

**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 123 PINE ORCHARD ROAD IN THE TOWN  
OF BRANFORD, CONNECTICUT

DOCKET NO. 386

Date: November 9, 2009

**RESPONSES BY T-MOBILE NORTHEAST, LLC TO THE FIRST SET  
OF INTERROGATORIES BY THE CONNECTICUT SITING COUNCIL**

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 received return receipts from all the abutters. The abutters list was compiled on or about July 9, 2009, shortly before T-Mobile submitted the Application to the Connecticut Siting Council ("Council").**
2. What tower height was considered at the rejected Shoreline Pet Lodge property? Was the property owner contacted regarding possible telecommunications use? If so, was the property owner receptive?  
**A2 T-Mobile's RF Engineers evaluated the efficacy of the Shoreline Pet Lodge (the "Lodge") with a tower height of 125 feet. T-Mobile contacted the Lodge property owners in August, 2009, regarding a possible telecommunications facility on that property; however, the Lodge property owner did not respond to T-Mobile's inquiries.**
3. Please submit a diagram showing the search ring for this site. When was the search ring established?  
**A3 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.**


4. Were any other photos taken during the preparation of the visibility analysis? If so, please submit.
- A4 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.**
5. Application Attachment P contains correspondence addressed to the Branford P&Z Commission and the Branford Historical Society. Was a response received? If so, please provide correspondence or summarize verbal communications.
- A5 T-Mobile did not receive any response from the Planning & Zoning Commission or the Branford Historical Society. However, on June 16, 2009, representatives of T-Mobile met with the Honorable Anthony DaRos, the First Selectman, to discuss the Facility and answer any questions the Town might have regarding the Facility. The Town did not require a public meeting regarding the Facility.**
6. Appendix D and Appendix P of Application Attachment P contains several diagrams that show different locations for the Norton House. Please identify the correct location.
- A6 The Norton House is located at 200 Pine Orchard Road, Branford, Connecticut.**
7. What is T-Mobile's minimum signal level threshold for in-building and in-vehicle use?
- A7 T-Mobile's minimum design thresholds are -84 dBm for In-Vehicle Coverage and -76 dBm for In-Building Coverage**
8. Did T-Mobile perform a site drive test or base line drive test for the area? If yes, please provide.
- A8 T-Mobile continually drives its on air sites for network analysis and propagation model tuning purposes. Attached hereto as Exhibit A is a baseline plot showing existing coverage conditions in the area of the proposed Facility.**
9. 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 heights of 112 and 102 feet.

- A9** Attached hereto as Exhibit B are coverage plots depicting coverage from existing and approved T-Mobile sites and the proposed Facility at heights of 102 feet and 112 feet.
10. Does T-Mobile currently use fuel cells as back up generators at any of its Connecticut tower sites? If yes, identify such sites?
- A10** T-Mobile installed a fuel cell for its telecommunications facility located at 82 North Eagleville Road, Storrs, Connecticut.
11. 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?
- A11** 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.  
Monte E. Frank, Esq.  
Jesse A. Langer, Esq.

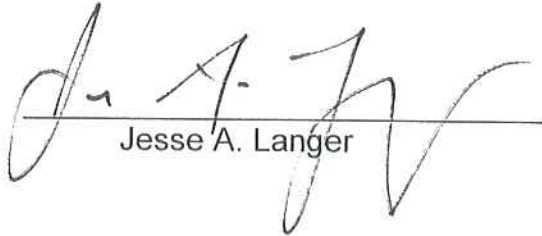
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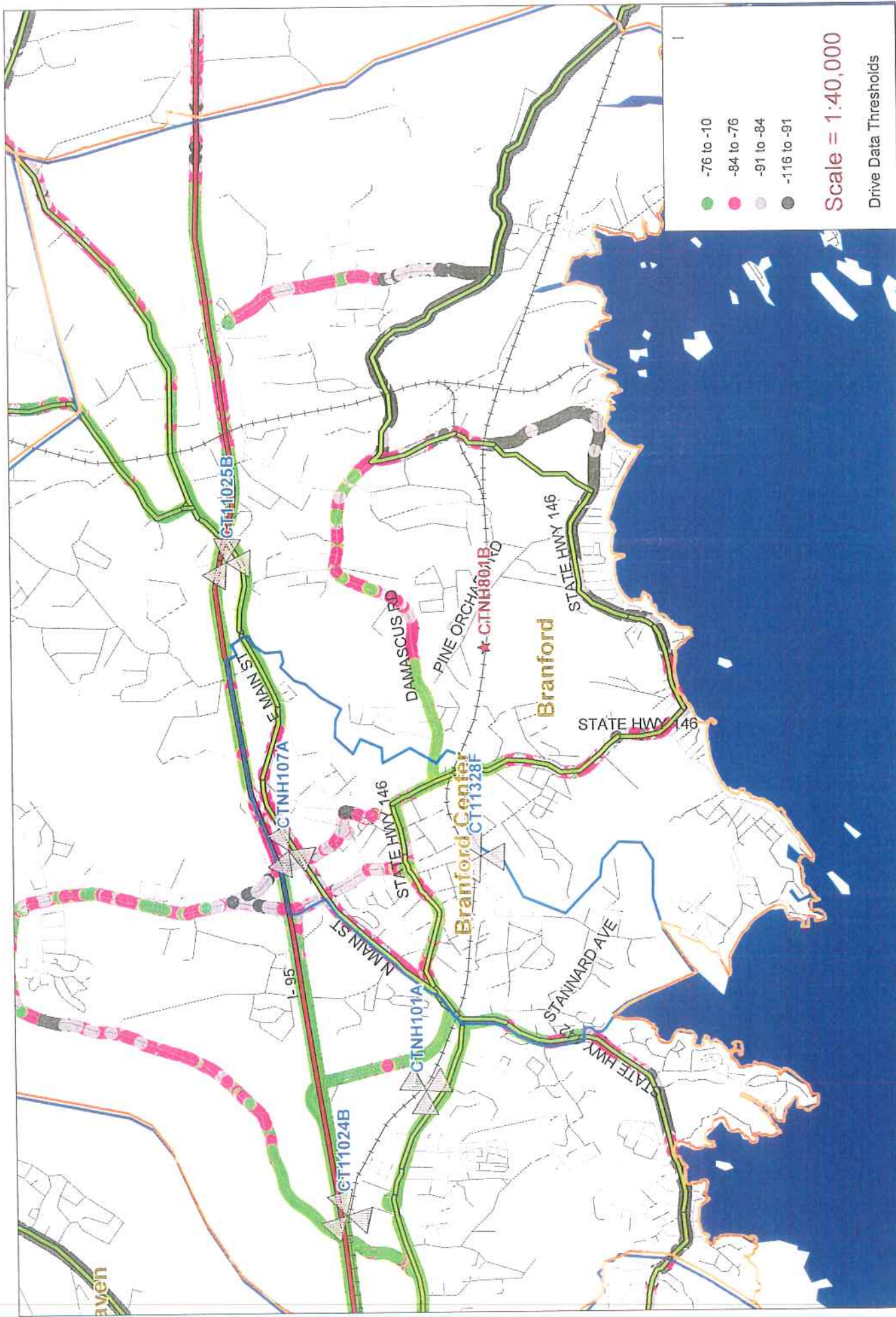
CERTIFICATE OF SERVICE

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:

Christopher B. Fisher, Esq.  
Daniel M. Laub, Esq.  
Cuddy & Feder, LLP  
445 Hamilton Avenue, 14<sup>th</sup> Floor  
White Plains, NY 10601

  
Jesse A. Langer

# EXHIBIT A

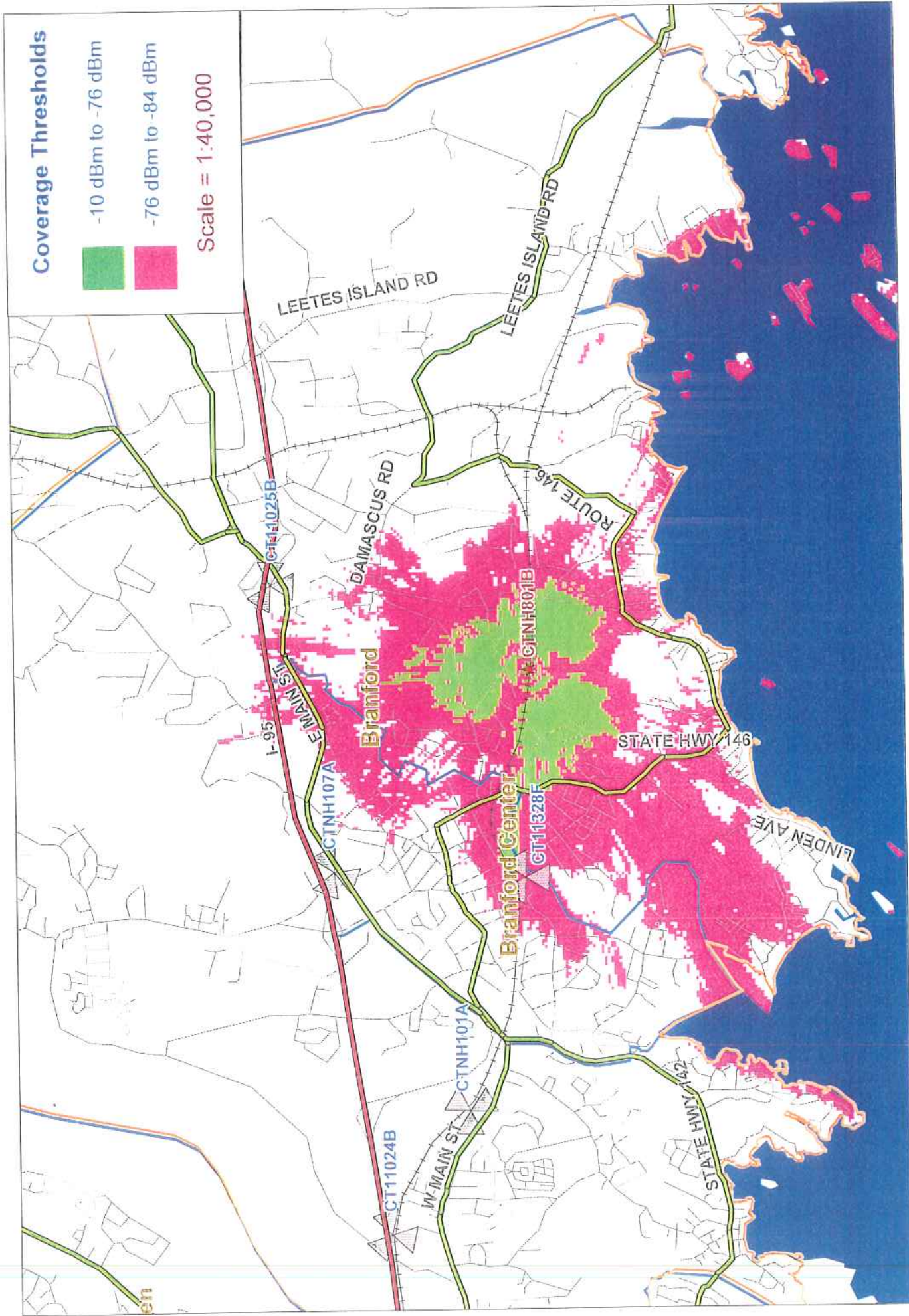


Existing T-Mobile On Air Coverage (Drive Data)

- T-Mobile -



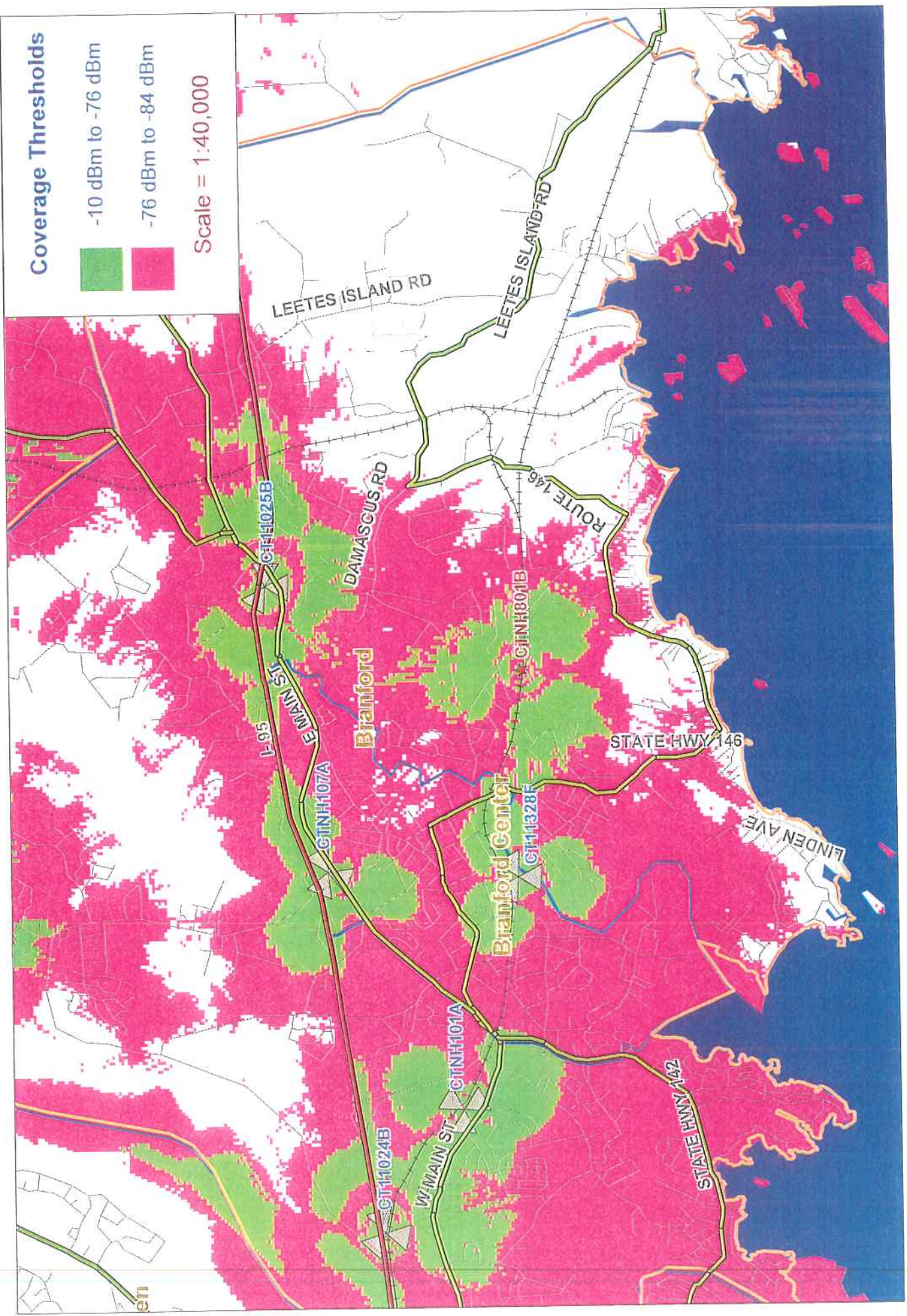
# **EXHIBIT B**



- T-Mobile-- T-Mobile Proposed CTNH801B @ 112'







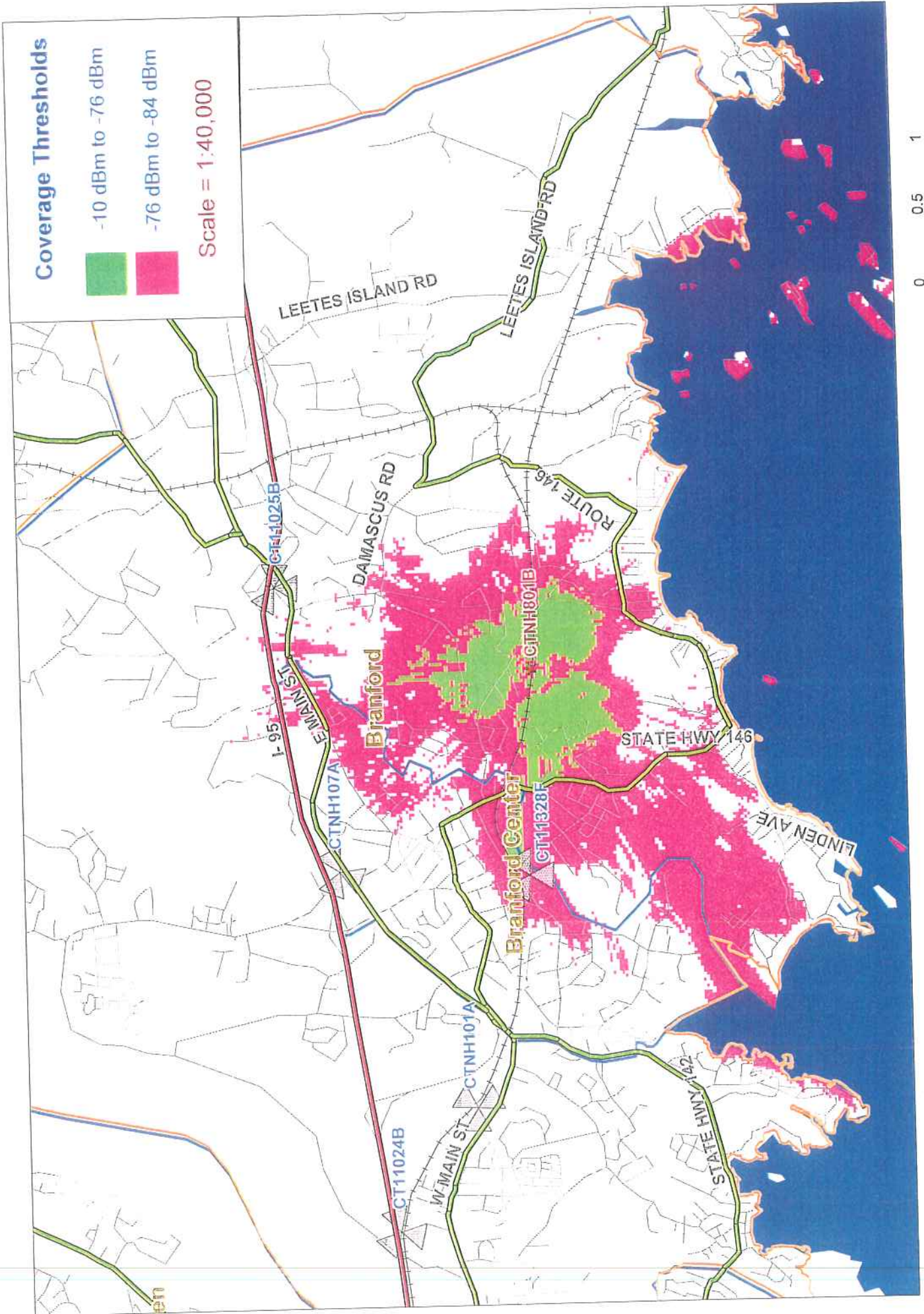
**Coverage Thresholds**

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

Scale = 1:40,000

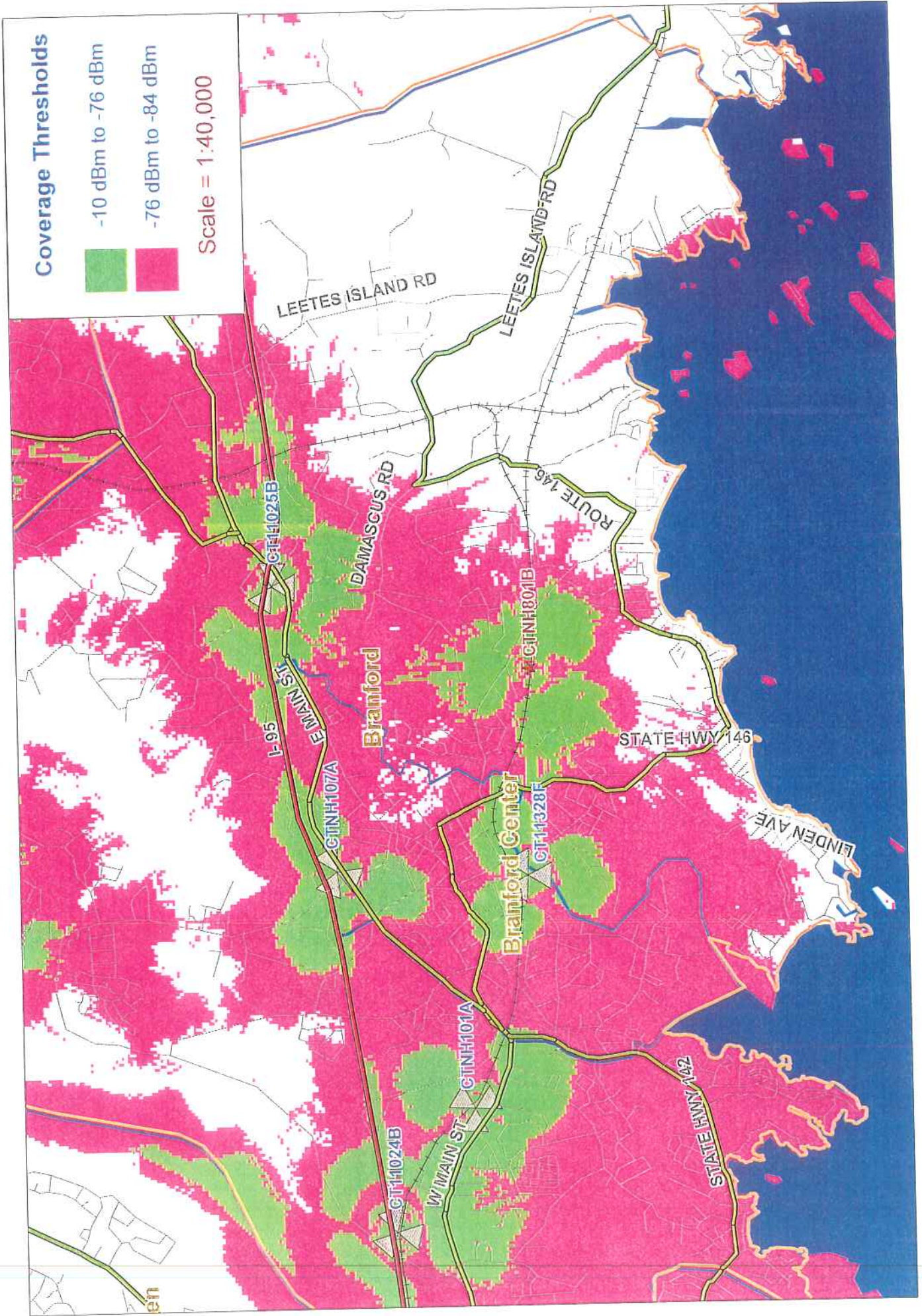
**- T-Mobile -**  
 Existing T-Mobile On Air Coverage  
 With CTNH801B @ 112'





T-Mobile Proposed CTNH801B @ 102°

T-Mobile



**Coverage Thresholds**

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

Scale = 1:40,000



Existing T-Mobile On Air Coverage  
With CTNH801B @ 102'

- T-Mobile -

