

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE
NORTHEAST LLC FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT MOOSE HILL ROAD IN THE TOWN
OF GUILFORD, CONNECTICUT

DOCKET NO. 417

Date: July 18, 2011

PRE-FILED TESTIMONY OF SCOTT M. CHASSE

Q1. Please state your name and profession.

A1. Scott M. Chasse and I am a civil engineer and co-founder of All-Points Technology Corporation ("All-Points").

Q2. What kind of services does All-Points provide?

A2. All-Points is a civil and structural engineering firm with offices located in Killingworth, Connecticut and Conway, New Hampshire that provides design and permitting services to wireless providers in the northeast, including Connecticut and New York. All-Points develops zoning and construction drawings for the installation of prefabricated equipment shelters and equipment cabinet arrays with supporting antennae on existing structures and for new stand-alone cellular towers. All-Points also manages the surveys, wetland delineations, coastal consistency analyses and visual resource evaluations performed for proposed telecommunications facilities.

Q3. Please summarize your professional background in telecommunications.

A3. I have a B.S. in civil engineering from the University of Connecticut. I have been licensed as a professional engineer in Connecticut since 1997 and in New York since 2001. I have over 14 years of experience in the telecommunications industry. My experience includes the zoning, design and construction of more than 1250 wireless telecommunications facilities.

Q4. What services did All-Points provide T-Mobile with respect to the proposed Facility?

A4. T-Mobile retained All-Points to design and prepare the site plan for the proposed telecommunications facility on real property known as Map 66, Parcel 64 on the Guilford Assessor's Map and commonly known as Moose Hill Road, Guilford, Connecticut ("Facility"). The site plan included the site access plan, the compound plan and tower elevation for the Facility. In addition, All-Points evaluated the proposed development and prepared a tree inventory to determine whether the proposed Facility would require the removal of any trees.

Q5. Please describe the site of the proposed Facility?

A5. The site of the proposed Facility is on real property known as Map 66, Parcel 64 on the Guilford Assessor's Map and commonly known as Moose Hill Road, Guilford, Connecticut ("Property"). The Property is a 163 acre parcel, which is undeveloped with existing mature vegetation. The Property is zoned for residential uses. Leete Associates, INC owns the Property. T-Mobile would lease a 3,000 square foot area located in the southwestern portion of the Property.

Q6. Please describe the access to the proposed Facility.

A6. Vehicular access to the Facility would extend from Moose Hill Road over an existing gravel access. T-Mobile would improve the access so that it would consist of a continuous 12 foot wide gravel access; this includes replacing an existing culvert.

Q7. Please describe the proposed Facility.

A7. The Facility would consist of a 110 foot monopole structure with antenna arrays flush mounted thereon and related equipment on the ground at the base on a concrete pad. The monopole, antennas and all mounting appurtenances would be painted medium gray-brown to blend with the bark color of adjacent trees. The Facility would include a 2,500 square foot compound, which would sit within the 3,000 square feet leased area. T-Mobile would install panel antennas at 107'9" feet above grade level to the centerline of the antennas. The compound would be enclosed by an 8-foot chain link fence. T-Mobile would extend utility service overhead from an existing utility demarcation on Moose Hill Road.

Q8. Would the construction, operation and maintenance of the proposed Facility require the removal or relocation of any trees?

A8. T-Mobile does not anticipate the removal of any trees associated with the construction, installation and maintenance of the Facility compound. However, T-Mobile would have to remove 2 trees associated with the improvement of the existing gravel access and installation of overhead utilities. *Please see Application, Exhibit M.*

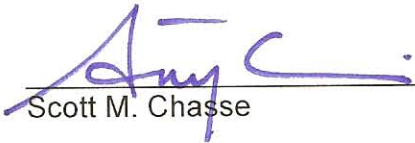
Q9. How much clearing and grading is necessary?

A9. The Facility compound would require approximately 170 cubic yards of cut and 255 cubic yards of fill. The access would require approximately 15 cubic yards of cut and 15 cubic yards of fill. The culvert replacement would require approximately 18 cubic yards of cut. In my opinion, with appropriate sedimentation and erosion controls installed, this amount of disturbance would be minimal.

Q10. Can the monopole be designed with a pre-engineered fault to prevent encroachment on adjacent properties?

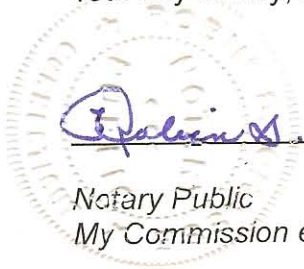
A10. Yes, it is common practice to design monopoles with such engineered faults and in fact many of the telecommunications facilities approved by the Council have been designed in this manner.

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Scott M. Chasse

Sworn and subscribed to before me this
18th day of July, 2011.





Robin S. Chasse

Notary Public
My Commission expires

ROBIN S. CHASSE
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, 2014