

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF T-MOBILE NORTHEAST, : DOCKET NO. 401
LLC FOR A CERTIFICATE OF : :
ENVIRONMENTAL COMPATIBILITY AND : :
PUBLIC NEED FOR THE CONSTRUCTION, : :
MAINTENANCE AND OPERATION OF A : :
TELECOMMUNICATIONS FACILITY AT : :
208 VALLEY ROAD, NEW CANAAN, : :
CONNECTICUT : AUGUST 11, 2010

**POST-HEARING BRIEF OF INTERVENOR
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS**

On April 5, 2010, T-Mobile Northeast, LLC (“T-Mobile”) submitted an application (“Application”) to the Connecticut Siting Council (“Council”) for a certificate of environmental compatibility and public need (“Certificate”) for the construction, maintenance and operation of a 120-foot monopole tower on property at 208 Valley Road, New Canaan, Connecticut (“Property”). (T-Mobile Exhibit (“Exh.”) 1.)

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) has identified a need for wireless service in New Canaan, particularly along portions of State Route 106 and local roads in the central and eastern portions of the Town. Cellco determined that the proposed T-Mobile facility was a structure that could help it satisfy a significant portion of that need. Consequently, on June 11, 2010, Cellco filed a petition to intervene in the Application and hearing process (“Petition”). (Cellco Exh. 1.) On July 1, 2010, the Council granted Cellco intervenor status.

The Council conducted an evidentiary and public hearing on the Application on July 13, 2010. (July 13, 2010 Transcript (“Tr.”) (Afternoon) at 3). This post-hearing brief is filed on

behalf of Cellco pursuant to Section 16-50j-31 of the Regulations of Connecticut State Agencies (“R.C.S.A.”) and the Council’s directives. (Tr. (Evening) at 60).

The T-Mobile Installation

T-Mobile proposes the installation of a 120 foot monopole tower within a 1,250 square foot leased area in the northerly portion of the Property. Pursuant to its agreement with Silver Hill Hospital, Incorporated, the owner of the Property, all antennas and antenna cables associated with this facility must be concealed inside the monopole structure. To achieve this, the upper 40 feet of T-Mobile’s proposed monopole would maintain a diameter of 30 inches. The lower portion of the monopole, from a height of 80 feet to its base, would maintain a diameter of 53 inches. T-Mobile would install antennas at centerline heights of 117 feet and 107 feet above the finished grade of the site compound. (T-Mobile Exh. 1; Tr. at 36). T-Mobile’s radio equipment would be located on the ground near the base of the tower. (T-Mobile Exh. 1).

Cellco’s Need and Installation

Cellco’s network in New Canaan currently experiences gaps in coverage along significant portions of Route 106, as well as local roads in the area between its existing New Canaan, New Canaan South, North Norwalk, Wilton 2 and Wilton D&B cell sites. The Docket No. 401 record contains ample written evidence and testimony that Cellco’s antennas at the 97-foot level on the proposed 120-foot monopole tower would provide quality wireless service and satisfy a significant portion of Cellco’s coverage needs in central and eastern portions of New Canaan. (Cellco Exh. 2 at 2-3 and Tab 1).

To satisfy this need Cellco would install six (6) panel-type antennas (two antennas per sector) at the 97-foot level on the proposed monopole tower. Initially, Cellco’s Silver Hill

facility would provide cellular and LTE service only. PCS service would be provided in the future if capacity needs in this area increase. (Cellco Exh. 2).

In accordance with the requirements of Silver Hill Hospital, Cellco's antennas and antenna cables will be concealed inside the monopole structure. (Cellco Exh. 2). In order to accommodate Cellco's six antennas at the 97-foot level, T-Mobile's antennas at the 117 and 107-foot levels and all of the necessary antenna cables inside the monopole, the diameter of the upper portion of the monopole will need to be increased from 30 inches to 54 inches. Consequently, the diameter of the lower portion of the monopole, from a height of 80 feet to its base, would also increase from 53 inches to 76 inches. (Tr. (Afternoon) at 19). By installing six (6) antennas at the 97-foot level on the tower, Cellco can satisfy its coverage objectives in the area while occupying only a single antenna location on the tower. The 87-foot level on the tower would remain open and available for future co-location by a third wireless carrier. (T-Mobile Exh. 1; Cellco Exh. 2; Tr. (Afternoon) at 50).

Cellco's radio equipment and a diesel-fueled back-up generator would be located in a 12' x 24' single-story shelter installed near the base of the tower. (Cellco Exh. 2).

Alternatives Considered

During the course of the hearing, the Council explored alternative antenna configurations and tower options in an effort to address Cellco's need for a facility and reduce, to the extent possible, the diameter of the proposed monopole. When asked if it could use two antenna mounting levels (the 97-foot and 87-foot levels) rather than one, Cellco's witness confirmed that its antennas could physically fit inside a 30 inch diameter monopole. A 30-inch diameter monopole is not large enough, however, to house the T-Mobile and Cellco antennas and all of the necessary antenna cables. (Tr. (Afternoon) at 73-80; Cellco Exh. 3; Cellco Exh. 4). Project

engineers estimate that the smallest monopole diameter needed to accommodate the T-Mobile and Cellco antennas and all antenna cables (each carrier using two antenna mounting locations), would be 40 and 48 inches. (Tr. (Evening) at 59).

The physical space limitations inside a narrow monopole tower, like that proposed by T-Mobile, would also result in the routing of antenna cables adjacent to or in front of Cellco's antennas located at lower levels on the monopole. This would likely result in interference with Cellco's wireless transmission. (Tr. (Afternoon) at 73-74). These potential interference problems would not occur with a larger diameter monopole and the proper routing of antenna cables. (See Cellco Exh. 3).

Additional alternatives discussed during the July 13, 2010 hearing included the installation of a second monopole tower and the use of external "flush-mounted" antenna. Cellco did approach Silver Hill Hospital and asked about leasing space for a second tower at the Property that would be designed to satisfy Cellco's needs alone. That request was denied. (Tr. (Afternoon) at 82). T-Mobile, during its lease negotiations, also discussed the potential use of flush-mounted antennas with the Property owner. Again, Silver Hill Hospital insisted that all antennas and antenna cables remain concealed inside a monopole structure. (Tr. (Afternoon) at 32).

Visual Impact


Cellco's shared use of the T-Mobile facility at Silver Hill Hospital will not require an increase in height of the proposed structure and will not result in an increase in overall visibility of the tower. (Cellco Exh. 2, p. 3 and Tab 3). The only potential visual effect that could occur relates to the increased diameter of the monopole that is needed to accommodate all proposed antennas and antenna cables. According to the Visual Resource Evaluation Report prepared for

Cellco, the visual effect of the larger diameter monopole will be “insignificant”. (Cellco Exh. 2, p. 3 and Tab 3).

Conclusion

The evidence in the Docket No. 401 record supports Cellco’s need for a new facility in the central and eastern portions of New Canaan. The installation of Cellco antennas on the proposed T-Mobile tower at the Silver Hill Hospital will satisfy Cellco’s coverage objectives in the area. Due to limitations imposed by the Property owner, all antennas and antenna cables must be concealed inside the proposed monopole structure. In order to accommodate the needs of T-Mobile and Cellco, and maintain the 87’ level for future use by a third wireless carrier, the diameter of the upper portion of the monopole will need to increase 54 inches. The significant benefits realized in satisfying the needs of multiple carriers in New Canaan outweighs the minimal additional (visual) environmental impact associated with the larger diameter monopole. Cellco, therefore, respectfully requests that the Council approve the T-Mobile Application, as modified by the Cellco proposal and issue a Certificate for this Facility accordingly.


Respectfully submitted,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

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CERTIFICATION

I hereby certify that on this 11th day of August, 2010, a copy of the foregoing was sent,
postage prepaid, to the following parties and intervenors:

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