

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

In Re:

APPLICATION OF SBA TOWERS II, LLC ("SBA") FOR A  
CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY  
AND PUBLIC NEED FOR THE CONSTRUCTION,  
MAINTENANCE AND OPERATION OF A  
TELECOMMUNICATIONS FACILITY AT ONE OF TWO  
ALTERNATE SITES AT RABBIT HILL ROAD IN  
WARREN, CONNECTICUT

DOCKET: 378

May 12, 2009

**CROWW'S SECOND SET OF PRE-HEARING INTERROGATORIES  
TO APPLICANT SBA**

**Proposed Power and Frequencies**

1. Please provide worst case power density calculations and analyses for proposed Sites A and B in accordance with the most current edition of FCC OET Bulletin No. 65. Identify the formula(s) used and show all calculations. Provide simple diagrams similar to Figure 4 in Bulletin No. 65, identifying all points of interest and their spatial relationships. Identify the maximum permissible exposure (MPE) for the general population for each frequency. Assume that all channels are operating simultaneously at maximum power and that all antennas in a sector are oriented directly toward the point of interest. Provide power density levels individually for each initial and potential service/frequency band and the cumulative percentage of MPE with all initial and future carriers operating. Address the following carriers and points of interest as a minimum:

Carriers

AT&T Wireless Cellular  
AT&T Wireless PCS  
Verizon Wireless Cellular  
Verizon Wireless PCS  
Verizon Wireless 800 MHz  
T-Mobile  
Town of Warren Emergency Services  
Point-to-Point (backhaul) services  
Other potential carriers

Points of Interest

The base of the tower  
The nearest point(s) of public access  
The point(s) of greatest power density  
The property line of the nearest adjacent property  
The nearest part of the nearest residential building

2. Please provide propagation maps showing the current coverage of Town of Warren Emergency Services within the Town and a map showing the coverage potentially available from proposed Sites A and B. Identify all frequencies, services and received signal strength levels and all assumptions, including Effective Radiated Power (ERP), antenna types and antenna heights associated with these services.

**Site Description:**

3. Please provide the coordinates for the exact location of the tower at Sites A and B.

4. Please provide the square footage of the area to be occupied by the tower and related equipment and access route for each of Sites A and B.

**Agricultural Restriction**

5. Did the Applicant or any consultant on its behalf meet or communicate with any representative of the following agencies concerning the issue of "agricultural restrictions" referred to in C.G.S. §16-50p(a)(3)(G)?

- Connecticut Siting Council
- Connecticut Department of Agriculture
- Connecticut Farmland Preservation Program
- Connecticut Council on Environmental Quality
- Connecticut Office of Attorney General
- Other Connecticut official agencies
- Any party or intervenor in Docket 378

6. If so, please describe the contents of such meeting or communication and provide a copy of any written summary, memorandum, emails, notes, minutes or other documentation.

**Warren Town Plans**

7. Did the Applicant or any consultant on its behalf review the Warren Recommended Town Plan dated 1974? If so, please describe or provide a copy of any written analysis, memorandum, or other document relating to the applicability and effect of such Plan on the proposed tower at Sites A and B.

8. Did the Applicant or any consultant on its behalf review the Warren Plan of Development Update, dated 1989? If so, please describe or provide a copy of any written analysis, memorandum, or other document relating to the applicability and effect of such Plan on the proposed tower at Sites A and B

9. Did the Applicant or any consultant on its behalf review the Warren Plan of Conservation dated 2009? If so, please describe or provide a copy of any written analysis, memorandum, or other document relating to the applicability and effect of such Plan on the proposed tower at Sites A and B

**Warren Zoning Regulations**

10. What is the distance from the nearest three residences to Site A and to Site B?

11. What is the distance from the nearest three adjacent property lines to Site A and to Site B?

Respectfully submitted,



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Gabriel North Seymour P.C.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, an original and fifteen copies of the foregoing CROWW Second Set of Pre-Hearing Interrogatories to Applicant SBA was served on the Connecticut Siting Council by first class mail and copy of same was sent postage prepaid to:

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

Christopher B. Fisher, Esq., Cuddy & Feder LLP  
445 Hamilton Avenue, 14th Floor, White Plains, NY 10601

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Hon. Mark E. Lyon, First Selectman, Bryan Memorial Town Hall  
P.O. Box 383, Washington Depot, CT 06794


Hon. Jack Travers, First Selectman  
Warren Town Hall, 7 Sackett Hill Road, Warren, CT 06754

Ray and Mary Ellen Furse, 26 Jack Corner Road  
Warren, CT 06777

Hon. F. Philip Prelli, Commissioner, Department of Agriculture  
165 Capitol Avenue, Hartford, CT 06106

Susan Payne, Chairperson, Conservation Commission  
Town of Washington, Bryan Memorial Town Hall  
P. O. Box 383, Washington Depot, CT 06794

Diane Dupuis, Chair, Cell Tower Committee  
Conservation Commission, Bryan Town Hall  
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Gabriel N. Seymour  
Attorney for CROWW

Dated: May 12, 2009