

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

PRE-HEARING SUBMISSION OF
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

Sandy M. Carter, Regulatory Manager, Cellco Partnership

Mark Brauer, Radio Frequency Engineer, Cellco Partnership

Carlo Centore, P.E., Centek Engineering, Inc.

Michael Libertine, LEP, Director Environmental Services, Vanasse Hangen Brustlin, Inc.

Dean Gustafson, Senior Environmental Scientist, Vanasse Hangen Brustlin Inc.

B. Exhibits to be offered

Cellco intends, at this time, to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco Partnership d/b/a Verizon Wireless dated December 15, 2010, including attachments and the following bulk file exhibits:
 - a. Greenwich Zoning Regulations;
 - b. Greenwich Plan of Conservation and Development;
 - c. Greenwich Inland Wetlands and Watercourses Regulations; and
 - d. Cellco's "Technical Report" dated September 24, 2010, filed with Greenwich Planning and Zoning Commission.
2. Certificate of Publication from the *Advocate*, filed with the Council on January 3, 2011.
3. Notification Pursuant to C.G.S. § 16-50l(e) dated January 10, 2011.
4. Cellco's Responses to Pre-Hearing Interrogatories (Set One) from the Council dated February 25, 2011.
5. Sign Posting Affidavit dated March 14, 2011.
6. Cellco's Responses to Pre-Hearing Interrogatories (Set Two) from the Council dated March 22, 2011.
7. Cellco's Responses to Pre-Hearing Interrogatories from John Hartwell dated March 22, 2011.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By: 


Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Its Attorneys

CERTIFICATION

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

Julie Donaldson Kohler, Esq.
Jesse Langer, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
P.O. Box 1821
Bridgeport, CT 06604-4247

John Hartwell
42 Ritch Avenue W.
Greenwich, CT 06830



Kenneth C. Baldwin