COHEN and WOLF P.C.
ATTORNEYS AT LAW

JESSE A. LANGER

PLEASE REPLY TO: Bridgeport
E-Mail Address: jlanger@cohenandwolf.com

November 18, 2011

VIA REGULAR MAIL

Ms. Linda Roberts, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 421 – Application by T-Mobile Northeast LLC for a Certificate of Environmental Compatibility and Public Need for a Telecommunications Facility at 158 Edison Road, Trumbull, Connecticut

Dear Ms. Roberts:

Enclosed herein please find the following document filed on behalf of the Applicant, T-Mobile Northeast LLC:

(1) An original and fifteen (15) copies of Applicant T-Mobile Northeast LLC's First Set of Interrogatories to Intervenor C.A.T.T.

Please contact me if you have any questions.

Very truly yours,

Jesse A. Langer

JAL:lcc

Enclosures
cc: Service List

1115 Broad Street
P.O. Box 1821
Bridgeport, CT 06601-1821
Tel: (203) 368-0211
Fax: (203) 394-9901

158 Deer Hill Avenue
Danbury, CT 06810
Tel: (203) 792-2771
Fax: (203) 791-8149

320 Post Road West
Westport, CT 06880
Tel: (203) 222-1034
Fax: (203) 227-1373

657 Orange Center Road
Orange, CT 06477
Tel: (203) 298-4066
Fax: (203) 298-4068

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 158 EDISON ROAD IN THE TOWN OF TRUMBULL, CONNECTICUT

DOCKET NO. 421

Date: November 18, 2011

FIRST SET OF INTERROGATORIES BY APPLICANT T-MOBILE NORTHEAST LLC TO THE INTERVENOR CATT

The Applicant, T-Mobile Northeast LLC ("T-Mobile"), through counsel, respectfully submits the following interrogatories to the Intervenor, a voluntary association called Citizens Against Trumbull Tower ("CATT"), in connection with the above-captioned docket. T-Mobile requests responses to these interrogatories by November 29, 2011, in accordance with the scheduling order of the Connecticut Siting Council.

Instructions

For each study, test, analysis or report responsive to any of the following interrogatories, please state: (a) the nature and type of each study, test, analysis or report; (b) who conducted each study, test, analysis or report; (c) when each study, test, analysis or report occurred; and (d) the results of each study, test, analysis or report.

Please provide a copy of each study, test, analysis or report, which is responsive to any of the following interrogatories. Additionally, please provide a copy of any other document or communication which is responsive to any of the following interrogatories.

None of the following interrogatories seek any documents or communications that are subject to the attorney-client privilege or the work product doctrine.

INTERROGATORIES

1. Please provide the names and addresses of each member of the purported voluntary association called Citizens Against Trumbull Tower ("CATT").

2. Please state CATT's date of formation and provide copies of the originating documents and/or by-laws of CATT and each subsequent version or amendment thereof.

3. Please provide copies of the minutes of each and every CATT meeting.

4. Please describe any other instance in which CATT has acted to protect or conserve the natural resources in the Town of Trumbull.

5. Please state specifically how the telecommunications facility, proposed by T-Mobile Northeast LLC ("T-Mobile"), at 158 Edison Road, Trumbull, Connecticut ("Facility"), has or is reasonably likely to have the effect of unreasonably polluting, impairing or destroying the natural resources of the State, as alleged in in the Application to Intervene by CATT, dated October 5, 2011 ("ATI"), or otherwise.

6. Please state specifically how the Facility would "have a negative impact on the scenic vistas in Trumbull . . ." as alleged in the ATI.

7. Please state with specificity which "scenic vistas" the Facility would impact negatively or otherwise.

8. Please state specifically how the Facility "fails to meet the requirements of zoning in the Town in a way which fundamentally harms the general welfare of the community," as alleged in the ATI, and cite specific sections of the zoning regulations.

9. Please state specifically what "configuration . . . can provide adequate coverage for the applicant with less impact by utilizing a shorter tower because the height is driven by a speculative and baseless purported need of the Town communications . . ." as alleged in the ATI.

10. Please state specifically what "configuration . . . can provide adequate coverage for the applicant with less impact by utilizing . . . internally or flush mounted antennas . . ." as alleged in the ATI, which is different from the configuration proposed by T-Mobile.

11. Please identify what other locations CATT identified which would allow T-Mobile to locate a Facility with less impact and for each location identified:

a. state the address of the location;

b. identify the property owner of the location;

c. state whether the property owner is willing to locate a telecommunications facility at that location;

d. provide any communications between CATT (or anyone affiliated with CATT) and the property owner concerning the siting of a telecommunications facility at that location; and

e. provide any studies, tests, analyses or reports conducted by CATT (or by someone retained by CATT or by someone affiliated with CATT) concerning the siting of a telecommunications facility at that location;

12. Please state specifically how "the height requested is excessive and unnecessary to meet the public need and will be visible from sensitive residential receptors" as alleged in the ATI.

13. Please state with specificity what is meant by "sensitive residential receptors" as alleged in the ATI.

14. Please state specifically how "the design [of the Facility] does not incorporate the best available technology for reducing the visual impacts of the facility in that it fails to consider alternative designs" as alleged in the ATI

15. Please state what studies, tests, analyses or reports CATT relied upon to determine that the proposed Facility would "have a negative impact on the scenic vistas in Trumbull . . . ."

16. Please state what studies, tests, analyses or reports CATT relied upon to determine that the proposed Facility "fails to meet the requirements of zoning in the Town in a way which fundamentally harms the general welfare of the community."

17. Please state what studies, tests, analyses or reports CATT relied upon to determine that there is "at least one configuration which can provide adequate coverage for the applicant with less impact by utilizing a shorter tower because the height is driven by a speculative and baseless purported need of the Town communications . . . ."

18. Please state what studies, tests, analyses or reports CATT relied upon to determine that there is "at least one configuration which can provide adequate coverage for the applicant with less impact by utilizing . . . internally or flush mounted antennas . . . ."

19. Please state what studies, tests, analyses or reports CATT relied upon to determine that there is "at least one configuration which can provide adequate coverage for the applicant with less impact by . . . removing the Town whip antennas from the top of the pole . . . ."

20. Please state what studies, tests, analyses or reports CATT relied upon to determine that there is "at least one configuration which can provide adequate coverage for the applicant with less impact by utilizing . . . other locations."

21. Please state what studies, tests, analyses or reports CATT relied upon to determine that "the height [of the Facility] requested is excessive and unnecessary to meet the public need and will be visible from sensitive residential receptors."

22. Please state whether CATT (or someone retained by CATT or by someone affiliated with CATT) conducted a visual analysis of the Facility (a) as proposed by T-Mobile in the Application for Certificate or (b) with any other alternative configuration or design.

23. Please state whether CATT (or someone retained by CATT or by someone affiliated with CATT) conducted any studies, tests, analyses or reports concerning T-Mobile's need for the Facility or T-Mobile's coverage objective.

24. Please state whether CATT (or someone retained by CATT or by someone affiliated with CATT) conducted any studies, tests, analyses or reports concerning alternative deployment technologies for the Facility or T-Mobile's coverage objective.

25. Please state whether CATT (or someone retained by CATT or by someone affiliated with CATT) conducted any studies, tests, analyses or reports concerning the Town of Trumbull's communications needs.

26. Please state whether CATT (or someone retained by CATT or by someone affiliated with CATT) conducted any studies, tests, analyses or reports to determine whether the proposed Facility has or is reasonably likely to have the effect of unreasonably polluting, impairing or destroying the natural resources of the state.

27. Please state whether CATT (or someone retained by CATT or by someone affiliated with CATT) conducted any other studies, tests or analyses concerning the proposed Facility which are not addressed by any of the preceding interrogatories.

28. Please identify each person whom CATT expects to call as an expert witness to testify at any hearing concerning the Facility and for each expert identified:

a. state in detail the substance of the facts and opinions about which the expert witness is expected to testify, and state the basis for each fact and the complete grounds for each opinion;

b. identify all documents, communications, or other information received, reviewed or considered by the expert in connection with the formulation of his or her opinions and expected testimony;

c. identify all documents (including but not limited to notes and reports) prepared by the expert in connection with the formulation of said expert's opinions;

d. identify any exhibits to be used as a summary of or support for said expert's opinions;

e. state the qualifications of said expert, and identify all resumes or CVs used by said expert in the preceding four years;

f. identify all publications authored (in whole or in part) by said expert in the preceding ten years; and

g. identify each case (by case name, docket number, and court or agency) in which said expert has testified as an expert at trial or by deposition within the preceding four years, and identify the attorneys for the parties in each case.

29. Please identify each person whom CATT expects to call as a witness to testify at any hearing concerning the Facility and for each person identified:

a. state that person's profession;

b. state that person's home address; and

c. describe briefly the nature of that person's testimony and interest in this Docket.

Respectfully submitted,

T-MOBILE NORTHEAST LLC

By: _____

Julie D. Kohler, Esq.
Jesse A. Langer, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604
Tel. (203) 368-0211
Fax (203) 394-9901
jkohler@cohenandwolf.com
jlanger@cohenandwolf.com

CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and First Class U.S. Mail, postage prepaid, to all parties and interveners of record, as follows:

Keith R. Ainsworth, Esq.
Evans Feldman & Ainsworth, L.L.C.
261 Bradley Street
P.O. Box 1694
New Haven, CT 06507-1694
*(**Via Email**: krainsworth@snet.net)*

Jesse A. Langer