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CONNECTICUT
SITING COUNCIL

July 10, 2008

Kenneth C. Baldwin, Esq.
Robinson & Cole, LLP
280 Trumbull Street
Hartford, CT 06103

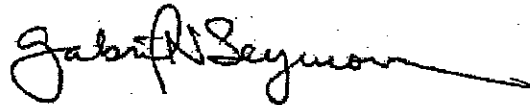
RE: **DOCKET No. 360** before the Connecticut Siting Council, Cellco Partnership d/b/a/ Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility located at 188 Route 7 South, Falls Village (Canaan), Connecticut.

Dear Mr. Baldwin:

Pursuant to the direction of the Connecticut Siting Council at the hearing on the above named Docket on July 1, 2008, Intervenor Dina Jaeger requests your responses to the enclosed questions no later than July 24, 2008.

Please forward electronic copies to Gabriel North Seymour at certiorari@earthlink.net and to Whitney North Seymour, Jr. at wseymour@stblaw.com and mail one hard copy to the undersigned at the address above, as well as providing the required number of copies to the Siting Council for its use.

Sincerely,



Gabriel North Seymour
for Intervenor Dina Jaeger

cc. Robert Marconi, Esq.

21 copies to Connecticut Siting Council Office

Sandy Carter, Verizon

Enclosure

**HEARING INTERROGATORIES
PURSUANT TO DIRECTION OF THE CONNECTICUT SITING COUNCIL AT
THE JULY 1, 2008 HEARING
DOCKET NO. 360 - CANAAN (FALLS VILLAGE)
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS**

Reminder: Cellco-Verizon has agreed to provide coverage maps showing the minimum projected usage and the maximum projected usage for the proposed site.

Cellco-Verizon's environmental consultant has also agreed to provide a list of all natural features and schools within the proposed coverage area.

Cellco-Verizon's environmental consultant has also agreed to identify the NDDP areas shown on the DEP map in Cellco-Verizon's Application under Docket 360, and state his findings as to the environmental basis for designating those areas based on his own site investigation and observations.

Municipal Consultation

1. Who decided to solely consult with the First Selectman of Falls Village instead of the full Board of Selectmen?
2. What consideration was given to the possibility of a conflict of interest based on a relationship between the First Selectman and any present or past officer of the Falls Village Volunteer Fire Department?
3. Were any inquiries made as to such relationship?
4. Did you at any time consider expanding your municipal consultation to include the full Board of Selectmen? If not, why not?

Reliability of Service

5. Has any consideration been given to the possibility of a taxpayer suit to enjoin Cellco's operation and terminate the lease based on the reversion clause in the Town's grant of land to the Falls Village Volunteer Fire Department?
6. Has Cellco's attorney reviewed the risk of reversion of the land to the Town once the tower is erected?

Financial Responsibility

7. If, in the future, a neighboring resident were to bring suit against Cellco, the Falls Village Fire Department and/or the Town seeking damages for cancer or other illness

allegedly caused by the tower operation, who will pay the attorneys' fees to defend the Falls Village Volunteer Fire Department and the Town?

8. What is the worst case scenario as to the legal costs of defending such an action?
9. Does the Cellco-Verizon lease provide for insuring the Falls Village Volunteer Fire Department and the Town against such claims? If so, in what amount?

Migratory Birds

10. Does the Federal Migratory Bird Treaty Act preempt the authority of the Connecticut Siting Council in the placement of cell towers where they may adversely impact on migratory birds

- a) in flight?
- b) mating?
- c) nesting?
- d) their food supply?

11. Did Cellco conduct any investigation of the presence of migratory birds in the proposed coverage area? If so, what species were found to be present?

12. Are any of the migratory birds found in the proposed coverage area birds protected under the Migratory Bird Treaty Act?

13. Do you disagree with the findings of ornithologist John McNeely as to migratory bird sightings in the Beebe Hill vicinity? If so, in what respects?

14. Do you dispute the statements of any of the members of the public at the hearing on July 1, 2008 as to their sightings of birds in the proposed coverage area?

Bald Eagles

15. Does the federal Bald Eagle Protection Act preempt the authority of the Connecticut Siting Council in the placement of cell towers where they may adversely impact on Bald Eagles,

- a) in flight?
- b) mating?
- c) nesting?

- d) their food supply?
16. Does Cellco's environmental consultant have any understanding or explanation as to why Bald Eagles have been observed in the proposed coverage area?
17. What is the primary food source for Bald Eagles?
18. Are there any such food sources for Bald Eagles in the proposed coverage area? If so, please identify their location.

Endangered and Listed Species

19. What endangered and listed species have been identified by Cellco's environmental consultant as found in the proposed coverage area?
20. Has Cellco's consultant determined whether the Blue Spotted Salamander has been found in the proposed coverage area?

Public Safety

21. What personnel are on duty at the Falls Village Volunteer Fire Department headquarters during the course of a 24-hour day? What are their responsibilities?
22. Have you considered the effect of any of the following conditions (reported in European studies of health effects from RF emissions) on the effectiveness of such Fire Department personnel in performing their responsibilities?
- a) headaches
 - b) fatigue and urge for sleep
 - c) inability to concentrate
 - d) short-term memory loss
23. Specifically would any of those symptoms affect the efficiency and reliability of persons acting as dispatchers to provide accurate directions and prompt communications to first responders?
24. Are you familiar with the 2004 resolution of the International Association of Fire Fighters objecting to cell tower siting on or near firehouses?
25. What is your understanding of the basis for the IAFF resolution?

26. Is there any possibility that use of either of the proposed frequencies on the Cellco tower will interfere with transmission of radio communications from Police, Fire or Safety personnel during emergencies?

27. Is there any possibility that use of either of the proposed frequencies on the Cellco tower will interfere with proper transmission of radio communications by Police, Fire or Safety vehicles?

28. What percentage(s) of the FCC regulated power level will exist at the new Firehouse (located 90 feet from the tower) when the cell tower is at full operation with all antennas in use?