

**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 52 STADLEY ROUGH ROAD,
DANBURY, CONNECTICUT

DOCKET NO. 366

August 18, 2008

RESPONSE TO CONNECTICUT SITING COUNCIL
PRE-HEARING INTERROGATORIES
OPTASITE TOWERS LLC ("OPTASITE") AND
OMNIPOINT COMMUNICATIONS, INC. ("T-MOBILE")

Questions for Optasite:

Q1. How many of the return receipts for the notices sent to abutting landowners did Optasite receive? If some return receipts were not received, did Optasite make other attempts to notify the landowners? If yes, explain.

A1. All of the return receipts for the notices sent to abutting landowners were received. Included in Exhibit A attached hereto is a copy of the return receipts.

Q2. What accounts for the seemingly long interval between the date of Optasite's submittal of a technical report to the City of Danbury (January 31, 2006) and its application submittal to the Siting Council (June 30, 2008)?

A2. As detailed in the Pre-Filed Testimony included in Attachment 1 of the Application and the June 10, 2008 correspondence to the City of Danbury included in Attachment 8, many activities were conducted by both Optasite and T-Mobile during the time period between the technical report filing and the submission of the Application. These activities generally fall into three categories: 1) coordination with wireless carriers by Optasite; 2) Optasite and T-Mobile investigation of alternatives sites and designs as requested by the City as part of the consultation and comments provided; and 3) Optasite discussions with the original property owner, its landlord, and the subsequent purchaser regarding the project.

Carrier Coordination

Optasite has communicated with the various wireless carriers who have expressed a need for service in this area of the City since actively pursuing a site. Through its ongoing discussions with the wireless carriers throughout this period, Optasite learned more specifically of the needs of Verizon and Sprint/Nextel which need a facility to provide service in this area. As such, some of the time was spent working with T-Mobile,

Sprint/Nextel and Verizon Wireless to coordinate their respective needs in each carriers' network and height requirements on any new support structure. Additionally, we note that during this time, Optasite negotiated a lease with Sprint/Nextel for shared use of the proposed Facility.

Alternatives Investigation as Requested by City of Danbury

During this time Optasite also worked closely with T-Mobile to exhaustively investigate potential alternative sites. Attachment 3 of the Application includes the details of Optasite's and T-Mobile's site search. As noted therein, twelve alternative sites were investigated, including the alternative sites suggested by the City during the municipal consultation, which included the City owned water tank at Nabby Road (number 11 in Attachment 3) and the DOT garage on Rockwell Road (number 12 in Attachment 3).

Optasite also worked with its design team and the property owner to redesign the facility in response to the City's comments. The facility was relocated further from the adjacent property to the west. The monopole was redesigned to include flush mounted antennas. Optasite also investigated a bell tower design, which was rejected by the Church as too visually obtrusive. These redesign efforts required an amended lease with the property owner.

Property Owner Discussions

Finally, as noted in the Application, the property changed ownership during the time period between municipal consultation and Application filing. As such, Optasite spent considerable time working with the new property owner and amending the lease as noted above.

Q3. Which party originally initiated a search for a site in this area, Optasite or T-Mobile?

A3. A search for a site to provide needed service in the northeastern portion of the City dates back several years and was initially instituted by Sprint PCS sometime prior to the Fall of 2000. At that time, Sprint PCS proposed a tower along Great Plain Road. That site was locally opposed at a time when Sprint PCS was under local zoning jurisdiction. Sprint's zoning applications were denied by the City's Planning Commission in December of 2000 shortly after a moratorium had expired. Some efforts were subsequently made, upon the change in State/local jurisdiction, by Sprint to file a Siting Council application, but to our knowledge a Docket was never instituted.

T-Mobile has had a formal search ring that started in sometime after Sprint's efforts through early 2005. In 2005, based on its ongoing dialogue and business relationships with wireless carriers, Optasite learned that this area of the City was a "dead zone". Optasite also learned of past efforts by Sprint and Verizon Wireless to find a site to provide needed service that were unsuccessful.

In June of 2005, Optasite received a call from the previous owner of the property interested in leasing a portion of the church property for a wireless facility. Knowing that the wireless

carriers still needed a site in this area, Optasite took the lead in communication with the property owner and searching for any other sites in June 2005.

Q4. When did this site search begin? Where was the site search centered? What was the extent of the search ring? Provide a map, with scale and compass, of search ring.

A4. As noted in response number 3 above, Optasite began its search for sites in June of 2005. The search for a site to provide needed service in this area of the City was started several years earlier by various wireless carriers. Given that Optasite essentially took over a search from the wireless carriers that had been conducted for a few years prior to Optasite's involvement, Optasite was familiar with the dead zone area. Accordingly, a search ring map was not created as it was not needed given the information already obtained when Optasite began the site search process.

Q5. During the site search, did Optasite contact any knowledgeable resource persons other than municipal officials for suggestions for alternate sites?

A5. Yes. Optasite contacted the wireless carriers licensed to provide service in Fairfield County for suggestions on locations/properties to provide needed service to this area of the City.

Q6. Optasite seems to have originally presented the City of Danbury with plans for a 130-foot tower. What led to the change to a 140-foot tower?

A6. The change in proposed tower height was driven by the carrier's need for service in this area of the City. Sprint/Nextel indicated a need for a centerline mounting height of 127' AGL. As shown in the technical report, T-Mobile's minimum height at this site is 127' AGL. Since both carriers cannot locate their antennas at the same height, the monopole height was increased to accommodate the needs of both carriers.

Q7. What changes to Optasite's original plans were made in response to City of Danbury's comments?

A7. In response to the City's comments, Optasite redesigned the proposed facility to include flush mounted antennas and relocated the facility further from the adjacent property to the west. Optasite also investigated a bell tower design, as suggested by the City. The property owner, however, rejected the proposed bell tower design as too visually intrusive.

Q8. Is the Nabby Road water tower referred to in the Planning Commission's letter the same as the water tank at Sterling Woods Condominiums?

A8. Yes.

Q9. Did Optasite investigate the CT DOT garage on Rockwell Road as suggested by the Danbury Planning Commission? Is so, what were the results of the investigation?

A9. Yes. The details of this site are included in Attachment 3 of the Application, number 12. T-Mobile's Radio Frequency engineers analyzed this location and determined that it was too far south to provide coverage to the target area. Also, this site is located at the base of a plateau, which would cause shadowing of the radio frequency propagation, thereby preventing coverage to the target area.

Q10. Have either Verizon or Sprint/Nextel indicated the heights they would like to reserve for their antennas and the number of antennas they would like to install on the tower? If so, what are they?

A10. Sprint/Nextel has reserved an antenna centerline mounting height of 127' AGL. Sprint/Nextel has not finalized the number of antennas it would flush mount on the monopole. At this time, Verizon Wireless has not reserved an antenna mounting height or provided the number of antennas it would install.

Q11. How much cut and fill would be required to develop the proposed site?

A11. Approximately 140 cubic yards of cut would be required for development of the facility and site. No fill is required.

Q12. Would any blasting be required to develop the site?

A12. At this time, blasting is not anticipated. If ledge is encountered through the geotechnical investigation of the site, chipping will be utilized rather than blasting.

Questions for T-Mobile:

Q13. What would T-Mobile use for back up power?

A13. T-Mobile will utilize Battery Back up power at the proposed site.

Q14. What are T-Mobile's licensed operating frequencies in this part of the state?

A14. T-Mobile's licensed operating frequencies for the Fairfield BTA are:

PCS

Transmit: TX: 1940.000 MHz to 1949.800 MHz
Receive: RX: 1860.000 MHz to 1869.500 MHz

AWS

Transmit: TX1: 2140.000 to 2145.000 MHz
Receive: RX1: 1740.000 to 1745.000 MHz

Transmit: TX2: 2110.000 MHz to 2120.000 MHz
Receive: RX2: 1710.000 MHz to 1720.000 MHz

Q15. What is the design signal strength for T-Mobile's system for in-vehicle coverage? For in-building coverage?

A15. T-Mobile's minimum design receive signal level threshold is -84 dBm. This level is the lower limit to where T-Mobile can provide in vehicle coverage to its network users. A more robust signal level is required to provide reliable coverage to subscribers inside building structures. The lower limit for in building design is -76 dBm for average residential and business dwelling environments

Q16. What is the existing signal strength in the area T-Mobile would serve from this proposed site?

A16. The existing signal strength in the area T-Mobile would serve from this proposed site ranges from -85 dBm to -110 dBm.

Q17. What would be the total area T-Mobile could cover from the proposed site?

A17. The total area T-Mobile would cover from the proposed site is approximately 7.4 square miles.

Q18. What is the size of the coverage gap T-Mobile is seeking to cover from this site?

A18. T-Mobile is seeking to cover approximately 2 miles along Stadley Rough Road and surrounding side streets.

Q19. Identify, by address, sites with which T-Mobile's antennas at the proposed site would hand off signals - include type and height of structure and height of T-Mobile's antennas on structure.

A19. Below is a table that includes the requested information for the hand-off sites and surrounding sites.

Also, attached in Exhibit B are updated propagation plots with T-Mobile's site CT11924A. This site, which is located at the junction of Route 7 and I-84 came on-air after the plots for the Application were generated.

Site ID	Address	Town	Site Type	Existing Structure Height (feet AGL)	Antenna Height (Feet AGL)	Status
CT11896A	41 Padanaram Road	Danbury	Wood Pole	80	80	On Air
CT11900B	457 Main Street	Danbury	Rooftop	42	46	On Air
CT11108A	94 Hospital Avenue	Danbury	Rooftop	134	155	On Air
CT11924A	78 Federal Road	Danbury	Billboard	78	81	On Air
CT11201A	20 Vale Road (Tower # 10247)	Danbury	Utility Pole	115	130	On Air

Q20. What is the minimum height at which T-Mobile could achieve its coverage objectives from the proposed site?

A20. T-Mobile requires a minimum height of 127 feet AGL to achieve the coverage objective for the proposed site.

Q21. Provide a propagation map, at the same scale as the maps provided in the application, showing what T-Mobile's coverage would be at 10 feet below its antennas' proposed heights at the proposed site.

A21. Please see the propagation plot included in Exhibit C.

Q22. What is the approximate cost of the antennas and related equipment that T-Mobile would install at the proposed facility?

A22. The approximate cost of T-Mobile's facility ranges from \$125,000 to \$150,000.

Q23. In addition to extending T-Mobile's coverage, would this site provide capacity relief for any adjacent sites, especially those covering I-84?

A23. Coverage from the proposed site will provide some very limited capacity relief to those sites primarily covering Interstate 84, however the primary objective of the proposed site is to provide service to areas that have predominantly unreliable or no T-Mobile service.

Q24. Would it be possible for T-Mobile to meet its coverage/capacity goals by utilizing additional hardware such as tower mounted amplifiers on existing towers, thereby eliminating the need for a new tower or at least requiring a lower tower?

A24. T-Mobile would not be able to make use of hardware alterations to existing facilities to provide coverage to its target area. The coverage area for the proposed site is primarily shaped by local terrain and clutter obstructions. Due to this type of attenuating environment, the only way to introduce coverage into this area is to locate a site in the objective area itself or in an area that has an unobstructed view of it to overcome the constrictive surrounding terrain obstacles. Hardware alterations, especially those that would result in a greater power output from the site, are typically used when the obstacles include unobstructed distance or line of site building penetration scenarios. At T-Mobile's frequency range, an increase in power would not allow for the signal to overcome the existing terrain conditions in the area.

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and twenty copies of Optasite's and T-Mobile's responses to interrogatories were served on the Connecticut Siting Council by overnight mail with an electronic copy sent via email.

Dated: August 18, 2008


Lucia Chiocchio

cc: Charles Regalbuto
Hans Fiedler
Hollis Redding
Christopher B. Fisher, Esq.
Paul Lusitani
Michael Libertine

EXHIBIT A

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jose and Christina Carvalho
14 Indian Spring Road
Danbury, CT 06811

2. Article Number

(Transfer from service label)

7008 0150 0001 6870 4968

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Maria Almeida Agent
 Address

B. Received by (Printed Name)

C. Date of Delivery

6/24/08

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

C&E

City of Danbury
Attn: City Clerk
155 Deer Hill Avenue
Danbury, CT 06810

2. Article Number

(Transfer from service label)

7008 0150 0001 6870 4999

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Pamela R. Hulse Agent
 Address

B. Received by (Printed Name)

C. Date of Delivery

6/24/08

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Andrew Alpert
83 Stadley Rough Road
Danbury, CT 06811

2. Article Number

(Transfer from service label)

7008 0150 0001 6870 5057

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Andrew Alpert Agent
 Address

B. Received by (Printed Name)

C. Date of Delivery

6/24/08

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tom and Rosemary Peat
2 Poppy Road
Brookfield, CT 06804

2. Article Number
(Transfer from service label)

7008 0150 0001 6870 5002

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Rose Mary Peat* Agent
Address

B. Received by (Printed Name)

C. Date of Delivery

ROSE MARY PEAT 6/28/08

D. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Carol Rizza
8 Indian Spring Road
Danbury, CT 06811

2. Article Number
(Transfer from service label)

7008 0150 0001 6870 4951

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Carol W. Rizza* Agent
Address

B. Received by (Printed Name)

C. Date of Delivery

6/28/08

D. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Colonial Hills Baptist Church
40 Stadley Rough Road
Danbury, CT 06811

2. Article Number
(Transfer from service label)

7008 0150 0001 6870 5040

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Justin Jay* Agent
Address

B. Received by (Printed Name)

C. Date of Delivery

6/24/08

D. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jose A. Collado and
 Monica A. Espinal
 81 Stadley Rough Road
 Danbury, CT 06811

2. Article Number
 (Transfer from service label)

7008 0150 0001 6870 4982

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery

01/24/08

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Catherine R. Stone and
 Denise M. Griss
 85 Stadley Rough Road
 Danbury, CT 06811

2. Article Number
 (Transfer from service label)

7008 0150 0001 6870 4975

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Charles Hibbard and Ruth R.
Snodgrass
10 Indian Spring Road
Danbury, CT 06811

2. Article Number
(Transfer from service label)

7008 0150 0001 6870 4937

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Ruth Snodgrass Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

6/24/02

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lisa Marie and James J. Baker
6 Indian Spring Road
Danbury, CT 06811

2. Article Number
(Transfer from service label)

7008 0150 0001 6870 4944

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

[Signature] Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

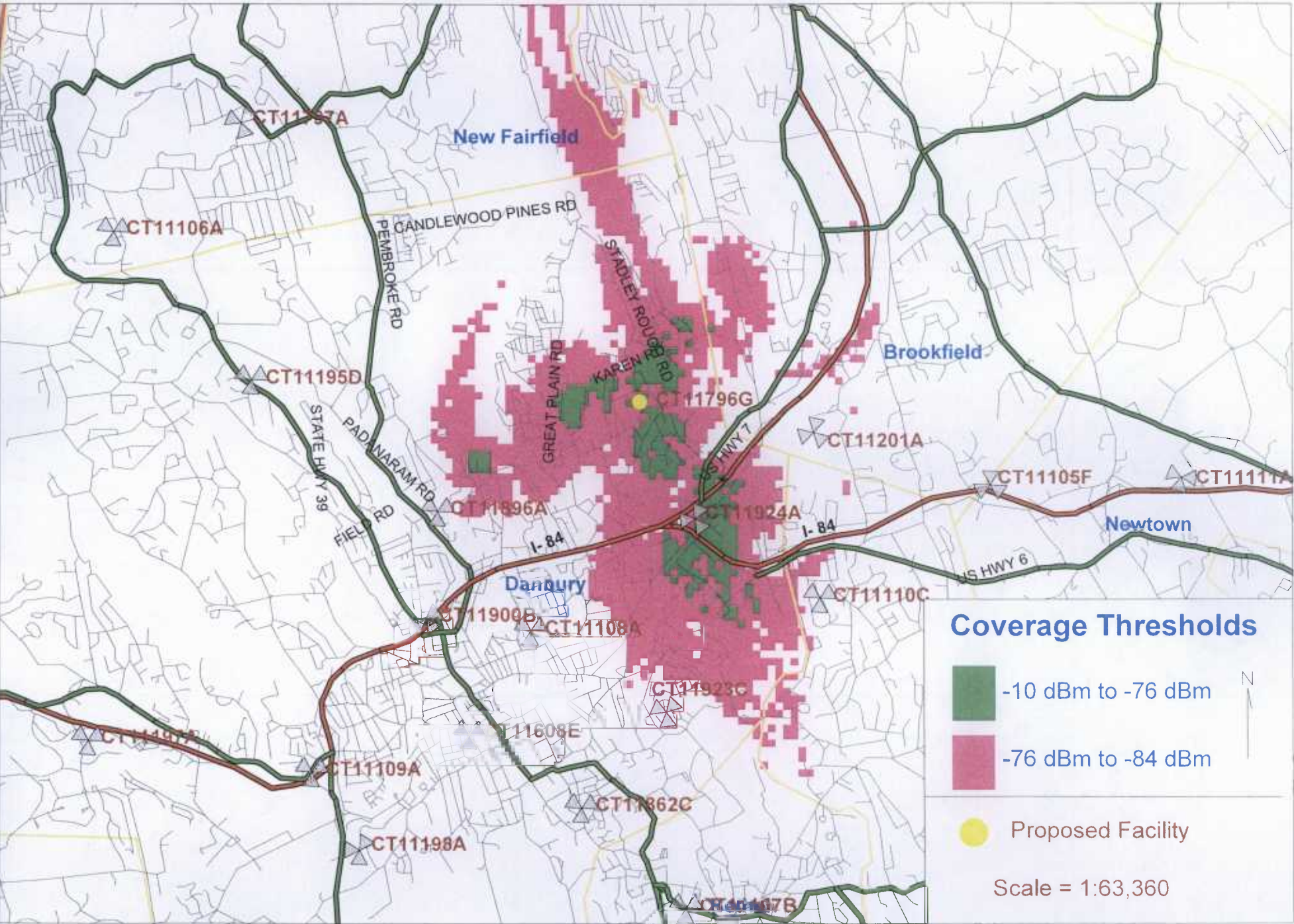
D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

EXHIBIT B

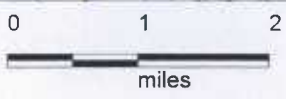


Coverage Thresholds

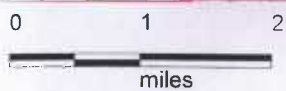
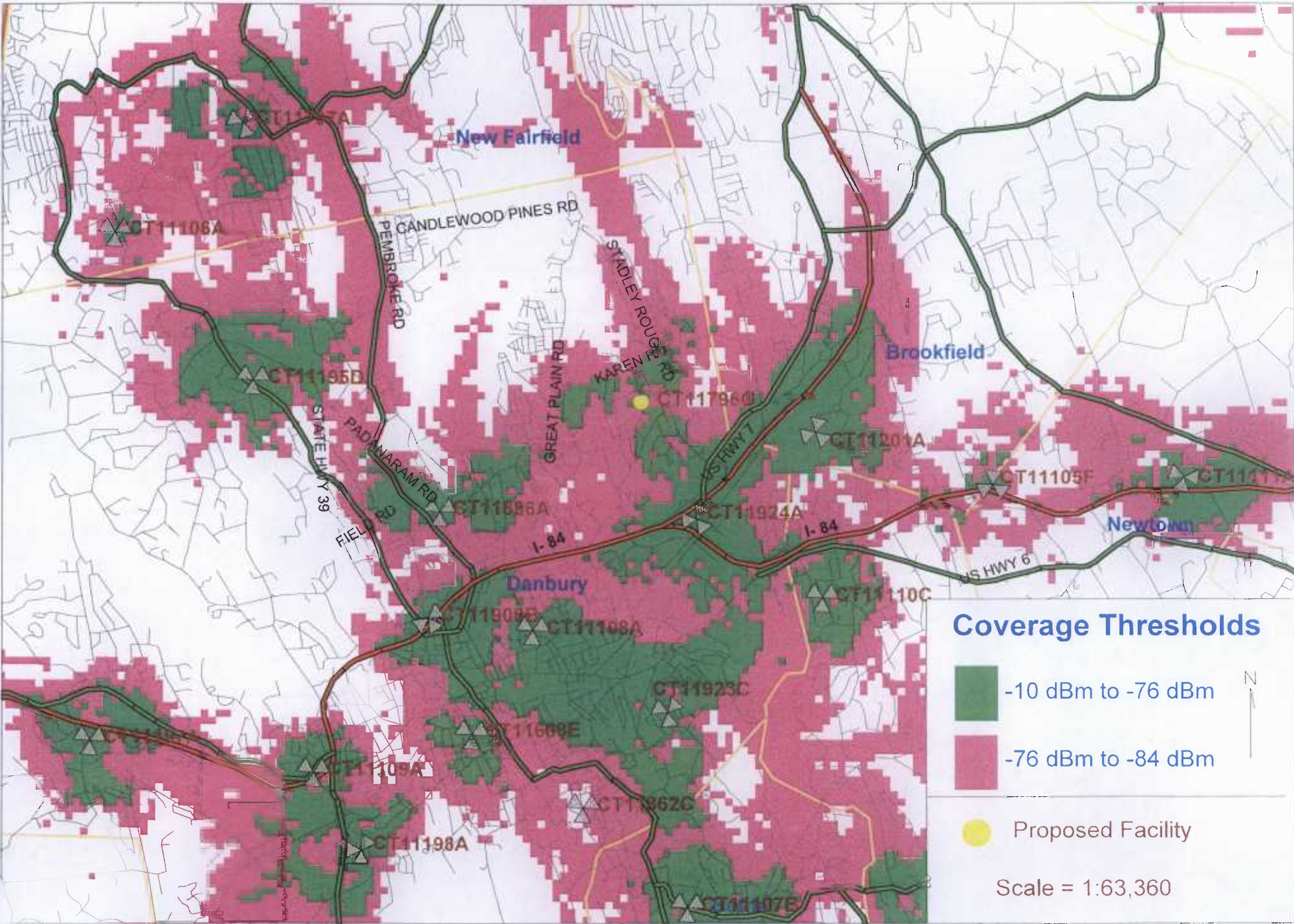
- 10 dBm to -76 dBm
- 76 dBm to -84 dBm

Proposed Facility

Scale = 1:63,360

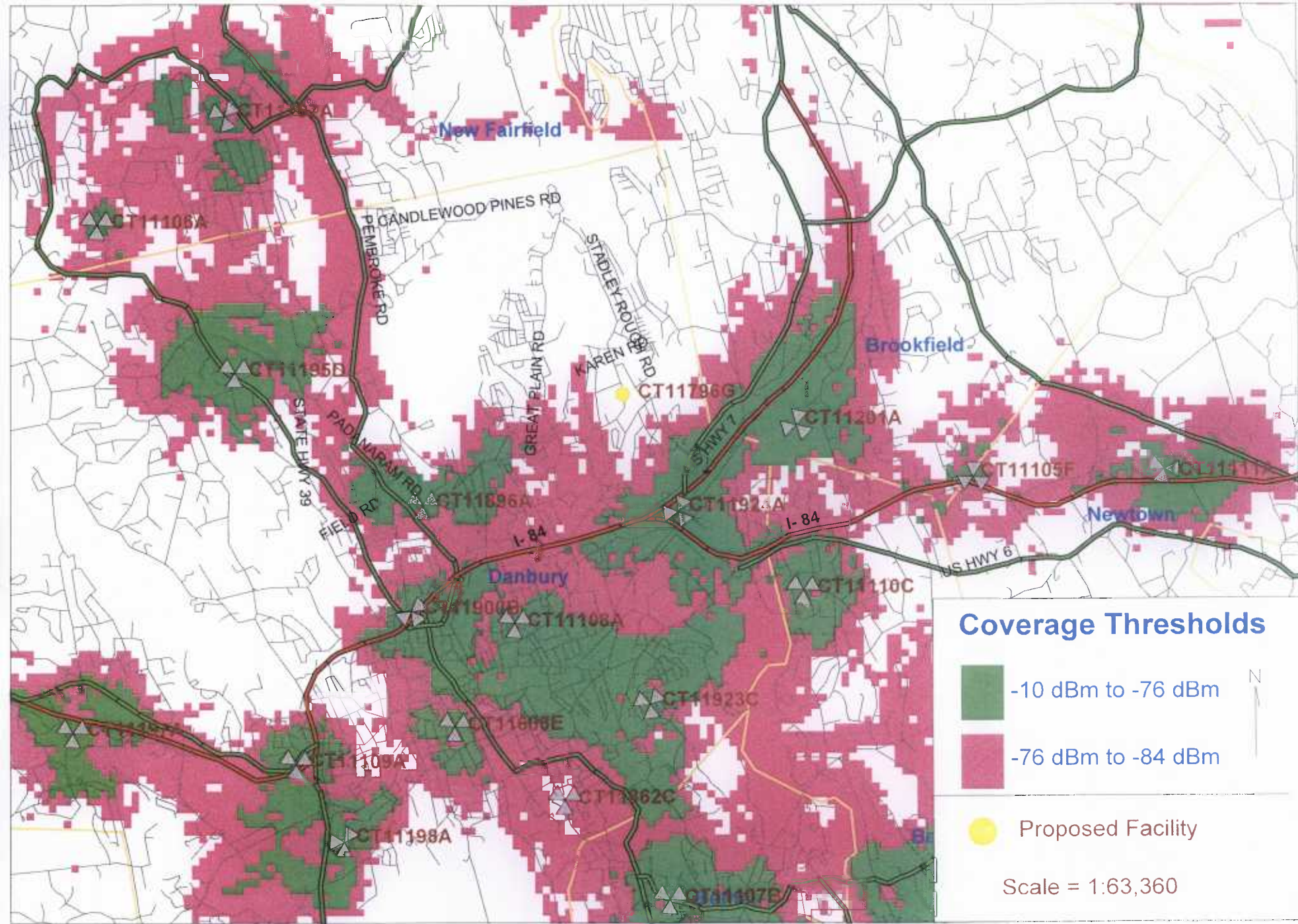


Coverage From Proposed CT11796G @ 127' AGL



Existing T-Mobile On Air Coverage With CT11796G @ 127' AGL

EXHIBIT C



Coverage Thresholds

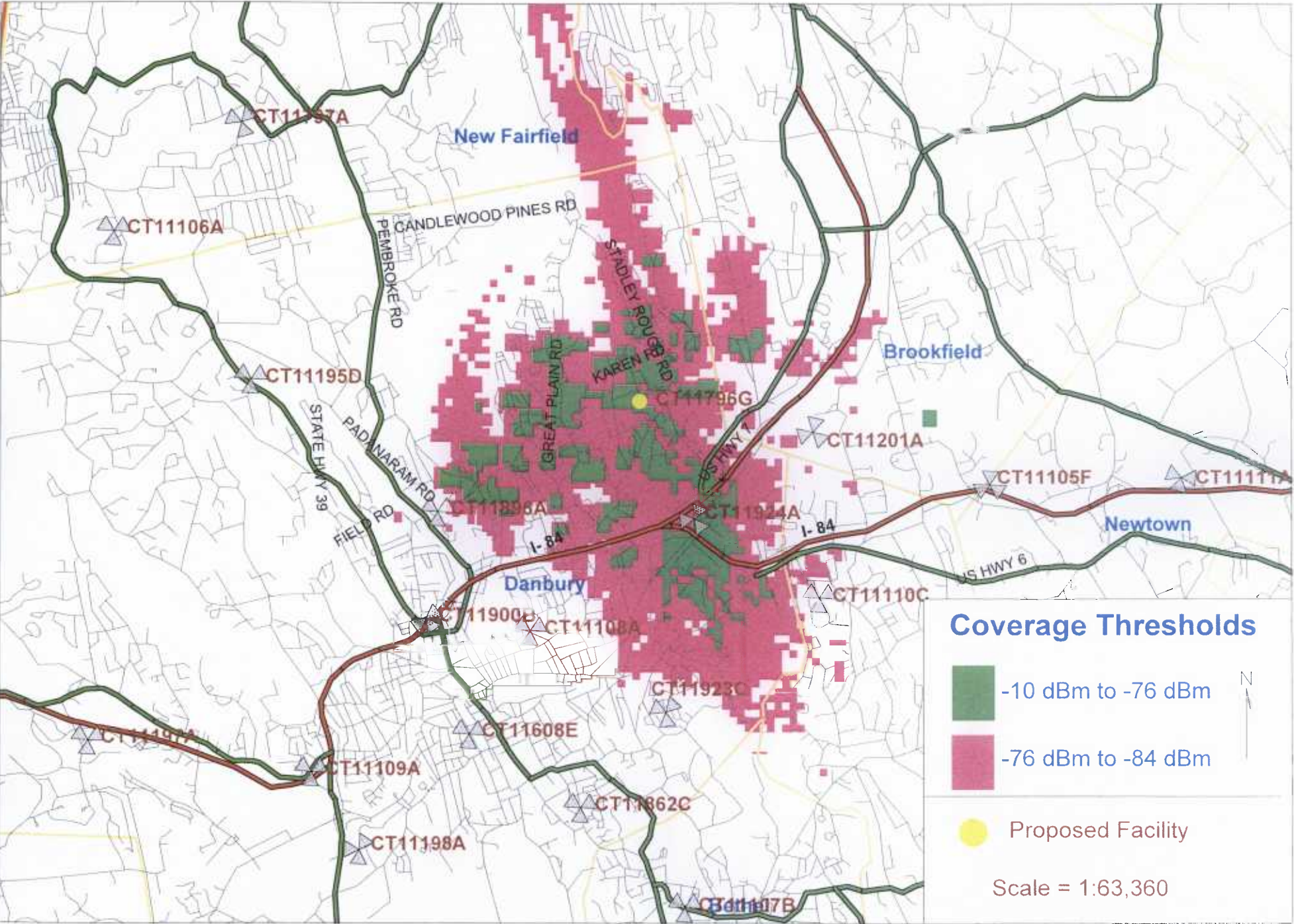
- 10 dBm to -76 dBm
- 76 dBm to -84 dBm

Proposed Facility

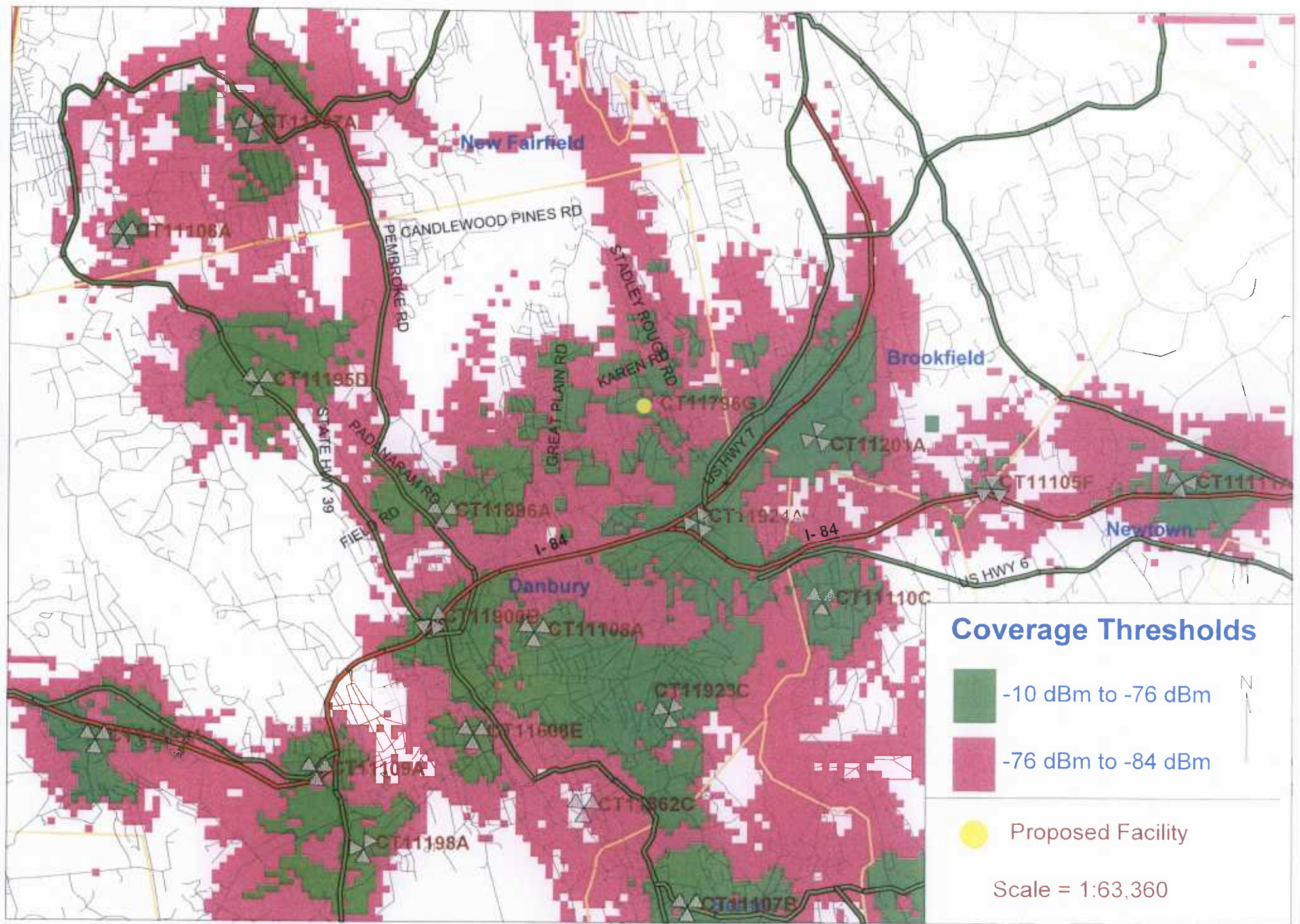
Scale = 1:63,360



Existing T-Mobile On Air Coverage



Coverage From Proposed CT11796G @ 137' AGL



Existing T-Mobile On Air Coverage With CT11796G @ 137' AGL