

**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 61-1 BUTTONBALL ROAD IN THE TOWN
OF OLD LYME, CONNECTICUT

DOCKET NO. 393

Date: April 9, 2010

SUPPLEMENTAL PRE-FILED TESTIMONY OF MICHAEL P. LIBERTINE

The following pre-filed testimony supplements my pre-filed testimony filed on January 28, 2010, in connection with the above-captioned Application for a Certificate of Environmental Compatibility and Public Need for a telecommunications facility ("Facility") at 61-1 Buttonball Road, Old Lyme, Connecticut ("Property") submitted by T-Mobile Northeast LLC ("T-Mobile").

Q12. Did Vanasse Hangen Brustlin, Inc. ("VHB") conduct any additional research regarding the potential views of the Facility from the Black Hall Golf Course?

A12. Yes. Pursuant to an agreement between T-Mobile and the Black Hall Club ("Black Hall"), on March 25, 2010, VHB conducted an in-field inspection of Black Hall's golf course, which is adjacent to the Property, to supplement its previous visibility analysis. VHB arranged with the owner of the property to have a crane parked at the proposed Facility, with its boom raised to its maximum height of 70 feet above grade level ("AGL"), and flew a red balloon, four-feet in diameter, tethered to a height of 100 feet AGL from approximately 8:30 a.m. until 11:40 a.m. VHB, representatives of T-Mobile and representatives of Black Hall walked the golf course to observe the balloon while aloft. VHB took photographs from several locations on the golf course property

selected by Black Hall representatives. VHB completed an additional visual analysis based upon the results of these supplemental activities. The visual analysis, appended hereto as Attachment A, includes a photolog and photo-simulations depicting the proposed Facility as a brown-stick structure with flush-mounted antennas, mono-pine, and traditional monopole.

Q13. Would the Facility be visible from the Black Hall Golf Course?

A13. Yes. As depicted on VHB's original viewshed map and the attached photolog, some locations on the golf course property would have either year-round or seasonal views. Views are expected to be limited primarily to areas in the north and northwest portions of the golf course property. The additional analysis generally confirmed the conclusions previously reached by VHB during its initial assessment of the Facility. See Attachment A for photographs and simulations from specific locations on the golf course property.

Q14. Would a stealth design mitigate the views of the Facility?

A14. VHB assessed the potential for mitigating views of the Facility on the surrounding area by implementing a stealth design. Although a stealth option might mitigate views of the upper portions of the Facility from a distance, it would not substantially alter views from locations within the immediate vicinity of the Facility. Within close proximity to the proposed Facility, a mono-pine design might appear a novelty and/or out-of- place. A "brown stick" stealth design would provide some mitigation of the views within the immediate area of the Facility as well as from a distance. Please see Attachment A.

Q15. What is the combined, total acreage of views of the three proposed T-Mobile Facilities (the subjects of Dockets 391, 392 and 393) from the Long Island Sound?

A15. The combined total acreage of views of the three proposed Facilities in Old Lyme from the Long Island Sound would be approximately 2,555 acres. This total was developed by subtracting those common, overlapping areas (primarily associated with the Docket 391 and 391 sites). Please note that in previous testimony (on March 2, 2010), I responded with a different acreage total to a question posed by Attorney Ainsworth regarding the total acreage of views of the three Old Lyme sites from the Long Island Sound. At that time, I did not have an opportunity to assess accurately this value and simply totaled the individual amounts of visible acreage over the Sound as identified in each Facility's respective Visual Resource Evaluation report (i.e. 2,698 acres). The total acreage of the Long Island Sound (within the Connecticut Coastal Management Zone (CMZ)) is approximately 334,350 acres; this total does not include additional, adjacent areas of surface water within the CMZ (e.g., rivers, marshes, and streams).

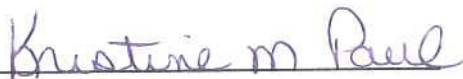
Q16. Did VHB assess the visual impact of the 190-foot telecommunications facility proposed previously on property owned by Black Hall directly across the street from the Black Hall Golf Course?

A16. Yes. Although VHB was not involved in this prior application, VHB performed some predictive computer modeling of a 190-foot telecommunications facility proposed previously by another wireless carrier on property owned by Black Hall directly across the street from the Black Hall Golf Course ("BHC Facility"). The BHC Facility would

have been located approximately 320 feet west of Buttonball Road across from the Black Hall Golf Course. Black Hall's Golf Course would have had views of the BHC Facility from northern portions of the golf course. Based on computer modeling, it appears that overall views of the BHC Facility would have been significantly greater than the views of the proposed Facility. Although the total acreage of year-round visibility on the golf course would be about the same (approximately 11 acres), a greater length of the BHC Facility would have been visible above the tree canopy because of the BHC Facility height (nearly double that of T-Mobile's proposed Facility). In addition, areas to the south and southwest of the property, including residential neighborhoods and the Long Island Sound, would have experienced substantially greater views of the BHC Facility. As a general comparison, the proposed T-Mobile Facility would be visible year-round from approximately 289 acres within a two-mile radius; the BHC Facility would have been visible from approximately 1,719 acres within a two-mile radius. Please see the viewshed maps appended hereto as Attachment B.


Michael P. Libertine

Sworn and subscribed to before me this
9th day of April, 2010.



Notary Public
My Commission expires

KRISTINE M. PAUL
NOTARY PUBLIC
MY COMMISSION EXPIRES JAN. 31, 2014

ATTACHMENT A

Photographic Documentation and Simulations

Proposed Wireless Telecommunications Facility

CTNL801A

Amtrak Old Lyme 2
61-1 Buttonball Road
Old Lyme, CT

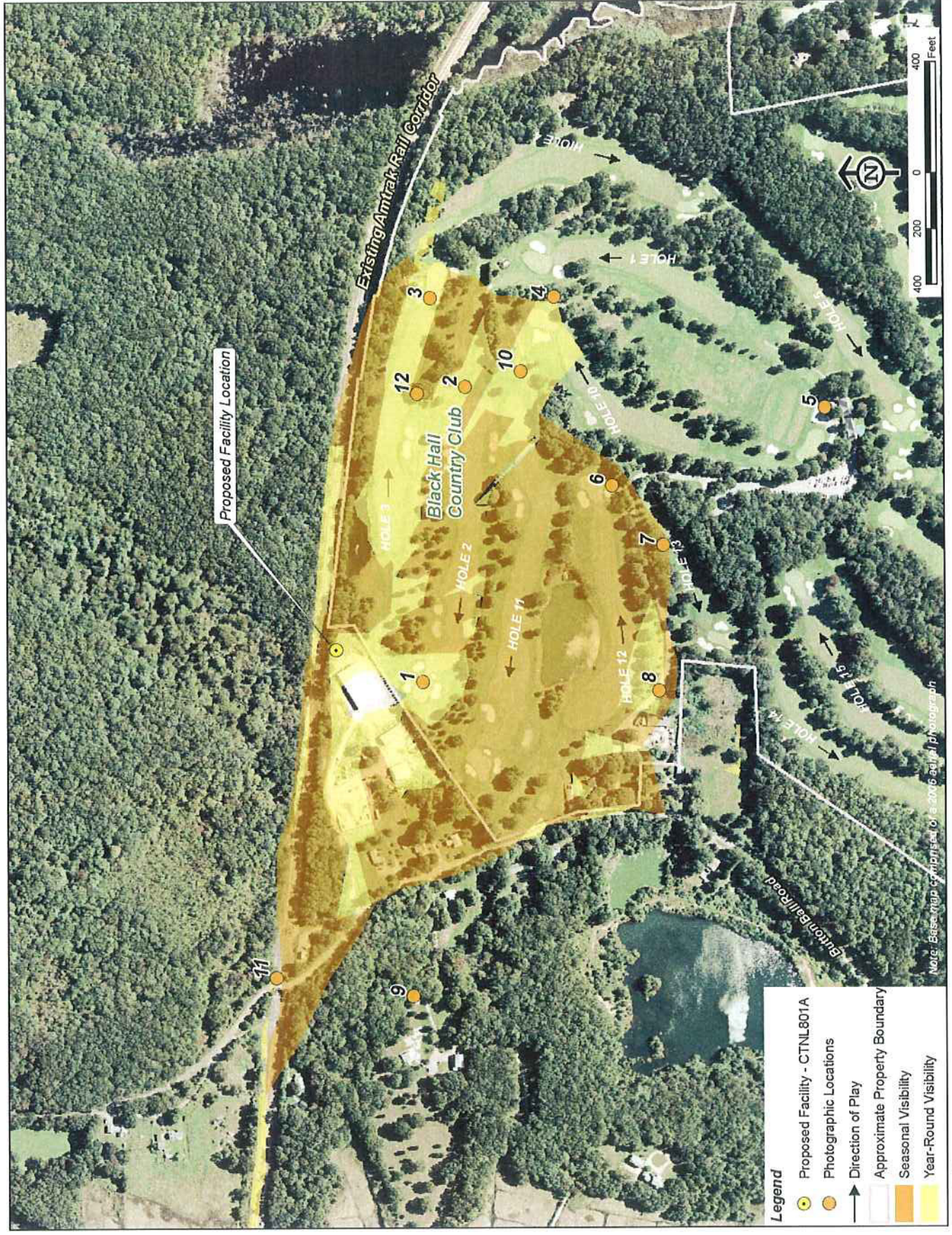
SUBMITTED TO:



SUBMITTED BY:



PHOTOLOG MAP



PHOTOGRAPHIC DOCUMENTATION

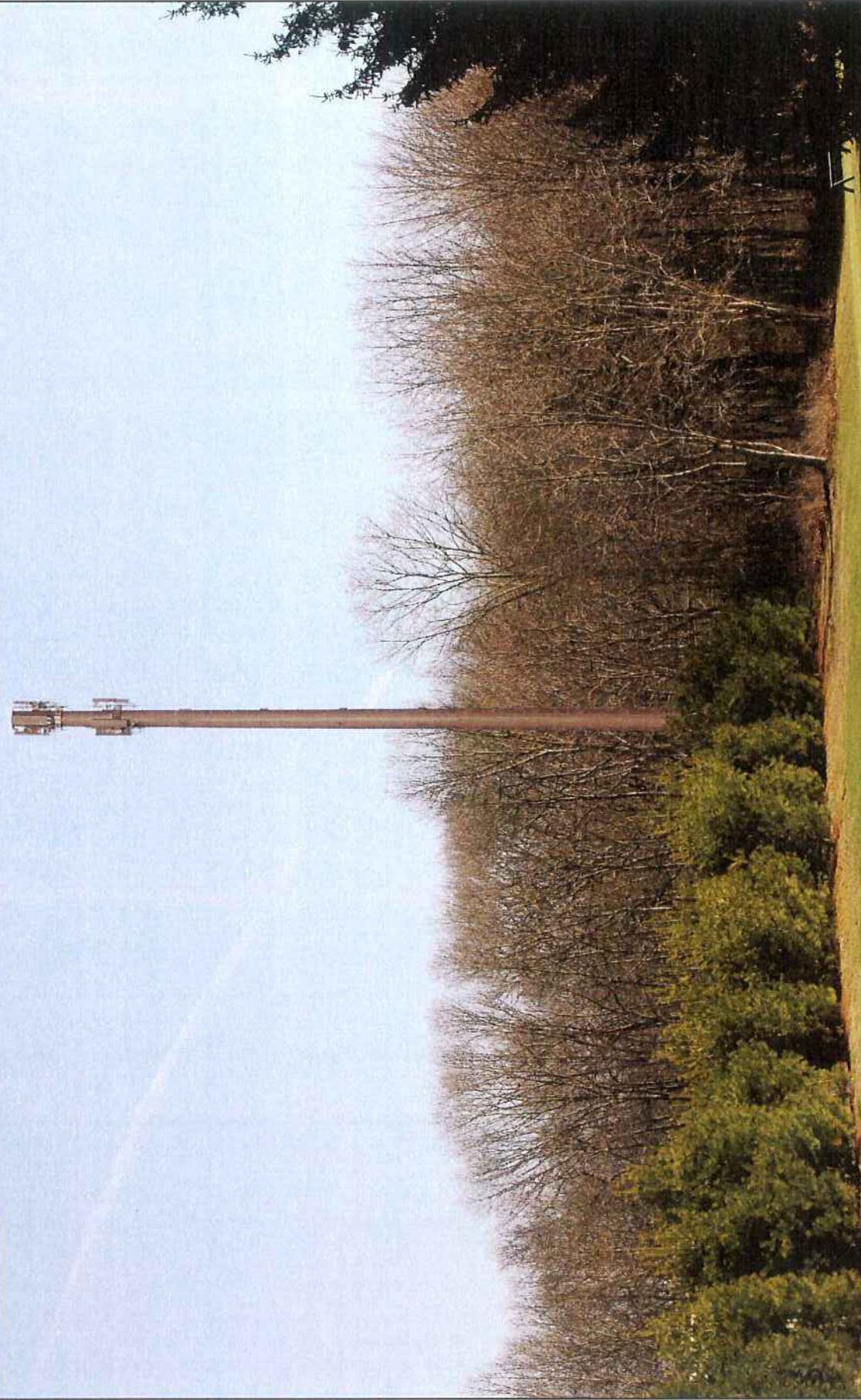


VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	BLACK HALL COUNTRY CLUB GREEN #2	NORTHEAST	0.06 MILE +/-	YEAR-ROUND

Final 100% of 10/10/10 10:00 AM, 10/10/10 10:00 AM, 10/10/10 10:00 AM

PHOTOGRAPHIC SIMULATION

Brown Stick

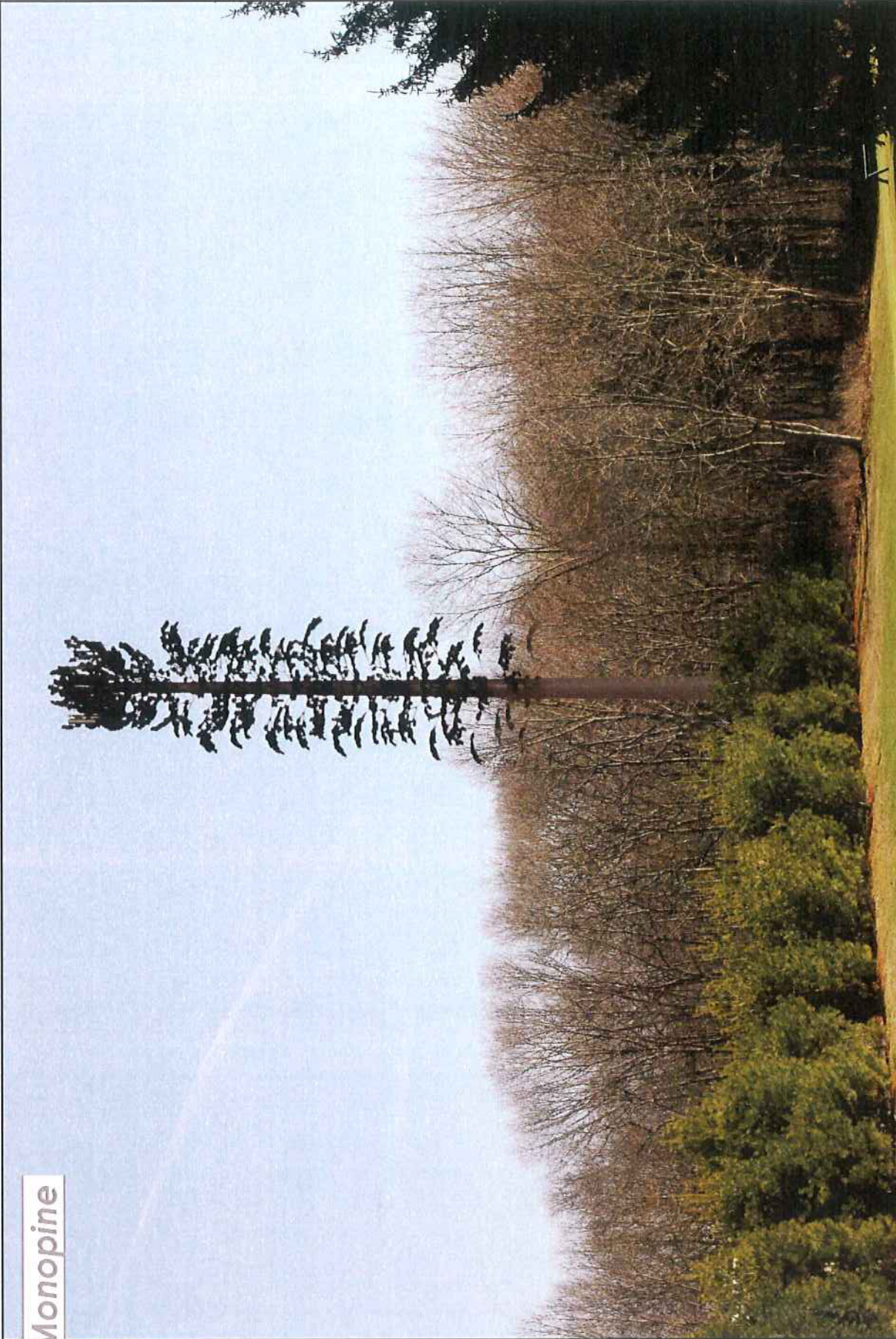


VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	BLACK HALL COUNTRY CLUB GREEN #2	NORTHEAST	0.06 MILE +/-	YEAR-ROUND

Childan, Lopez, & Graphics FIGURES 15626 08_Photomem_Busck_Hill

PHOTOGRAPHIC SIMULATION

Monopine



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	BLACK HALL COUNTRY CLUB GREEN #2	NORTHEAST	0.06 MILE +/-	YEAR-ROUND

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PHOTOGRAPHIC SIMULATION

Monopole



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	BLACK HALL COUNTRY CLUB GREEN #2	NORTHEAST	0.06 MILE +/-	YEAR-ROUND

Copyright 2005 by graphics FIGURES-1000-09-Finddm_Euroc_Hel

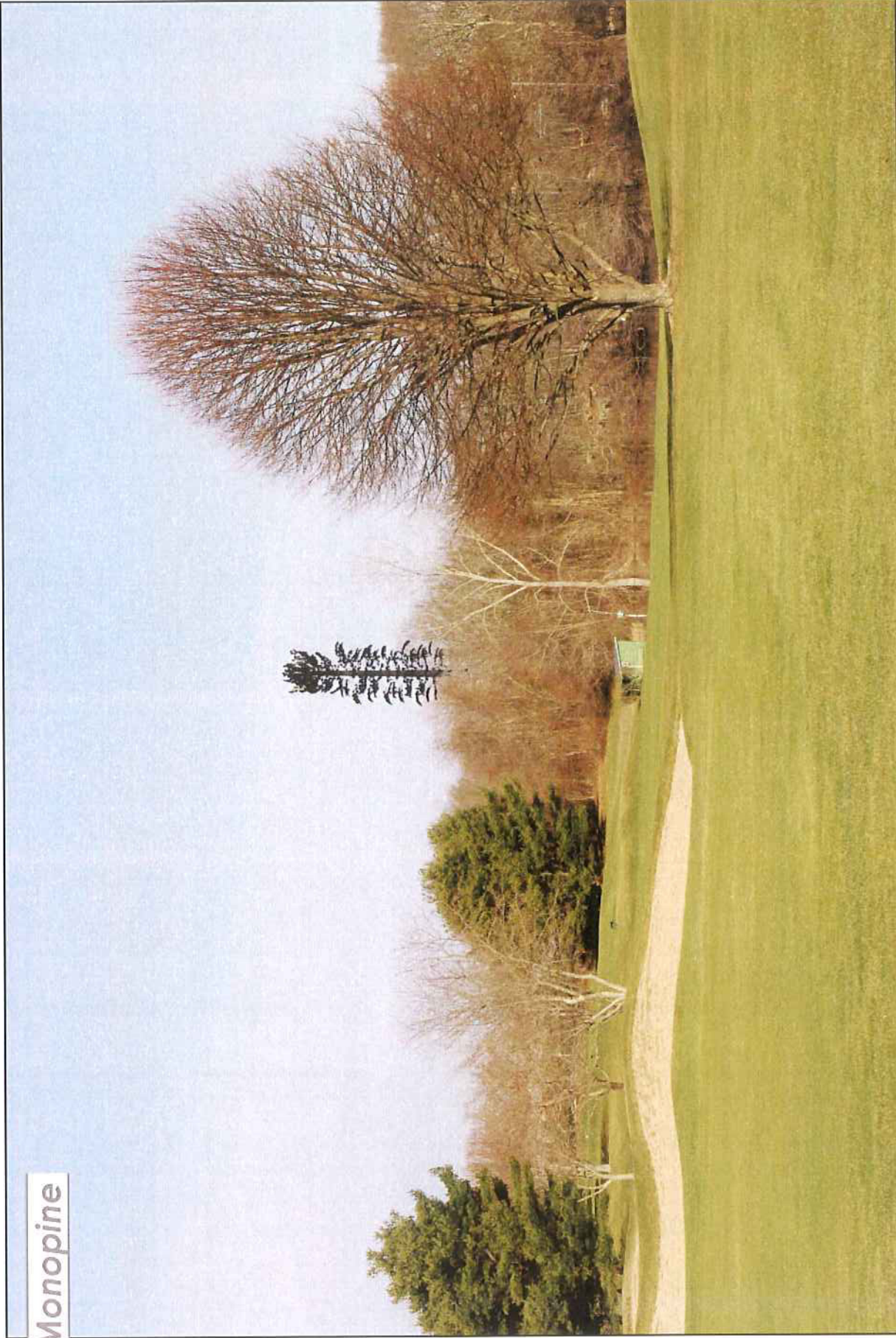
PHOTOGRAPHIC DOCUMENTATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	BLACK HALL COUNTRY CLUB TEE #2	NORTHWEST	0.20 MILE +/-	YEAR-ROUND

PHOTOGRAPHIC SIMULATION

Monopine



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	BLACK HALL COUNTRY CLUB TEE #2	NORTHWEST	0.20 MILE +/-	YEAR-ROUND

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PHOTOGRAPHIC SIMULATION

Monopole



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	BLACK HALL COUNTRY CLUB TEE #2	NORTHWEST	0.20 MILE +/-	YEAR-ROUND

PHOTOGRAPHIC DOCUMENTATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	BLACK HALL COUNTRY CLUB GREEN #3	NORTHWEST	0.24 MILE +/-	YEAR-ROUND

PHOTOGRAPHIC SIMULATION

Brown Stick

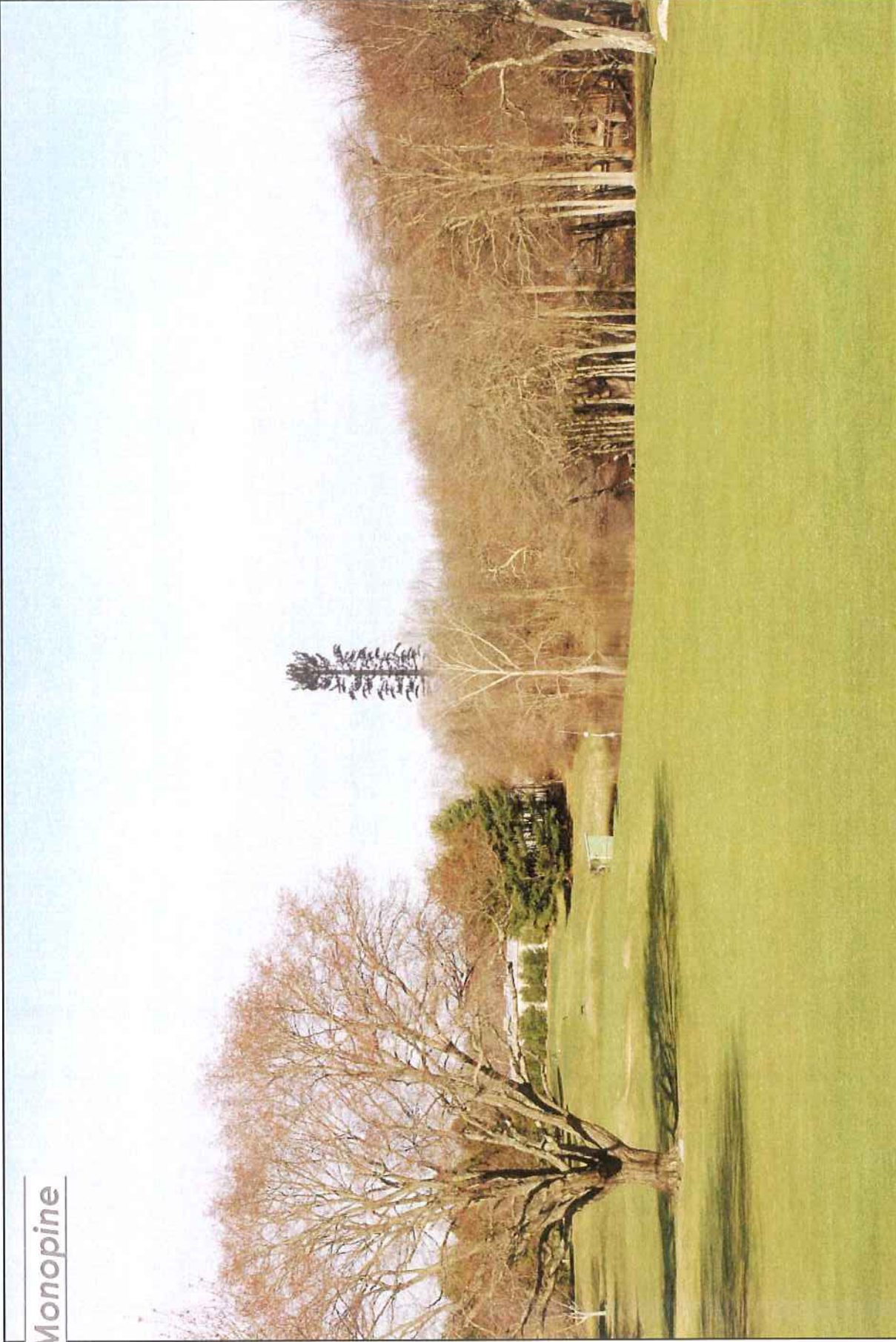


VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	BLACK HALL COUNTRY CLUB GREEN #3	NORTHWEST	0.24 MILE +/-	YEAR-ROUND

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PHOTOGRAPHIC SIMULATION

Monopine



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	BLACK HALL COUNTRY CLUB GREEN #3	NORTHWEST	0.24 MILE +/-	YEAR-ROUND

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PHOTOGRAPHIC SIMULATION

Monopole



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	BLACK HALL COUNTRY CLUB GREEN #3	NORTHWEST	0.24 MILE +/-	YEAR-ROUND

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PHOTOGRAPHIC DOCUMENTATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	BLACK HALL COUNTRY CLUB GREEN #10	NORTHWEST	0.28 MILE +/-	YEAR-ROUND