

**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: January 25, 2010

PRE-FILED TESTIMONY OF RAYMOND M. VERGATI

Q1. Please state your name and profession.

A1. Raymond M. Vergati and I am the vice president of operations for HPC Development, LLC ("HPC") with respect to projects in New England. HPC is located at 46 Mill Plain Road, 2nd Floor, Danbury, Connecticut.

Q2. What services does HPC provide?

A2. HPC Development is a full service professional consulting and site development firm servicing the wireless telecommunications, broadband, broadcast, and wind energy industries. With respect to the telecommunications industry, HPC provides management services for site development projects including, but not limited to, locating primary and backup sites for telecommunications facilities within a specified search area; coordinating the site design with A&E firms, radio frequency ("RF") engineers and construction managers; and negotiating lease or option agreements.

Q3. What is your professional background in telecommunications?

A3. I received a B.S. in finance (with a minor in Spanish) from Seton Hall University. I have approximately twelve years of experience in the telecommunications industry. I have managed site development projects for wireless carriers since 2001, including site acquisition, zoning needs and oversight of construction vendors. Since April of 2008, I have managed site acquisition for T-Mobile regarding numerous sites in Connecticut.

Q4. What services has HPC provided T-Mobile with respect to the proposed Facility?

A4. T-Mobile retained HPC to perform a search for possible sites within this area of Old Lyme, assist in negotiating the acquisition of a particular site and oversee the development of that particular site. HPC has overseen the development of the telecommunications facility proposed at 61-1 Buttonball Road, Old Lyme, Connecticut (the "Facility"). I assisted in all facets of the site acquisition.

Q5. How does T-Mobile conduct a search for possible sites?

A5. T-Mobile decides to seek out a site in an area based upon the needs of its wireless infrastructure and extensive research of the subject area. T-Mobile looks for possible site candidates in areas in which T-Mobile has identified coverage and/or capacity needs. The area targeted is the geographical location where the installation of a site would, based on general radio frequency engineering and system design standards, likely address the identified problem. T-Mobile's goal is to locate sites that will remedy coverage or capacity issues, while resulting in the least environmental impact to the surrounding area.

T-Mobile is sensitive to State and local desires to minimize the construction of new towers, and it does not pursue development of a new facility where an acceptable existing structure can be found. In general, T-Mobile first studies the area in and near the area of need to determine whether any suitable structure exists. If T-Mobile cannot find a structure with appropriate height and structural capabilities, it turns to industrial/commercial areas or individual parcels that have appropriate environmental and land use characteristics. T-Mobile looks for sites that will produce the least amount, if any, environmental impact on the surrounding area. Ultimately, the suitability of each location depends on whether that location would accommodate the coverage need and whether there would be any negative environmental effects.

Q6. Please describe the search undertaken by T-Mobile for this Facility.

A6. T-Mobile initiated its search for a site in this area of Old Lyme ("Old Lyme or "Town") on or about July 17, 2008. The focus of this search was a 0.2 mile radius with the center located at the intersection of Buttonball Road and the Amtrak rail line. T-Mobile focused on this search area with the objective to provide coverage to Buttonball Road and Route 156 just south of Interstate 95 in the Old Lyme, as well as the Amtrak rail line that passes through this area.

Q7. Did T-Mobile consider alternative sites?

A7. Yes. T-Mobile considered several sites other than the site of the proposed Facility. Those sites considered and rejected by T-Mobile are as follows:

1. Amtrak Power Substation, 63 Buttonball Road. This parcel is an Amtrak right of way. Amtrak maintains a strict policy against collocation of antennas on Amtrak catenaries. The parcel is only 1.5 acres and is situated very close to Buttonball Road. The ground elevation is also eight feet lower than the proposed Site.

2. Black Hall Golf Course, 50 Buttonball Road. Several calls were made to the landlord but were met with a lack of interest in leasing the property for the location of a tower.

3. 71 Buttonball Road. This is a large parcel owned by the Town. The parcel, however, is designated open space.

4. 21 Buttonball Road. This is an approximate 12.5 acre parcel owned by Black Hall Woods, LLC. The property owner was not interested in executing a lease with T-Mobile regarding a telecommunications facility.

Q8. Why did T-Mobile select the site of the proposed Facility over the other candidate sites reviewed by HPC?

A8. The proposed site of 61-1 Buttonball Road, Old Lyme, Connecticut ("Property") is superior to other parcels in the area. The Property is zoned for light industrial use (LI-80) and is 2.53 acres. The Property is currently used as a commercial storage facility (the existing twenty foot building located on the Property is too low to afford adequate coverage). Access to the Facility is across an existing bituminous driveway and parking lot on the Property. The Facility would be set back approximately 1,000 feet from Buttonball Road, with adequate screening mature trees. The Black Hall Golf Course abuts the Property to the south and a large track of forest is located to the north.

At this location, the proposed Facility would enhance wireless service availability to existing and future T-Mobile wireless device users. Enhanced coverage provided by the Facility would allow T-Mobile subscribers to use voice and data services reliably as well as to connect to Emergency 911 services. The intended coverage area of the

Facility would include Buttonball Road and Route 156 just south of Interstate 95 in the Town, as well as the Amtrak rail line that passes through this area.

The construction, maintenance and operation of the Facility would have minimal environmental impacts, if any, on the surrounding area. The construction of the Facility would require minimal grading and would not require the removal or relocation of any trees. The Facility would not impact any wetland or coastal resources because no such resources are located within close proximity to the site of the proposed Facility. Additionally, the Facility would sit adjacent to developed areas on the Property.

Finally, the visual impact of the Facility would be minimal. The areas from which the Facility would be at least partially visible (the top of the tower) year round are primarily comprised of select portions of parcels within the immediate vicinity of the Facility and the Long Island Sound.

Q9. Has T-Mobile consulted with municipal officials about the proposed Facility?

A9. Yes. T-Mobile has met its obligations for municipal consultation under General Statutes § 16-50/ (e). On May 28, 2009, T-Mobile submitted a technical report to the First Selectman regarding the Facility, a copy of which is included in the bulk filing accompanying the Application, which includes specifics about the Property, the Facility, the site selection process and the environmental effects, if any, of the proposed Facility. Additionally, on June 25, 2009 and December 1, 2009, representatives of T-Mobile also met with the First Selectman, Fire Chief and the Zoning and Inlands Wetlands Enforcement Officer to discuss the Facility as well as the other two facilities proposed in Old Lyme.

Q10. Has T-Mobile offered the Town of Old Lyme the opportunity to co-locate its emergency services equipment on the Facility?

A10. T-Mobile has expressed to the Town its willingness to provide, free of charge, space on the proposed monopole for municipal public safety communications antennas. The Town has not expressed its intentions regarding co-location as of yet.

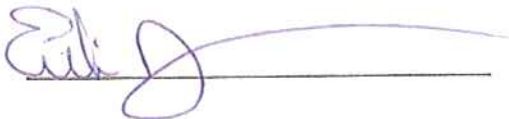
Q11. Did T-Mobile post a sign giving the public notice of the hearing on this Application?

A11. Yes, on or about January 20, 2010, T-Mobile posted a sign at the Property giving the public notice of the hearing on this Application. Photographs of the sign and an affidavit are appended hereto as Attachment A.



Raymond M. Vergati

Sworn and subscribed to before me this
25th day of January, 2010.



Notary Public
My Commission expires

ERIKA M. MAGNUSSEN
Notary Public
My Commission Expires 06/30/2010

ATTACHMENT A

**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: January 25, 2010

AFFIDAVIT OF RAYMOND M. VERGATI

I, Raymond M. Vergati, do hereby declare and state:

1. I am over the age of 18 years, and believe in the obligation of an oath.
2. I am the vice president of operations of HPC Development, LLC ("HPC")

with respect to projects in New England.

3. I have personal knowledge of the development of the Facility including the specific contents of this affidavit.

4. HPC has overseen the development of the telecommunications facility proposed at 61-1 Buttonball Road, Old Lyme, Connecticut (the "Facility"). I assisted in all facets of the site acquisition.

5. On or about January 20th, 2010, a sign was installed at the site of the proposed Facility.

6. On or about January 22, 2010, I viewed the sign installed at the site of the proposed Facility.

7. The sign was installed at the site of the proposed Facility at least ten business days prior to the date of the hearing on the application for a certificate of

environmental compatibility and public need submitted to the Connecticut Siting Council bearing docket number 393.

8. Photographs of the sign posted at the site of the proposed Facility are attached hereto as Exhibit A.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 25th day of January, 2010.



Raymond M. Vergati

Subscribed and sworn to before me this 25th day of January, 2010



Notary Public

My Commission Expires:

ERIKA M. MAGNUSSEN
Notary Public
My Commission Expires 06/30/2010

EXHIBIT A

PUBLIC NOTICE

[Applicant] has filed an application with the Connecticut Siting Council ("Council") for the construction of a telecommunications facility on this site. The maximum height of this facility shall not exceed [100 ft]. The Council will hold a public hearing on [February 4, 2010] at [Town Hall, 52 Lyme St, Old Lyme, CT] at 3 p.m. and 7 p.m. A copy of the application can be reviewed at the town hall or at the offices of the Council in New Britain, CT. For more information, please contact the Council by telephone at (860) 827-2935, electronically at siting.council@ct.gov, or by mail at 10 Franklin Square, New Britain, Connecticut, 06051.

1-21-10

PUBLIC NOTICE

[Applicant] has filed an application with the Connecticut State Council ("Council") for the construction of a telecommunications facility on this site. The maximum height of this facility shall not exceed 1100 ft. The Council will hold a public hearing on [February 4, 2010] at [Town Hall, 52 Lyme St, Old Lyme, CT] at 3 p.m. and 7 p.m. A copy of the application can be reviewed at the town hall or at the offices of the Council in New Britain, CT. For more information, please contact the Council by telephone at (860) 807-2915, electronically at ctinfo@connectictp.gov or by mail at 10 Franklin Square, New Britain, Connecticut, 06003.

1 21 10