

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE  
NORTHEAST, LLC, FOR A  
CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED  
FOR A TELECOMMUNICATIONS FACILITY  
AT 23 STONYBROOK ROAD IN THE TOWN  
OF STRATFORD, CONNECTICUT

DOCKET NO. 385

Date: November 12, 2009

**INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL  
FROM APPLICANT T-MOBILE NORTHEAST, LLC**

The Applicant, T-Mobile Northeast, LLC ("T-Mobile"), submits the following responses to the first set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council in connection with the above-captioned Application.

1. Did T-Mobile receive all of the return receipts for the abutting landowners listed in Application Attachment G? If not, list the abutters that did not receive notice and describe any additional effort to serve notice. When was the abutter list compiled?  
**A1 T-Mobile has received all but three of the return receipts for the abutting landowners listed in the Application. Those that remain outstanding include the following: (1) Jose A. Miranda of 55 Stonybrook Road; (2) Elizabeth Nelson and Gary L. Takacs, II of 56 Stonybrook Road; and (3) Robin M. Lalond of 46 Stonybrook Road. On October 27, 2009, T-Mobile issued a second notice to these abutters and has not received return receipts as of the date of these interrogatory responses. T-Mobile compiled the abutter list on or about July 16, 2009.**
  
2. What is the size of the site parcel (Lot 13)? What is the size of Lot 12 and Lot 16?  
**A2 According to the Stratford Tax Assessor's Office, the lot sizes are as follows:  
Lot 16 = 0.46 +/- Ac.  
Lot 12 = 0.11 +/- Ac.  
Lot 13 = 0.15 +/- Ac.  
Total = 0.72 +/- Ac = 0.73 Ac**

3. What is the height of the retain building at 23 Stonybrook Road?
- A3 The height of the building at 23 Stonybrook Road is 14'10" above grade level.**
4. Please submit a diagram showing the search ring for this site. When was the search ring established? Were the other immediate adjacent sites on-line when the search ring was established?
- A4 Because of internal technical difficulties, T-Mobile is unable to access its search ring information. T-Mobile will disclose this information to the Council immediately after resolving these issues.**
5. Were any other photos taken during the preparation of the visibility analysis? If so, please submit.
- A5 All of the photographs taken by Vanasse Hangen Brustlin, Inc. are included in the Visual Resource Evaluation Report, attached to the Application as Exhibit M.**
6. Estimate the number of residential structures within the area marked as seasonably visible on the visibility analysis.
- A6 There are approximately forty-seven residential structures with partial seasonal views. These residential structures are located within 0.20 miles of the telecommunications facility proposed at 23 Stonybrook Road, Stratford, CT ("Facility") along Stonybrook Road, Broadbridge Avenue, Barnum Terrace, Klondike Street, Vielie Street and Light Street. It is estimated that most of these views of the Facility from these properties would be largely obstructed and limited to the upper third of the tower.**
7. Application Attachment P contains correspondence addressed to the Stratford P&Z Commission and the Stratford Historical Society. Was any response received to date? If so, please provide correspondence or summarize verbal communications.
- A7 T-Mobile has not received any response to its correspondence addressed to the Stratford Planning & Zoning Commission and the Stratford Historical Society. However, on May 28, 2009, T-Mobile submitted a technical report to the First Selectman regarding the Facility. The technical report included specifics about the Facility, the property that would host the Facility, the site selection process and the environmental effects of the proposed Facility. The Town did not respond to T-Mobile's numerous requests for a consultation regarding the Facility.**

8. What is T-Mobile's minimum signal level threshold for in-building and in-vehicle use?
- A8 T-Mobile's minimum design thresholds are -84 dBm for in-vehicle coverage and -76 dBm for in-building coverage.**
9. What is the current signal strength in the target service area?
- A9 The current signal strength in the target service area ranges from -76 dBm to below -100dBm. The signal strength varies throughout the target service area because of the relative proximity to existing on-air sites and because of the local terrain and clutter obstructions.**
10. Did T-Mobile perform a site drive test or base line drive test for the area? If yes, please provide.
- A10 T-Mobile continually drives its on-air sites for network analysis and propagation model tuning purposes. Attached hereto as Attachment A is a baseline plot depicting the most recent drive test data. Also included in Attachment A is a coverage plot showing existing coverage. These plots depict coverage refined with the new drive test data and upgraded model and update the propagation plots filed with the Application (Exhibit H).**
11. Provide coverage plots, using the scale and thresholds in Application Attachment H that depicts coverage from existing/approved T-Mobile sites and the proposed site at tower maximum tower height of 90 feet.
- A11 Attached hereto as Attachment B are coverage plots depicting coverage from a facility at a height of 90 feet (in lieu of the proposed 100 feet). To minimize the visual impact of the Facility, T-Mobile has proposed a unipole structure with the antennae concealed within. To provide adequate coverage for the intended area, however, T-Mobile would require two antenna arrays, located within the unipole tower at 97 and 87 feet respectively. See the Site Plan, Southern Elevation Detail, Sheet SP-2, included as Exhibit B to the Application. T-Mobile would utilize one antenna array for GSM (Global System Mobile Communication) and the other array for UTMS (Universal Telecommunications Mobile System). The plots attached hereto demonstrate the Facility's coverage with antenna arrays at 97 feet and 87 feet. Although not requested, please find attached plots at a height of 77 feet depicting the significant loss in coverage at that height.**
12. Does T-Mobile currently use fuel cells as back up generators at any of its Connecticut tower sites? If yes, identify such sites?

- A12 T-Mobile installed a fuel cell for its telecommunications facility located at 82 North Eagleville Road, Storrs, Connecticut.**
13. Does T-Mobile plan to use a fuel cell at the proposed site or have any plans to install a fuel cell at any existing or future sites in Connecticut?
- A13 T-Mobile does not plan to use a fuel cell at the proposed Facility. T-Mobile does not have any current plans to install fuel cells at any of its existing or future sites in Connecticut.**

Respectfully submitted,

**T-MOBILE NORTHEAST, LLC**

By: 

Julie D. Kohler, Esq.  
Jesse A. Langer, Esq.  
Cohen and Wolf, P.C.  
1115 Broad Street  
Bridgeport, CT 06604  
Tel. (203) 368-0211  
Fax (203) 394-9901  
[jkohler@cohenandwolf.com](mailto:jkohler@cohenandwolf.com)  
[mfrank@cohenandwolf.com](mailto:mfrank@cohenandwolf.com)  
[jlanger@cohenandwolf.com](mailto:jlanger@cohenandwolf.com)

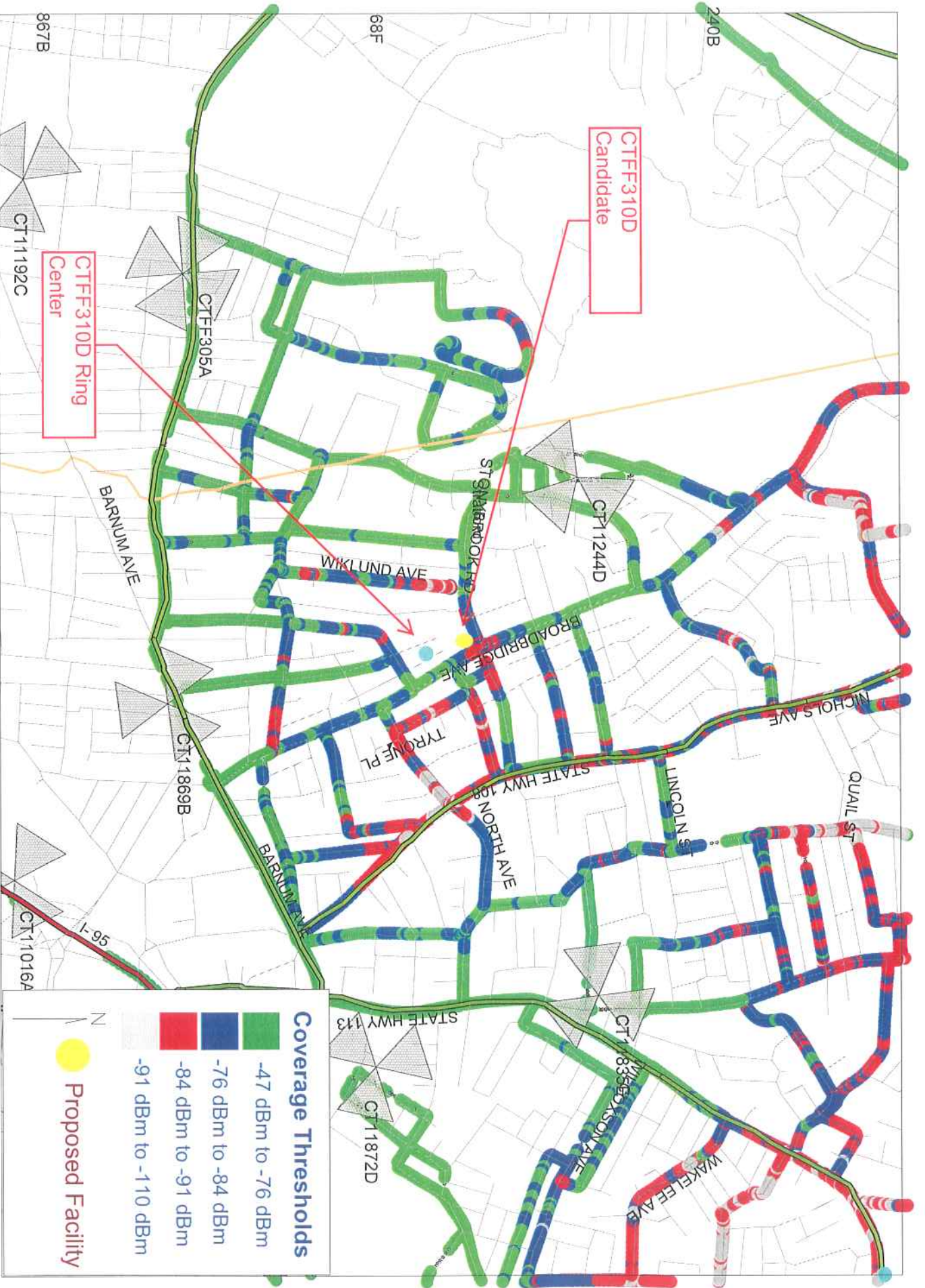
CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by regular mail, postage prepaid, to all parties and interveners of record, as follows:

N/A

  
\_\_\_\_\_  
Jesse A. Langer

# **ATTACHMENT A**



CTFF310D  
Candidate

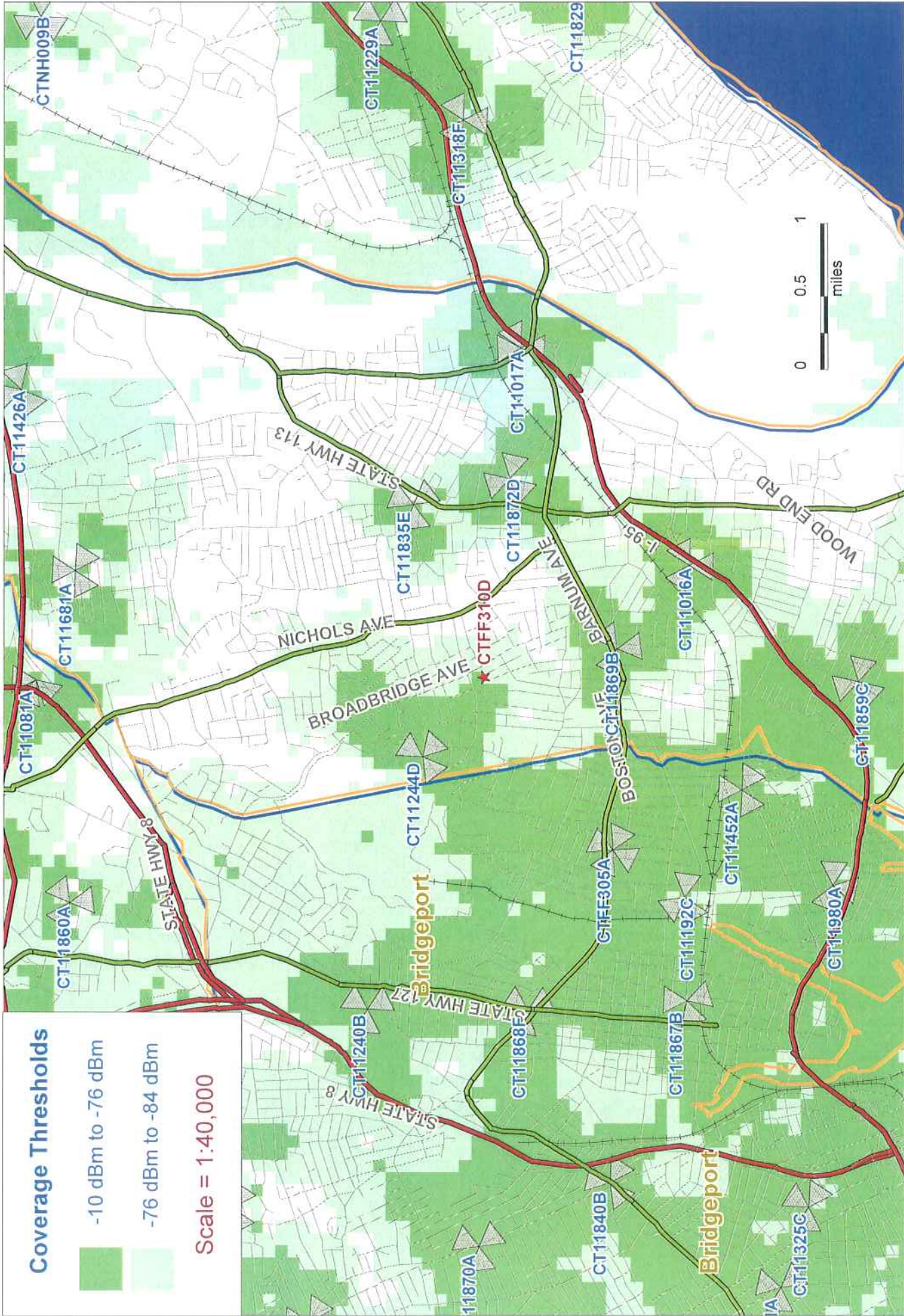
CTFF310D Ring  
Center

**Coverage Thresholds**

- █ -47 dBm to -76 dBm
- █ -76 dBm to -84 dBm
- █ -84 dBm to -91 dBm
- █ -91 dBm to -110 dBm

● Proposed Facility

Stratford Existing Coverage (CTFF310)



Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage

- **T-Mobile** - Existing T-Mobile On Air Coverage



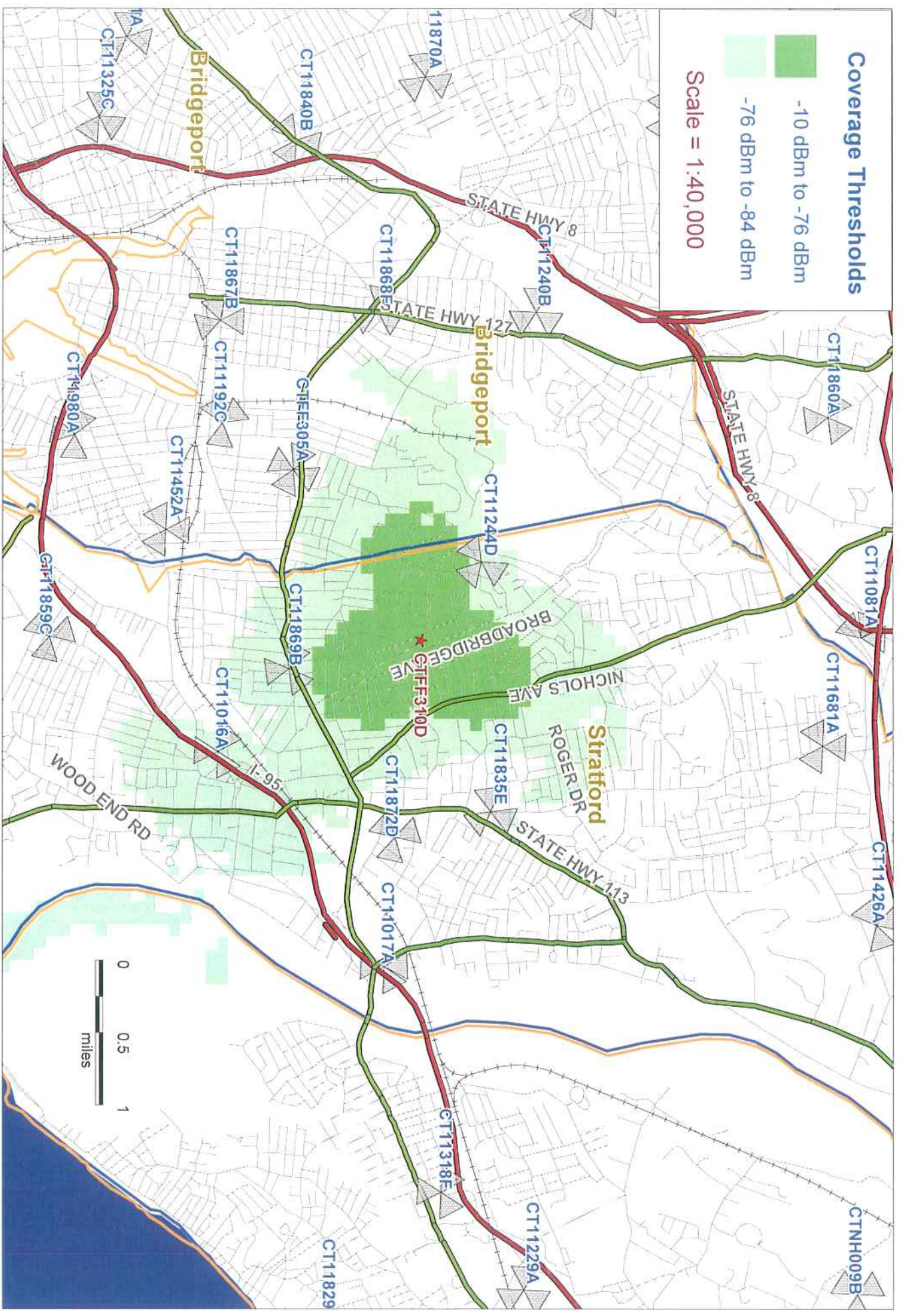


# **ATTACHMENT B**

**Coverage Thresholds**

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

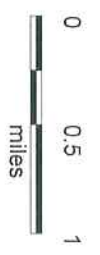
Scale = 1:40,000

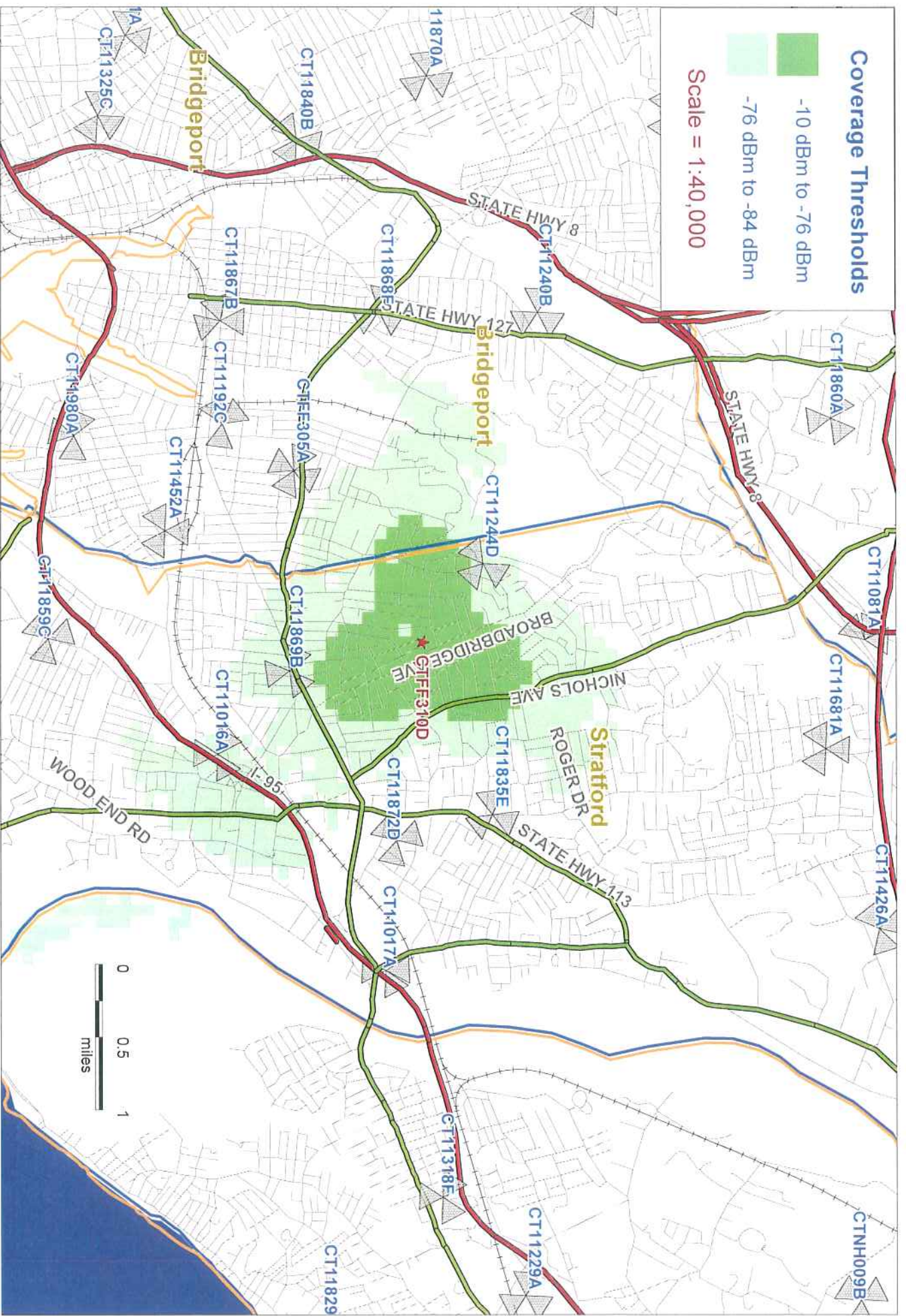


**T-Mobile**

T-Mobile Proposed CTFF310D @ 97'

Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage





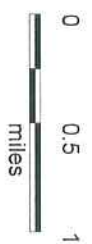
**Coverage Thresholds**

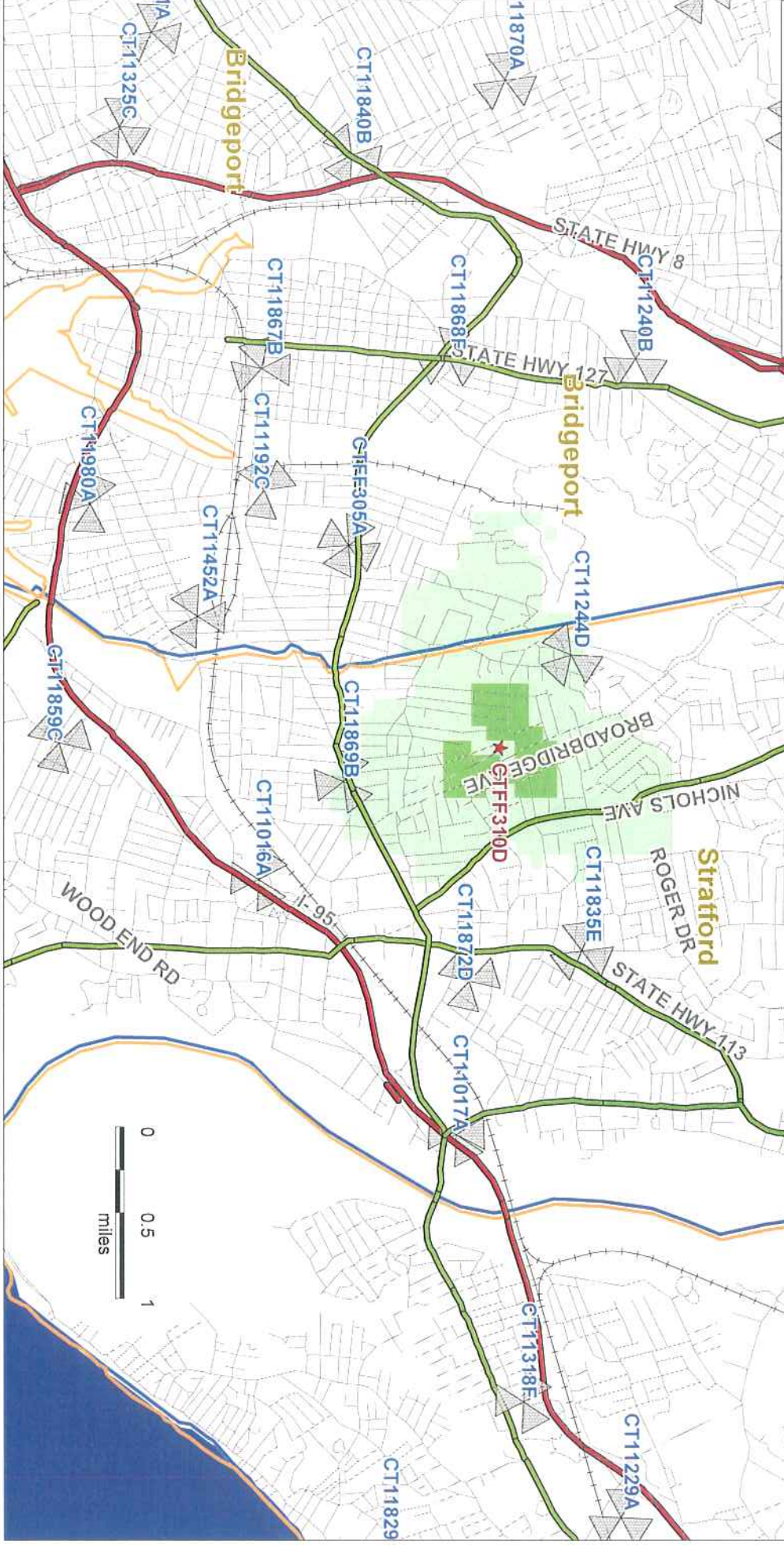
- 10 dBm to -76 dBm
  - 76 dBm to -84 dBm
- Scale = 1:140,000

**-T-Mobile--**

T-Mobile Proposed CTFF310D @ 87'

Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage





**- T-Mobile -**

T-Mobile Proposed CTFF310D @ 77'

Coverage Thresholds

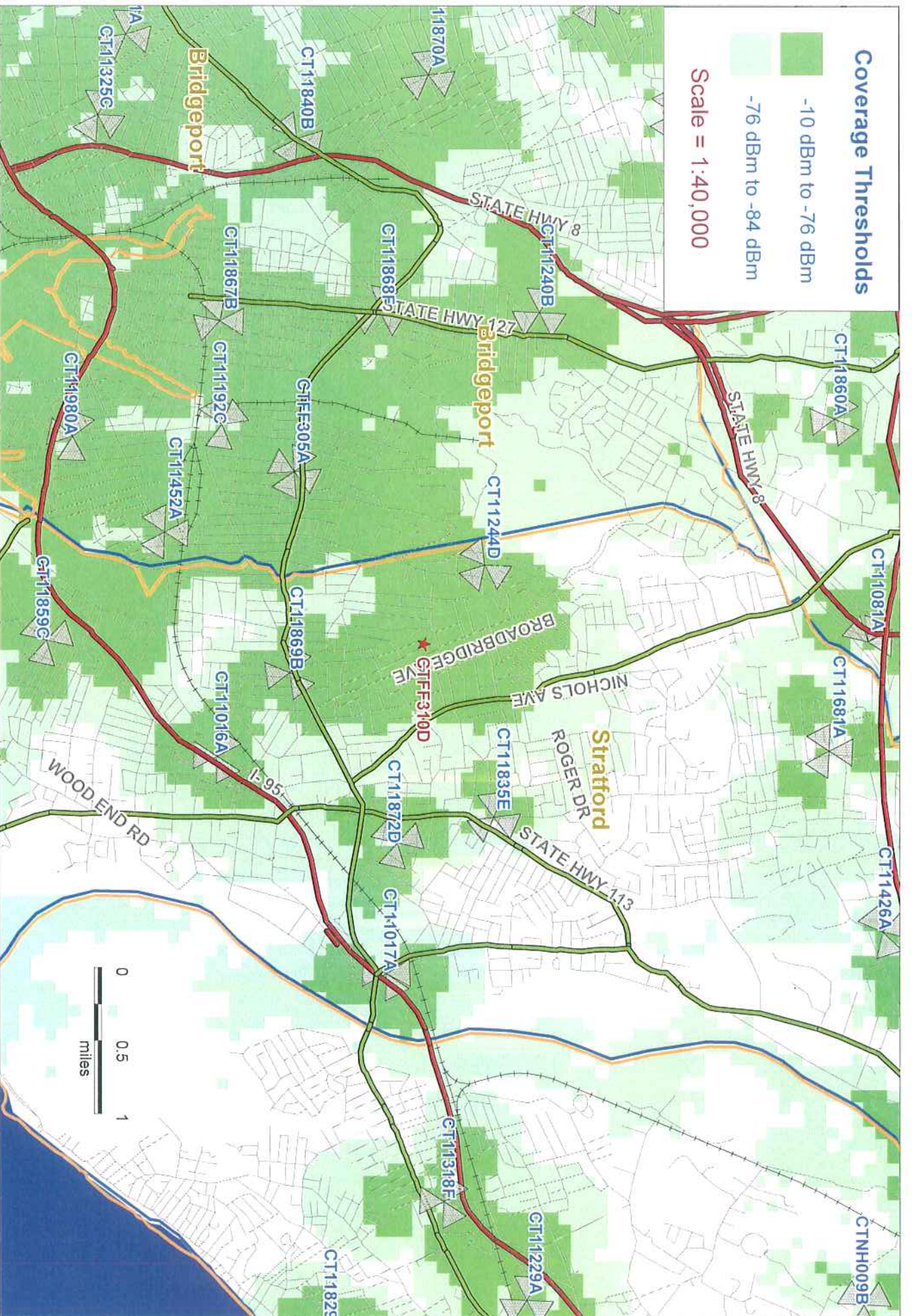
- Dark Green - In Building Coverage
- Light Green - In Vehicle Coverage

### Coverage Thresholds

-10 dBm to -76 dBm

-76 dBm to -84 dBm

Scale = 1:40,000



**-T-Mobile-**

Existing T-Mobile On Air Coverage  
With CTF310D @ 97'

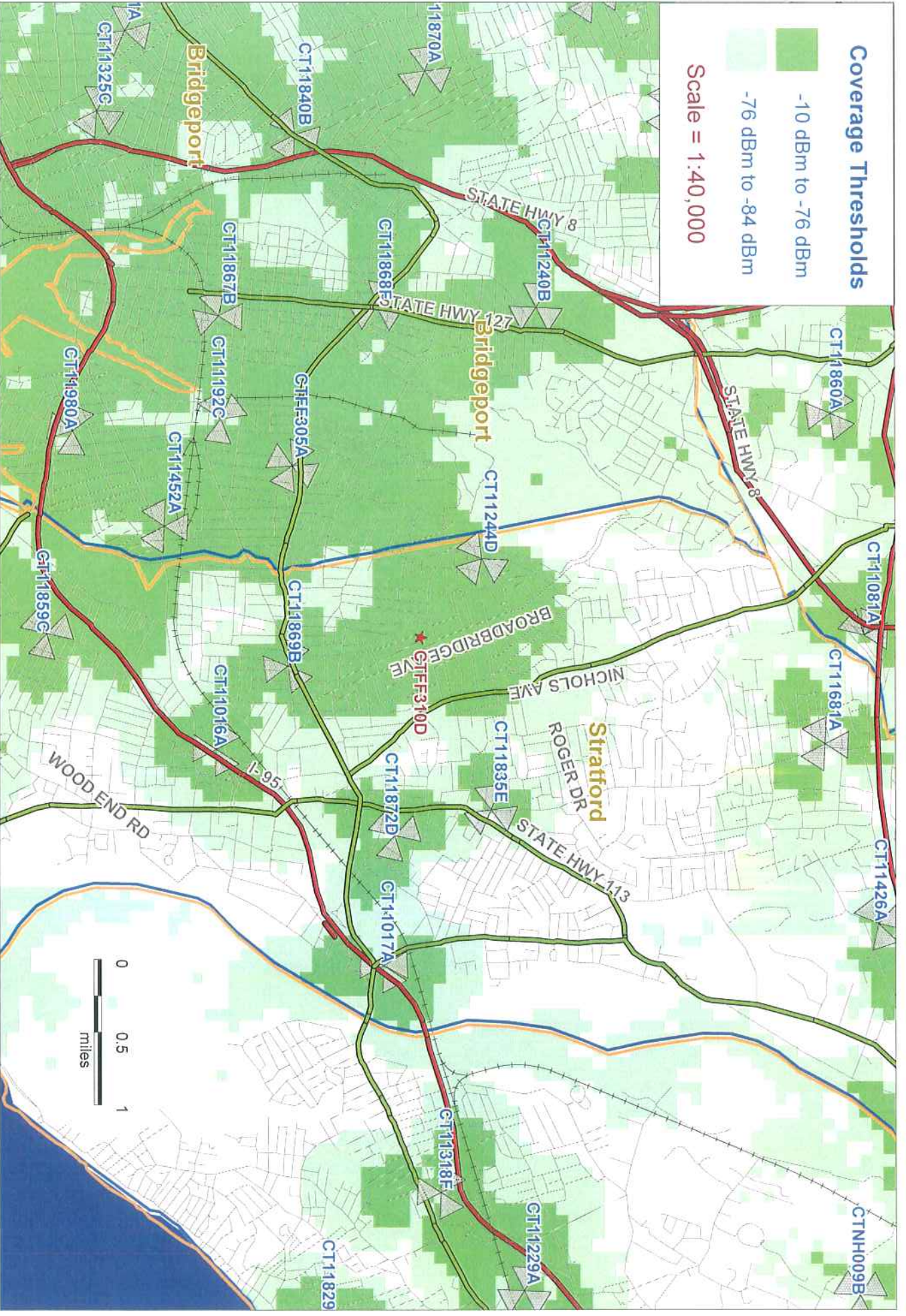
Coverage Thresholds  
Dark Green - In Building Coverage  
Light Green - In Vehicle Coverage

### Coverage Thresholds

-10 dBm to -76 dBm

-76 dBm to -84 dBm

Scale = 1:40,000



## -T-Mobile-

Existing T-Mobile On Air Coverage  
With CTFF310D @ 87'

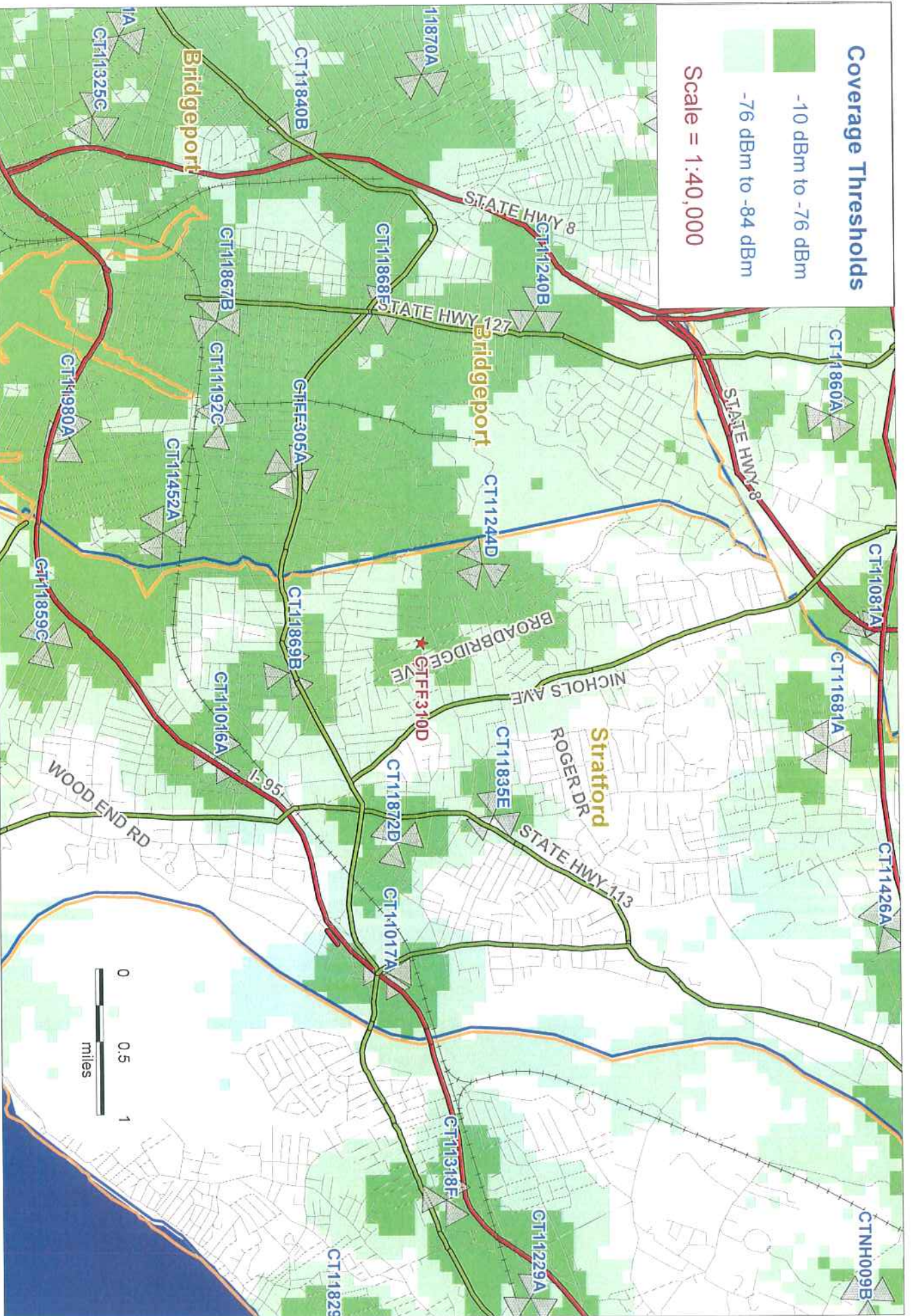
Coverage Thresholds  
Dark Green - In Building Coverage  
Light Green - In Vehicle Coverage

### Coverage Thresholds

-10 dBm to -76 dBm

-76 dBm to -84 dBm

Scale = 1:40,000



**T-Mobile**

Existing T-Mobile On Air Coverage  
With CTF310D @ 77'

Coverage Thresholds  
Dark Green - In Building Coverage  
Light Green - In Vehicle Coverage