

April 26, 2010

BY ELECTRONIC AND OVERNIGHT DELIVERY

Hon. Daniel F. Caruso, Chairman
and Members of the Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket 388
New Cingular Wireless PCS, LLC (“AT&T”)
Application for Certificate of Environmental Compatibility and Public Need
1990 Litchfield Turnpike Woodbridge, Connecticut

Dear Chairman Caruso and Members of the Council:

On behalf of New Cingular Wireless PCS, LLC (“AT&T”), please accept this letter and attendant Findings of Fact in further support of its Certificate Application in Docket No. 388. This letter is being submitted in accordance with the 30 day post-hearing time frame established by the Council for the receipt of any written comments, proposed findings of fact or briefs and outlines the reasons why AT&T believes that the record in this proceeding supports the public need for the proposed facility.

Public Need

As part of testimony, plots and drive data provided to the Council, Mr. John Blevins of AT&T and Anthony Wells of C Squared Systems testified that AT&T’s existing sites cannot serve the gaps in coverage along State Routes 69 and 63 and the surrounding areas in Woodbridge. AT&T’s data clearly demonstrates that there is no reliable service in the area. The record evidence simply demonstrates that the proposed facility is an integral part of AT&T’s wireless communications network and is needed by AT&T to provide an adequate level of service to people living in and traveling through this area of the State. In addition, AT&T can also provide space on the tower for the installation of Town/emergency service antennas and other carriers who have stated a need for the site in this Docket such as Pocket and Verizon. While given limited weight, we also note the significant and varied testimony at the public hearing that a tower site in this part of Woodbridge is needed for public safety and service to the public.

Lack of Alternative Tower Sites

As set forth in the Application and in the testimony of Mr. Kevin Dey, a search for existing towers or tall structures for the installation of a facility was comprehensively conducted. However, there are no existing telecommunications towers or telecommunications sites within several miles of the area where a site is technically sought by AT&T to remedy gaps in service.

As part of its investigation, AT&T did consult with Connecticut Light of Power (CL&P) numerous times regarding the use of existing electric transmission infrastructure or its right-of-ways for the construction of a proposed wireless facility. However, CL&P's transmission reliability requirements and other constraints imposed on CL&P severely restrict the use of this particular high-priority transmission infrastructure and practically prohibit its use on terms and conditions by which AT&T could provide its service to the public reliably. As such, CL&P infrastructure is not a viable alternative. Other United Illuminating Company (UI) transmission infrastructure to the northeast of the proposed site is too low and simply cannot provide coverage due to intervening terrain.

Numerous other properties in the area are Class I and II watershed lands as well as state forest lands associated with West Rock State Park where, as a matter of state law, telecommunications tower facilities are prohibited. The remaining lands in the vicinity of the proposed site are Town owned open space parcels that are deed restricted or smaller residential parcels further south. As such, based on AT&T's extensive search, the proposed parcel which hosts a farm was identified as the only site that is commercial in nature, legally available for tower siting and in area which can technically meet the public need for service.

Minimal Environmental Effects

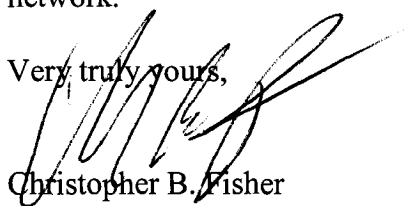
While the options are limited as noted above, we note that the proposed tower site location is excellent from an environmental standpoint as well. No historic or cultural resources will be impacted by the proposed facility as identified by SHPO. Similarly, the facility is not within an area designated as hosting threatened, endangered or special concern species as identified by DEP. Only 17 total trees of 6" dbh or greater will have to be removed as part of the site's development. Site access is largely provided by use of an existing dirt access path that can be improved to address site stabilization and runoff in accordance with the Connecticut Soil Erosion Control Guidelines.

Indeed, the proposed Facility was specifically sited by AT&T to balance and minimize other potential impacts. The tower would not visually impact any significant aesthetic or scenic resources and would be in the same viewshed as the existing CL&P transmission towers that extend along the adjacent parcel. Moreover, the proposed tower will have limited visual impact on the surrounding area due to the existing mature vegetation around the proposed site and the largely restricted development in the vicinity of the parcel. Indeed, despite proximity to local and Blue Blaze trail systems in the area, no impacts are anticipated from the facility given the topography, tree cover and perspective from any of these resources. As such, AT&T submits that there are no significant adverse impacts associated with development of the tower site as proposed in Docket 388.

Conclusion

For all of the foregoing reasons, AT&T respectfully submits that the record in this proceeding fully supports the public need for a tower facility to serve Woodbridge, State Routes 69 and 63 and surrounding areas and that there are no significant adverse environmental effects from the project as proposed. Accordingly, a Certificate for construction of a tower facility should be issued to AT&T to provide its service to the public and that of other competing wireless carriers and potentially the Town for improvements to its municipal/emergency communications network.

Very truly yours,



Christopher B. Fisher

cc: Michele Briggs, AT&T
Mr. Kevin Dey, SAI
Daniel M. Laub, Esq.