

To: Attorney Kenneth C. Baldwin
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From: Richard W. Thunberg Jr.-Board President
Thompson Hills West Condo Association
13 Westside Drive, Suite 92
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Date: Tuesday, May 27th, 2008

Subject: Pre-Hearing Interrogatories/Questions

Docket #: 358 Town of Thompson, Connecticut

Dear Attorney Kenneth C. Baldwin;

As agreed upon at the pre-hearing conference held on May 22nd, 2008 at the office of the Connecticut Siting Council in New Britain, Connecticut, I am submitting my anticipated list of questions for either direct or redirect cross examination at the actual hearing to be held in the town of Thompson, Connecticut on Tuesday, June 10th, 2008 beginning at 3:00pm as it pertains to the application of a certificate of environmental compatibility and public need for the construction, maintenance and operation of a telecommunications facility at one of 2 locations in Thompson, Connecticut. Please be advised that this may or may not be a complete list of all of the questions that may be posed to you and or your clients including Brad Gannon from MCF. And I apologize in advance for the questions not being in the proper order, as I jump from topic to topic.

Question #1- In Question #8 in the "Responses of Cellco Partnership D/B/A Verizon Wireless to Connecticut Siting Council Pre-Hearing Interrogatories", you state that that the THWCA Board of Trustees informed MCF that it would not extend the lease term and was no longer interested in having a tower on its property. I was informed by Brad Gannon that Deborah Kirkconnell from A&A Management, the firm responsible for managing the day to day operation of Thompson Hills West at that time, was the actual person who informed Brad Gannon that THWCA did not want to extend the lease. Please explain the discrepancy in your interrogatory response. The Board of Trustees themselves were never asked if they wanted to extend the lease because it is my understanding that at that time all of the residents of this community were in fact in favor of the installation of a telecommunications facility on our property.

Question #2-In Question #8 in the "Responses of Cellco Partnership D/B/A Verizon Wireless to Connecticut Siting Council Pre-Hearing Interrogatories", you state that for the Connecticut Siting Council to require MCF to start lease negotiations this late in the state of the siting process would unfairly delay the project further. As you are well aware this project has been on going for over 7 years now, beginning with the initial talks to

lease property at the Thompson Hills West beginning in the year 2000. Please explain why another few months or more to examine the feasibility of adding the Thompson Hills West property as Alternate Site C would be such an unfair delay when in fact this entire process has taken years. Clearly from all evidence reviewed by this board, we strongly feel that the property at Thompson Hills West is the preferred and best location of the installation of said telecommunications facility and at that time several years ago so did Brad Gannon from MCF.

Question #3- In Question # 13 in the “Responses of Cellco Partnership D/B/A Verizon Wireless to Connecticut Siting Council Pre-Hearing Interrogatories” your response to the question “Is the condominium complex on Westside Drive included in the “Visual Comparison Chart” and then Approximately how many of the condominium units would have a view of Site B Structure? And your reply is “without gaining access to each of the individual condominium units it is impossible to determine which of the units would have views of the tower”. First, why would you need to enter each unit to determine if a view of the structure is evident? Could you not just make this determination by an exterior view? Clearly we feel that there would be a view of each and every condominium unit at the Thompson Hills West Property if the telecommunications facility were constructed on Site B. I plan to ask some questions at the hearing in this area and refer to the actual Visual Analysis Report included in your application dated February 22nd, 2008 to the Connecticut Siting Council as done by Clough Harbour & Associates out of Rocky Hill, Connecticut. Clearly they have a strong opinion concerning the visual impact of the telecommunications tower at Site B and how it impacts the residents of Thompson Hills West.

Question #4- In Question #32 in the “Responses of Cellco Partnership D/B/A Verizon Wireless to Connecticut Siting Council Pre-Hearing Interrogatories” your response to the question “What was the Town of Thompson’s response to the proposed project during the municipal consultation period?” You state the First Selectman who is not named in your document, but whom I will identify for the Council as Mr. Larry Groh, you indicate he has encouraged Cellco to proceed with either Site A or Site B locations that have been leased by MCF, and the Planning and Zoning Commission has a preference for Site A. At any time during discussions with either the First Selectman Mr. Groh or the PZC did the property at Thompson Hills West come up as an alternate site? And if so, what was the content of those discussions? Were both Mr. Groh and the PZC made aware of the prior lease with the THWCA?

Question #5- Are you in possession of or do you have access to the original lease agreement and any associated studies that were done during the initial lease agreement period of 2000-2002 between Brad Gannon of MCF and the Thompson Hills West Condo Association? And if so, could you please provide copies of any and all paperwork, agreements and or studies to the entire Siting Council as well as me.

Question #6- During the initial lease agreement period of 2000-2002 between Brad Gannon of MCF and Thompson Hills West Condo Association, it was determined at that time by all parties that the property at THWCA was the preferred location of the

installation of the telecommunications facility in the town of Thompson. Despite the fact that the property management company according to Brad Gannon the refusal to renew the lease and not the THWCA Board of Trustees, do you and Verizon Wireless feel that we are or could be the preferred location and would you be willing to revisit our site and add us as alternate Site C ? knowing that the present Board of Trustees is completely on board and approves of such a telecommunications facility being constructed on our property? And for the record I spoke with Deborah Kirkconnell today and she denied ever telling Brad Gannon that the Board of Trustees at THWCA did not want to renew the lease with him and his company.

Question #7- If Thompson Hills West Condo Association agreed to pay a portion of the total charges for any and all engineering studies that Cellco/Verizon Wireless would require, such as what was or would have been during the initial lease period in 2000-2002 would that change you and or your clients mind about possible consideration of the THWCA as alternate Site C ?

Question #8- If it is determined by said studies that the property at Thompson Hills West Condo Association is in fact the preferred site for the installation of a telecommunications facility, then why would you or your client not want to reconsider and add us as alternate Site C ? If in fact you would get better service due to the location, height, lower resistance, less hassle from neighbors, etc etc etc does it not make sense to at least examine our location? If your only reasoning to not revisit the THWCA location is the additional length of time to complete any and all studies, if in fact we were determined to be the best site for the tower, would not that be worth the wait for you and or your client Verizon Wireless? This process has already gone on for almost 8 years, please explain why another few months would harm the progress of this project?

Question #9- In your application to the Connecticut Siting Council, dated February 22nd, 2008 in section with thumbtab #10, Site Search Summary, in accordance with Section 16-50j-74(j) of the Regulations of Connecticut State Agencies which required submission of a statement that describes the narrowing process by which other possible sites were considered and eliminated, you state on page 3 under "Sites Investigated in the Thompson 2 Area, you have listed in the #4 slot Thompson Hill Condominiums and state there that –"MCF explored the use of a portion of the Thompson Hill Condominium property to the northeast of the Site B Facility. The Condominium Association was not interested in leasing space for a tower site." Could you explain to me and the Council when was your most recent contact to the Thompson Hills West Condo Association Board of Trustees? Are you stating here that you contacted us recently and we refused to lease land to you/MCF or Verizon Wireless? We maintain we were never contacted and in fact the last time we were contacted was by Brad Gannon over 4 years ago when he claims he contacted Deborah Kirkconnell at A&A Management seeking to renew the lease. Why then did you list the Thompson Hills West Condo complex in your list of site consideration or eliminations if in fact you did not contact us for this most recent lease? Clearly there is a discrepancy here that needs to be explored. Did Brad Gannon just assume that the new Board of Trustees at Thompson Hills West would not be interested

in negotiations pertaining to the lease of our land to him company and subsequently to Cellco/Verizon Wireless?

Question #10-Could you please explain your position or the position of your client as to the reasons why you feel Site A or Site B would less adverse environmental effects and more benefits to the public (ie., those requiring taller towers, possibly with lights, those with substantial adverse impacts on densely populated residential areas; and those with limited ability to share space with other public or private telecommunications entities) than Alternate Site C which would be the property at Thompson Hills West?

Question #11-What is the anticipated amount of money each land owner in either Site A or Site B would receive from Cellco/Verizon Wireless either monthly or yearly should their site be approved for the installation of a telecommunications facility?

Question #12- If the Town of Thompson First Selectman Mr. Larry Groh and or the Thompson Planning and Zoning Commission had an opinion that the property at Thompson Hills West Condos could be a better location than either Site A or Site B would Cellco/Verizon Wireless then be more interested to explore the THWCA property as alternate Site C ?

Question #13- Which is your clients preferred site, A or B ? and why?

Question #14- Which site, A or B would have a greater impact on the residents of Thompson Hills West Condo Association in your or your clients opinion? And Why?

Question #15- Have you received any objections from neighbors of either Site A or Site B? And if so what is the nature of their objection?

Question #16- Looking at Exhibit named “Thompson A and B aerial map”, the amended picture you provided to me at the pre-hearing conference, it would appear that the property at Thompson Hills West Condos site higher than both Site A and Site B. Would you state that this is a benefit for Cellco/Verizon Wireless, having a higher site location with little or minimal harm to the environment, less impact on neighbors and a host of other reasons? Or does height of the telecommunications facility not really matter?

Question #17- Do you have any evidence such as documents, agreements and the like indicating that the Board of Trustees at THWCA were contacted by Brad Gannon from MCF regarding their desire to not renew the lease to his company? And if so could you please provide copies of any and all correspondence to me and the council.

Very Truly Yours;

Richard W. Thunberg Jr.
Thompson Hills West Condo Association
Board of Trustees President