

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051 Phone: (860) 827-2935 Fax: (860) 827-2950 E-Mail: siting.council@ct.gov www.ct.gov/csc

January 8, 2010

TO:

Parties and Intervenors

FROM:

S. Derek Phelps, Executive Director

RE:

DOCKET NO. 383 - New Cingular Wireless PCS, LLC (AT&T) application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility located at 316 Perkins

Road, Southbury, Connecticut.

As stated at the hearing in Southbury on November 24, 2009, after the Council issues its draft findings of fact, parties and intervenors may identify errors or inconsistencies between the Council's draft findings of fact and the record; however, no new information, evidence, argument, or reply briefs will be considered by the Council.

Parties and Intervenors may file written comments with the Connecticut Siting Council on the Draft Findings of Fact issued on this docket February 4, 2010.

SDP/jbw

Enclosure



 DOCKET NO. 383 – New Cingular Wireless PCS, LLC }

 application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a }

 telecommunications facility located at 316 Perkins Road, Southbury, Connecticut.

 Southbury, Connecticut.

Connecticut
Siting
Council

January 8, 2010

DRAFT

Findings of Fact

Introduction

- 1. Pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes (CGS), as amended, and Section 16-50j-1 et. seq. of the Regulations of Connecticut State Agencies (RCSA), New Cingular Wireless PCS, LLC (AT&T) applied to the Connecticut Siting Council (Council) on July 24, 2009 for the construction, operation, and maintenance of a telecommunications facility that would include a 150-foot steel monopole tower. The facility would be located at 316 Perkins Road in the Town of Southbury, Connecticut. (See Figures 1 and 2) (AT&T 1, p. 1)
- 2. AT&T is a Delaware limited liability company with an office at 500 Enterprise Drive, Rocky Hill, Connecticut. The company's member corporation is licensed by the Federal Communications Commission (FCC) to construct and operate a personal wireless services system, which has been interpreted as a "cellular system." The company does not conduct any other business in the State of Connecticut other than the provision of wireless services under FCC rules and regulations. (AT&T 1, p. 2)
- 3. The party in this proceeding is the applicant. (Transcript, November 24, 2009, 3:00 p.m. [Tr. 1], p. 5)
- 4. The purpose of the proposed facility is to provide service in northern Southbury and parts of southern Roxbury. (AT&T 1, p. 1)
- 5. Pursuant to CGS § 16-50m, the Council, after giving due notice thereof, held a public hearing on November 24, 2009, beginning at 3:00 p.m. and continuing at 7:00 p.m. in the Southbury Town Hall, 501 Main Street South in Southbury, Connecticut. (Tr. 1, p. 2 ff.)
- 6. The Council and its staff conducted an inspection of the proposed site on November 24, 2009, beginning at 2:00 p.m. On the day of the field inspection, the applicant flew a balloon beginning at approximately 6:50 a.m. until approximately 4:00 p.m. Conditions for the balloon flight were good throughout most of the morning when winds were light. Winds increased in the afternoon. Overall, conditions were generally fair, and visibility was over one mile. (Tr. 1, pp. 15-16)
- 7. Pursuant to CGS § 16-50l (b), public notice of the application was published in <u>Voices</u>, on June 3 and 10, 2009. (AT&T 1, p. 3, Attachment 9)

- 8. In accordance with CGS § 16-50*l*(b), AT&T sent notices of its intent to file an application with the Council to each person appearing of record as owner of property abutting the property on which the proposed facility is located. (AT&T 1, p. 4, Attachment 9)
- 9. AT&T did not receive return receipts from four of the abutters to whom it sent its notice. Follow up letters, along with the original notice, were sent to three of the four abutters. AT&T did obtain confirmation of receipt by the fourth abutter—R&M Associates Realty—through the Postal Service website. (AT&T 2, Response 1)
- 10. Pursuant to CGS § 16-50*l* (b), AT&T provided notice to all federal, state, regional, and local officials and agencies listed therein. (AT&T 1, p. 3, Attachment 8)
- 11. On November 12, 2009, AT&T posted a sign near the host property at the intersection of Perkins Road and Garnet Road. The sign indicated that an application for a telecommunications facility on the host property was pending before the Council. It also announced that a balloon float, a site visit, and a public hearing would occur on November 24, 2009. (AT&T 5: Pre-filed testimony of Kevin Dey, 5.Q.A.)

State Agency Comments

- 12. Pursuant to CGS § 16-50*l*, the Council solicited comments on AT&T's application from the following state departments and agencies: Department of Agriculture, Department of Environmental Protection, Department of Public Health, Council on Environmental Quality, Department of Public Utility Control, Office of Policy and Management, Department of Economic and Community Development, and the Department of Transportation. The Council's letters requesting comments were sent on September 22, 2009 and November 30, 2009. (CSC Hearing Package dated September 22, 2009; Letter to State Department Heads dated November 30, 2009)
- 13. The Council did not receive any comments from state agencies or departments regarding this application. (Record)

Municipal Consultation

- 14. AT&T filed a technical report with the Towns of Southbury and Roxbury (the proposed site is within 2,500 feet of the Roxbury town boundary) on April 6, 2009. AT&T representatives subsequently spoke with the First Selectmen of both towns together with respective zoning and land use officials. (AT&T 1, pp. 16-17)
- 15. AT&T would provide space on its proposed tower for the Town of Southbury's emergency services antennas with no charge. (AT&T 2, Response 3; Tr. 1, p. 18)

Public Need for Service

- 16. The United States Congress, through adoption of the Telecommunications Act of 1996 (Act), recognized the important public need for high quality telecommunication services throughout the United States. The purpose of this Act was to "provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans." (AT&T 1, p. 4)
- 17. The Act prohibits local and state bodies from discriminating among providers of functionally equivalent services. (Council Administrative Notice No. 7 Telecommunications Act of 1996)
- 18. The Act prohibits any state or local agency from regulating telecommunications towers on the basis of the environmental effects of radio frequency emissions to the extent that such towers and equipment comply with FCC's regulations concerning such emissions. This Act also blocks the Council from prohibiting or acting with the effect of prohibiting the provision of personal wireless service. (Council Administrative Notice No. 7 Telecommunications Act of 1996)
- 19. In an effort to ensure the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (the 911 Act). The purpose of this legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. (AT&T 1, pp. 5-6)
- 20. AT&T would provide Enhanced 911 services from the proposed site as required by the 911 Act. (AT&T 1, p. 5)
- 21. AT&T's proposed facility would be an integral component of its FCC-licensed network and would provide service within a coverage gap that exists in the area of South Street, Lower River Road, Brown Brook Road, West Purchase Road and surrounding areas in the Town of Southbury and adjoining areas in Roxbury. (AT&T 1, p. 4)

Site Selection

- 22. AT&T Radio Frequency engineers initiated a request for a site in the vicinity of the proposed facility in February 2006. AT&T representatives began a search for a site in this area in March 2008. (AT&T 2, Response 4)
- 23. The center of AT&T's original search ring was located near the intersection of Scatacook Lane and Sachem Road at 41° 29' 15" north latitude and 73° 18' 59" west longitude. Its radius was approximately 3,000 feet. (AT&T 1, p. 7; Attachment 2)

- 24. AT&T revised its search ring because sites within the original search ring that were investigated did not meet radiofrequency propagation needs. The center of the new search ring was near the town line between Southbury and Roxbury where Perkins Road in Southbury becomes Garnet Road in Roxbury. The coordinates for the center of this new search ring were 41° 30° 24" north latitude and 73° 18' 8" west longitude. Its east-west radius was approximately 5,000 feet. (AT&T 1, p. 7; Attachment 2)
- 25. In its site search, AT&T considered locating its antennas on the telecommunications tower owned by the Department of Public Safety (DPS) and located on the grounds of the Southbury Training School, which is approximately one mile east of AT&T's proposed tower. AT&T tested antennas at heights of 130 feet, 150 feet, and 190 feet. AT&T's antennas would not provide adequate service to the majority of its coverage objective and nor hand off signals with adjacent AT&T facilities at any of the heights tested. (AT&T 1, p. 7; Tr. 1, pp. 20, 24-25, 58-59)
- 26. The tower at the Training School would be difficult to extend because it is built with round member legs, which are harder to reinforce to bear the additional structural stress of an extension than angle iron legs. (Tr. 1, p. 25)
- 27. AT&T also investigated using an existing tower at a firehouse on Stillson Road. This tower would not provide adequate service to AT&T's coverage objective. (AT&T 1, p. 7)
- 28. In addition to the proposed site at 316 Perkins Road, AT&T investigated 18 other locations as possible sites for its facility. These sites are listed below.
 - a. Wolf #1 This was a site on property at 1012 West Purchase Road. This site did not meet AT&T's radiofrequency engineering criteria.
 - b. Wolf #2 This was another location on the property at 1012 West Purchase Road. This site did not meet AT&T's radiofrequency engineering criteria.
 - c. Weinstein #1 This was a property at the end of Scatacook Lane. This site did not meet AT&T's radiofrequency engineering criteria.
 - d. Weinstein #2 562 Tepi Drive. This site did not meet AT&T's radiofrequency engineering criteria.
 - e. Hardy Farms Graham #1 327 West Purchase Road. This site did not meet AT&T's radiofrequency engineering criteria.
 - f. Hardy Farms Graham #2 327 West Purchase Road. This location did not meet AT&T's radiofrequency engineering criteria.
 - g. Agate 206 West Purchase Road. This site did not meet AT&T's radiofrequency engineering criteria.
 - h. Fire House on Stillson Road. As stated above, the emergency services tower at this location did not meet AT&T's radiofrequency engineering criteria.

- i. Breen 84 Perkins Road. AT&T sent a query letter to this property owner but received no response. Development of this property would encounter challenging access issues and require greater land disturbance than the proposed site.
- j. Oster 331 Perkins Road. AT&T sent a query letter to this property's owners who replied that they were not interested.
- k. Houldin 84 Garnet Road. AT&T sent a query letter to this property owner but received no response. Development of this property would encounter challenging access issues and require greater land disturbance than the proposed site.
- 1. Childs 78 Garnet Road. AT&T sent a query letter to this property owner but received no response. Development of this property would encounter challenging access issues and require greater land disturbance than the proposed site.
- m. Ludorf property (Block 90, Lot 5,7 and Block 87, Lot 14). This property was unavailable for development as it is encumbered by a conservation easement obtained by the Southbury Land Trust in conjunction with the Southbury Historical Society.
- n. R&M Associates 67 Garnet Road. AT&T sent a query letter to this property owner who was interested. However, the terrain of this property is characterized by deep craters and old garnet mines that make it unsuitable for development as a wireless facility.
- o. Southbury Land Trust. This property is designated as Open Space and is unavailable for development. Southbury Land Trust owns several properties within the site search area. Most of these properties are deed restricted, and the Trust is not interested in leasing its properties for commercial purposes.
- p. Open Space (Block 87, Lot 8A). This property is part of the Southbury Land Trust's Paradise Hill Preserve. It is reserved as open space and is unavailable for development.
- q. Southbury Land Trust (Block 87, Lot 9). This property is reserved open space and is unavailable for development.

(AT&T 1, Attachment 2; AT&T 2, Responses 5, 6, 7, 8, 9, 10 [and Attachment 3], 11)

29. Subsequent to the public hearing held on its application, AT&T investigated the feasibility of a location on the western portion of the Southbury Training School property that was suggested by Robert Woodside during the November 24 public hearing. AT&T's investigation concluded that a facility at this location could not provide sufficient coverage to the north and west on Lower River Road, South Street/River Road, and portions of Roxbury that would be targeted to be served by the proposed facility. (AT&T Post Hearing Supplemental Submission of Information Requested by the Siting Council, dated December 23, 2009)

30. Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies would not be practicable or feasible means of providing service within the area AT&T seeks to cover from the proposed facility. There are no equally effective and feasible technological alternatives to the construction of the proposed tower. (AT&T 1, p. 6)

Facility Description

- 31. The applicant's proposed facility is located at 316 Perkins Road on a 9.87-acre parcel owned by Elizabeth A. Archibald. The property is used as the residence of the property owner. It is located approximately 1,200 feet east of Southbury/Roxbury town line where Brown Brook Road in Southbury becomes South Street in Roxbury, approximately 3,300 feet east of Lower River Road in Roxbury, and 5,500 feet east of West Purchase Road. (AT&T 1, p. 8; Attachment 4 Photolog map)
- 32. The Archibald property is zoned R-80, a residential zoning district that requires a minimum lot size of 80,000 square feet. Wireless telecommunications towers are permitted in R-80 zoning districts by Special Exception. The Town of Southbury's zoning regulations list six possible locations for wireless towers in order of preference. New towers in residential districts are the least preferred location. (AT&T 1, pp. 9, 13; AT&T Bulk Filing Town of Southbury Zoning Regulations)
- 33. According to the Town of Southbury's zoning regulations, the proposed tower should be setback at least 170 feet from all property lines. The tower's proposed location is 145 feet from the Archibald property's northern property line and 160 feet from its southern property line. (AT&T 1, p. 14)
- 34. The town's zoning regulations stipulate that towers be designed to accommodate six carriers. The proposed tower would be designed to accommodate four carriers. (AT&T 1, p. 14)
- 35. On the Archibald property, AT&T would develop a 75-foot by 75-foot compound within a 100-foot by 100-foot lease area. The compound would include a 150-foot monopole tower and a 12-foot by 20-foot equipment shelter for AT&T's ground equipment. The compound would be enclosed by an eight-foot high chain link fence. (See Figure 3) (AT&T 1, p. 8; Attachment 3)
- 36. The proposed tower would be located at 41° 30' 22.27" north latitude and 73° 18' 10.36" west longitude. Its ground elevation would be 597.5 feet above mean sea level. (AT&T 1, Attachment 3 Site Evaluation Report; Tr. 1, pp. 9-10)
- 37. The proposed tower would be designed in accordance with the 2005 Connecticut State Building Code, the 2003 International Building Code, and the Electronic Industries Association Standard EIA/TIA-222-F, "Structural Standards for Steel Antenna Towers and Antenna Support Structures." It would be capable of supporting four levels of antennas. The base of the tower would be approximately four and a half feet in diameter. The top of the tower would be approximately two feet in diameter. (AT&T 1, Attachment 3 Facilities and Equipment Specification)

- 38. The proposed tower would be designed to be expandable by at least 20 feet. (Tr. 1, pp. 16-17)
- 39. AT&T would initially install up to six Powerwave 7770.0, or equivalent, antennas on a low profile platform at a centerline height of 147 feet above ground level (agl). The antennas are 55 inches high, 11 inches wide and 5 inches deep. (AT&T 1, p. 8; Attachment 3 Facilities and Equipment Specification)
- 40. AT&T would rely primarily on a diesel generator for backup power, but it would also have battery backup power to prevent a "re-boot" condition during the generator start-up delay period. The total run time of the backup generator would be approximately 114 hours. The generator's fuel tank would be a steel containment chamber lined with a bladder to contain fuel in the event of a fuel spill. (AT&T 2, Response 15)
- 41. Development of the proposed facility would require approximately 135 cubic yards of cut and approximately 436 cubic yards of fill. (AT&T 2, Response 13)
- 42. Vehicular access to the site would extend northerly from Perkins Road over the property owner's existing driveway and then over a new 12-foot gravel drive that would be approximately 87 feet long. (AT&T 1, pp. 8-9)
- 43. AT&T would adjust the location of its access road to preserve two cedar trees and two oak trees that would help shield the view of the compound from the nearest neighbors to the east. (Tr. 1, pp. 61-63)
- 44. Utilities would be extended above ground approximately 280 feet using existing utility poles on the host property that provide utility service to the Archibald residence. From the last existing pole, the utility service would be installed underground for a distance of approximately 190 feet to the facility compound. The underground utilities would generally follow the access drive. (AT&T 1, p. 9; Attachment 3 Sheet S-3; Tr. 1, pp. 17-18)
- 45. It is possible that rock could be encountered in the development of the proposed facility. It is likely that any rock encountered can be removed using mechanical methods. (AT&T 2, Response 14)
- 46. The proposed tower's setback radius would extend approximately five feet onto the adjacent property to the north, which is in the Town of Roxbury. (AT&T 1, Attachment 3 Overall Site Plan, Drawing S-3)
- 47. AT&T would design a yield point into the tower in order to effectively keep the setback radius contained on the host property. The yield point would be placed in a location that would ensure that the setback radius would remain on the host property even if the tower were to be extended. (Tr. 1, pp. 16 ff.)
- 48. There are 13 residences within 1,000 feet of the proposed tower's location. (AT&T 1, Attachment 3 Site Development Information)

- 49. The nearest residence to the proposed tower's location belongs to the property owner and is approximately 210 feet to the east. (AT&T 1, Attachment 3 Site Development Information)
- 50. The nearest occupied residence off of the Archibald property is located approximately 430 feet to the east. It is owned by Robert and Jurintha Fallow. (AT&T 1, Attachment 3 Site Development Information & Drawings S-1 and S-2)
- 51. There is a structure to the southeast of the proposed facility location that appears to be an unoccupied residence. The structure is located approximately 330 from the proposed tower's location. (Tr. 1, p. 11)
- 52. Land use in the general vicinity of the proposed facility consists primarily of low density residential development and undeveloped woodlands. (AT&T 1, Attachment 4, p. 1)
- 53. The estimated cost of the facility, excluding leasehold costs, is:

Tower and foundation costs	\$ 200,000
Site development costs	70,000
<u>Utility installation costs</u>	50,000
Total estimated costs	\$ 320,000

(AT&T 1, p. 17)

54. The estimated cost of AT&T's antennas, lines, and related equipment would be approximately \$300,000. (AT&T 2, Response 27)

Environmental Considerations

- 55. AT&T's proposed facility would have no effect on historic, architectural, or archaeological resources listed on or eligible for the National Register of Historic Places. (AT&T 1, Attachment 7 Letter from SHPO, dated December 11, 2008)
- 56. Based upon a review of the Connecticut Department of Environmental Protection's Natural Diversity Database, no known endangered or threatened species' habitats are located within the vicinity of the proposed facility. (AT&T 1, p. 10; Attachment 5 Southbury West #2040 NDDB Map)
- 57. The vegetation in the vicinity of the proposed facility is characterized as early successional forest and abandoned agricultural land currently dominated by small diameter trees and brush. (AT&T 2, Response 28 and Attachment 9)
- 58. AT&T would remove 43 trees with diameters of six inches or greater at breast height for the proposed facility. (AT&T 1, Attachment 3 Site Development Information)

- 59. The nearest wetland to the proposed facility is located approximately 240 feet to the northwest on an adjacent property in the Town of Roxbury. (AT&T 1, p. 16; Attachment 3 Drawings S-2 and S-3)
- 60. AT&T would establish and maintain soil erosion control measures and other best management practices throughout the construction of the proposed facility. These measures would be designed and employed in accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council for Soil and Water Conservation. (AT&T 1, p. 16)
- 61. AT&T utilized the FCC's TOWAIR program to determine if its proposed site would require registration with the Federal Aviation Administration (FAA). The results of this program indicated that no registration would be required and that the tower would not need any lighting or marking. (AT&T 1, pp. 11-12)
- 62. The cumulative worst-case maximum power density from the radio frequency emissions of AT&T's proposed antennas is calculated to be 0.0406 mW/cm² or 6.0% of the standard for Maximum Permissible Exposure, as adopted by the FCC, at the base of the proposed tower. This calculation was based on methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) that assumes all antennas would be pointed at the base of the tower and all channels would be operating simultaneously, which creates the highest possible power density levels. Under normal operation, the antennas would be oriented outward, directing radio frequency emissions away from the tower, thus resulting in significantly lower power density levels in areas around the tower. (AT&T 1, Attachment 3 Power Density Calculation for Proposed AT&T Antennas)

Visibility

- 63. The proposed tower would be visible year-round from approximately 72 acres within a two-mile radius of the site. (See Figure 7) (AT&T 1, Attachment 4, p. 4)
- 64. The visibility of the proposed tower from different vantage points in the surrounding vicinity is summarized in the following table. (See Figure 7)

Location	Visible Site	Approx. Portion of (150') Tower Visible (ft.)	Approx. Distance and Direction to Tower Site
1. – 205 Perkins Road	Yes	50'	1,400 feet; NW
2. – 225 Perkins Road	Yes	60'	1,270 feet; W
3. – Town Line Road	Yes	20'	8,900 feet; SE
4. – Berry Road, south of Minor Bridge Road	Yes	20'	8,300 feet; SE
5. – Town Line Road	Yes	20°	9,600 feet; SE
6. – Town Line Road, north of Minor Bridge Road	Yes	20'	8,800 feet; SE

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7. – 64 Minor Bridge Road	Yes	50'	5,600 feet; SE
8. – 129 Turrill Brook Road	Yes	40'	1,600 feet; NW

(AT&T 1, Attachment 4)

- 65. The majority of the area from which the tower would be visible year-round is open, undeveloped agricultural land located along an elevated ridgeline near the western limits of the area within a two-mile radius of the proposed site. (AT&T 1, Attachment 4, p. 4)
- 66. Other areas of year-round visibility include portions of Perkins Road, Berry Road, Minor Bridge Road, and Turrill Brook Road. (AT&T 1, Attachment 4, p. 4)
- 67. The tower would be visible year-round from at least portions of 11 residential properties. Five of these properties are located along Perkins Road; two properties are located along Town Line Road; two properties are located along Turrill Brook Road; and two residences are located along Minor Bride Road. (AT&T 1, Attachment 4, pp. 4-5)
- 68. The tower would be seasonally visible from approximately an additional 56 acres in the area within a two-mile radius of the site. (AT&T 1, Attachment 4, p. 5)
- 69. Areas of seasonal visibility include portions of Garnet Road, Perkins Road, Turrill Brook Road, Brown Brook Road, and Minor Bridge Road. (AT&T 1, Attachment 4, p. 5)
- 70. Approximately eight additional residential properties would have seasonal views of the tower. Four of these properties are located along Garnet Road; two properties are located along Turrill Brook Road; and two properties are located along Brown Brook Road. (See Chart in Finding No. 64) (AT&T 1, Attachment 4, p. 5; AT&T 2, Response 29)
- 71. Garnet Road, a locally-designated scenic roadway within the Town of Roxbury, is located adjacent to the host property. It is possible that that there would be limited seasonal views of the proposed tower from Garnet Road within the general vicinity of the Southbury/Roxbury town line. Such views would be mostly screened by existing vegetation, even during winter months. (AT&T 2, Response 30)

Existing and Proposed Wireless Coverage

- 72. AT&T is licensed to operate on the "B" band at cellular frequencies and on the "A3" band at PCS frequencies. (AT&T 2, Response 16; Tr. 1, p. 18-19)
- 73. There are approximately 14 miles of roads without existing adequate service within AT&T's coverage objective. (AT&T 2, Response 21)
- 74. From its proposed facility, AT&T would cover approximately 13 of the 14 miles of roads currently without adequate coverage. (AT&T 2, Response 22)

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- 75. The proposed facility would hand off signals to the AT&T site at 24 Dinglebrook Lane in Newtown, approved in Docket 376, and to a site for which there is currently a search ring in Roxbury. (AT&T 2, Response 24)
- 76. The 24 Dinglebrook Lane site in Newtown is approximately 2.45 miles from the proposed facility, and the site in Roxbury is approximately 3.19 miles from the proposed facility. (AT&T 3, Response 2)
- 77. AT&T designs its system for -82 dBm for in-vehicle coverage and -74 dBm for in-building coverage. (AT&T 2, Response 17)
- 78. AT&T's existing signal strength in the area that would be covered by the proposed facility varies from -82 dBm to less than -105 dBm. (AT&T 2, Response 18)
- 79. At a best signal level of -74 dBm, AT&T would cover 4.1 square miles from the proposed facility at cellular frequencies. At a best signal level of -82 dBm, AT&T would cover 8.7 square miles at cellular frequencies. At a best signal level of -92 dBm, AT&T would cover 23.2 square miles at cellular frequencies. (AT&T 2, Response 20; Tr. 1, p. 19)
- 80. The minimum height at which AT&T could achieve its coverage objectives at the proposed site would be 150 feet. (AT&T 2, Response 25)

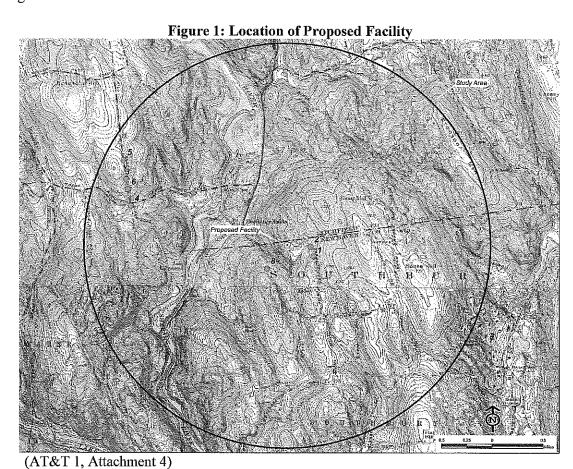
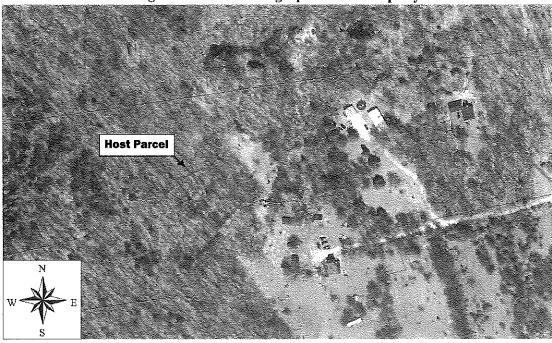
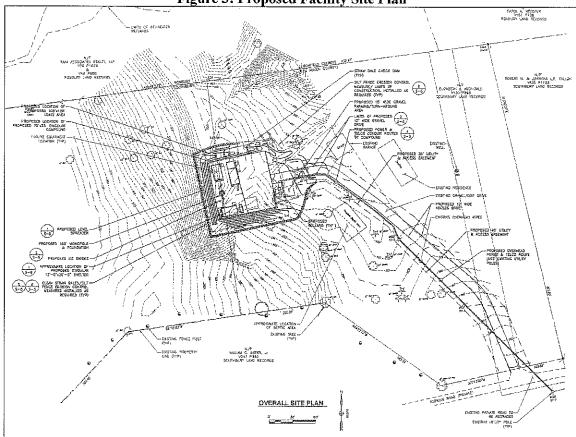


Figure 2: Aerial Photograph of Host Property

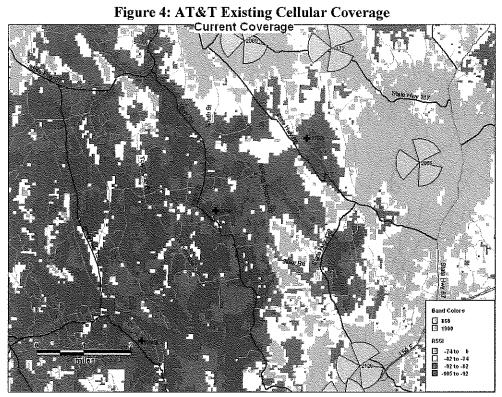


(AT&T 1, Attachment 3)

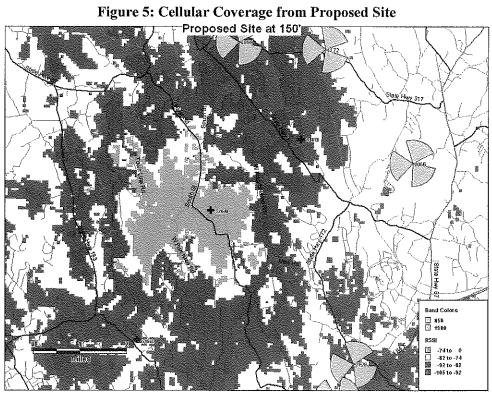
Figure 3: Proposed Facility Site Plan



(AT&T 1, Attachment 3)

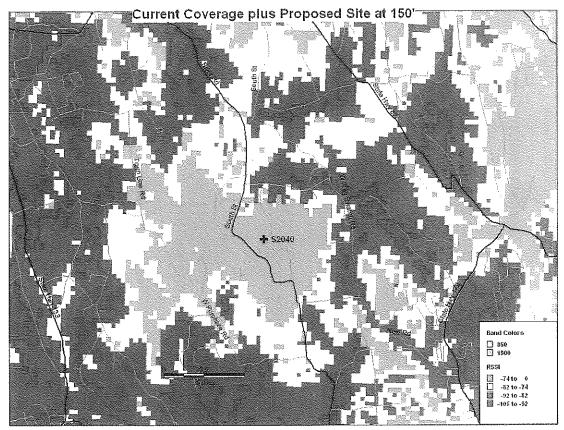


(AT&T 1, Attachment 1)



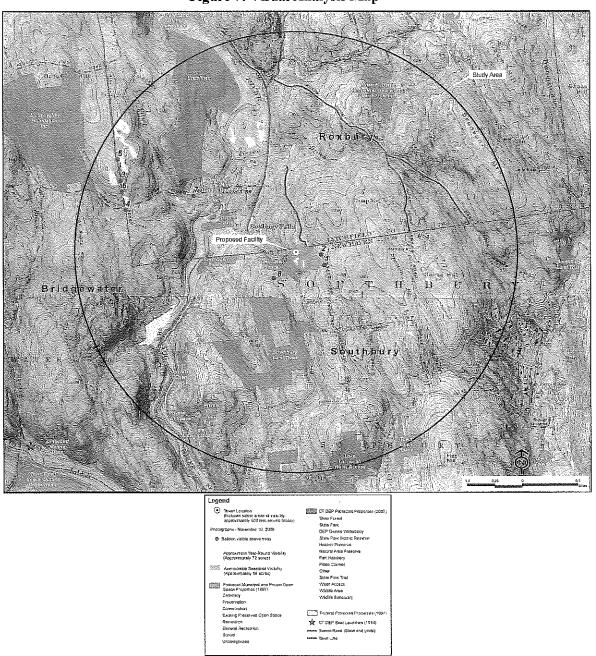
(AT&T 1, Attachment 1)

Figure 6: Coverage with Proposed Site



(AT&T 1, Attachment 1)

Figure 7: Visual Analysis Map



(AT&T 1, Attachment 4 – Visual Resource Evaluation Report)