

**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 36 RITCH AVENUE, IN THE TOWN OF  
GREENWICH, CONNECTICUT

DOCKET NO. 414

Date: March 21, 2011

**PRE-FILED TESTIMONY OF RAYMOND M. VERGATI**

**Q1. Please state your name and profession.**

A1. Raymond M. Vergati and I am the vice president of operations for HPC Development, LLC (“HPC”) with respect to projects in New England. HPC is located at 46 Mill Plain Road, 2<sup>nd</sup> Floor, Danbury, Connecticut.

**Q2. What services does HPC provide?**

A2. HPC Development is a full service professional consulting and site development firm servicing the wireless telecommunications, broadband, broadcast, and wind energy industries. With respect to the telecommunications industry, HPC provides management services for site development projects including, but not limited to, locating primary and backup sites for telecommunications facilities within a specified search area; coordinating the site design with A&E firms, radio frequency (“RF”) engineers and construction managers; and negotiating lease or option agreements.

**Q3. What is your professional background in telecommunications?**

A3. I received a B.S. in finance (with a minor in Spanish) from Seton Hall University. I have approximately 14 years of experience in the telecommunications industry. I have managed site development projects for wireless carriers since 2001, including site acquisition, zoning needs and oversight of construction vendors. Since April of 2008, I have managed site acquisition for T-Mobile Northeast LLC (“T-Mobile”) regarding numerous sites in Connecticut.

**Q4. What services has HPC provided T-Mobile with respect to the proposed Facility?**

A4. T-Mobile retained HPC to perform a search for possible sites within the area of the Town of Greenwich (“Town”) where Cellco Partnership d.b.a. Verizon Wireless (“Verizon”) proposes to locate a telecommunications facility. I assisted in all facets of site acquisition.

**Q5. How does T-Mobile conduct a search for possible sites?**

A5. T-Mobile searches for a telecommunications facility site in an area based upon the needs of its wireless infrastructure and extensive research of the subject area. T-Mobile looks for possible site candidates in areas in which T-Mobile has identified coverage and/or capacity needs. The area targeted is the geographical location where the installation of a site would, based on general radio frequency engineering and system design standards, likely address the identified problem. T-Mobile’s goal is to locate sites that will remedy coverage or capacity issues, while resulting in the least environmental impact to the surrounding area.

T-Mobile is sensitive to State and local desires to minimize the construction of new towers, and it does not pursue development of a new facility where an acceptable existing structure can be found. In general, T-Mobile first studies the area in and near the area of need to determine whether any suitable structure exists. If T-Mobile cannot find a structure with appropriate height and structural capabilities, it turns to industrial/commercial areas or individual parcels that have appropriate environmental and land use characteristics. T-Mobile looks for sites that will produce the least amount of environmental impact, if any, on the surrounding area. Ultimately, the suitability of each location depends on whether that location would accommodate the coverage need and whether there would be any negative environmental effects.

**Q6. Please describe the search undertaken by T-Mobile for this Facility.**

A6. The site search began on or about January 8, 2004. The starting point for the search area was near Exit 2 on Interstate 95 in Greenwich, Connecticut. Please see T-Mobile's Responses to Interrogatories.

**Q7. Did T-Mobile consider alternative sites?**

A7. Yes. T-Mobile considered several other parcels prior to selecting the telecommunications facility proposed by Verizon at 36 Ritch Avenue in Greenwich ("Facility"). T-Mobile had initiated a search in the area of the Facility and investigated possible locations for a telecommunications facility prior to the time the Facility became a viable option. Those parcels include:

1. 9 Tingué Street. This is a small parcel consisting of .115 acres. After consulting with the property owner, T-Mobile determined that the property did not offer enough space for a telecommunications facility.
2. 38 Gold Street. This parcel hosts a church rectory with an existing twenty-five foot flag pole. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective because it was too far to the west.
3. 104 Ritch Avenue (Greenwich Terrace Condominiums). The owners did not respond to T-Mobile's inquiries regarding a possible telecommunications facility. T-Mobile's RF engineers determined that the existing structure was too low to add a telecommunications facility.
4. 124 Ritch Avenue (Greenwich Shore Condominiums). T-Mobile communicated with the landlord and ascertained that the landlord was not interested in hosting a telecommunications facility on the parcel. The roof top of the existing structure was too low and, accordingly, T-Mobile would have to construct a stand-alone facility.
5. 10 Hamilton Avenue (Bimbo Bakeries). T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective because it was too far to the south.
6. 44 Talbot Lane. This is a .363 acre residential parcel. T-Mobile considered this parcel as an alternative site to the Facility at the time the Facility was not available for co-location. T-Mobile submitted a technical report to the Town in connection with this parcel.

Prior to the availability of the Facility, the Town also requested that T-Mobile considered several additional parcels, which T-Mobile's RF engineers determined would not meet the intended coverage objective. Those parcels include:

1. Off of I-95/Field Point Road. This is a Town owned parcel behind a weigh station off of I-95/Field Point Road. This would require a stand-alone telecommunications facility. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective.
2. 50 Chestnut Street (Decorative Crafts). This parcel would require a stand-alone telecommunications facility. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective.
3. Life Saver Building (One Landmark Square). This parcel hosts a 5 story building. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective.

4. Smokestack (Fox Island Road). This structure is approximately 140 feet high and currently hosts 2 wireless telecommunications carriers. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective.

5. Hasco Building (84 Water Street). This parcel hosts a 5 story building. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective.

6. Westy Storage (351 North Main Street, Port Chester, NY). This parcel hosts a 4 story building. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective.

7. Clock Tower (451 North Main Street, Port Chester, NY). This structure is approximately 75 feet high. T-Mobile's RF engineers determined that this parcel would not meet the intended coverage objective.

**Q8. Why did T-Mobile select the site of the proposed Facility over the other candidate sites reviewed by HPC?**

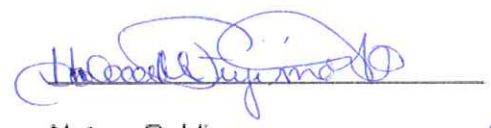
A8. Verizon has proposed to construct the Facility, which would replace an existing telecommunications facility installed by AT&T previously. The Facility would enhance wireless service availability to existing and future T-Mobile wireless device users. Enhanced coverage provided by the Facility would allow T-Mobile subscribers to use voice and data services reliably as well as to connect to Emergency 911 services. The intended coverage area of the proposed Facility would include Interstate 95, Chestnut Street, Eugene Street and Ritch Avenue east of Route 1 and north of the Interstate 287 Connector as well as the areas surrounding the proposed Facility.

**Q9. Has T-Mobile consulted with municipal officials about the proposed Facility?**

A9. Although T-Mobile is not the applicant, T-Mobile has met with representatives of the Town regarding the efficacy of the Facility as well as T-Mobile's search for alternative sites. On August 19, 2010, T-Mobile representatives attended a meeting with Verizon and Town representatives to discuss the Facility and T-Mobile's efforts to find a feasible site in the area. Additionally, on October 26, 2010, T-Mobile participated in a meeting before the Town Planning & Zoning Commission. At the meeting, T-Mobile discussed its need for a telecommunications facility to address the intended coverage objective and the Facility as proposed by Verizon.

  
Raymond M. Vergati

Sworn and subscribed to before me this  
21st day of March, 2011.



Notary Public  
My Commission expires 05/31/12