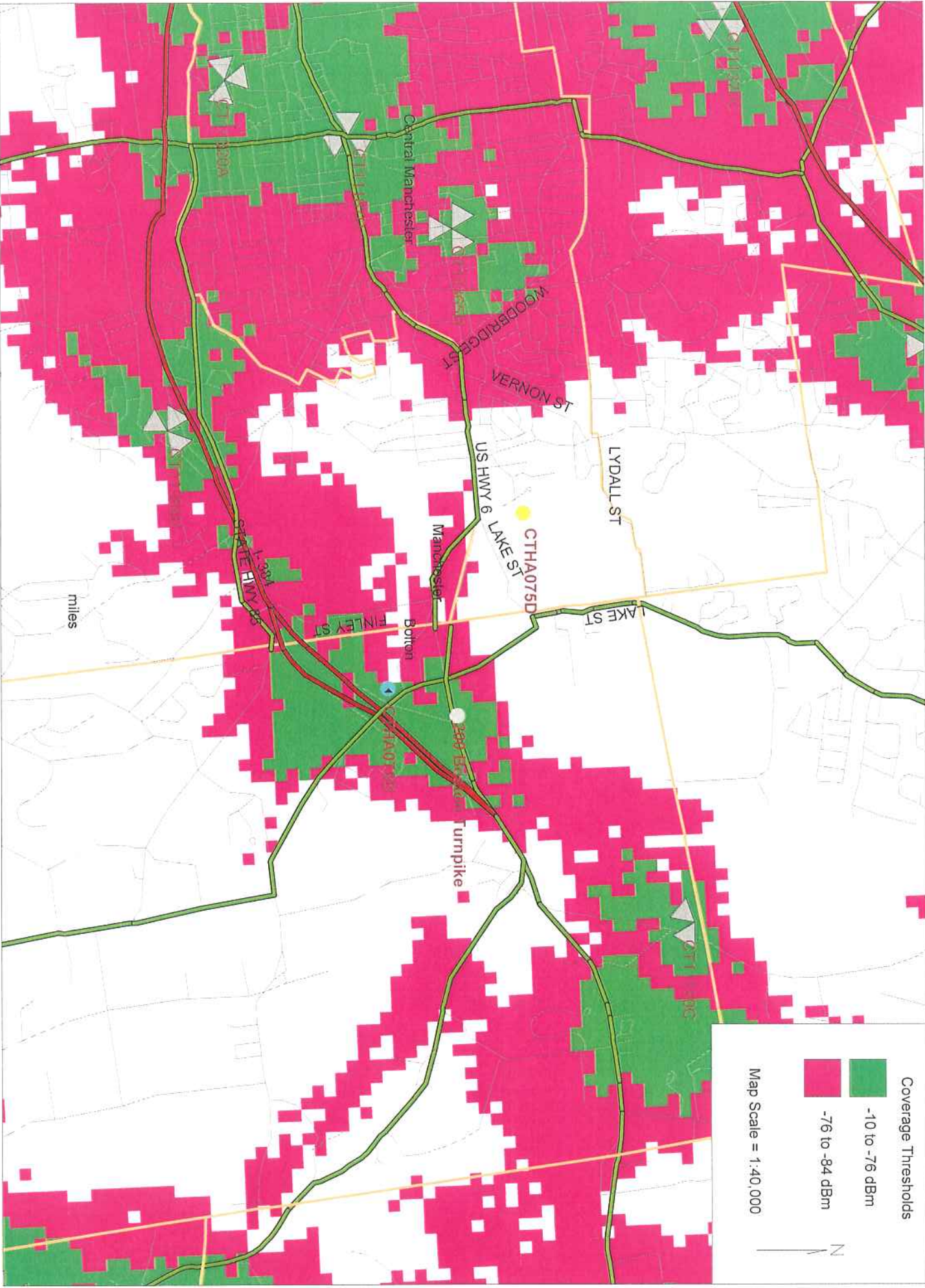


Coverage from 200 Boston Turnpike at 67' AGL

Coverage Thresholds

- 10 to -76 dBm
- 76 to -84 dBm

Map Scale = 1:40,000



Coverage Thresholds

- -10 to -76 dBm
- -76 to -84 dBm

Map Scale = 1:40,000

Existing Coverage with 200 Boston Turnpike at 67' AGL