

**CONNECTICUT SITING COUNCIL**  
**DOCKET NO. 362**

IN THE MATTER OF:

---

APPLICATION OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS  
FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND  
PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY OFF  
165 ELMWOOD HILL ROAD, PUTNAM, CONNECTICUT

APPLICANT'S POST-HEARING BRIEF

---

Submitted by:

Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103  
(860) 275-8200

*September 4, 2008*

TABLE OF CONTENTS

EXECUTIVE SUMMARY..... i

I. INTRODUCTION.....1

II. PROCEDURAL BACKGROUND.....1

III. FACTUAL BACKGROUND .....2

    A. Pre-Application History .....2

    B. Local Contacts.....3

    C. Tower Sharing.....3

    D. The East Putnam Facility Proposal .....3

IV. THE APPLICATION SATISFIES THE CRITERIA OF CONN. GEN. STAT. §  
16-50p FOR ISSUANCE OF A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED .....4

    A. A Public Need Exists for the East Putnam Facility .....5

    B. Nature of Probable Impacts.....7

        1. Natural Environment and Ecological Balance .....7

        2. Public Health and Safety.....8

        3. Scenic Values.....9

        4. Historical Values.....10

        5. Recreational Values .....11

        6. Forests and Parks .....11

        7. Air and Water Quality.....11

        8. Fish and Wildlife.....12

    C. The Application Should Be Approved Because The Benefits Of The  
Proposed Facility Outweigh Any Potential Impacts .....13

V. CONCLUSION.....14

## **EXECUTIVE SUMMARY**

On May 15, 2008, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) filed an application (“Application”) with the Connecticut Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (“Certificate”) to construct a wireless telecommunications facility off 165 Elmwood Hill Road in Putnam, Connecticut (the “East Putnam Facility”). The proposed East Putnam Facility would provide for much needed coverage along the heavily-traveled Route 44 as well as local roads in the northeasterly portion of Putnam.

### **Facility Description**

At the East Putnam Facility, Cellco proposes to construct a 150-foot tower in the southerly portion of the 22-acre heavily-wooded parcel located at 165 Elmwood Hill Road. At the top of the tower, Cellco would install twelve (12) antennas, six (6) Personal Communication Service (“PCS”) and six (6) cellular. Cellco would also install a 12’ x 30’ shelter located near the base of the tower to house its radio equipment and a back-up generator. Access to the East Putnam Facility would extend from 165 Elmwood Hill Road a distance of approximately 1,200 feet to the cell site.

### **Public Need**

Cellco currently experiences significant gaps in both cellular and PCS coverage along Route 44 between its existing Putnam cell site at 154 Sayle Avenue in Putnam and the Rhode Island State line. These gaps total 3.6 miles at PCS frequencies and 1.2 miles at cellular frequencies. The proposed East Putnam Facility would provide reliable service to a 2.47 mile portion of Route 44 and an overall area of 5.8 square miles at PCS frequencies and a 3.5 mile portion of Route 44 and an overall area of approximately 12.1 square miles at cellular

frequencies.

### **Nature of Probable Impacts**

The only potential adverse impact from the proposed tower involves “scenic values.” The overall area where some portion of the proposed East Putnam Facility tower would be visible year round (above the tree line), is limited to approximately 53 acres, 38 acres of which is over open water of Quaddick Reservoir. These areas, including Quaddick Reservoir, are located at significant distances, generally in excess of 1.5 miles, from the East Putnam Facility. Areas where seasonal views are anticipated comprise an additional four (4) acres. At least partial year-round views may be possible from select portions of nine (9) residential properties within the two mile radius study area, again, many at significant distances from the tower location. During the course of the proceeding, two Elmwood Hill Road residents expressed concerns about the East Putnam Facility. As a result, the Council requested that Cellco evaluate an alternative tower location at the Rawson Materials Inc. property near the intersection of East Putnam and Munyan Roads. Cellco determined that a tower height of approximately 274 feet would be needed at the Rawson Materials Inc. site for Cellco to provide coverage comparable to that provided from the proposed Elmwood Hill Road site at 150 feet.

### **Conclusion**

The evidence in the record clearly demonstrates that there is a need for the proposed East Putnam Facility and that the environmental impacts from the proposed facility would be minimal when balanced against its benefits. Therefore, the Council should approve the Application as submitted.

## **I. INTRODUCTION**

On May 15, 2008, Cellco Partnership d/b/a Verizon Wireless (“Cellco” or “Applicant”) filed with the Connecticut Siting Council (“Council”) an application (the “Application”) for a certificate of environmental compatibility and public need (“Certificate”), pursuant to Sections 16-50g et seq. of the Connecticut General Statutes (“Conn. Gen. Stat.”), for the construction, maintenance and operation of a wireless telecommunications facility (the “East Putnam Facility”) at 165 Elmwood Hill Road in Putnam, Connecticut (the “Property”). (Cellco Exhibit 1 (“Cellco 1”). Cellco currently experiences significant gaps in both PCS and cellular coverage along Route 44 between its existing Putnam cell site at 154 Sayle Avenue in Putnam the Rhode Island State line. These existing coverage problems must be resolved in order for Cellco to continue to provide high-quality, uninterrupted and reliable wireless telecommunications service consistent with its Federal Communications Commission (“FCC”) license and to meet the demands of its wireless telecommunications customers. The East Putnam Facility would provide for much needed coverage along the heavily-traveled Route 44, as well as local roads in northeasterly Putnam. (Cellco 1).

## **II. PROCEDURAL BACKGROUND**

The Council conducted an evidentiary and public hearing on the Application on August 5, 2008. (August 5, 2008 Transcript (afternoon) (“TR1”) at 2; August 5, 2008 Transcript (evening) (“TR2”) at 2). Prior to the afternoon session of the hearing, the Council and its staff visited the Property. At the Council’s request, Cellco caused a balloon with a diameter of approximately four (4) feet to be flown at the proposed tower location, at 150 feet above ground level (“AGL”) during the site visit. (Cellco 1; TR1 at 30-31).

This post-hearing brief is filed on behalf of the Applicant pursuant to Section 16-50j-31 of the Regulations of Connecticut State Agencies (“R.C.S.A.”) and the Council’s directives. (TR2 at 20). This brief evaluates the Application in light of the review criteria set forth in Section 16-50p of the Connecticut General Statutes and addresses several other issues raised throughout the course of this proceeding.

### **III. FACTUAL BACKGROUND**

#### **A. Pre-Application History**

Cellco is licensed to provide both PCS and cellular service throughout Connecticut. Cellco currently experiences significant PCS and cellular coverage gaps along Route 44 and local roadways between its existing Putnam cell site at 154 Sayle Avenue and the Rhode Island State line. (Cellco 1).

Cellco began a search for an appropriate location for a facility to resolve these significant coverage problems in April, 2007. (Cellco 1, Tab 9). As a first step in its site search process, Cellco investigates whether there are existing towers, or non-tower structures of suitable height in an area that can be used to satisfy its coverage objectives. There are no such existing towers in the vicinity of the East Putnam Facility that Cellco does not already share. Likewise, there are no existing non-tower structures of suitable height in the area that can satisfy Cellco’s needs. If a new tower must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual impact of the facility could be reduced to the greatest extent possible. (Cellco 1 at 10, Tab 9). Cellco selected the location for the proposed East Putnam Facility in such a manner as to allow it to build and to operate a high-quality wireless system with the least environmental impact.

B. Local Contacts

On February 21, 2008, Cellco representatives met with Putnam Mayor Robert Viens regarding the proposed East Putnam Facility. (Cellco 1 at 18; TR2 at 51-52). At that meeting, Mr. Viens received copies of technical information summarizing Cellco's plans to establish a telecommunications facility at the Property ("Technical Report"). Because the Town of Thompson ("Thompson") is located within 2,500 feet of the Property, on February 21, 2008, Cellco also delivered additional copies of the Technical Report to the Thompson First Selectman Lawrence K. Groh, Jr. (Cellco 1. at 18; Cellco (Bulk) 1.d.).

C. Tower Sharing

Consistent with its practice, Cellco regularly explores opportunities to share its facilities with other wireless service providers. Cellco has designed the 150-foot tower so that it could be shared by other carriers. During the course of its meeting with municipal officials in Putnam, Cellco agreed to provide access to the tower, at no cost, to the Town and local emergency service providers. Cellco would also agree to make ground space in the facility compound available, if needed. (Cellco 1 at 11).

D. The East Putnam Facility Proposal

The East Putnam Facility would be located within a 50' x 50' fenced compound in the southerly portion of a heavily-wooded 22.10 acre parcel ("Property") owned by Lois Pray. On the northern-most portion of the Property is the landlord's residence. (Cellco 1, Tab 1, Plan Sheet S-1; TR2 at 21). At the East Putnam Facility, Cellco would construct a new 150-foot tall monopole tower and install twelve (12) panel-type antennas – six (6) PCS and six (6) cellular with their centerline at 147 feet AGL. The top of the Cellco antennas would not extend above the height of the proposed tower. (Cellco 1 at 2-3, Tab 1).

Cellco would install a 12' x 30' single-story shelter near the base of the tower to house Cellco's receiving, transmitting, switching, processing and performance monitoring equipment and the required heating and cooling equipment. A diesel-fueled back-up generator would be installed within a segregated room in Cellco's equipment shelter for use during power outages and periodically for maintenance purposes. The tower and equipment shelter would be surrounded by an 8-foot high security fence and gate. Vehicular access and utility service to the East Putnam Facility would extend from Elmwood Hill Road following portions of an existing logging road, a distance of approximately 1,200 feet to the cell site. (Cellco 1).

**IV. THE APPLICATION SATISFIES THE CRITERIA OF CONN. GEN. STAT. § 16-50p FOR ISSUANCE OF A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

Section 16-50p of the Public Utility Environmental Standards Act ("PUESA"), Conn. Gen. Stat. §16-50g *et seq.*, sets forth the criteria for Council decisions in Certificate proceedings and states, in pertinent part:

In a certification proceeding, the council shall render a decision upon the record either granting or denying the application as filed, or granting it upon such terms, conditions, limitations or modifications of the construction or operation of the facility as the council may deem appropriate . . . The council shall file, with its order, an opinion stating in full its reasons for the decision. The council shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine: (1) A public need for the facility and the basis of the need; (2) the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, on, and conflict with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife; (3) why the adverse effects or conflicts referred to in subdivision (2) of this subsection are not sufficient reason to deny the application. . . .

Conn. Gen. Stat. § 16-50p(a).



Under Section 16-50p, the Applicant must satisfy two key criteria in order for the Application to be granted and for a Certificate to issue. First, the Applicant must demonstrate that there is a “public need for the facility.” Conn. Gen. Stat. § 16-50p(a)(1). Second, the Applicant must identify “the nature of the probable environmental impact” of the proposed facility through review of the numerous elements specified in Conn. Gen. Stat. § 16-50p(a)(2), and then demonstrate that these impacts “are not sufficient reason to deny the application.” Conn. Gen. Stat. § 16-50p(a)(3). The evidence in the record for this docket establishes that the above criteria have been satisfied and that the Applicant is entitled to a Certificate.

A. A Public Need Exists for the East Putnam Facility

The first step in the review of the pending Application addresses the public need for the proposed facility. As noted in the Application, the FCC in its Report and Order released on May 4, 1981 (FCC Docket No. 79-318) recognized a public need on a national basis for technical improvement, wide area coverage, high quality and a degree of competition in mobile telephone service. More recently, the Federal Telecommunications Act of 1996 (the “Telecommunications Act”) emphasized and expanded on these aspects of the FCC’s 1981 decision. Among other things, the Telecommunications Act recognized an important nationwide public need for high quality personal wireless telecommunications services of all varieties. The Telecommunications Act also expressly promotes competition and seeks to reduce regulation in all aspects of the telecommunications industry in order to foster lower prices for consumers and to encourage the rapid deployment of new telecommunications technologies. (Cellco 1; Council Adm. Notice 7).

Cellco currently experiences a significant gap in cellular coverage and no PCS coverage at all along Route 44 between its existing Putnam cell site at 154 Sayle Avenue in Putnam and

the Rhode Island State line. (Cellco 1, Tab 7). These existing coverage problems must be resolved in order for Cellco to continue to provide high-quality, uninterrupted and reliable wireless telecommunications service consistent with its FCC license and to meet the demands of its wireless telecommunications customers. The East Putnam Facility described above would provide for much needed coverage along the heavily-traveled Route 44 as well as local roads in northeast Putnam. (Cellco 1).

As the Council is aware, Cellco holds licenses to provide both cellular and PCS service in Windham County, Connecticut and proposes to deploy both PCS and cellular frequencies at the East Putnam Facility. (Cellco 1; Cellco 4). The cellular and PCS services Cellco plans to deploy, operate at different frequencies, and will allow customers to use the same cell site for voice and/or data services. By installing both PCS and cellular antennas at the East Putnam Facility, Cellco can ensure that it has more capacity available to meet the growing demand of its customers for wireless voice and data services. (Cellco 1; Cellco 4).

The deployment of both PCS and cellular frequencies is particularly important to Cellco in areas east of I-395, along the Rhode Island State border. In Connecticut, Cellco owns the A-Band cellular license. AT&T owns the B-Band cellular license in Connecticut. In Rhode Island, the opposite occurs; Cellco owns the B-Band cellular license and AT&T owns the A-Band cellular license. (Cellco 4). To avoid cross-border interference problems, Cellco and AT&T have entered into a spectrum sharing agreement, under which, each company agrees to use only one-half of its licensed cellular frequencies in the area along the state border. By doing so, both companies limit the possibility of interference between their respective cellular systems. By doing so, however, Cellco limits the capacity of its cellular network in the area. Cellco

compensates for this loss of cellular capacity by utilizing more PCS channels to carry voice services. Cellco's ability to provide reliable coverage at PCS frequencies in the eastern portion of the state, therefore, is a more significant factor for Council consideration when addressing the issue of need. (Cellco 4; TR1 at 31).

The record contains ample, written evidence and testimony that a 150-foot tower at the Property would allow Cellco to achieve and maintain high quality wireless telecommunications service at both PCS and cellular frequencies without interruption from dropped calls and interference. The East Putnam Facility would be incorporated into a network design plan, intended to provide Cellco customers with reliable wireless service along Route 44, as well as along local roads in northeast Putnam where coverage is currently unreliable or non-existent. (Cellco 1; Cellco 4).

B. Nature of Probable Impacts

The second step in the statutory review procedure addresses the probable environmental impacts of the proposed facility and particularly the following factors:

1. Natural Environment and Ecological Balance

The proposed development of the East Putnam Facility has eliminated, to the extent possible, impacts on the natural environment. All East Putnam Facility improvements would be located within a 50' x 50' site compound. Access to the East Putnam Facility would extend from Elmwood Hill Road a distance of approximately 1,200 feet to the cell site, utilizing portions of an existing logging road on the Property. (Cellco 1). Access road grades, for the most part, slope gently from a ground elevation ("G.E.") of approximately 618' AMSL at Elmwood Hill Road down to a G.E. of 606' AMSL, then up to the site compound at a G.E. 644' AMSL. (Cellco 1; TR1 at 22-23). A short portion of the access driveway, approximately 80-85 feet in length, will

reach a grade of 20%. The grades of the access driveway, including the steepest portion, will not require special surface treatment. (TR1 at 22-23 and 52-53). Construction of the site compound and access road will require clearing of approximately 127 trees with a six inch (6") diameter at breast height. (TR1 at 22). Overall, the limited construction activity would have a negligible environmental impact on the Property. No evidence to refute this conclusion was presented to the Council.

## 2. Public Health and Safety

Cellco has considered several factors in determining that the nature and extent of potential public health and safety impacts resulting from installation of the proposed facility would be minimal or nonexistent.

First, the potential for the East Putnam Facility towers to fall does not pose an unreasonable risk to health and safety. The proposed towers would be designed and built to meet Electronic Industries Association ("EIA") standards. Other than the proposed equipment shelter, there are no structures within the fall radius of the tower and the fall radius would remain entirely within the limits of the Property. The nearest residence is located approximately 510 feet to the northeast of the East Putnam Facility. (Cellco 1).

Second, worst-case potential public exposure to RF power density for operation of the East Putnam Facility at the nearest point of uncontrolled access (the base of each tower) would be 17.34% of the FCC standard. Power density levels would drop off rapidly as distance from the towers increases. (Cellco 4).

Overall, the nature and extent of potential, adverse public health and safety impacts resulting from construction and installation of the East Putnam Facility would be minimal or nonexistent. No evidence to refute this conclusion was presented to the Council.

### 3. Scenic Values

As noted in the Application, the primary impact of any tower is visual. Cellco's site search methodology, described in the Site Search Summary, is designed in large part to minimize such visual impacts. As discussed above, wherever feasible, Cellco avoids construction of a new tower by first attempting to identify existing towers or other tall non-tower structures in or near the search area. Cellco currently maintains antennas on three (3) existing towers within four miles the of East Putnam Facility. No existing non-tower structures of suitable height exist in the northeasterly portion of Putnam. (Cellco 1).

If it determines that a new tower must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual impact of the site would be reduced to the greatest extent possible. There are no commercial or industrial zoned areas proximate to the Property. Cellco explored the use of several alternative sites, including land owned by Rawson Materials, Inc. off Munyan Road. This site is an existing gravel mining operation. Due to its location and ground elevation significantly lower than the proposed East Putnam Facility, a tower of 274 feet in height at the Rawson Materials site would be needed to provide coverage comparable to that achieved at the East Putnam Facility. (Cellco Late File Exhibit).

The Property and the surrounding area are heavily-wooded and sparsely development for residential purposes. The East Putnam Facility would be located in the southerly portion, a 22.10 acre parcel, adequately buffered from all adjacent properties. (Cellco 1).

Cellco submitted a Visual Resource Evaluation Report prepared by VHB ("VHB Report") as a part of the Application. Prior to preparing its report, VHB conducted a balloon float at the Property and field reconnaissance to assess visibility of the East Putnam Facility.

Further, after receiving comments from the Connecticut Council on Environmental Quality, VHB, during the second balloon float on the day of the Council hearing (August 5, 2008), conducted additional field reconnaissance, particularly focusing on views from the Quaddick Reservoir. (Cellco 1; Cellco Late File Exhibit). VHB determined that the proposed East Putnam Facility tower would be partially visible above the tree canopy from approximately 69 acres, or less than one percent of the two mile radius (8,042-acre) study area. VHB estimates that portions nine (9) residential properties may have partial views of the tower, above the tree line. These are, however, distant views, many more than 1.5 miles from the East Putnam Facility location. (Cellco 1; TR at 9-13). Areas where seasonal views are anticipated comprise an additional 5 to 6 acres and are located in the immediate vicinity of the proposed tower site and generally along Elmwood Hill Road.

#### 4. Historical Values

As it does with all of its tower applications, prior to filing the Application with the Council, Cellco requested that the State Historic Preservation Office (“SHPO”) of the Connecticut Historical Commission (the “Commission”) review the proposed facility and provide a written response. Based on his review of the information submitted by Cellco, the Deputy State Historic Preservation Officer determined that the development of a telecommunications facility at the Property would have “no effect” on historic, architectural, archaeological or cultural resources listed on or eligible for the National Register of Historic Places. (Cellco 1). No evidence to the contrary was presented to the Council. Furthermore, Cellco has no reason to believe that there are any other impacts on historical values not addressed by the SHPO’s review.

5. Recreational Values

There are no recreational activities or facilities at the Property that would be impacted by development of the East Putnam Facility. (Cellco 1). To the extent that the tower is visible, above the trees from portions of Quaddick Reservoir, these distant views (more than 1.5 miles away) could not be described as significant or having a substantial impact on this recreational resource. (Cellco Late File Exhibit; TR2 at 14-15).

6. Forests and Parks

The Quaddick State Forest is located approximately one-half mile to the east and the Quaddick State Park is located approximately 1½ miles north of the East Putnam Facility. No year-round or seasonal views of the tower are anticipated from any portions of the Quaddick State Forest or Quaddick State Park, excluding the open water portions of the Quaddick Reservoir. (Cellco 1, Tab 10). The tower, therefore, will have no impact on either of these resources. No evidence to refute this conclusion was presented to the Council.

7. Air and Water Quality

a. Air Quality.

The equipment at the site would generate no air emissions under normal operating conditions. During power outage events and periodically for maintenance purposes, Cellco would utilize an on-site diesel-fueled back-up generator to provide emergency power to the facility. The use of the generator during these limited periods would result in minor levels of emissions. Pursuant to R.C.S.A. § 22a-174-3, Cellco will obtain an appropriate permit from the Connecticut Department of Environmental Protection (“DEP”) Bureau of Air Management prior to installation of the proposed generator. (Cellco 1).

b. Water Quality.

The proposed East Putnam Facility would not utilize water, nor would it discharge substances into any surface water, groundwater, or public or private sewage system. Dean Gustafson, Professional Soil Scientist with VHB, Inc., conducted a field investigation and completed a Wetlands Delineation Report (the “Wetlands Report”) for the East Putnam Facility. According to the Wetlands Report, the closest wetland area is more than 100 feet from the northern-most portion of the access driveway and more than 900 feet from the East Putnam Facility compound. Due to the distance between site development activity and the closest wetland area and because erosion and sedimentation controls have been incorporated into project plans, construction and operation of the East Putnam Facility will not result in any adverse impacts to nearby wetland resource areas. (Cellco 1). No evidence to refute these conclusions was presented to the Council.

8. Fish and Wildlife

As a part of its National Environmental Policy Act (“NEPA”) Checklist, Cellco received comments on the proposed facility from the U.S. Department of Interior, Fish and Wildlife Service (“USFWS”) and the Environmental and Geographic Information Center of the DEP. The USFWS has determined that there are no federally-listed or proposed, threatened or endangered species or critical habitat known to occur in the East Putnam Facility project area. Likewise, according to the DEP, there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species at the East Putnam Facility. (Cellco 1).



C. The Application Should Be Approved Because The Benefits Of The Proposed Facility Outweigh Any Potential Impacts

Following a determination of the probable environmental impacts of the proposed facility, Connecticut General Statutes § 16-50p requires that the Applicant demonstrate why these impacts “are not sufficient reason to deny the Application.” Conn. Gen. Stat. § 16-50p(a)(3). The record establishes that the impacts associated with the proposal would be limited and outweighed by the benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application.

As discussed above, the only potential adverse impact from the proposed towers involves “scenic values.” As the record overwhelmingly demonstrates, the East Putnam Facility would have minimal impacts on scenic values in the area. (Cellco 1; Cellco Late File Exhibit). These limited aesthetic impacts may be, and in this case are, outweighed by the public benefit derived from the establishment of the East Putnam Facility. Unlike many other types of development, telecommunications facilities do not cause indirect environmental impacts, such as increased traffic and related pollution.

The limited aesthetic and environmental impacts of the proposed East Putnam Facility can be further mitigated by the sharing of the facility. Cellco has designed the 150-foot tower so that it could be shared by other carriers. (Cellco 1). During the course of its meeting with municipal officials in East Putnam, Cellco also agreed to provide access to the tower, at no cost, to the Town and to emergency service providers in the Town.

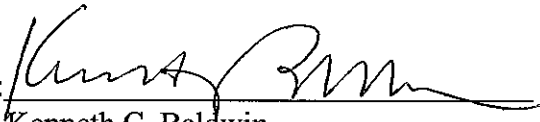
In sum, the potential environmental impacts from the proposed East Putnam Facility would be minimal when considered against the benefits to the public. These impacts are insufficient to deny the Application. The site, therefore, satisfies the criteria for a Certificate pursuant to

Connecticut General Statutes § 16-50p, and the Applicant's request for a Certificate should be granted.

**V. CONCLUSION**

Based on the overwhelming evidence in the record, the Applicant has established that there is a need for the proposed East Putnam Facility and that the environmental impacts associated with the Application would be limited and outweighed by the benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application. Therefore, the Council should approve the Application as submitted.

Respectfully submitted,  
CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS

By:   
Kenneth C. Baldwin  
ROBINSON & COLE LLP  
280 Trumbull Street  
Hartford, CT 06103-3597  
Its Attorneys