

**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: June 28, 2011

**POST-HEARING BRIEF OF  
INTERVENOR T-MOBILE NORTHEAST LLC**

Pursuant to § 16-50j-31 of the Regulations of Connecticut State Agencies, T-Mobile Northeast LLC ("T-Mobile") submits this post-hearing brief in support of the above-captioned Application for Certificate of Environmental Compatibility and Public Need ("Application"). This brief addresses T-Mobile's need for a facility in the area of the facility proposed by Cellco Partnership d.b.a. Verizon Wireless ("Verizon").<sup>1</sup>

**I. BACKGROUND**

On December 10, 2010, Verizon filed the Application with the Connecticut Siting Council ("Council"), seeking to construct, operate and maintain a wireless telecommunications facility ("Facility") at 723 Leetes Island Road, Branford ("Property"). On December 16, 2010, T-Mobile filed a Petition to Intervene in Docket 413, as the Facility would be an important component of T-Mobile's network design in New Haven County, pursuant to General Statutes § 16-50n and Regulations of Connecticut State Agencies § 16-50j-15a. (*Verizon Exhibit 1; T-Mobile, Exhibit 1.*)

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<sup>1</sup> T-Mobile submits its Proposed Findings of Fact contemporaneously with this Post-Hearing Brief.

## II. A SIGNIFICANT PUBLIC NEED EXISTS FOR THE FACILITY

General Statutes § 16-50p (a) (3) (A) mandates that the Council “shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine . . . [that] a public need for the facility and the basis of the need . . . .” The record demonstrates amply that there is a significant public need for the Facility, specifically a need for T-Mobile.

There is a coverage gap in T-Mobile’s network in the areas surrounding the proposed Facility. The coverage gap consists of coverage below T-Mobile’s minimum design threshold of -84 dBm. The Facility would remedy the existing coverage gap in this area of the Town of Branford (“Town”), specifically along Route 146, Old Quarry Road, Andrews Road and Inner Circle, as well as the Amtrak rail line that passes through the area and the areas surrounding the site of the Facility. Accordingly, the Facility would be an integral component of T-Mobile’s wireless network in the Town. (*Pre-Filed Testimony of Scott Heffernan [“Heffernan,”] pp. 3-5; T-Mobile’s Responses to the Council’s First Set of Interrogatories [“T-Mobile First Interrog. Resp.”]; T-Mobile’s Responses the Town’s First Set of Interrogatories, including supplemental responses [“T-Mobile Response to Town Interrog.”]; April 20, 2011 3:00p.m. Hearing Transcript [4.20.11 3:00p.m. Tr.], p. 74.*)

To provide effective coverage in the area of the proposed Facility, T-Mobile would need to mount its antenna array at 80 feet above grade level (“AGL”). An antenna array at 80 feet AGL would allow T-Mobile to overcome the mature vegetation and topography in the area, and achieve the coverage objective. This height would also allow T-Mobile to provide reliable 911/emergence call service to T-Mobile users.

Therefore, the Facility satisfies a significant need for both T-Mobile and the public. (*Heffernan*, pp. 4-5; *T-Mobile First Interrog. Resp.*; *T-Mobile Response to Town Interrog.*; 4.20.11 3:00p.m. Tr., p. 77.)

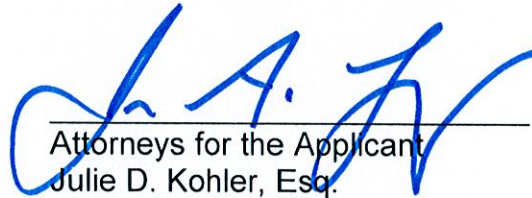
Additionally, the approval of the Facility would comport with the Connecticut legislature's determination that the sharing of towers to avoid the unnecessary proliferation of towers is in the public interest. General Statutes § 16-50aa; *see also* General Statutes §16-50p (b) (1) (A). The Facility would provide co-location opportunities for T-Mobile and AT&T, as well as the Town if so desired.

### III. CONCLUSION

The record supports the approval of a certificate for the Facility. The Facility is necessary to provide adequate wireless coverage in this area of the Town for T-Mobile, Verizon and AT&T. T-Mobile requests that the Council issue a certificate for the Facility, reflecting in its Decision and Order, consistent with General Statutes § 16-50x, that such approval satisfies and is in lieu of all local and state approvals and certifications.

**THE INTERVENOR,  
T-MOBILE NORTHEAST LLC**

By:

A handwritten signature in blue ink, appearing to be 'J.A. Langer', is written over a horizontal line.

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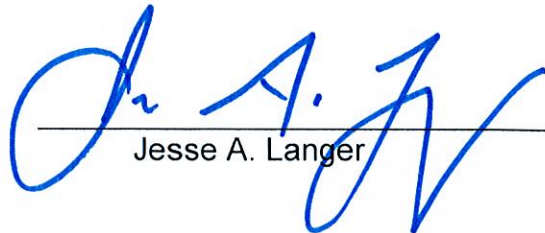
## CERTIFICATION OF SERVICE

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

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