STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

In Re:

APPLICATION OF NEW CINGULAR
WIRELESS PCS, LLC (AT&T) FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF TWO
TELECOMMUNICATIONS TOWER
FACILITY LOCATED AT 1990
LITCHFIELD TURNPIKE IN THE TOWN OF
WOODBRIDGE, CONNECTICUT

DOCKET NO. 388

June 14, 2010

RECEIVED

JUN 15 2010

CONNECTICUT SITING COUNCIL

AT&T RESPONSES TO SITING COUNCIL QUESTIONS DATED MAY 17, 2010

- Q1. Has New Cingular Wireless PCS, LLC (AT&T) evaluated all Connecticut Light and Power Company (CL&P) transmission lines in the vicinity of the proposed tower site for possible co-location in order to meet its coverage objectives? Explain. Also indicate which lines were evaluated and provide the line numbers.
- A1. Yes, CL&P lines in close proximity to the AT&T tower proposal were investigated by AT&T at several distinct times including the Spring of 2008, Fall of 2009 and Winter of 2010 with information sought from CL&P along the way. The line numbers are 3827 and 1640 (which is believed to include 1640 and 1685 115kv circuits) which are 345kv and 115kv lines. Page 22 of the Council's Findings of Fact in Docket 272 indicate that the typical height of the support structures for these lines are at 80 and 85 feet on average with heights up to 123 feet. AT&T's investigation included a walk of the right-of-way ("ROW"), review of the lines and consideration of several poles along these lines as noted in the map attached and other materials in the Application.

Subsequent to the Council's issuance of its May 17, 2010 interrogatories, AT&T consultants and radiofrequency engineers conducted another analysis of the CL&P lines. This included another walk of the ROW, communication with CL&P and further review by AT&T radiofrequency engineers. AT&T was provided with a copy of the CL&P asbuilts for the 115kv pole line in the immediate vicinity of the AT&T proposed tower, a copy of which as marked is attached. As noted, the poles in this area are 80' to 95' in height. As part of its radiofrequency analysis that included several of the 115kv poles shown in the attached map, AT&T again concluded that at heights up to that which would be considered co-location (i.e. 20' attachment to the existing structure), the CL&P lines could not fully meet its coverage objectives. Coverage to the west and along Route 63 was insufficient at these heights.

Q2. Do any of the CL&P transmission lines in the vicinity of the proposed tower have a number 2 rating or number 1 rating with respect to obtaining outages? If yes, provide the line number(s) and indicate whether any structures on that line would provide suitable

coverage to AT&T's target area. If any of the structures could provide suitable coverage, provide the structure numbers.

A2. Upon information and belief and based on discussions among AT&T and CL&P representatives, no lines in this area have a reliability rating of 1. Additionally, early on in 2008 and 2009, AT&T was advised that even the 115kv transmission line would likely be rated a 3/4 based on the need for outages for the two circuits on this line. As noted in more recent correspondence from CL&P's transmission line group, the 345kv line is rated a 4 and "[t]he 115-kV circuits hold a slightly lower rating but the need to keep them in service is still high". See CL&P correspondence from Mr. Morrisette, CL&P Manager Transmission & Siting included in the record. Since coverage for any co-location on an existing CL&P pole was not adequate in this case, AT&T did not further apply to CL&P for such a proposal on one of the 115kv or 345kv support structures.

It was suggested in separate and more recent correspondence from CL&P's President for Transmission, which was copied to an AT&T representative, that the 115kv transmission line is rated 2 for outages and possibly available for siting by AT&T. AT&T's understanding from the CL&P transmission group is that the 115kv line would only be rated a 2 if construction was limited to a co-location attachment **and** an outage was limited to only one of the 115kv circuits as opposed to both circuits that run along the poles that make up this 115kv line. A replacement CL&P tower (which would be required by AT&T to get to a height that would work for coverage purposes) would, however, require outages for both circuits. Thus, it is AT&T's understanding that the outage rating for a tower replacement by AT&T on the CL&P 115kv line would be a 3/4.

As noted above and previously in this Docket, the existing CL&P pole heights can not support antenna centerline heights that would be viable for co-location by AT&T. Rather a replacement CL&P tower would be required which AT&T understands would require an outage for both 115kv circuits which would be rated a 3/4. Additionally, it is known that a freestanding tower in the CL&P ROW is not viable for the reasons set forth in CL&P correspondence and AT&T responses to prior Siting Council questions. As such, and for the additional reasons noted by AT&T in prior responses to Council questions, AT&T has sought an adjacent parcel to the CL&P ROW to construct a tower that meets its coverage objectives and those of other wireless carriers that can readily share use of the proposed tower in this Docket.

AT&T respects the efforts by many in the community to better understand the limitations on shared use of wireless and utility infrastructure in this case. AT&T respectfully submits that the facts in this regard can best be summarized as follows:

- 1) Regardless of CL&P reliability ratings, the CL&P lines and associated support structures in this area of Woodbridge are not tall enough to support co-location and allow for reliable coverage to be provided to the public in the area intended to be served by AT&T;
- 2) CL&P reliability ratings on the lines in Woodbridge and other construction requirements practically preclude construction of a replacement tower or freestanding tower in CL&P's ROW to support the wireless facilities of AT&T and other wireless carriers expressing an interest in the area such as Verizon and Pocket.
- 3) A new self-supporting tower structure in this area of Woodbridge is required and a facility dedicated to commercial wireless services best enables the provision of such services to the public in a reliable manner.

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of the foregoing was sent to the Connecticut Siting Council electronically and by overnight delivery on June 14, 2010:

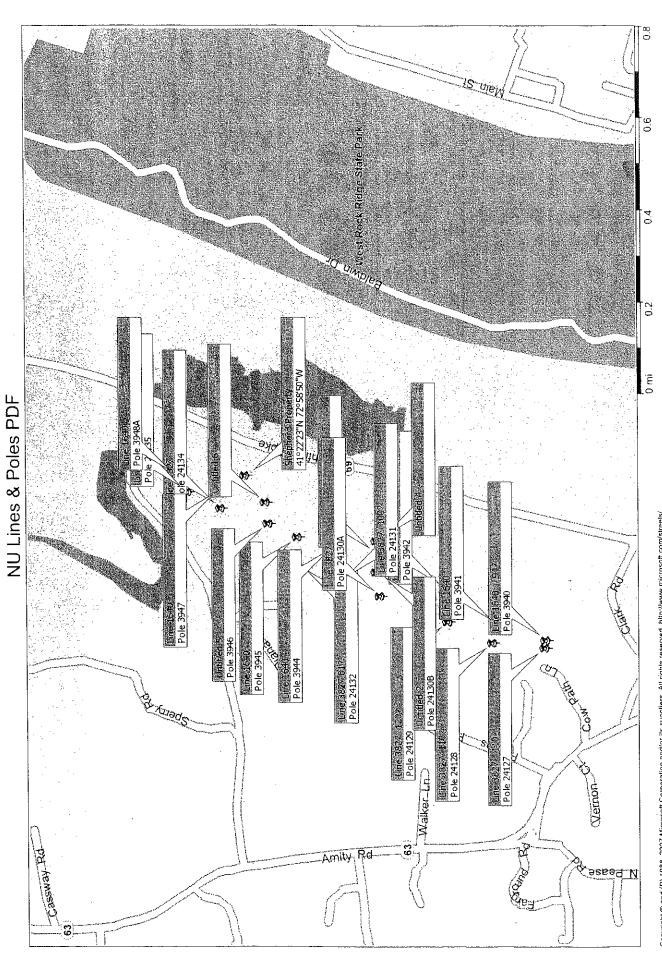
Dated: June 14, 2010

Christopher B. Fisher

cc: Michele Briggs, AT&T

Radu Alecsandru, AT&T

Kevin Dey, SAI Tim Burks, SAI



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