

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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February 10, 2010

TO:

Parties and Intervenors

FROM:

S. Derek Phelps, Executive Director

RE:

DOCKET NO. 385 – Omnipoint Communications, Inc. application for a

Certificate of Environmental Compatibility and Public Need for the construction,

maintenance and operation of a telecommunications facility located at 23

Stonybrook Road, Stratford, Connecticut.

As stated at the hearing in Stratford on December 8, 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 by February 23, 2010.

SDP/RDM/jbw

Enclosure



LIST OF PARTIES AND INTERVENORS $\underline{SERVICE\;LIST}$

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Status Granted	Service	(name, audress & phone number)	(name, address & phone number)
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DOCKET NO. 385 – T-Mobile Northeast LLC application for a Connecticut

Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility located at 23 Stonybrook Road, Stratford, Connecticut.

Stratford, Connecticut.

Connecticut

Siting

Council

DRAFT Findings of Fact

Introduction

- T-Mobile Northeast LLC (T-Mobile), in accordance with the provisions of Connecticut General Statutes (CGS) §§ 16-50g through 16-50aa, applied to the Connecticut Siting Council (Council) on September 2, 2009 for the construction, operation, and maintenance of a 100-foot wireless telecommunications facility located at 23 Stonybrook Road in Stratford, Connecticut. (T-Mobile 1, p. 1)
- 2. T-Mobile is a Delaware corporation with an office in Bloomfield, Connecticut. T-Mobile is licensed by the Federal Communications Commission (FCC) to construct and operate a personal wireless service system in Connecticut. (T-Mobile 1, p. 2)
- 4. The purpose of the proposed facility is to provide wireless service for T-Mobile to residential areas in the area of Broadbridge Road, Franklin Avenue, and Route 108 north of Route 1 in Stratford. (T-Mobile 1, pp. 4-5)
- 5. Pursuant to CGS § 16-50m, the Council, held a public hearing on December 8, 2009, beginning at 3:00 p.m. and continuing at 7:00 p.m. at the Birdseye Municipal Complex, 468 Birdseye Street, Stratford, Connecticut. (Transcript 1 12/08/09, 3:00 p.m. [Tr. 1], Tr. 1, p. 2; Transcript 2 12/08/09, 7:15 p.m. [Tr. 2], p. 2)
- 6. The Council and its staff conducted an inspection of the proposed site on December 8, 2009, beginning at 2:00 p.m. The applicant flew a four-foot diameter balloon at the site from 12:00 p.m. to 4:30 p.m. to simulate the height of the proposed tower. The balloon was flown at its intended height of 100 feet above ground level (agl) during the field review. (T-Mobile 6)
- 7. Notice of the application was sent to all abutting property owners by certified mail. Three notices were unclaimed. Public notice of the application was published in the <u>Connecticut Post</u> on July 26 and July 28, 2009. (T-Mobile 1, Tab F; T-Mobile 2, Q. 1)
- 8. T-Mobile installed a four-foot by six-foot sign on the property at the intersection of Stonybrook Road and Broadbridge Avenue. The sign presented information regarding the proposed project and Council's public hearing. (T-Mobile 3)
- 9. Pursuant to CGS § 16-50l(b), T-Mobile provided notice to all federal, state and local officials and agencies listed therein. (T-Mobile 1, Tab E)

State Agency Comment

- 10. Pursuant to General Statutes § 16-50j(h), on October 28, 2009 and December 9, 2009, the following State agencies were solicited to submit written comments regarding the proposed facility: Department of Environmental Protection (DEP), Department of Public Health (DPH), Council on Environmental Quality (CEQ), Department of Public Utility Control (DPUC), Office of Policy and Management (OPM), Department of Economic and Community Development (DECD), the Department of Transportation (DOT) and the Department of Agriculture (DOAg). (Record)
- 11. The Council received a written response from the DOT's Bureau of Engineering and Highway Operations on December 1, 2009, stating that the DOT had no comment. (Record)
- 12. No response was received from the DPH, DOAg, DEP, CEQ, DPUC, OPM, or DECD. (Record)

Municipal Consultation

- 13. T-Mobile submitted a technical report to James Miron, Mayor of the Town of Stratford, on May 28, 2009. T-Mobile discussed the project with Gary Lorenston, Planning and Zoning Administrator, and Brian Carey, Conservation Administrator, on July 28, 2009. (T-Mobile 1, p. 17; T-Mobile 3, Vergati Q. 9)
- 14. The Town did not comment on the proposal. (T-Mobile 1, p. 17; T-Mobile 3, Vergati Q. 9)
- 15. T-Mobile offered the town lease-free space on the tower for municipal service antennas. The town did not respond to this offer. (T-Mobile 1, p. 8; T-Mobile 3, Vergati Q. 10; Tr. 1, pp. 21-22)

Public Need for Service

- 16. In 1996, the United States Congress recognized a nationwide need for high quality wireless telecommunications services, including cellular telephone service. Through the Federal Telecommunications Act of 1996, Congress seeks to promote competition, encourage technical innovations, and foster lower prices for telecommunications services. (Council Administrative Notice Item No. 7)
- 17. In issuing cellular licenses, the Federal government has preempted the determination of public need for cellular service by the states, and has established design standards to ensure technical integrity and nationwide compatibility among all systems. T-Mobile is licensed by the FCC to provide wireless service to Fairfield County. (Council Administrative Notice Item No. 7; T-Mobile 1, p. 6)
- 18. The Telecommunications Act of 1996 prohibits local and state entities from discriminating among providers of functionally equivalent services. (Council Administrative Notice Item No. 7)
- 19. The Telecommunications Act of 1996, a Federal law passed by the United States Congress, prohibits any state or local entity 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 Item No. 7)

- 20. In an effort to ensure the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (Enhanced 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. (T-Mobile 1, pp. 5-6)
- 21. The site would provide Enhanced 911 service to the proposed service area. (T-Mobile 1, p. 6)

T-Mobile - Existing and Proposed Wireless Coverage

- 22. T-Mobile is licensed by the FCC to provide service in the 1900 MHz frequency range. (T-Mobile 3 Heffernan, Q. 5)
- 23. T-Mobile designs and operates at the following signal-level thresholds: in-vehicle service is -84 dBm and in-building service is -76 dBm. (T-Mobile 3 Heffernan, Q. 6)
- 24. T-Mobile currently has degraded coverage along portions of North Avenue, Nichols Avenue, Broadbridge Avenue, Wiklund Avenue, London Terrace and surrounding areas with signal levels ranging from -84 dBm to -110 dBm (refer to Figures 6 & 7). The area is predominately residential. (T-Mobile 2, Q. 10; Tr. 1, pp. 85-86)
- 25. T-Mobile experiences a drop-call percentage of 1.4% in the proposed service area. Some characteristics of degraded service that are not quantified as part of drop-call statistics include delayed calls, calls that do not connect and poor call quality. (T-Mobile late file 01/07/10; Tr. 1, pp. 87-89)
- 26. Installing antennas at 97 feet agl would provide reliable service to the proposed service area. The coverage footprint is approximately 3.5 square miles at -84 dBm. Approximately 2.4 square miles of this coverage would be in areas served by adjacent T-Mobile facilities; thus an additional 1.9 square miles of adequate coverage would be provided by the site in the proposed service area (refer to Figure 8). (T-Mobile 2, Q. 10; Tr. 2, pp. 29-30)
- 27. The proposed site would draw some call traffic off adjacent T-Mobile facilities, thus enhancing inbuilding service in areas currently served by these facilities. (Tr. 1, pp. 19-20)
- 28. Reducing the tower height to 90 feet would cause a slight degradation of coverage along the periphery of the coverage footprint for both in-vehicle and in-building coverage (refer to Figure 9). In-building coverage would be reduced along the east edge of the coverage footprint including the Summer Street-Johnson Avenue area, the Nichols Avenue-North Avenue area, Nichols Avenue-Meadowbrook Road area, and the Legion Avenue area. (T-Mobile 3, Q. 10)

Site Selection

- 29. T-Mobile established a search ring for the proposed service area in September of 2005. The search was centered in the Broadbridge Avenue and Stonybrook Road area. (T-Mobile 3, Vergati Q. 6)
- 30. The search for a site that would improve service included the possibility of modifying existing adjacent T-Mobile facilities, identification of potential structures that could be used for telecommunications purposes, and the examination of area properties, including municipal parcels, to identify potential telecommunications sites. (T-Mobile 1, p. 7; Tr. 1, pp. 62-66)

- 31. Stonybrook Park, a town park, is located south of the proposed site. The town was not interested in leasing space there for a telecommunications facility. (T-Mobile 1, Tab B; Tr. 1, p. 30)
- 32. The nearest T-Mobile facilities to the proposed site include a rooftop facility at the Sikorsky property, approximately 0.7 miles to the northeast, and a rooftop facility on Barnum Drive, approximately 0.8 miles to the south. Coverage from these sites or other nearby sites does not extend to the proposed service area. (T-Mobile 1, Tab J; Tr. 1, pp. 56-58, 63, 66-67)
- 33. T-Mobile did not identify any structures in the search area that would be suitable for a telecommunications facility. (T-Mobile 1, Tab J)
- 34. After determining there were no viable structures within the search area, T-Mobile searched for properties suitable for tower development. T-Mobile investigated six different locations and selected one for tower development. The five rejected locations and reasons for their rejection are as follows:
 - a) 2336 Broadbridge Avenue parcel too small to accommodate a tower (0.37-acre) and rooftop too low for a roof mount (20 feet agl);
 - b) Sikorsky Facility, 3191 Broadbridge Avenue T-Mobile has a rooftop facility at this location;
 - c) 1700 Broadbridge Avenue would not meet coverage objectives;
 - d) 55 Singer Court— too close to Sikorsky facility, coverage would be redundant;
 - e) Northeast Utilities transmission tower on Line # 1710– would not meet coverage objectives. (T-Mobile 1, Tab J)
- 35. Two other properties mentioned as possible candidates during the hearing, Remington Woods, a condominium development, approximately 0.6 miles northwest of the site, and Clover Field, a town park approximately 0.5 miles southeast of the site, are in areas already served by existing T-Mobile facilities. (Council Administrative Notice Item No. 17; Tr. 2, pp. 32-34, 41-42)
- 36. The search ring was not centered along Nichols Avenue (approximately 2,000 feet east of the site) since the general area there is zoned residential with small lots. Larger parcels in the area consist of town-owned education facilities. The town was not responsive to leasing any town property for telecommunications facilities. (T-Mobile 1 b, Zoning Map; T-Mobile late file 01/07/10; Tr. 1, p. 30; Tr. 2, p. 24)

Facility Description

- 37. The proposed facility is located on a 0.73-acre parcel identified as 23 Stonybrook Road, Stratford. The parcel consists of three different tax lots: lots 12, 13 and 16. The tower site would be located in the southwest corner of the parcel, on tax lot 13 (refer to Figures 1 & 2). Bruce Brook is located immediately to the southeast on town property. (T-Mobile 1, Tab B; T-Mobile 2, Q. 2)
- 38. The tower is approximately 28 feet north of property owned by the Town of Stratford that is identified as a right-of-way for Ruth Street. Stonybrook Park is south of the right-of-way. The tower is 31 feet east of the Miranda property. (T-Mobile 1, Tab B)
- 39. The parcel is zoned heavy commercial (CC). (T-Mobile 1, p. 9)
- 40. The parcel contains a two-story commercial building, approximately 15 feet above grade, fronting Stonybrook Road. Paved parking areas and access ways surround the building. The tower site would be located approximately 110 feet south of the existing building, in a paved area used to store dumpsters. (T-Mobile 1, Tab B, Tab M; T-Mobile 2, Q. 3)

- 41. T-Mobile proposes to construct a 100-foot unipole at the site. A unipole is a monopole that conceals flush-mounted panel antennas within a fiberglass type casing. The tower would be designed in accordance with the Electronic Industries Association Standard ANSI/TIA-222-F. (T-Mobile 1, p. 8, Tab B)
- 42. The tower is approximately 82 feet east of the Miranda residence and 120 feet southeast of the Torres residence at 65 Stonybrook Road. (T-Mobile 1, Tab B; Tr. 1, p. 102)
- 43. The tower setback radius would extend onto the Miranda property by 69 feet and onto town property by 72 feet. The tower could be designed with a pre-engineered fault to prevent encroachment onto these adjacent properties in the event of a tower failure. (T-Mobile 1, Tab B; T-Mobile 3, Q. 11; Tr. 1, p. 102)
- 44. T-Mobile proposes to paint the unipole white. (T-Mobile 1, Tab 10; Tr. 1, p. 28)
- 45. The unipole would be able to support three levels of flush-mounted panel antennas. The flush-mount design can only accommodate three panel antennas at each level. The tower would be constructed in accordance with the Electronic Industries Association standard ANSI/TIA-222-F. (T-Mobile 1, p. 8, Tab B)
- 46. T-Mobile proposes to install three panel antennas at the 97-foot and 87-foot levels of the tower. The 77-foot level of the tower would be available to another telecommunications carrier. (T-Mobile 1, Tab B)
- 47. Clearwire, a telecommunications provider operating in Connecticut, is interested in the 77-foot level of the tower. Clearwire is conducting tests to confirm if the site fits into their coverage network. Clearwire typically uses flat-panel antennas and round dish antennas in their network, but their requirements at this site are unknown. T-Mobile would be willing to construct a regular monopole with antennas flush-mounted on the exterior of the tower to provide mounting flexibility for Clearwire. The exterior flush mounts would also allow T-Mobile to make minor modifications to their antennas, such as tilt, to increase site performance, if necessary. (T-Mobile 1, p. 6; Tr. 1, pp. 24-26, 92-94; Tr. 2, pp. 27-28)
- 48. The top diameter of the unipole would be 26 to 30 inches. The top diameter of a monopole with exterior flush-mounted antennas would be 18 to 21 inches. (Tr. 1, pp. 92-93)
- 49. Whip antennas, typically used for municipal emergency services, could be accommodated on a unipole or a regular monopole. (Tr. 1, pp. 22-23)
- 50. T-Mobile proposes to construct a 26-foot by 50-foot equipment compound at the base of the tower, sufficient to accommodate ground equipment for T-Mobile and one other carrier. T-Mobile would install three equipment cabinets on a concrete slab within the compound. (T-Mobile 1, Tab B)
- 51. An eight-foot high chain link fence would enclose the compound. (T-Mobile 1, p. 8)
- 52. Four trash bins are located in the area where the compound is proposed. The bins would be re-located exterior to the northeast side of the compound, partially blocked from view from the west by the compound and a wood fence. (T-Mobile 1, Tab B; Tr. 2, p. 38)
- 53. Access to the compound would be from an existing parking lot on the property. (T-Mobile, 1, Tab B)

- 54. T-Mobile anticipates a technician would visit the site once every four weeks to service equipment. (T-Mobile 1, p. 13)
- 55. Overhead utilities would service the compound from existing service on Stonybrook Road. A new pole would be installed east of the compound. T-Mobile could install the utilities underground. (T-Mobile 1, Tab B; Tr. 1, p. 98)
- 56. The compound is oriented in a north-south direction along the west property line (Miranda property). The compound is approximately 12 feet from the property line. (T-Mobile 1, Tab B)
- 57. T-Mobile could relocate the compound in an east-west orientation to increase the distance from the tower to the adjacent property line by 50 feet. (Tr. 1, pp. 95-98; Tr. 2, pp. 13, 37-38)
- 58. If the compound was relocated, the trash bins would be placed behind the commercial building on the site and enclosed by fencing to the west, obscuring direct views from the street and from properties to the west. (Tr. 2, pp. 38-39)
- 59. There are 263 residential units (single family, two-family) within 1,000 feet of the tower site. (T-Mobile 1, Tab L)
- 60. Land use within a quarter-mile of the site consists of residential, recreational (town park), and several commercial properties. (T-Mobile 1, Tab B, Tab P)
- 61. The tower site is located at an elevation of 77 feet above mean sea level (amsl) at 41° 12' 11.8" north latitude and 73° 08' 55" west longitude. Surrounding terrain is generally flat to rolling. Trees in the area range from 55 to 65 feet in height. (T-Mobile 1, Tab M; Tr. 1, p. 34)
- 62. The estimated construction cost of the facility is:

Tower and foundation	\$71,000.	
Site development	68,000.	
Utility installation	39,000.	
Ground equipment, coax	<u>70,000.</u>	
Total estimated cost	\$248,000.	

(T-Mobile 1, p. 18; Tr. 1, p. 74)

Environmental Concerns

- 63. The proposed facility would have no adverse effect on historic, architectural or archeological resources listed in or eligible for the National Register of Historic Places. (T-Mobile 1, Tab N)
- 64. The site is not within any designated area indicating the presence of Federally threatened or endangered species or State endangered, threatened or special concern species. (T-Mobile 1, Tab N)
- 65. No trees would be removed to develop the site. If the site were re-aligned in an east-west direction, a few trees along the bank of Bruce Brook would have to be trimmed for clearance. (T-Mobile 1, Tab B; Tr. 1, p. 96)

- 66. Development of the compound would not directly affect any wetlands or watercourses. Bruce Brook is located 51 feet from the southeast corner of the compound. The brook is located down a steep embankment along the property line. If the compound were realigned in an east-west direction, the brook would be 36 feet from the southeast corner of the compound. (T-Mobile 1, Tab B; Tr. 1, p. 9; Tr. 2, p. 35)
- 67. The site is within the town's 100-foot upland review area (wetland buffer zone). (T-Mobile late file 01/07/10, Letter from Dean Gustafson)
- 68. The site is within a 100-year floodplain. The site is two to three feet above the base flood elevation of 74 feet, so that the proposed development would not adversely affect the flood storage capacity of the flood zone. T-Mobile would file the project with the Department of Environmental Protection Flood Division for a flood zone impact determination. (T-Mobile 1, p. 14; T-Mobile late file 01/07/10, Dean Gustafson; Tr. 2, pp. 25-26)
- 69. Erosion and sedimentation controls and other best management practices would be established and maintained for the duration of site construction. (T-Mobile 1, p. 16)
- 70. Aircraft hazard obstruction marking or lighting of the tower is not required or proposed. (T-Mobile 1, pp. 17-18; Tr. 1, pp. 74-75)
- 71. The cumulative worst-case maximum power density from the radio frequency emissions from the operation of the proposed T-Mobile antennas is calculated to be 14.3% 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 base. (T-Mobile late file 01/07/10)
- 72. Operation of the tower would not affect other equipment used by the public, such as garage door openers and televisions. T-Mobile antennas are permitted to operate in very specific frequency bands, as specified by the FCC, whereas other equipment operates in completely different frequency bands. (Tr. 2, pp. 31-32)

Visibility

72. The proposed tower would be visible year-round from approximately 10 acres within a quarter mile of the site (refer to Figure 3). The tower would be seasonally visible from an additional 37 acres within a quarter mile of the site. (T-Mobile 1, Tab M)

73. Visibility of the proposed tower from specific locations within a quarter-mile radius of the site is as follows:

Specific Location and Area Receptors	Visible	Approximate Portion of Tower Visible	Approx. Distance from Tower*
Intersection of London Terrace and Broadbridge Avenue (commercial area)	Yes	50 feet – unobstructed	0.08 mile east
Intersection of North Avenue and Broadbridge Avenue (residential area)	Yes	30 feet – unobstructed	0.25 mile southeast
Broadbridge Avenue immediately north of Stonybrook Road (residential and commercial area) Refer to Figure 4	Yes	50 feet – unobstructed	0.1 miles north
Klondike Street at #214 (residential area)	Yes	10 feet - unobstructed	0.13 mile south
Barnum Terrace south of Yukon Street (residential area)	Yes	20 feet- unobstructed	0.2 mile south
Barnum Terrace (residential area)	Yes	30 feet – unobstructed	0.1 mile south
Stonybrook Park (public park)	Yes	15 feet – unobstructed	0.07 mile south
Intersection of Stonybrook Road and Eaton Street (residential area) Refer to Figure 5	Yes	60 feet – unobstructed	0.06 mile northwest
Intersection of Marcroft Street and Chevvy Street	Yes	60 feet – unobstructed	0.17 mile northeast
Marcroft Street (commercial and residential area)	Yes	50 feet- unobstructed	0.11 mile northeast
Viele Street south of Marcroft Street	Yes	40 feet - unobstructed	0.11 mile northeast

(T-Mobile 1, Tab M)

* 0.1 mile = 528 feet.

74. The tower would be visible year-round from 51 residential properties within a quarter-mile of the site, as follows:

Street	No. of Residences	
Stonybrook Road	6	
Broadbridge Road	8	
North Avenue	2	
North Terrace	2	
Marcroft Street	8	
Viele Street	4	
Eaton Street	2	
Yukon Street	6	
Klondike Street	4	
Barnum Terrace	9	

(T-Mobile 1, Tab M)

- 75. The residence at 55 Stonybrook Road, immediately west of the site and set back from Stonybrook Road, would have a view of the entire tower and compound. T-Mobile could install fencing with privacy slats and vegetative screening along the property line to screen the compound area. T-Mobile would be willing to paint the tower any color to help it blend in with the surroundings. (T-Mobile 1, Tab M; Tr. 1, pp. 27-28, 30-31)
- 76. Re-locating the compound and tower in an east-west configuration would slightly decrease the visibility of the site from 55 Stonybrook Road. The tower would be approximately 50 feet farther from this property. (Tr. 2, p. 37-38)
- 77. The residence at 65 Stonybrook Road, immediately northwest of the site and fronting Stonybrook Road, would have views of the compound and most of the tower. (Tr. 1, p. 31)
- 78. The residence at 56 Stonybrook Road, across the street from the driveway and parking lot of the site, would have open views of the compound and tower. (Tr. 1, p. 31)
- 79. The tower would not be visible from any known hiking trails maintained by the DEP or the Connecticut Forest and Parks Association. The tower would be visible from Stonybrook Park immediately south of the site. The four-acre park contains field and playground areas. (T-Mobile 1 c, Plan of Conservation and Development, Tab M; Tr. 1, pp. 32-33)
- 80. The tower would not be visible from any scenic roads or historic districts. (T-Mobile 1, Tab M)

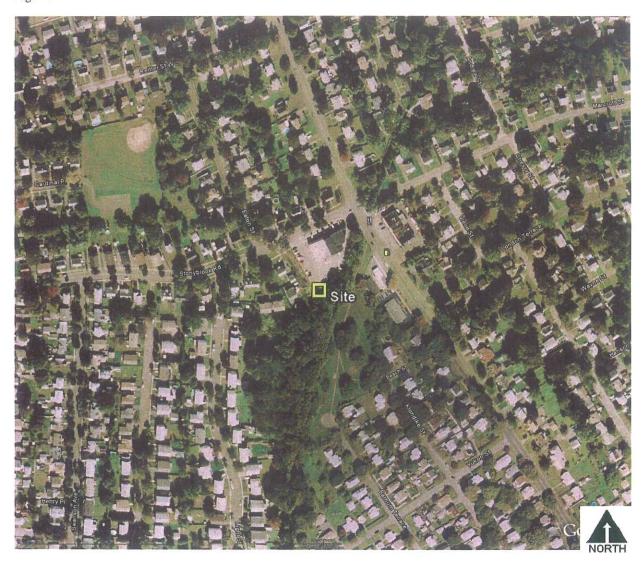


Figure 1: Location of site at 23 Stonybrook Road, Stratford. (T-Mobile 1, Tab B)

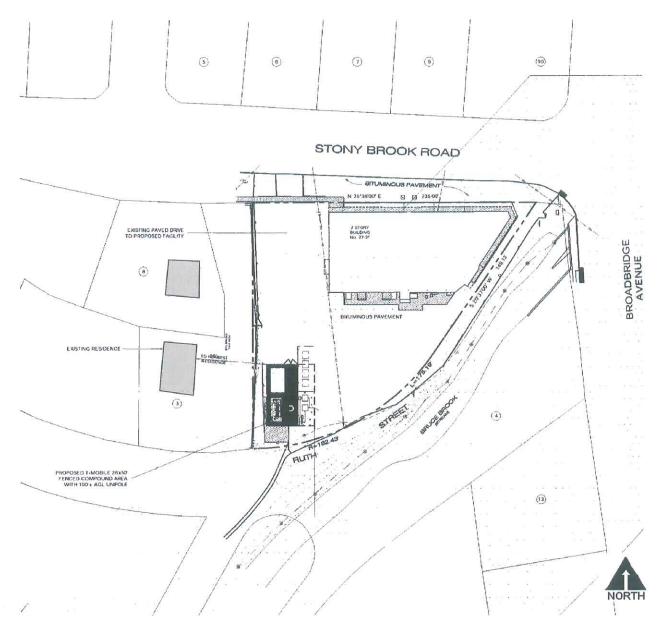


Figure 2: Site plan of proposed location at 23 Stonybrook Road. (T-Mobile 1, Tab B)

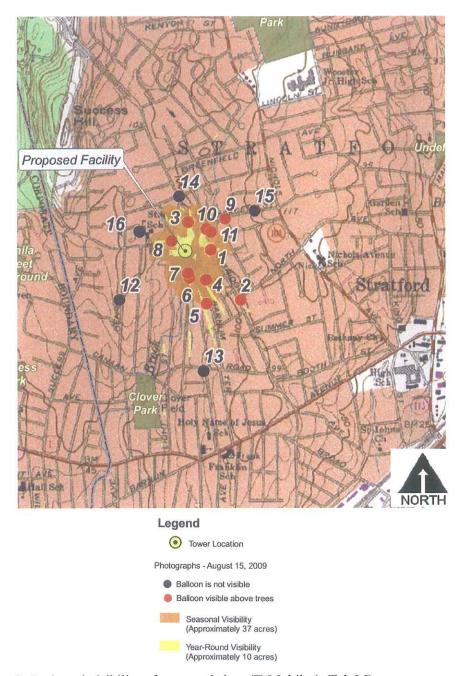


Figure 3: Projected visibility of proposed site. (T-Mobile 1, Tab M)

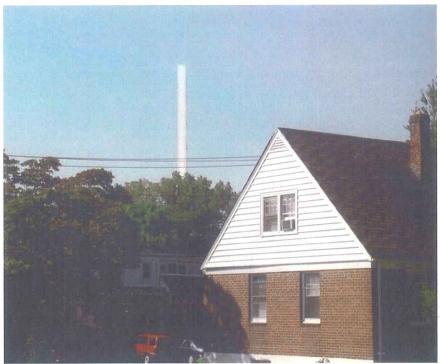


Figure 4: Photo-simulation of proposed tower from Broadbridge Avenue north of Stonybrook Road (location 3 on Figure 3). (T-Mobile 1, Tab M)



Figure 5: Photo-simulation of proposed tower from intersection of Marcroft Street and Chevvy Street (location 9 on Figure 3). (T-Mobile 1, Tab M)

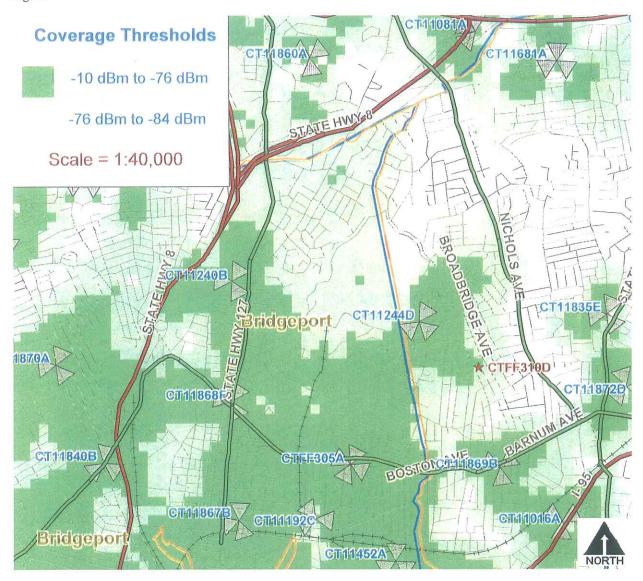


Figure 6: T-Mobile's existing wireless coverage. (T-Mobile 2, Q. 11)

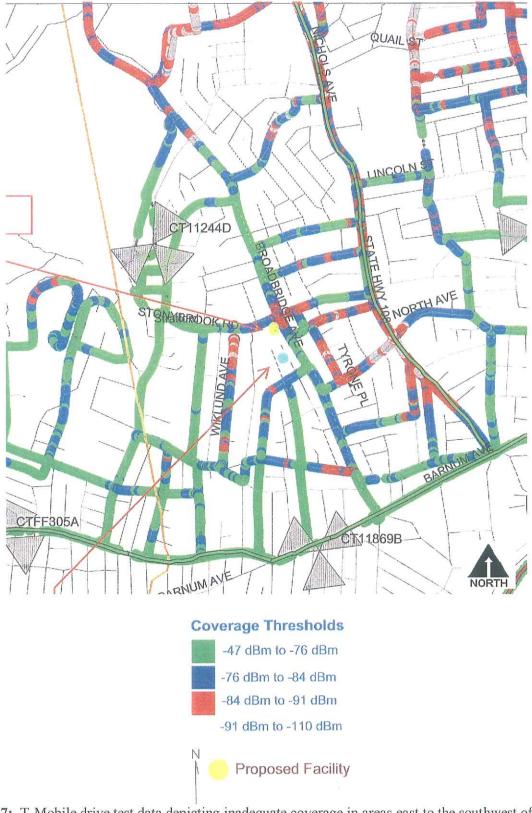


Figure 7: T-Mobile drive test data depicting inadequate coverage in areas east to the southwest of the site. (T-Mobile 2, Q. 10)

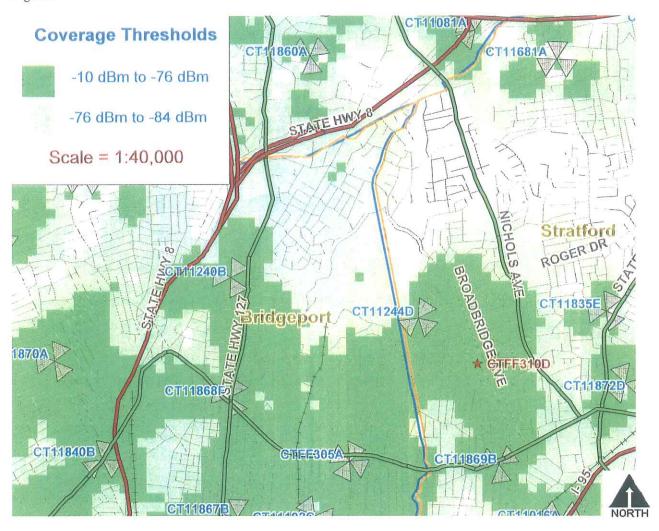


Figure 8: T-Mobile's proposed wireless coverage with antennas mounted at 97 and 87 feet agl. (T-Mobile 2, Q. 11)

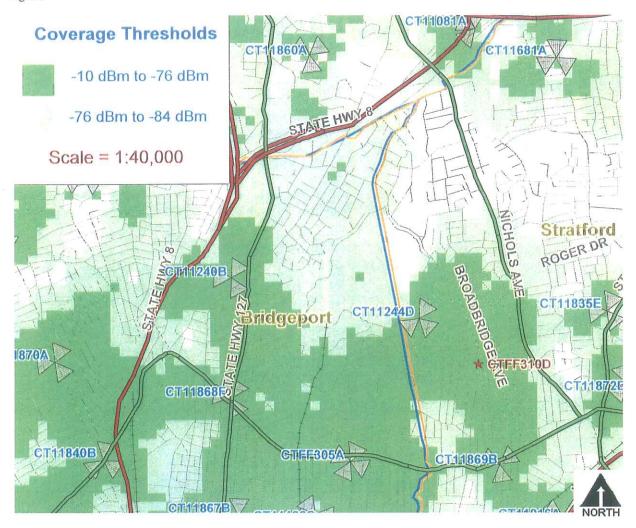


Figure 9: T-Mobile wireless coverage with antennas at 87 and 77 feet agl. (T-Mobile 1, Q. 11)