

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
: :  
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 414  
D/B/A VERIZON WIRELESS FOR A :  
CERTIFICATE OF ENVIRONMENTAL :  
COMPATIBILITY AND PUBLIC NEED FOR :  
THE CONSTRUCTION, MAINTENANCE :  
AND OPERATION OF A WIRELESS :  
TELECOMMUNICATIONS FACILITY AT 36 :  
RITCH AVENUE, GREENWICH, :  
CONNECTICUT : MARCH 22, 2011

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO  
CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES, SET TWO

On March 11, 2011, the Connecticut Siting Council (“Council”) issued Pre-Hearing Interrogatories, Set Two to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to the above-captioned docket. Below are Cellco’s responses.

Question No. 1

How did Cellco determine that there were no available DOT parcels in the search area? Were locations along the highway considered, such as land between the travel lanes of the highway and exit ramps?

Response

Cellco reviewed aerial photographs and Town of Greenwich Assessor’s records in an effort to identify Connecticut DOT parcels along the Interstate 95 (“I-95”) corridor in or near its southwest Greenwich search ring. (A copy of the search ring map is included behind Tab 8 of the Application). The closest DOT parcel identified was the DOT weigh station located approximately 0.75 miles to the northeast of the proposed facility. The weigh station is outside

of Cellco's search ring but appears to be within the "limited access highway" line for I-95. Cellco could not satisfy its coverage objectives in southwest Greenwich with a cell site at the weigh station. Coverage from a site at the weigh station would also provide too much overlapping coverage with Cellco's existing Greenwich South facility.

Based on its experience with the DOT in the past, Cellco does not consider the area between the travel lanes and the exit ramps within the I-95 right of way (a "limited access highway") as a viable or realistic option for the siting of a telecommunications tower. According to the DOT's August 7, 2006 Policy Statement Regarding Telecommunications Installations Within State Highway Rights Of Way (the "DOT Policy Statement"), access to construct and maintain telecommunications facilities within the highway right of way is prohibited from the travel lanes or ramps. (See Item no. 22 of the Council's standard list of Administrative Notice items). Accessing the I-95 right of way from outside the right of way itself would require DOT to approve a permanent break in the I-95 limited access highway line.

Question No. 2

Does Cellco have any tower facilities in Connecticut located on DOT property? If so, please describe the location, type of DOT property, and Cellco installation.

Response

No.

Question No. 3

Did Cellco consider locations for a facility on Town of Greenwich property (Western Middle School, Resource Recovery Area, New Lebanon School). If not, why not?

Response

No. Cellco representatives met, on numerous occasions, with Town of Greenwich officials prior to filing the Docket No. 414 application with the Council. At no time during these discussions did the Town suggest or offer the use of any municipal properties in the area, including the Western Middle School, the New Lebanon School or the Town's Resource Recovery Area. Unless specifically directed to a school property by the municipality, Cellco does not generally pursue school properties for the siting of telecommunications facilities. This question was presented to the Town of Greenwich. In an e-mail dated March 22, 2011, the Town's Attorney John Wetmore, on behalf of the First Selectman, confirmed that the Town "has no interest at this time seeing a cell tower developed on the schools or at the transfer station". (See March 22, 2011 e-mail attached).

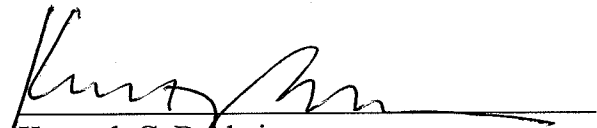
**CERTIFICATION**

I hereby certify that on this 22<sup>nd</sup> day of March, 2011, a copy of the foregoing was sent,  
postage prepaid, to the following parties and intervenors:

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Julie Donaldson Kohler, Esq.  
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Greenwich, CT 06830

  
Kenneth C. Baldwin

## Baldwin, Kenneth

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**From:** John Wetmore [John.Wetmore@greenwichct.org]  
**Sent:** Tuesday, March 22, 2011 8:36 AM  
**To:** Baldwin, Kenneth  
**Subject:** Re: Siting Council Interrogatories

Hi Ken

The First Selectman will be unable to attend the Siting Council hearing. However, he suggested that it would be appropriate for the Police Chief or a Captain to appear and address the public safety need for the Tower. The First Selectman further stated that the Town has no interest at this time in seeing a cell tower developed on the schools or at the Transfer station. I hope this information is helpful.

John W.