

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NEW CINGULAR
WIRELESS PCS, LLC (AT&T) FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF A
TELECOMMUNICATIONS TOWER
FACILITY AT ST. MATTHEW LUTHERAN
CHURCH AT 224 LOVELY STREET IN THE
TOWN OF AVON

DOCKET NO. 373

April 22, 2009

NEW CINGULAR WIRELESS PCS, LLC ("AT&T")
RESPONSES TO SITING COUNCIL INTERROGATORIES (THIRD SET) &
FOLLOW UP INFORMATION REQUESTED AT THE INITIAL HEARING

- Q1. How was the open space data shown on the diagram in New Cingular's response to Council's Interrogatories Set One, Tab H, obtained?
- A1. The open space data depicted on the diagram provided in Set One, Tab H was obtained by EBI Consulting using information available from the Department of Environmental Protection.
- Q2. Assuming the boundaries of the Huckleberry Hill Open Space are as depicted on the diagram, indicate on a diagram the optimum location or area within the open space parcel for a facility that could provide coverage to the target service area. Describe coverage from such a facility. Include coverage models, if necessary.
- A2. Based on the Town's recently stated siting preferences, AT&T consultants have further evaluated the Huckleberry Hill Open Space as a possible tower site location including a field review and hike along the existing trail system. See attached Town Open Space and Recreation Plan Map for general parcel and trail location and aerial photo of area included in Exhibit 1. Based on this field review and a subsequent radiofrequency engineering analysis, the "optimum location" from a radiofrequency transmission standpoint would be at the higher elevation within the parcel which is at the top of the ridge just west of Northington Drive. At this location, there is no established access and the nearest Town Road appears to be approximately 800 feet south at Northgate Road which is one of the trail heads for the open space parcel. The top of the ridge does nevertheless offer a potential tower location from which coverage could potentially be provided to the valley below and through which Lovely Street traverses (i.e. the "target area").

A plot from this location at the top of the ridge done at 100' AGL shows some shadowing to properties below and west of Lovely Street and duplicative coverage with other sites to the west including AT&T's facility at the Town landfill located on Huckleberry Hill Road (Site 1175) which is only .86 miles away. See map and coverage plot also annexed in Exhibit 1. As such, there are potential network operational issues for properly integrating a site at this location. Nevertheless, the Huckleberry Hill Open Space property can not be completely ruled out based on radiofrequency engineering analysis alone and a location has been identified where a less than 200' tower might provide coverage to the target area along Lovely Street.

Some photographs of the potential tower site location and homes on Northington Drive are also included in Exhibit 1.

- Q3. Describe if a telecommunications facility located at 31 Brian Lane (Avon Water Company) would be able to provide adequate coverage to the target service area. Include coverage models, if necessary.
- A3. Not at heights below 250' AGL. Annexed hereto in Exhibit 2 are coverage plots from the Avon Water Company property at 100', 130', 150', 170', 195' and 250' AGL. All show unreliable coverage to part of the coverage objective south along Country Club Road and at the Roaring Brook Elementary School, which it should be noted is a place of public shelter in case of emergency as indicated by the Town on its website and included here in Exhibit 2. Photos of the site and this residential area of Town along with the Town's ridgeline protection map are also included for the Council's reference in furtherance of testimony already heard at the initial public hearing.
- Q4. Would the landowner be amenable to the placement of the proposed telecommunications facility in the level wooded area east of the existing rear lawn? If so, indicate a location on a diagram or aerial photo.
- A4. Yes. Attached in Exhibit 3 is a combined aerial photo/locus plan showing the proposed tower facility location and including a potential on-site alternative location.

Follow Up Information: Attached in Exhibit 4 is an elevation with dimensions of the existing steeple prepared from the original steeple drawings for the St. Matthew Lutheran Church. Please also find a letter from EBI Consulting affirming the balloons floated on March 31, 2009, the day of the Council's initial hearing in this Docket in furtherance of the testimony already heard at the initial public hearing.

CERTIFICATION OF SERVICE

I hereby certify that on this day, an original and fifteen (15) copies of the foregoing was served on the Connecticut Siting Council via electronic and overnight mail with a copy to:

Mr. Juan Fernandez
246 Lovely Street
Avon, CT 06001

Andrew W. Lord, Esq.
Loni S. Gardner, Esq.
Murtha Cullina LLP
Two Whitney Avenue
PO Box 704
New Haven, CT 06503

Ms. Jane Garrett
15 Greenwood Drive
Avon, Connecticut 06001

Mary Ann Keenan
24 Quail Ridge Drive
Avon, CT 06001

David Lampert
4 Clearwater Court
Avon, CT 06001

Carrie L. Larson, Esq.
Pullman & Comely, LLC
90 State House Square
Hartford, CT 06103-3702

Mr. & Mrs. Thomas & Patricia McMahon
21 Greenwood Drive
Avon, Connecticut 06001

Stuart Noyes
3 Clearwater Court
Avon, CT 06001

Michael Pastore
80 Wildwood Drive
Avon, CT 06001

Mr. & Mrs. Mark & Sheridan Toomey
9 Greenwood Drive
Avon, Connecticut 06001

Hon. Peter Emmett Wiese
240 Lovely Street
Avon, Connecticut 06001

Dated: April 22, 2009



Daniel M. Laub
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
Attorneys for:
AT&T

cc: David Akerblom; John Blevins; Michele Briggs; Derek Creaser; Kevin Dey;
Christopher B. Fisher, Esq