

JESSE A. LANGER

PLEASE REPLY TO: Bridgeport
E-Mail Address: jlanger@cohenandwolf.com

February 4, 2011

VIA FEDERAL EXPRESS and ELECTRONIC MAIL

Ms. Linda Roberts
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

**Re: Docket No. 413,
Application by Cellco Partnership, d.b.a.
Verizon Wireless, for a Certificate of Environmental
Compatibility and Public Need for a Telecommunications
Facility at 723 Leetes Island Road, (Medlyn Farm), in the
Town of Branford, Connecticut**

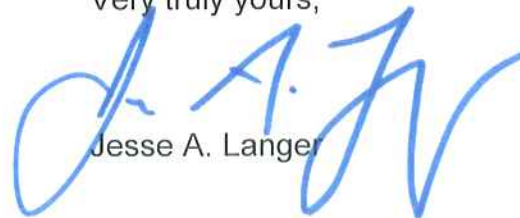
Dear Ms. Roberts:

I have enclosed the following documents filed on behalf of the Intervenor,
T-Mobile Northeast LLC, in connection with the above-captioned matter:

- (1) Original and fifteen (15) copies of Responses by T-Mobile Northeast LLC to the Pre-Hearing Interrogatories propounded by the Connecticut Siting Council.

Please contact me if you have any questions.

Very truly yours,



Jesse A. Langer

Enclosures

cc: Service List

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY CELLCO
PARTNERSHIP, d/b/a VERIZON WIRELESS,
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 723 LEETES ISLAND ROAD, (MEDLYN
FARM), IN THE TOWN OF BRANFORD,
CONNECTICUT

DOCKET NO. 413

Date: February 4, 2011

**INTERROGATORY RESPONSES TO THE CONNECTICUT
SITING COUNCIL FROM T-MOBILE NORTHEAST LLC**

The Intervenor, T-Mobile Northeast LLC ("T-Mobile"), submits the following responses to the first set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council in connection with the above-captioned Application.

1. What frequencies is T-Mobile licensed to use in the area of the proposed facility?

A1 T-mobile is licensed for the following frequencies in the New Haven BTA:

**PCS Band: TX1: 1935.000 MHz to 1945.000 MHz
RX1: 1855.000 MHz to 1865.000 MHz**

**TX2: 1980.000 MHz to 1985.000 MHz
RX2: 1900.000 MHz to 1905.000 MHz**

**AWS Band: TX1: 2110.000 MHz to 2120.000 MHz
RX1: 1710.000 MHz to 1720.000 MHz**

**TX2: 2140.000 MHz to 2145.000 MHz
RX2: 1740.000 MHz to 1745.000 MHz**

2. Would T-Mobile's antennas comply with E911 requirements?

A2 T-Mobile's antennas would comply with E911 requirements.

3. Identify T-Mobile's adjacent sites with which the proposed site would hand off signals. Include addresses of these sites.

A3 Please see Attachment A appended hereto. Attachment A includes a list of T-Mobile's adjacent sites to which the proposed facility would hand off signals.

4. For each of T-Mobile's licensed frequencies, provide propagation maps showing T-Mobile's existing coverage in the vicinity of the proposed facility and what T-Mobile's coverage would be with its antennas installed at their proposed height.

A4 T-Mobile's licensed frequencies for PCS (GSM) and AWS (UMTS) service are within 200 MHz of each other. T-Mobile has designed this facility for GSM coverage. The propagation characteristics for these two bands would be similar. There would not be a noticeable difference between the two bands at the same coverage thresholds. Please see Attachment B appended hereto, which includes propagation maps of (1) T-Mobile's existing coverage in the vicinity of the proposed facility; (2) T-Mobile's coverage with antennas installed on the proposed facility at the proposed height of 80 feet above ground level ("AGL"); and (3) T-Mobile's coverage on the proposed facility at the proposed height of 80 feet AGL, also with anticipated coverage from the proposed site identified as CTNH 802 (pending before the Council in Docket No. 407). These propagation maps also depict anticipated coverage from CTNH 801 (approved by the Council in Docket 386). Lastly, these propagation maps show the location, without coverage, of a proposed site identified as CTNH 805 in Guilford (to be filed with the Council).

5. What is the lowest height at which T-Mobile's antennas could achieve its coverage objectives from this site? Submit propagation maps showing the coverage at ten feet below this height.

A5 The lowest height that T-Mobile could utilize is the approved minimum height of the Facility, which would be 80 feet AGL. At this height the proposed facility would make a marginal connection to the adjacent sites to the east and west along Route 146 and the Amtrak rail line, specifically CTNH806A to the east and the proposed T-Mobile CTNH802B to the west. Please see Attachment C appended hereto, which includes propagation maps of (1) coverage with T-Mobile's antennas at 70 feet AGL and (2) coverage with T-Mobile's antennas at 70 feet AGL with anticipated coverage from the proposed site identified as CTNH 802 (pending before the Council in Docket No. 407). These propagation maps also depict anticipated coverage from CTNH 801 (approved by the Council in Docket 386). Lastly, these propagation maps show the location, without coverage, of a proposed site identified as CTNH 805 in Guilford (to be filed with the Council).

6. What is the signal strength for which T-Mobile designs its system? For in-vehicle coverage? For in-building coverage? Does this signal strength differ according to the different frequencies T-Mobile is licensed to use?
- A6** T-Mobile's minimum design threshold for in-building coverage is -76 dBm. T-Mobile's minimum design threshold for in-vehicle coverage is -84 dBm. T-Mobile would use the proposed facility for GSM coverage initially. T-Mobile would also include a UMTS overlay, but T-Mobile's design criteria are limited to GSM for this facility. There are subtle differences in the thresholds between UMTS and GSM.
7. What are T-Mobile's existing signal strengths in those areas it is seeking to cover from this site? At what frequencies?
- A7** T-Mobile's existing coverage levels range from approximately -85 dBm to approximately -110 dBm within the coverage objective.
8. Does T-Mobile have any statistics on dropped calls in the vicinity of the proposed facility? If so, what do they indicate? Does T-Mobile have any other indicators of substandard service in this area?
- A8** The two sectors leading into the coverage objective for the proposed facility include (1) CT11027D Sector C, which has a dropped call rate of 4.71 percent and (2) CTNH806A Sector C, which has a dropped call rate of 8.19 percent. These rates are much higher than T-Mobile's 2 percent target rate.
9. What are the lengths of the respective coverage gaps on Route 146 and along the Amtrak rail line that T-Mobile is seeking to cover from the proposed site at PCS frequencies? At AWS frequencies?
- A9** The coverage gap along Route 146 is 1.39 miles. The coverage gap along the Amtrak rail line is 1.38 miles. These figures account for T-Mobile's proposed facility identified as CTNH 802, which is currently pending before the Council in Docket No. 407. The gaps for both frequencies are the same.
10. What are the coverage gaps on local streets that T-Mobile would cover from the proposed site at PCS frequencies? At AWS frequencies?
- A10** T-Mobile would provide the following coverage from the proposed facility at the proposed height of 80 feet AGL: (1) 0.70 miles along Old Quarry Road; (2) 0.42 miles along New Quarry Road; (3) 0.35 miles along Andrews Road; (4) 0.37 miles along Inner Circle. These figures account for T-Mobile's proposed facility identified as CTNH 802, which is currently pending before the Council in Docket No. 407. The gaps for both frequencies are the same.

11. What distances on T-Mobile's target areas would T-Mobile cover from the proposed facility?

A11 T-Mobile would cover the following distances from the proposed facility at 80 feet AGL: (1) 1.44 miles along Route 146; (2) 1.39 miles along the Amtrak rail line; (3) 0.47 miles along Old Quarry Road; (4) 0.42 miles along New Quarry Road; (5) 0.35 miles along Andrews Road; (6) 0.37 miles along Inner Circle.

12. Describe the antenna array T-Mobile would install on the proposed facility.

A12 T-Mobile would propose a full antenna array with 9 antennas

Respectfully Submitted,
T-MOBILE NORTHEAST LLC

By:



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CERTIFICATION

I hereby certify that on this day a copy of the foregoing, including all attachments, was delivered by Electronic Mail and regular mail, postage prepaid, to all parties and intervenors of record, as follows:

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
(Via Email: kbaldwin@rc.com)

Christopher B. Fisher, Esq.
Lucia Chiochio, Esq.
Cuddy & Feder, LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
(Via Email: CFisher@cuddyfeder.com)
(Via Email: LChiochio@cuddyfeder.com)



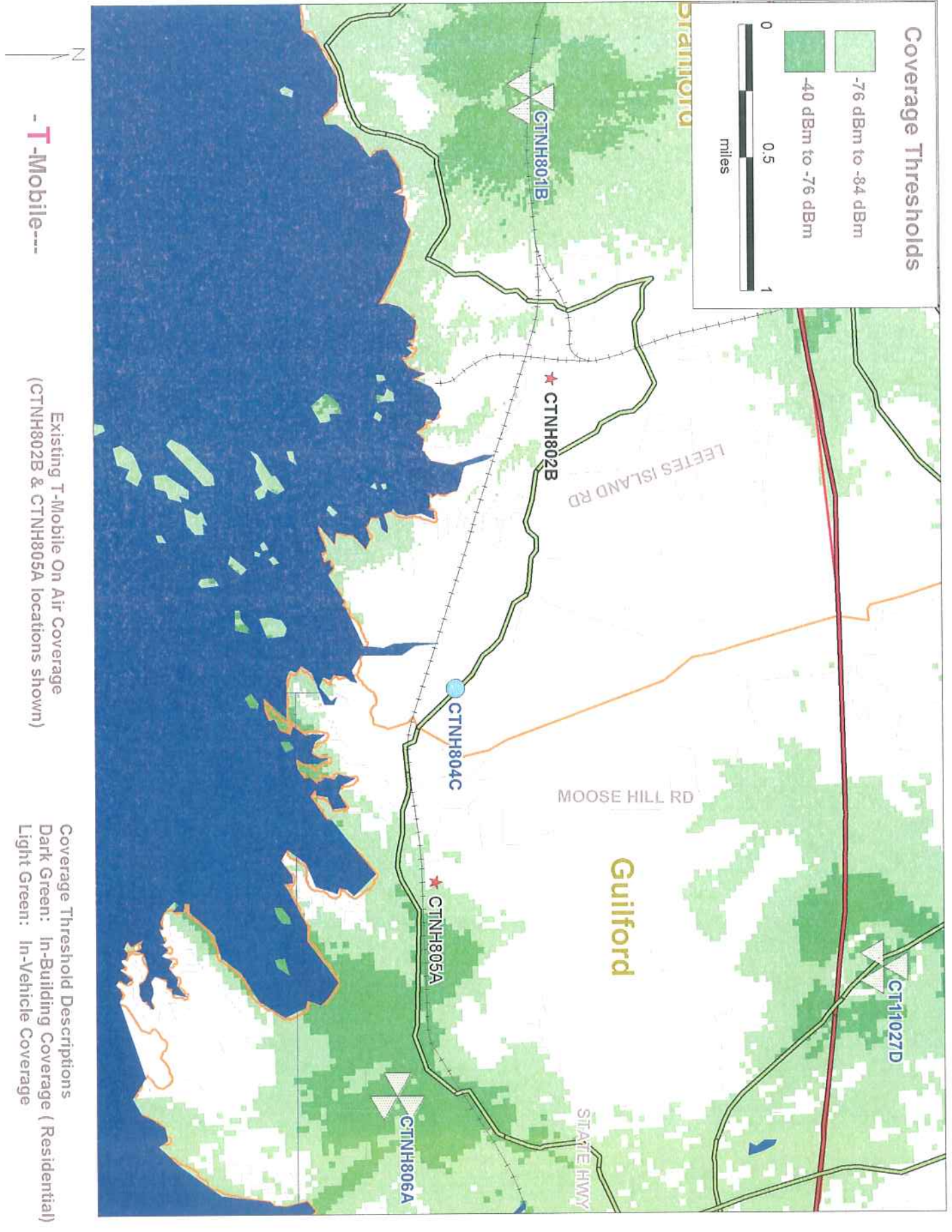
Jesse Langer

ATTACHMENT A

CTNH804C Surrounding Site List

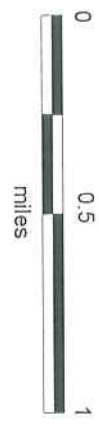
Site ID	Site Name	Address	Town	Structure Type	Structure Height	T-Mobile Antenna Height	Status
CTNH802B	Branford 2	Pleasant Point Road	Branford	Monopole	160 feet	157 feet 9 inches	Proposed
CT11027D	Sprint Guilford	1919 Boston Post Road	Guilford	Monopole	150 feet	147 feet	On Air
CTNH806A	Sachems Water Tank	188 Sachems Head Road	Guilford	Water Tank	87 feet 10 inches	85 feet 4 inches	On Air

ATTACHMENT B



Coverage Thresholds

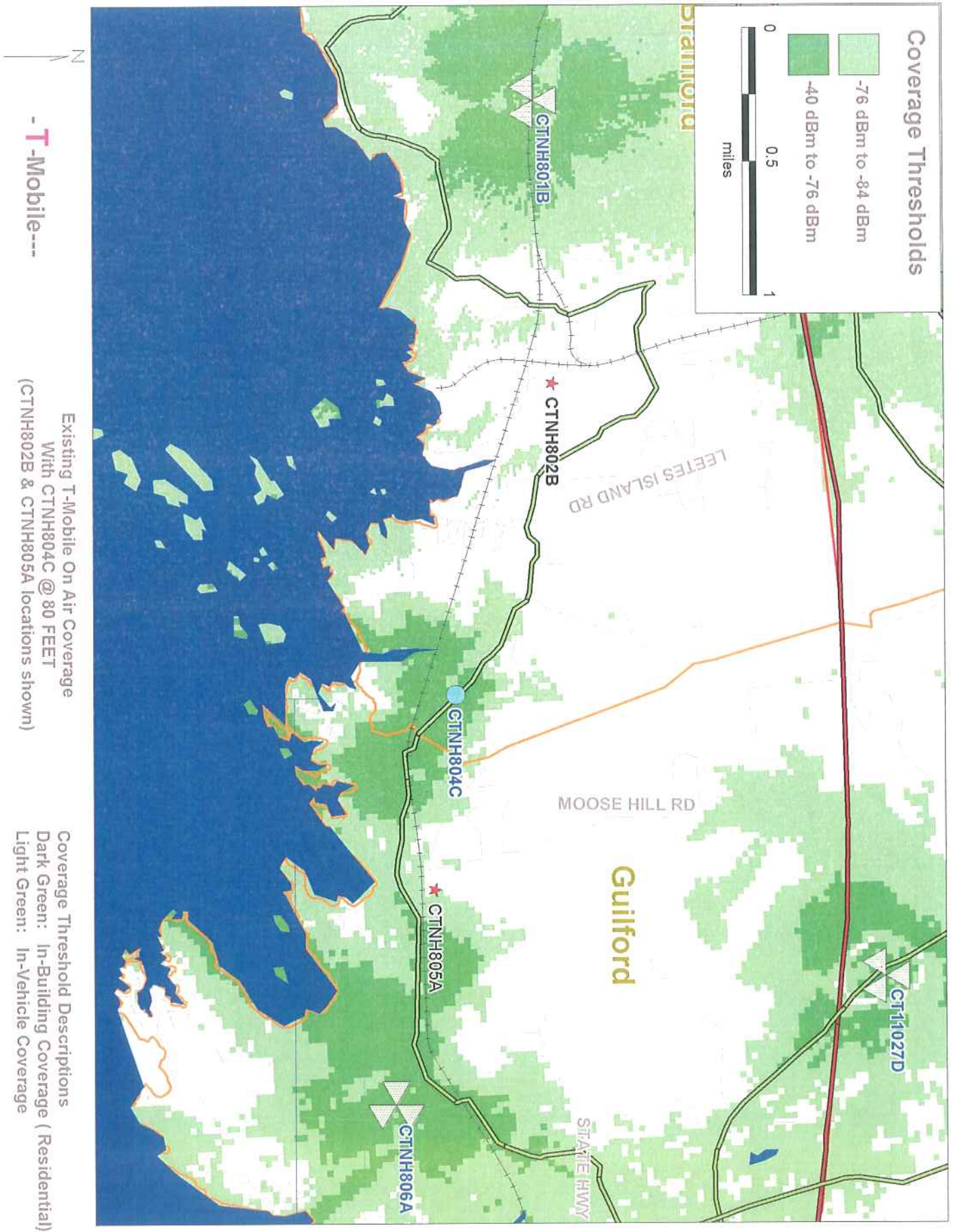
- 76 dBm to -84 dBm
- 40 dBm to -76 dBm



-T-Mobile---

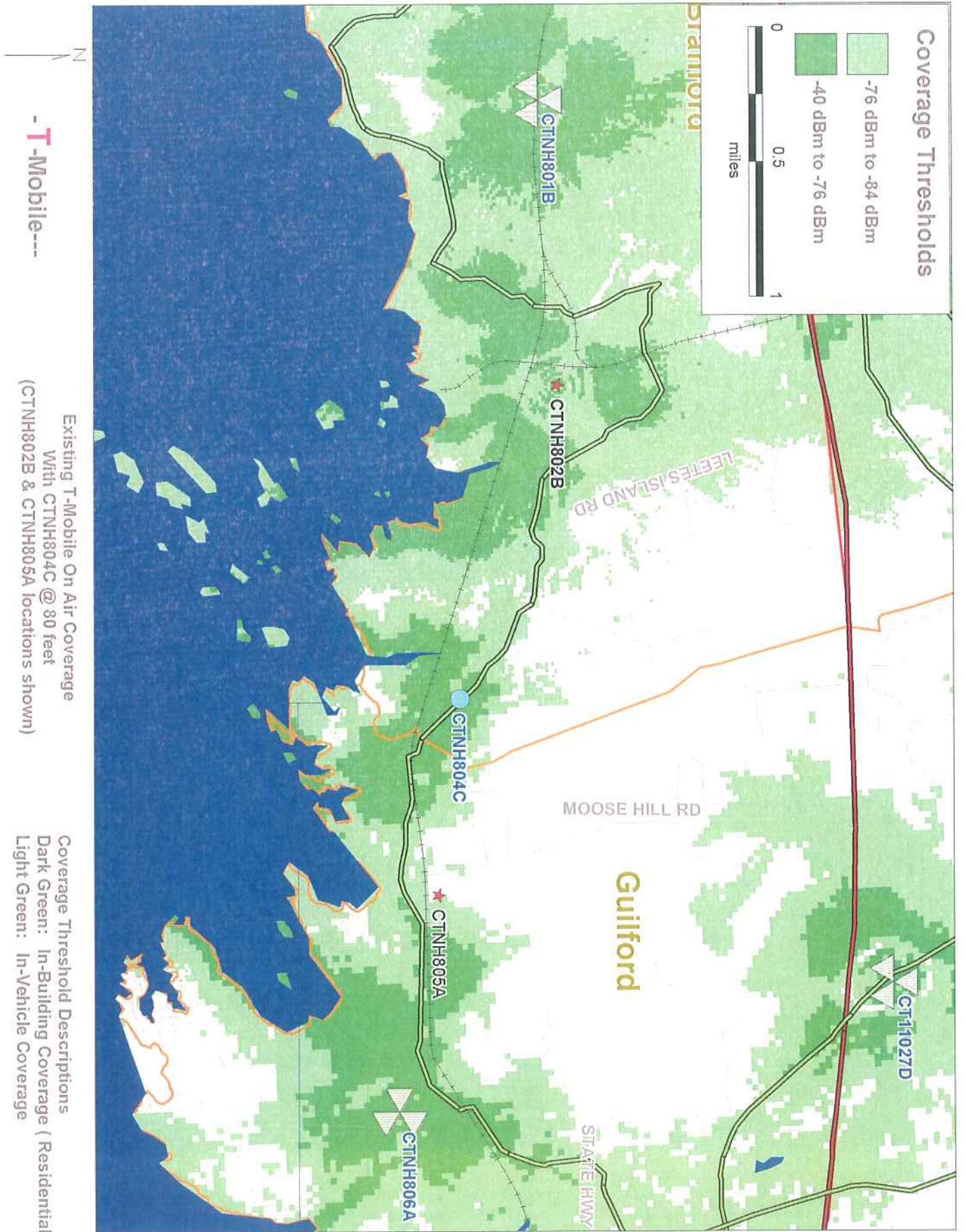
Existing T-Mobile On Air Coverage
(CTNH802B & CTNH805A locations shown)

Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage



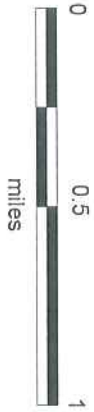
Existing T-Mobile On Air Coverage
 With CTNH804C @ 80 FEET
 (CTNH802B & CTNH805A locations shown)

Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage



Coverage Thresholds

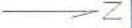
- 76 dBm to -84 dBm
- 40 dBm to -76 dBm



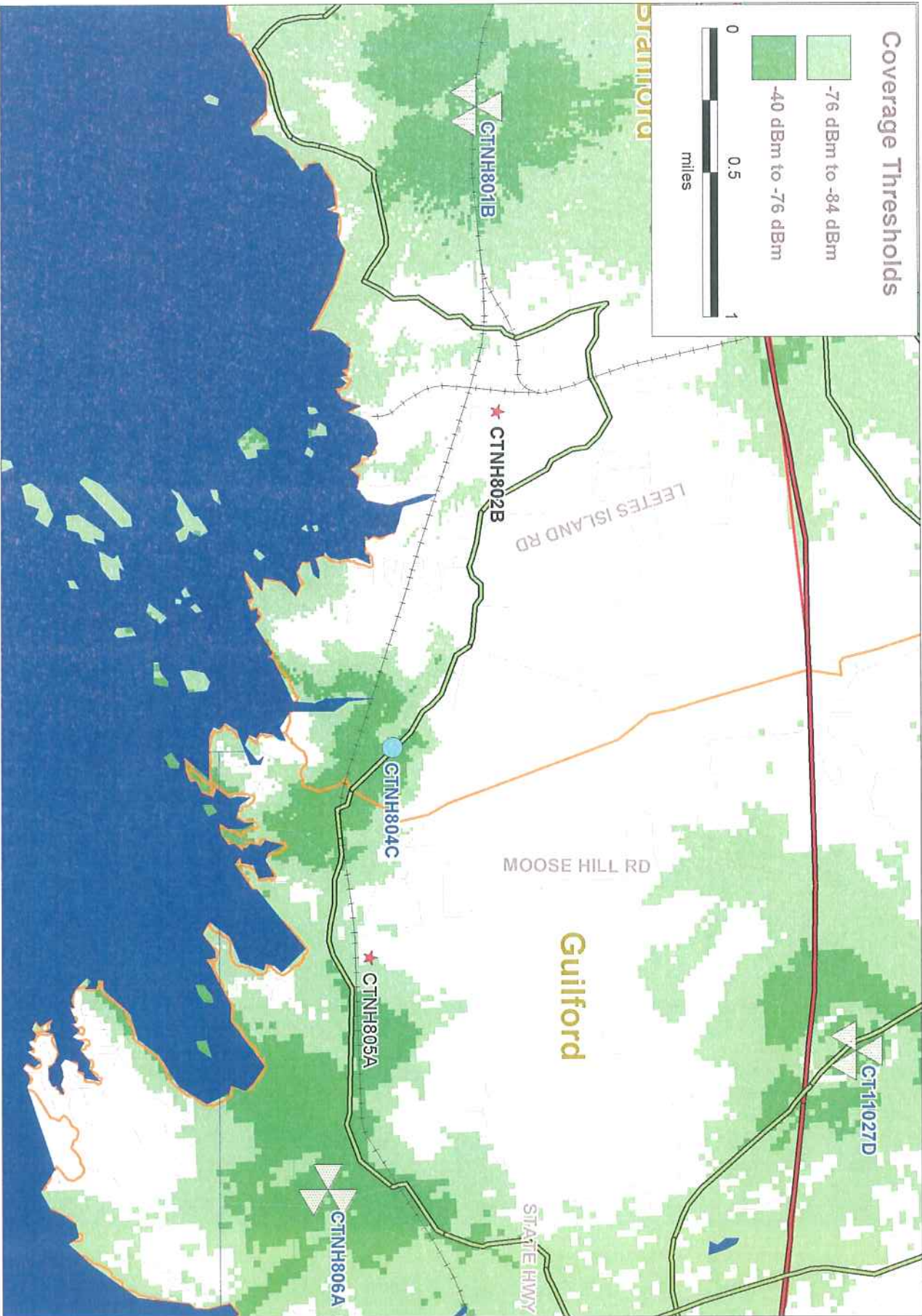
Existing T-Mobile On Air Coverage
 With CTNNH804C @ 80 feet
 (CTNNH802B & CTNNH805A locations shown)

Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage

T-Mobile



ATTACHMENT C



Coverage Thresholds

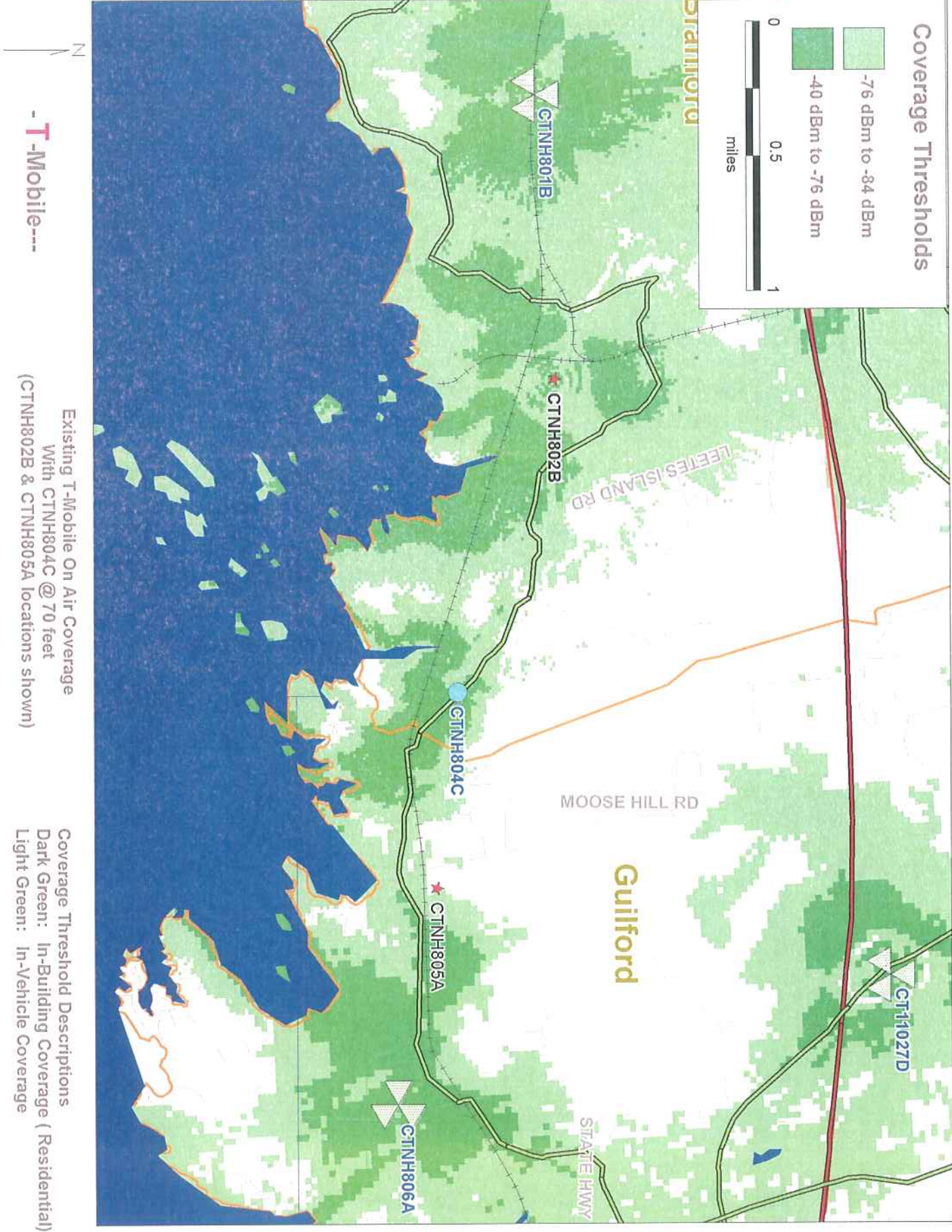
- 76 dBm to -84 dBm
- 40 dBm to -76 dBm



T-Mobile

Existing T-Mobile On Air Coverage
 With CTNNH804C @ 70 FEET
 (CTNNH802B & CTNNH805A locations shown)

Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage



Existing T-Mobile On Air Coverage
 With CTNH804C @ 70 feet
 (CTNH802B & CTNH805A locations shown)

Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage