

**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 232 SHORE ROAD IN THE TOWN
OF OLD LYME, CONNECTICUT

DOCKET NO. 391

Date: January 21, 2010

PRE-FILED TESTIMONY OF SCOTT M. CHASSE

Q1. Please state your name and profession.

A1. Scott M. Chasse and I am a civil engineer and co-founder of All-Points Technology Corporation ("All-Points").

Q2. What kind of services does All-Points provide?

A2. All-Points is a civil and structural engineering firm with offices located in Killingworth, Connecticut and North Conway, New Hampshire that provides design and permitting services to wireless providers in the northeast including Connecticut and New York. All-Points develops zoning and construction drawings for the installation of prefabricated equipment shelters and equipment cabinet arrays with supporting antennae on existing structures and for new stand-alone telecommunications towers. All-Points also manages surveys, wetland delineations, coastal consistency analyses and visual resource evaluations for proposed telecommunications facilities.

Q3. Please summarize your professional background in telecommunications.

A3. I have a B.S. in civil engineering from the University of Connecticut. I have been licensed as a professional engineer in Connecticut since 1997 and in New York since 2001. I have over thirteen years of experience in the telecommunications industry. My experience includes the zoning, design and construction of more than 1250 wireless telecommunications facilities.

Q4. What services did All-Points provide T-Mobile with respect to the proposed Facility?

A4. T-Mobile retained All-Points to design and prepare the site plans for the proposed telecommunications facility at 232 Shore Road, Old Lyme, Connecticut (the "Facility"). The site plans included the site access plan, the compound plan and tower elevation for the Facility. In addition, All-Points evaluated the proposed development and the tree inventory to determine whether the proposed Facility would require the removal of any trees.

Q5. Please describe the site of the proposed Facility?

A5. The site of the proposed Facility is 232 Shore Road, Old Lyme, Connecticut (the "Property"). The Property is a 5 acre parcel and is designated on the Assessor's Tax Map as Map 8, Lot 36-2. The Property is zoned for light industrial uses. South Shore Landing Self Storage owns the Property and currently uses the Property as a storage facility. T-Mobile would lease a 2,400 square foot area located in the northwesterly portion of the Property.

Q6. Please describe the access to the proposed Facility.

A6. Vehicular access to the Facility would extend from Shore Road. The access would extend over an existing bituminous driveway and gravel parking areas.

Q7. Please describe the proposed Facility.

A7. The Facility would consist of a 100 foot monopole structure with antenna arrays mounted thereon and related equipment on the ground at the base on a concrete pad. The Facility would consist of an 2,400 square foot compound, comprising the entire leased area. T-Mobile would install panel antennas mounted on T-Arms at 100 feet above grade level to the centerline of the antennas. The Facility would accommodate three additional wireless carriers. The compound would be enclosed by an eight-foot chain link fence. T-Mobile would extend utility service underground from an existing transformer and telephone demarcation point on the Property.

Q8. Would the construction, operation and maintenance of the proposed Facility require the removal or relocation of any trees?

A8. Yes. T-Mobile would have to remove eight trees in connection with the construction, installation and maintenance of the Facility. Four trees would be between 8" and 10" in diameter and four trees would be greater than 14" in diameter. See Exhibit M attached to the Application.

Q9. How much clearing and grading is necessary?

A9. The Facility compound would require approximately 8 cubic yards of cut and 42 cubic yards of fill. The utility trench would require approximately 222 cubic yards of cut

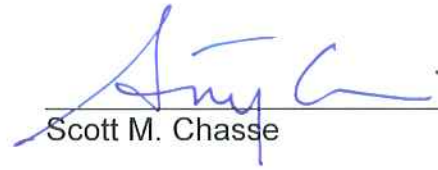
and 222 cubic yards of fill. In my opinion, with appropriate sedimentation and erosion controls installed, this amount of disturbance would be minimal.

Q10. Please describe the results of the on-site wetlands inspection.

A10. At the request of T-Mobile, All-Points retained Vanasse Hangen Brustlin, Inc. ("VHB") to conduct a wetlands inspection of the Property, the results of which are found at Exhibit K of the Application. All-Points and VHB reviewed the materials concerning the location of the proposed Facility, access drive and utility easements. VHB then conducted an in-field review of the property to determine the location of wetlands on or near the Property and the impact of the proposed Facility on any wetlands. Based upon VHB's inspection, there are two wetland systems located on the Property. T-Mobile would install a silt fence during construction of the Facility to avoid any temporary impacts and would finish disturbed areas around the Facility with loam and a New England Conservation / Wildlife seed mix to avoid any permanent impacts. Accordingly, the proposed Facility would not directly or indirectly affect the identified wetlands or watercourses.

Q11. Can the tower be designed with a pre-engineered fault to prevent encroachment on adjacent properties?

A11. Yes, it is common practice to design towers with such engineered faults and in fact many of the facilities approved by the Council have been designed in this manner.



Scott M. Chasse

Sworn and subscribed to before me this
21th day of January, 2010.



Notary Public
My Commission expires

ROBIN S. CHASSE
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, 2014