

**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 77-145 PLEASANT POINT ROAD IN THE
TOWN OF BRANFORD, CONNECTICUT

DOCKET NO. 407

Date: January 11, 2011

**FIRST SET OF INTERROGATORIES BY APPLICANT
T-MOBILE NORTHEAST LLC TO THE TOWN OF BRANFORD**

The Applicant, T-Mobile Northeast LLC ("T-Mobile"), through counsel, respectfully submits the following interrogatories to the Intervenor, Town of Branford, in connection with the above-captioned docket. T-Mobile requests responses to these interrogatories by January 18, 2011, in accordance with the scheduling order of the Connecticut Siting Council.

Instructions

For each study, test, analysis or report responsive to any of the following interrogatories, please state: (a) the nature and type of each study, test, analysis or report; (b) who conducted each study, test, analysis or report; (c) when each study, test, analysis or report occurred; and (d) the results of each study, test, analysis or report.

Additionally, please provide a copy of each study, test, analysis or report responsive to any of the following interrogatories.

None of the following interrogatories seek any documents or communications that are subject to the attorney-client privilege or the work product doctrine.

INTERROGATORIES

1. Please provide all the factual support for the proposition in the Application to Intervene by the Town of Branford ("Town"), dated December 16, 2010 ("ATI"), that the telecommunications facility, proposed by T-Mobile Northeast LLC, at Pleasant Point Road, Branford, Connecticut ("Facility") has or is reasonably likely to have the effect of unreasonably polluting the natural resources of the State.

2. Please provide all the factual support for the proposition in the ATI that the Facility has or is reasonably likely to have the effect of unreasonably impairing the natural resources of the State.

3. Please provide all the factual support for the proposition in the ATI that the Facility has or is reasonably likely to have the effect of unreasonably destroying the natural resources of the State.

4. Please provide all the factual support for the proposition in the ATI that the Facility would "unreasonably impair the visual quality of the environment in and about a scenic road, Route 146 and Long Island Sound"

5. Please provide all the factual support for the proposition in the ATI that the proposed Facility "is reasonably likely to cause viewshed deterioration that is unreasonable"

6. Please provide all the factual support for the proposition in the ATI that there is "at least one feasible alternative of lesser impact" to the proposed Facility.

7. Please provide all the factual support for the proposition in the ATI that the proposed Facility "will have a negative impact on the scenic vistas in Branford."

8. Please state with specificity which "scenic vistas" would be impacted negatively by the proposed Facility.

9. Please provide all the factual support for the proposition in the ATI that "there exists an alternative location and configuration [for and to the proposed Facility] which can provide adequate coverage for the applicant by utilizing antenna technology and configurations, and lower heights to achieve adequate coverage."

10. Please provide all the factual support for the proposition in the ATI that the "height requested [for the proposed Facility] is excessive and unnecessary to meet the public need"

11. Please provide all the factual support for the proposition in the ATI that the proposed Facility ". . . will be visible from sensitive historic and recreational receptors including the scenic road, Route 146, residential neighborhoods and Long Island Sound adjacent to the facility."

12. Please provide all the factual support for the proposition in the ATI that the proposed Facility is “adjacent” to “residential neighborhoods.”

13. Please provide all the factual support for the proposition in the ATI that the proposed Facility is “adjacent” to the “Long Island Sound.”

14. Please provide all the factual support for the proposition in the ATI that the “design [of the proposed Facility] does not incorporate the best available technology for reducing the visual impacts of the facility in that it fails to consider lower antenna height, antenna combining technology, closer spacing, close mounting and other stealth techniques, including multiple shorter antenna structures to cover the target area.”

15. Please define “antenna combining technology” as the term is used in the ATI and provide examples.

16. Please define “closer spacing” as the term is used in the ATI and provide examples.

17. Please define “close mounting” as the term is used in the ATI and provide examples.

18. Please provide all the factual support for the proposition in the ATI that “antenna combining technology” is a feasible alternative to the proposed Facility.

19. Please state what studies, tests, analyses or reports the Town relied upon to determine that “antenna combining technology” is a feasible alternative to the proposed Facility.

20. Please provide all the factual support for the proposition in the ATI that “closer spacing” is a feasible alternative to the proposed Facility.

21. Please state what studies, tests, analyses or reports the Town relied upon to determine that “closer spacing” is a feasible alternative to the proposed Facility.

22. Please provide all the factual support for the proposition in the ATI that “close mounting” is a feasible alternative to the proposed Facility.

23. Please state what studies, tests, analyses or reports the Town relied upon to determine that “close mounting” is a feasible alternative to the proposed Facility.

24. Please specify exactly what “other stealth techniques” as referenced in the ATI would serve as a feasible alternative to the proposed Facility.

25. Please state what studies, tests, analyses or reports the Town relied upon to determine that “other stealth techniques” is a feasible alternative to the proposed Facility.

26. Please provide all the factual support for the proposition in the ATI that “multiple shorter antenna structures” is a feasible alternative to the proposed Facility.

27. Please describe with specificity where T-Mobile would locate “multiple shorter antenna structures” so as to replace the proposed Facility as a feasible alternative.

28. Please describe with specificity what height T-Mobile would use for each of the “multiple shorter antenna structures” so as to replace the proposed Facility as a feasible alternative.

29. Please state what studies, tests, analyses or reports the Town relied upon to determine that “multiple shorter antenna structures” is a feasible alternative to the proposed Facility.

31. Please state whether the Town conducted a visual analysis of the proposed Facility to determine the visual impact of the proposed Facility.

32. Please state whether the Town conducted a visual analysis of the proposed Facility with “lower antenna height” to determine the visual impact of the proposed Facility with “lower antenna height,” if any.

33. Please state whether the Town conducted a visual analysis of the proposed Facility with “antenna combining technology” to determine the visual impact of the proposed Facility with “antenna combining technology,” if any.

34. Please state whether the Town conducted a visual analysis of the proposed Facility with “closer spacing” to determine the visual impact of the proposed Facility with “closer spacing,” if any.

35. Please state whether the Town conducted a visual analysis of the proposed Facility with “close mounting” to determine the visual impact of the proposed Facility with “close mounting,” if any.

36. Please state whether the Town conducted a visual analysis of the proposed Facility with “other stealth techniques” to determine the visual impact of the proposed Facility with “other stealth techniques”, if any.

37. Please state whether the Town conducted a visual analysis of the proposed Facility with “multiple shorter antenna structures” to determine the visual impact of the proposed Facility with “multiple shorter antenna structures,” if any.

38. Please state whether the Town conducted any studies, tests, analyses or reports regarding T-Mobile’s need for the Facility or the Facility’s coverage objective.

39. Please state whether the Town conducted any studies, analyses or tests to determine whether the proposed Facility has or is reasonably likely to have the effect of unreasonably polluting the natural resources of the state.

40. Please state whether the Town conducted any studies, analyses or tests to determine whether the proposed Facility has or is reasonably likely to have the effect of unreasonably impairing the natural resources of the state.

41. Please state whether the Town conducted any studies, analyses or tests to determine whether the proposed Facility has or is reasonably likely to have the effect of unreasonably destroying the natural resources of the state.

42. Please state whether the Town conducted any other studies, tests or analyses concerning the proposed Facility which are not addressed by any of the preceding interrogatories.

Respectfully submitted,

T-MOBILE NORTHEAST LLC

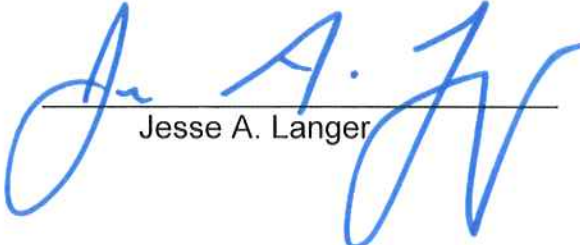
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CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and First Class U.S. Mail, postage prepaid, to all parties and interveners of record, as follows:

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