DRAFT

Docket No. 392 387 Shore Road, Old Lyme

T-Mobile Request to Reopen and Modify the Decision and Order And

EM-T-MOBILE-105-240516 – T-Mobile notice of intent to modify an existing telecommunications facility located at 387 Shore Road, Old Lyme, Connecticut.

Staff Report July 12, 2024

Notice

On September 23, 2010, the Connecticut Siting Council (Council) issued a Certificate of Environmental Compatibility and Public Need (Certificate) to T-Mobile Northeast, LLC (T-Mobile) for the construction, maintenance and operation of a telecommunications facility at 387 Shore Road, Old Lyme, Connecticut. The Council's Docket No. 392 Decision and Order (D&O), Condition No. 1 specified, in part, that "The wireless antennas shall be attached to the tower via T-arm mounts."

On May 16, 2024, T-Mobile submitted a Request to Reopen and Modify D&O Condition No. 1 (Request to Reopen and Modify) to allow for the use of platform mounting systems at this facility. Also on May 16, 2024, T-Mobile submitted an associated exempt modification request to modify the antenna configuration (EM-T-MOBILE-105-240516).

The Council issued interrogatories to T-Mobile on May 29, 2024. T-Mobile provided responses to the Council's interrogatories on June 17, 2024.

Existing Facility

On April 29, 2011, the Council approved a Development and Management (D&M) Plan for this facility that included an 80-foot monopole. The D&M Plan included T-Mobile's installation consisting of nine panel antennas and six tower mounted amplifiers attached to T-arm mounts at a centerline height of 77-feet 7-inches above ground level (agl).

On November 10, 2015, PTI US Towers I, LLC and PTI US Towers II, LLC (Phoenix Towers International) acquired the telecommunications facility from T-Mobile.

The Council approved requests for exempt modification from T-Mobile on April 16, 2014, September 30, 2015, November 8, 2021, and November 1, 2022. Currently, T-Mobile maintains nine T-arm-mounted panel antennas and three remote radio units (RRUs) at the 78-foot level of the tower.

On May 31, 2024, the Council received an Eligible Facilities Request (EFR) from Dish Wireless, LLC (Sub-petition No. 1133-DISH-20240531) to extend the existing facility to 90 feet and install three panel antennas at the 87-foot level of the tower on T-arm mounts. The Council approved this EFR on July 2, 2024.

By letter dated June 17, 2024, Phoenix Towers International agrees to comply with the terms and conditions of the Certificate in compliance with Condition No. 13 of the Council's D&O.

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Request to Reopen and Modify

On or about May 7, 2024, T-Mobile notified the Docket 392 Service List of the Request to Reopen and Modify the D&O.

T-Mobile's Request to Reopen and Modify seeks to allow the use of platform mounting systems to promote tower sharing and to enhance existing wireless service, as detailed below:

- The T-arm design restricts the ability of wireless carriers, including T-Mobile, from upgrading existing antennas and other equipment;
- T-Mobile is unable to meet increasing capacity and coverage demands with the T-arm configuration and requires a platform to structurally accommodate the required antennas and other equipment needed to meet such capacity and coverage demands;
- T-Mobile would not be able to proceed with its proposed request for exempt modification without a platform mounted antenna configuration; and
- The change to a platform-mounted configuration is not expected to result in a significant visual/aesthetic impact.

On May 16, 2024, the Council notified the Docket 392 Service List (including the Town) of the Request to Reopen and Modify and requested submission of comments or statements of position in writing with respect to whether the Request to Reopen and Modify the D&O should be granted or denied including whether a public hearing should be held on the request by May 30, 2024. No comments were received.

T-Mobile Request for Exempt Modification

T-Mobile provided notice of the Request for Exempt Modification to the Town and the property owner on May 16 and 20, 2024, respectively.

If the Request to Reopen and Modify the D&O is approved by the Council, T-Mobile's May 16, 2024 Request for Exempt Modification seeks to replace six panel antennas and install three RRUs on a platform antenna mount at a centerline height of 78 feet agl.

Other improvements include installing two new equipment cabinets on an existing 15-foot by 10-foot concrete pad within the existing compound. The modifications include equipment that is 5G capable.

The Request for Exempt Modification included certification from a Structural Engineer duly licensed in the State of Connecticut that the structure is capable of supporting the proposed loading based on certain modifications having been completed.

The facility would have a cumulative worst-case power density for T-Mobile and Dish of 15.0% of the applicable limit using a far field approximation.

Conclusion

If approved, staff recommends the following conditions:

- 1. Approval of any changes be delegated to Council staff;
- 2. Antenna mounts shall be installed in accordance with the Mount Analysis prepared by P. Marshall & Associates LLC, dated February 27, 2024 and stamped and signed by Joseph Fitzsimons;
- 3. Within 45 days following completion of equipment installation, T-Mobile shall provide documentation certified by a Professional Engineer that its installation complied with the recommendations of the Mount Analysis;

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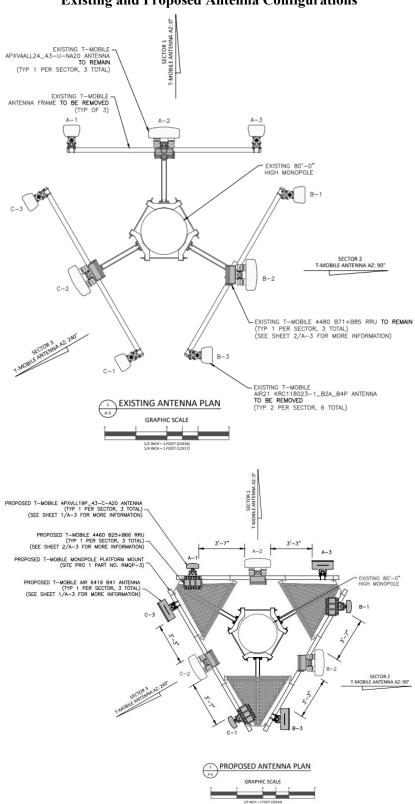
- 4. RF access restriction and caution signage shall be installed at the site in compliance with FCC guidance;
- 5. Written notification to the Council at least two weeks prior to the commencement of site construction activities; and
- 6. Deployment of any 5G services must comply with FCC and FAA guidance relative to air navigation, as applicable.

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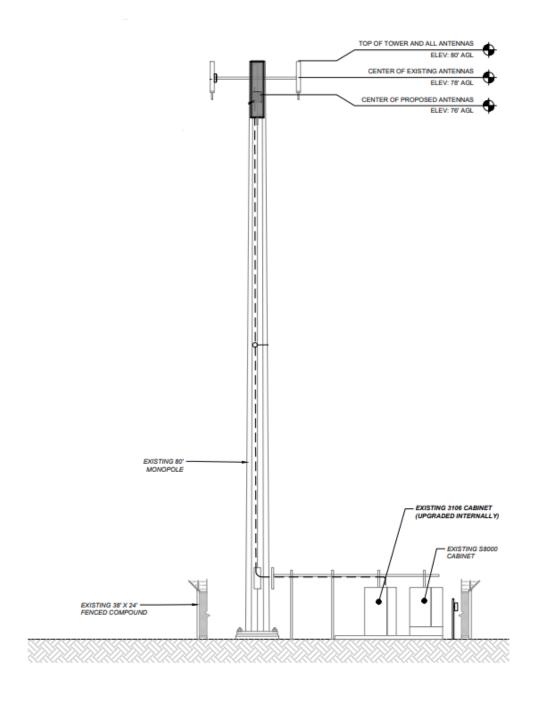
Existing Facility Site



Existing and Proposed Antenna Configurations



Existing Tower Elevation Configuration¹





¹ EM-T-MOBILE-105-22103, available at https://portal.ct.gov/-/media/csc/2 ems-medialibrary/old lyme/shorerd/t mobile/em-t-mobile-105-221003 filing shorerd oldlyme.pdf

Proposed Tower Elevation Configuration

