

**JESSE A. LANGER**

PLEASE REPLY TO: Bridgeport  
E-Mail Address: [jlanger@cohenandwolf.com](mailto:jlanger@cohenandwolf.com)

November 29, 2011

**VIA FEDERAL EXPRESS and ELECTRONIC MAIL**

Ms. Linda L. Roberts  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

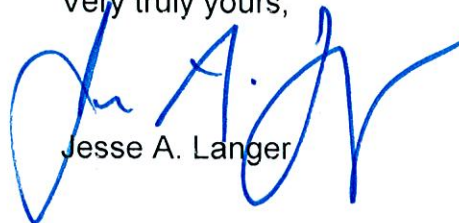
**Re: Docket No. 421 – Application by T-Mobile Northeast LLC  
for a Certificate of Environmental Compatibility and Public  
Need for a Telecommunications Facility at 158 Edison Road  
in the town of Trumbull, Connecticut**

Dear Ms. Roberts:

Enclosed herein please find an original and fifteen (15) copies of the following documents filed on behalf of the Applicant, T-Mobile Northeast LLC ("T-Mobile"):

- (1) Exhibit List;
- (2) Witness List;
- (3) Pre-Filed Testimony of Ashley Bonavenia;
- (4) Pre-Filed Testimony of Michael P. Libertine;
- (5) Pre-Filed Testimony of Eric Fine;
- (6) Pre-Filed Testimony of Scott Heffernan;
- (7) Pre-Filed Testimony of Raymond M. Vergati;
- (8) Pre-Filed Testimony of Scott M. Chasse; and
- (9) T-Mobile's Responses to Intervenor CATT's First Set of Interrogatories.

Very truly yours,



Jesse A. Langer

JAL:lcc  
Enclosures

cc: Service List

**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 29, 2011

**EXHIBIT LIST**

The Applicant, T-Mobile Northeast LLC ("T-Mobile), will present the following exhibits at the public hearing to be held on December 6, 2011:

1. The Application of T-Mobile for a Certificate of Environmental Compatibility and Public Need ("Application") at 158 Edison Road in Trumbull, Connecticut, filed with the Connecticut Siting Council ("Council") on August 2, 2011, including all exhibits attached thereto and materials bulk filed with the Application, already submitted to the Council;
2. Updated opinion letter from the State Historic Preservation Office, dated August 15, 2011, with cover letter from Cohen and Wolf, P.C., dated August 22, 2011;
3. T-Mobile's responses to the Council's First Set of Pre-Hearing Interrogatories, dated October 25, 2011, including all exhibits submitted therewith, already submitted to the Council;
4. T-Mobile's responses to the First Set of Interrogatories, dated November 29, 2011, submitted by the Intervenor, Citizens Against Trumbull Tower, including all attachments submitted therewith, filed with the Council contemporaneously with this Exhibit List;
5. Pre-filed testimonies of Raymond Vergati, Scott Heffernan, Scott Chasse, Michael Libertine, Ashley Bonavenia DeCabia and Eric Fine, including all attachments submitted therewith, filed with the Council contemporaneously with this Exhibit List;
6. Enlarged prints of site plans and aerial photograph (the originals of which are already a part of the record), to be submitted to the Council at the hearing on December 6, 2011; and

7. Any other exhibits that may be obtained prior to the hearing and are relevant to this Application.

T-Mobile respectfully reserves the right to offer additional exhibits, witnesses, testimony, and administratively noticed materials during the proceedings as necessary.

Dated at Bridgeport, Connecticut this 29<sup>th</sup> day of November, 2011.

**Respectfully submitted,**

**T-MOBILE NORTHEAST LLC**

By: \_\_\_\_\_

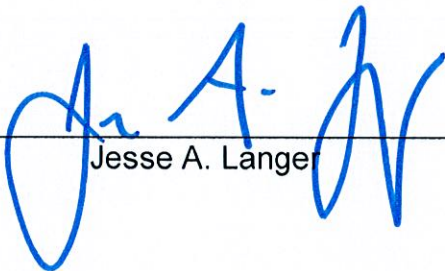


Julie D. Kohler, Esq.  
Jesse A. Langer, Esq.  
Cohen and Wolf, P.C.  
1115 Broad Street  
Bridgeport, CT 06604  
Tel. (203) 368-0211  
Fax (203) 394-9901  
[jkohler@cohenandwolf.com](mailto:jkohler@cohenandwolf.com)  
[jlanger@cohenandwolf.com](mailto:jlanger@cohenandwolf.com)

**CERTIFICATION**

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and regular mail, postage prepaid, to all parties and intervenors of record, as follows:

Keith R. Ainsworth, Esq.  
Evans Feldman & Ainsworth LLC  
261 Bradley Street  
P.O. Box 1694  
New Haven, CT 06507-1694  
(Via Email: [krainsworth@snet.com](mailto:krainsworth@snet.com))



Jesse A. Langer

**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 29, 2011

**WITNESS LIST**

The Applicant, T-Mobile Northeast LLC ("T-Mobile"), will present the following witnesses at the public hearing to be held on December 6, 2011:

1. Raymond M. Vergati, Vice President of Operations (New England) of HPC Development, LLC;
2. Michael P. Libertine, Director of Environmental Services for Vanasse Hangen Brustlin, INC;
3. Scott Chasse, P.E., Co-Founder and Civil Engineer for All-Points Technology Corporation;
4. Scott Heffernan, Radio Frequency Engineer for T-Mobile Northeast LLC;
5. Ashley Bonavenia DeCabia, Program Manager for EBI Consulting;
6. Hans Fiedler, Development Manager for Connecticut and New England for T-Mobile; and
7. Eric Fine, Integration Engineer for Northeastern Communications, Inc. (consultant for the Town of Trumbull).

T-Mobile respectfully reserves the right to offer additional witnesses and testimony during the proceedings as necessary.

Dated at Bridgeport, Connecticut, this 29<sup>th</sup> day of November, 2011.

**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](mailto:jkohler@cohenandwolf.com)

[jlanger@cohenandwolf.com](mailto:jlanger@cohenandwolf.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a copy of the foregoing was delivered by electronic mail and regular mail, postage prepaid, to all parties and intervenors of record, as follows:

Keith R. Ainsworth, Esq.  
Evans Feldman & Ainsworth LLC  
261 Bradley Street  
P.O. Box 1694  
New Haven, CT 06507-1694  
**(Via Email: [krainsworth@snet.com](mailto:krainsworth@snet.com))**



Jesse A. Langer

**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: October 31, 2011

**PRE-FILED TESTIMONY OF ASHLEY BONAVENTIA**

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

A1. Ashley Bonavenia and I am a program manager for EBI Consulting ("EBI"). EBI is located at 21 B Street, Burlington, MA, 01803.

**Q2. What kind of services does EBI provide?**

A2. EBI is a full service environmental, health and safety consulting firm. It provides a wide array of services for those in the telecommunications industry, including assessments under the National Environmental Policy Act of 1969 ("NEPA").

**Q3. Please summarize your professional background in telecommunications.**

A3. I have a B.S. in Ocean Engineering from the University of Rhode Island. I have extensive experience in Phase I environmental site assessment, NEPA compliance, environmental assessments, SEQRA reviews and remediation consulting services to, among other industries, telecommunication firms. My work with environmental reviews includes analysis of historical properties, wetlands, endangered species habitat, flood



plains, and other areas of environmental concern, in relation to proposed and existing telecommunications facilities.

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

A4. T-Mobile retained EBI to perform NEPA compliance for the proposed telecommunications facility on real property known as 158 Edison Road, Trumbull, Connecticut ("Facility"). I performed and/or oversaw the NEPA analysis for the proposed Facility.

**Q5. Please describe the results of the NEPA analysis?**

A5. The Facility is categorically excluded from any requirement for further environmental review by the Federal Communications Commission ("FCC") in accordance with the NEPA and no permit is required by the FCC prior to construction of the proposed Facility. See Application, Exhibit P.

**Q6. Is the proposed Facility located in an officially designated wilderness area or wildlife preserve?**

A6. No. The Property is not located in a wilderness area and it is not identified as a wildlife preserve or in a U.S. Fish and Wildlife Service National Wildlife Refuge.

**Q7. Is the proposed Facility likely to affect threatened or endangered species or designated critical habitats?**

A7. No. The Facility would not affect threatened or endangered species or designated critical habitats. There are no threatened or endangered species identified in the Town of Trumbull. See Application, Exhibits N and P.

**Q8. Is the proposed Facility designed to minimize any impacts on migratory bird species?**

A8. Yes. The design for the Facility would minimize any impact to migratory bird species in accordance with interim (non-binding) guidelines for telecommunications facilities adopted by the United States Fish and Wildlife Service ("USFW"). The Facility would be less than 200 feet in height and would not use guy wires. Additionally, the Facility would not be lighted. See Application, Exhibits C, N and P.

**Q9. Is the proposed Facility likely to affect any National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands?**

A9. No. The proposed Facility would not affect any National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands.

**Q10. Is the proposed Facility likely to affect any districts, sites, buildings, structures, or objects of significance in American history, architecture, archeology, engineering or culture as listed, or potentially eligible for listing in the National Register of Historic Places?**

A10. No. The proposed Facility would not impact any recognized districts, sites, buildings, structures or objects of significance in American history, architecture,

archeology, engineering or culture as listed on the National Register of Historic Places. On August 15, 2011, the State Historic Preservation Office issued a letter stating that the proposed Facility would not impact such resources. See Application, Exhibits N and P; see *also* T-Mobile's letter to the Connecticut Siting Council, dated August 22, 2011.

**Q11. Would the proposed Facility affect any Native American religious sites?**

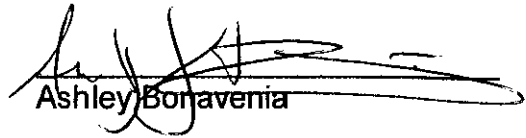
A11. No. EBI also consulted with four Native American Indian tribes – Delaware Nation, the Mashantucket Pequot Tribe, the Narragansett Indian Tribe and the Delaware Tribe of Indians of Oklahoma – because they might have interests impacted by the construction, operation and maintenance of the proposed Facility. The Tribes confirmed that they do not have any interests that would be impacted by the Facility as presently proposed. See Application, Exhibit P.

**Q12. Would the proposed Facility be located in a floodplain?**

A12. The Facility would not be located in a floodplain.

**Q13. Would the proposed Facility involve a significant change in surface features (i.e. wetlands, deforestation, water diversion)?**

A13. The Facility compound would not impact any wetland system or involve a significant change in surface features. The Property is already developed as a police station and the proposed Facility would be located immediately adjacent to a concrete sidewalk and existing bituminous parking area in the center of the Property. See Application, Exhibits C and P.

  
Ashley Bonavenia

Sworn and subscribed to before me this  
31 day of October, 2011.

  
Notary Public  
My Commission expires

**Jaclyn M Fansler**  
**Notary Public, State of New York**  
**No. 01FA6232334**  
**Qualified in Suffolk County**  
**Commission Expires December 6, 2014**

**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: October 21, 2011

**PRE-FILED TESTIMONY OF MICHAEL P. LIBERTINE**

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

A1. Michael P. Libertine and I am the Director of Environmental Services employed by Vanasse Hangen Brustlin, Inc. ("VHB"). VHB is located at 54 Tuttle Place in Middletown, Connecticut. My responsibilities at VHB include managing and overseeing the environmental science and engineering projects, including telecommunications projects, undertaken by VHB's Middletown office.

**Q2. What kind of services does VHB provide?**

A2. Among many other services, VHB provides a full array of services for the permitting of telecommunications facilities, including visual impact analyses, wetlands compliance and environmental assessments.

**Q3. Please summarize your professional background in telecommunications.**

A3. I have assisted in the permitting of over 500 telecommunications projects in New England and New York over the past twelve years. My responsibilities include the coordination and oversight of environmental and land use evaluations, visual impact analyses and regulatory permitting support.

My background includes over nineteen years of consulting in the environmental field. I have a B.S. in natural resources management from the University of Connecticut and a B.A. in marketing from Stonehill College. I am also a licensed Environmental Professional in Connecticut. I have served as the project manager for more than 1,600 environmental site assessments and field investigations for property transfers in Connecticut, Rhode Island, New Hampshire, Massachusetts, New Jersey, New York, Florida and Canada.

**Q4. What services did VHB provide T-Mobile regarding the proposed Facility?**

A4. T-Mobile retained VHB to perform a Visual Resource Evaluation ("Evaluation") and provide a Visual Resource Evaluation Report ("VRE Report"), as well as a wetland compliance analysis and coastal management zone compliance evaluation for the proposed telecommunications facility ("Facility") on real property known as 158 Edison Road, Trumbull, Connecticut ("Property"). I oversaw these activities associated with the proposed Facility.

**Q5. Please describe the process for conducting the Visual Resource Evaluation.**

A5. The Evaluation consists of a predictive computer model and in-field analysis. The predictive computer model assesses the potential visibility of the Facility within a two mile radius ("Study Area"), including private property and/or otherwise inaccessible areas for field verification. The in-field analysis consists of a "balloon float" and drive through reconnaissance of the Study Area. This in-field investigation allows VHB to obtain location and height representations, back-check the initial predictive computer

model results and assess the visibility of the proposed Facility from areas accessible to the public. VHB assesses the results of the predictive computer model and the in-field analysis and incorporates these results into the final viewshed map. In this case, VHB had the opportunity to review in-field conditions on three separate occasions via balloon floats on March 2 and March 7, 2010, and May 11, 2010. The May 11, 2010 balloon float was conducted at the request of the Connecticut State Historic Preservation Office ("SHPO") to assess specifically the potential visual impact of the Facility on Route 15 (the Merritt Parkway), a designated National Scenic By-way. The completed VRE Report and viewshed map are included in Exhibit M of the Application for Certificate.

**Q6. Please describe how VHB prepared the viewshed analysis for the VRE Report.**

A6. VHB uses a computer modeling tool developed by the Environmental Systems Research Institute, Inc. (ESRI), called ArcView® Spatial Analyst, to calculate the areas within the Study Area where the Facility would be visible. This is based upon data such as the height of the Facility, the Facility's ground elevation, the surrounding topography and existing vegetation. VHB first constructs a digital elevation model, which is derived from Connecticut LiDAR-based digital elevation data produced by the University of Connecticut Center for Land Use Education and Research, to develop a three dimensional topographic layer of the Study Area. A forest canopy layer is then created by hand-tracing (digitizing) mature trees and woodland areas (as depicted on 2006 digital orthophotos [aerial photographs]), converting this into a geographic data layer, and assigning an average height value. During the initial analysis, VHB omits the tree

canopy so the only visual constraint is topography. This initial analysis provides a reference point useful in understanding areas that may provide direct lines of sight and determining seasonal visibility fluctuations. Subsequent to the initial analysis, VHB adds the existing vegetation data (in this case, a height of 60 feet was assigned to this data layer). VHB also includes an additional data layer, obtained from the Connecticut State Department of Environmental Protection, depicting significant resource areas such as State forests and parks, recreational facilities, registered historic sites, open space lands and other sensitive visual receptors. VHB also depicts on the view shed map any state-or locally-designed scenic roads and Connecticut blue-blazed hiking trails that exist in the Study Area.

**Q7. Please describe how VHB conducted the balloon float.**

A7. On March 2 and March 7, 2010, VHB raised and maintained an approximate 4-foot diameter helium filled weather balloon at the location of the proposed Facility at a height of 150 feet and 173 feet above grade level ("AGL") to conduct the initial in-field analysis. VHB conducted the balloon floats at these heights because the proposed monopole would be 150 feet AGL and the regional dispatch platform (designed by the Town of Trumbull) would reach over 170 feet AGL. As discussed above, VHB also conducted an additional balloon float on May 11, 2010, at the request of the SHPO to assess the potential visual impact of the Facility on Route 15 (the Merritt Parkway).

After stabilizing the balloon, VHB traveled the local public thoroughfares within the Study Area to verify the computer generated viewshed map and inventory areas of visibility. In conducting the drive-by reconnaissance, VHB focused its evaluation on



nearby residential areas, the Merritt Parkway and other potential sensitive visual receptors. While the balloon was aloft, VHB took photographs from a variety of locations, settings and vantage points to assist in evaluating where the balloon was visible. VHB also recorded the latitude and longitude of each photograph using a handheld global positioning system (GPS) receiver unit. The photographs were taken using a Cannon Digital Rebel camera body and Canon 18 millimeter to 55 millimeter zoom lens. VHB set the lens to 50 millimeters for most of the views, which most accurately represents the relation of sizes between objects as observed by the unaided human eye.

**Q8. How did VHB select the locations for the photographs during the in-field investigation?**

A8. VHB selected several of the photograph locations using a preliminary version of the viewshed map to identify areas adjacent to public roads within the Study Area from where the proposed Facility might be visible. VHB selects other locations based on in-field observations made during the time of the balloon float.

**Q9. Please describe the estimated visibility of the proposed Facility.**

A9. The Facility would be at partially visible year round to approximately 46 acres within the 8,042 acre Study Area, which is approximately one-half of 1 percent of the total Study Area. The majority of these views would be within the immediate area of the proposed Facility (approximately 0.25 miles). There are also some isolated views to the northwest, west and southwest approximately 0.60 to 0.90 mile from the Facility. The

Facility may be partially visible year round from 71 residential properties within the Study Area.

Areas of seasonal visibility would comprise of approximately 42 additional acres, primarily within the immediate vicinity of the proposed Facility. The proposed Facility would be visible during leaf-off conditions from areas to the northwest, west, southwest and northeast of the Property. These areas are generally adjacent to the areas of year-round visibility and range in distance from approximately 0.35 miles to 0.85 miles. Approximately 48 additional residential properties could have seasonal views of the proposed Facility.

**Q10. Please describe any features that would reduce potential visual impact of the proposed Facility.**

A10. The Facility configuration would incorporate several stealth measures which would mitigate some of the potential visual impact of the Facility. T-Mobile would implement the following stealth measures: (1) flush mounts, as opposed to T-arms to reduce the horizontal profile; and (2) privacy slats within the fence to shield the Facility compound. With respect to the regional dispatch platform, the Town of ("Trumbull") has agreed to implement the following stealth measures: (1) the use of fiberglass, slim line whip antennas (eliminate dipoles); (2) antennas painted sky blue to blend with the sky background; (3) the reduction of the overall height of the Facility from 173'4" to 171'6" AGL by reducing the height of the regional platform antennas to include 3 whip antennas at 3'2", 2 whip antennas at 9'6", 4 whip antennas at 16" and 1 whip antenna at 21'6"; and (4) the use of 4 foot standoff T-boom antenna mounts as opposed to a walk-around platform.

Additionally, the surrounding topography and existing vegetation would assist in reducing the visual footprint of the proposed Facility. The topography in the area consists of rolling hills ranging from 85 feet above mean seal level ("AMSL") to 490 feet AMSL. The existing vegetation consists of mixed deciduous hardwood species with an average estimated height of 60 feet. The tree canopy covers nearly 4,096 acres of the 8,042 acre Study Area ( $\pm 50\%$ ).

**Q11. Did VHB's analysis take into account the stealth measures incorporated into the Facility configuration, as referenced in Question 10 above?**

A11. Yes. VHB incorporated the above-mentioned stealth measures into its viewshed analysis and VRE Report. VHB did not have to perform an additional balloon float and in-field analysis because the proposed stealth measures did not add to the height or overall size of the proposed Facility.

**Q12. Will the proposed Facility have any visual impact on any sensitive visual receptors such as scenic, historic or recreational sites, hiking trails or parks?**

A12. As depicted in the VRE Report, there would be little to no visual impact to sensitive visual receptors such as scenic, historic or recreational sites. Only one park – Island Brook Park – would have a view of any portion of the proposed Facility. The view from Island Brook Park, however, would only entail the very top of the proposed Facility (essentially, the regional dispatch antennas), just over the tree line, even during leaf-off conditions. See Application, Exhibit M (view 19).

Additionally, the balloon float performed on May 11, 2010, confirmed that the Facility would not have an adverse visual impact on Route 15, which is a designated

National Scenic By-way. The only view would be from an overpass associated with Interstate 84. The results of the additional balloon float were consistent with VHB's earlier field studies. See Application, Exhibits M and P.

**Q13. What did VHB do to determine the existence of wetlands on or near the site of the proposed Facility?**

A13. On November 22, 2009, Dean Gustafson, a Soil Scientist with VHB, performed an on-site investigation of the Property and proposed Facility location. He also reviewed the site plans for the Facility, prepared by All-Points Technology Corporation, PC. Based upon the on-site investigation and the review of the site plans, Mr. Gustafson completed a wetlands inspection report. See Application, Exhibit K.

**Q14. Based upon this investigation, are there any wetlands located on the Property?**

A14. No. The nearest wetland is a disturbed wetland system area associated with the front yard of an existing residence, which is located approximately 175 feet southwest of the Property. This wetland system is located on the opposite side of Merwin Street from the Property. See Application, Exhibit K.

**Q15. In VHB's professional opinion, based upon review of the site plans and the proposed site of the Facility, would the construction, operation and maintenance of the Facility compound impact any wetland system?**

A15. No. The closest wetland system is too far from the site of the proposed Facility to be impacted by the construction, operation and maintenance of the Facility.

**Q16. Would the access or utility routing proposed for the Facility impact any wetland system?**

A16. No. The proposed Facility would utilize the existing bituminous access to the Property. Additionally, T-Mobile proposes underground utility routing from an existing utility pole on Merwin Street. The proposed utility route would traverse an already developed portion of the Property.


**Q17. Would the Facility be located within the coastal boundary?**

A17. No. The Town is not one of the 36 Connecticut municipalities located within the coastal area and, therefore, the Town is not included within the coastal boundary, as defined by the Connecticut Coastal Management Act, General Statutes § 22a-90 *et seq.* Accordingly, the proposed Facility would not be located in the coastal boundary or impact any "coastal resources." See the Coastal Boundary Map appended hereto as Attachment A.

**{SPACE LEFT BLANK INTENTIONALLY}**

  
Michael P. Libertine

Sworn and subscribed to before me this  
21<sup>th</sup> day of October, 2011.



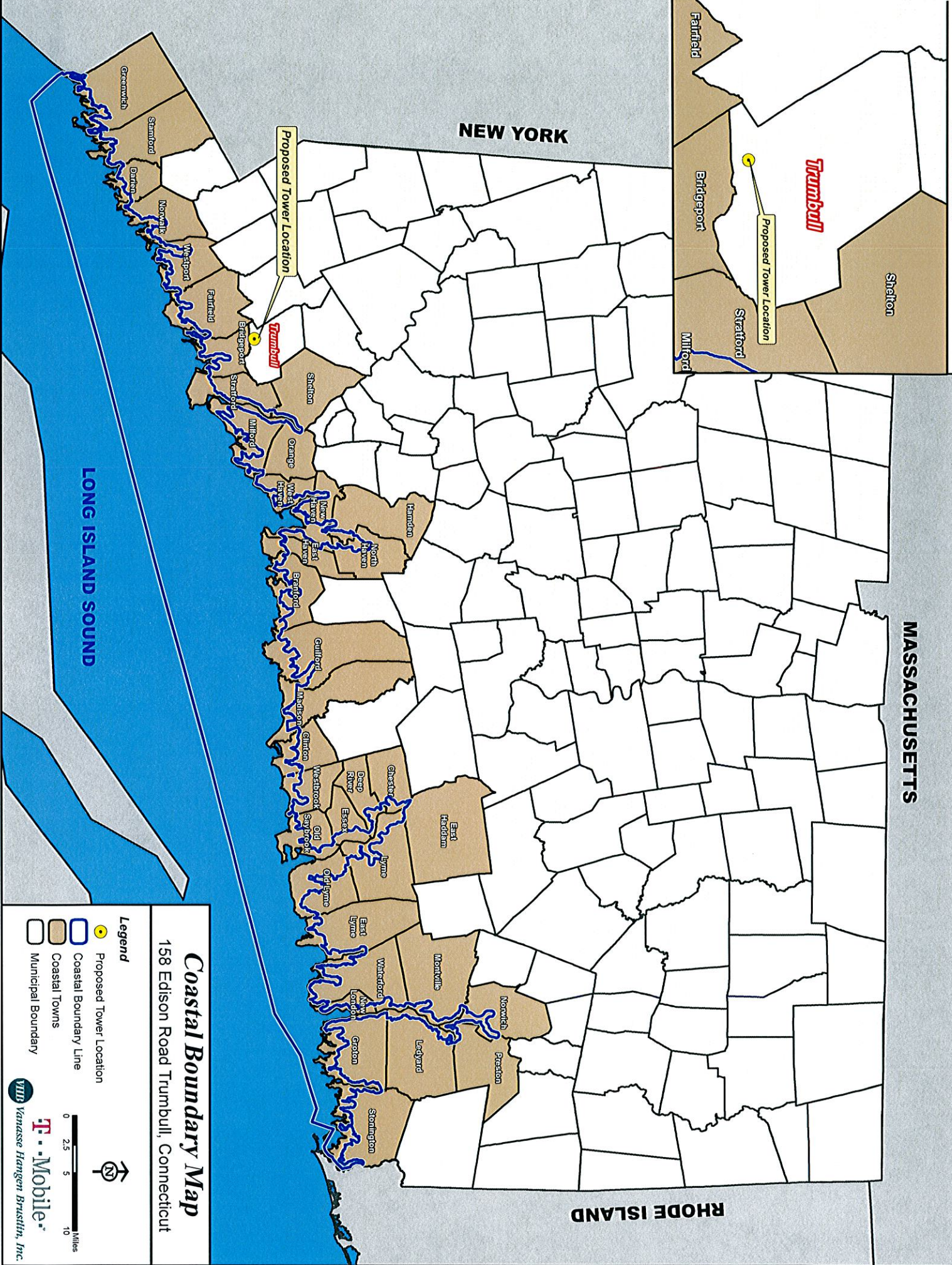
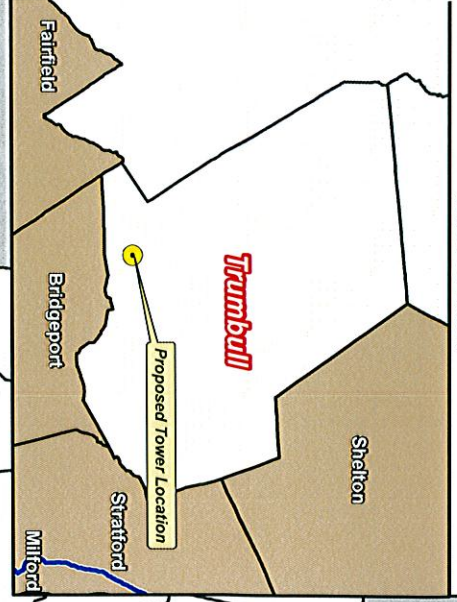
Notary Public

My Commission expires

**KRISTINE M. PAUL**  
**NOTARY PUBLIC**  
MY COMMISSION EXPIRES JAN. 31, 2014

# **ATTACHMENT A**

**INSET MAP**



**Coastal Boundary Map**  
158 Edison Road Trumbull, Connecticut

**Legend**

- Proposed Tower Location
- Coastal Boundary Line
- Coastal Towns
- Municipal Boundary

0 2.5 5 10 Miles

**T-Mobile**  
VHB Vanasse Hangen Brustlin, Inc.



**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 22, 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 12 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 this area of the Town of Trumbull ("Town"), assist in negotiating the acquisition of a particular site and oversee the development of that particular site. HPC has overseen the development of the telecommunications facility proposed on real property known as 158 Edison Road, Trumbull, Connecticut ("Facility"). I assisted in all facets of the site acquisition.

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

A5. T-Mobile decides to seek out a 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, if any, environmental impact 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 in early 2008. The center of the search area was between Route 111 (Main Street) and Route 127 (Church Hill Road)- Middlebrooks Avenue area and Island Brook Park.

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

A7. Yes. T-Mobile considered several sites other than the site of the proposed Facility. Those sites considered and rejected by T-Mobile are as follows:

1. 5663 Main Street. This parcel hosts a small two-story building used as a deli. The Town requested that T-Mobile not consider this parcel, which is located in a residential area.

2. 100 Middlebrooks Avenue. This parcel hosts the Long Hill Baptist Church. T-Mobile's RF engineers reviewed the Church's steeple and determined that the height was insufficient to afford adequate coverage to the subject area. T-Mobile's RF

engineers also determined that a telecommunications facility on this parcel would have to be between 140 and 160 feet AGL.

3. 100 Quality Street. This parcel hosts a Stop & Shop plaza. T-Mobile's RF engineers reviewed the plaza's 25 foot rooftop and determined that it is too far north to provide coverage to the coverage objective. Additionally, the property owner is not interested in leasing space for a free-standing telecommunications facility.

4. 250 Middlebrooks Avenue. This parcel hosts the Town's Emergency Medical Services. The Town did not want to execute a lease with T-Mobile for the construction of a new telecommunications facility on this parcel.

5. Town owned property across from Town Hall. The Town did not want to execute a lease with T-Mobile for the construction of a new telecommunications facility on this parcel. There are no suitable existing structures for co-location on this parcel.

6. 366 Church Hill Road. This parcel hosts the Town's Department of Public Works/Highway Garage. There are no suitable structures on this parcel for co-location. The terrain would require a very tall structure on this parcel, perhaps in excess of 250 feet.

7. 5866 Main Street, Town Hall. This parcel hosts the Town Hall. T-Mobile's RF engineers reviewed the cupola and determined that the height was insufficient to afford adequate coverage to the target area.

8. 5958 Main Street. This parcel hosts the Grace Episcopal Church. This parcel is located too far north to achieve coverage for the subject area with the available height. This site is located at the edge of coverage from existing sites CT11200 and CT11961.

9. 5065 Main Street. This parcel is undeveloped and located adjacent to the Trumbull Mall. The property owner is not interested in leasing space for a telecommunications facility. Additionally, T-Mobile is one of the wireless carriers using a rooftop installation on the Trumbull Mall.

10. 965 Church Street. This parcel hosts a 3 story commercial building. This parcel is located at too low an elevation to achieve the coverage objective.

11. Island Brook Park, Orchard Street. This parcel is undeveloped and serves as a municipal park. Neither the Town nor representatives of the community expressed any interest in the park serving as the location for a telecommunications facility.

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

A8. The proposed site on real property known as 158 Edison Road, Trumbull, Connecticut ("Property") is superior to the other parcels in the area. The Property is a 2.30 acre parcel, which is already developed and used as the Town's police station. The Facility would replace an aging 100 foot lattice tower located on the Property. Access is across an existing bituminous driveway and parking lot. T-Mobile would not have to remove any trees and the installation of the Facility would require minimal intrusion. Additionally, the Facility would host a regional dispatch platform, which would enhance the coverage for emergency services in the area.

The proposed 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 the areas surrounding the proposed location of the Facility, specifically along Route 15, Main Street and Highgate Road.

The construction, maintenance and operation of the Facility would have minimal environmental impacts, if any, on the surrounding area. The Facility compound would not impact any wetland systems. The nearest wetland system is a disturbed wetland system area associated with the front yard of an existing residence located approximately 175 feet southwest of the Property. This wetland system is located on the opposite side of Merwin Street from the Property. Finally, the Facility would implement stealth measures to mitigate the potential visual impact on the surrounding

areas. See Application, Exhibits K and M; see also Mike P. Libertine Pre-Filed Testimony.

**Q9. Has T-Mobile offered the Town the opportunity to co-locate its emergency services equipment on the Facility?**

A9. Yes. The Town has also expressed a need to replace the existing 100 foot lattice tower, which is outdated and insufficient to address the Town's fire, police and emergency services communication needs. The Town has stated that it would need a new regional and municipal dispatch platform situated atop a taller structure, preferably 150 feet AGL. According to the Town, a platform for emergency services at this height would allow the Town to overcome the challenging topography of the area, as well as provide much needed coverage and allow for future growth.

The Facility would replace an existing lattice tower used by the Town for emergency services communication, which is approximately 100 feet above grade level ("AGL"). The existing lattice tower is approximately 30 years old and nearing the end of its life cycle. The Town would like to replace the existing lattice tower with a new, taller structure to accommodate the Town's police, fire and emergency services current and future communication needs. The existing tower, at its current height, does not address the Town's communication needs sufficiently.

**Q10. Has T-Mobile consulted with municipal officials about the proposed Facility?**

A10. Yes, T-Mobile has engaged in extensive consultation with the Town and its citizens. This consultation spanned approximately 18 months – since the submission of

the Technical Report on December 23, 2009 – included many meetings with the community and the retention of an independent RF consultant. It is also important to note that the Town owns the Property and is in need of a new communications tower for its emergency communications services.

T-Mobile has met its obligations for municipal consultation under General Statutes § 16-50/ (e). On December 23, 2009, T-Mobile submitted a technical report to the First Selectman, the Honorable Timothy M. Herbst, regarding the Facility. The technical report, a copy of which was filed with the Application, included specifics about the Property, the Facility, the site selection process and the environmental effects, if any, of the proposed Facility.

On January 29, 2010, representatives of T-Mobile met with the First Selectman; Police Chief, Thomas H. Kiely; and one of the Town's attorneys, Douglas E. LoMonte, to discuss the proposed Facility. They outlined the proposal and addressed questions the Town representatives raised regarding need, environmental impacts and specific project details. T-Mobile also met separately with Police Chief Kiely, Attorney LoMonte and representatives of the Police Union. T-Mobile answered questions posed by the union representatives about health and safety concerns.

**Q11. Did T-Mobile conduct any additional technical studies to address questions raised about the proposed Facility?**

A11. Yes. To address the Police Union's concerns further, T-Mobile retained an independent RF engineer to assess the RF levels of the existing lattice tower, which hosts municipal communication equipment, and compare those measurements to the anticipated RF emissions of the proposed Facility.

On February 24, 2010, Ronald E. Graiff, P.E., met with representatives of T-Mobile, Police Union representatives and Police Chief Kiely at the Property. Mr. Graiff conducted a field study of the RF emissions emitted from the existing lattice tower at various locations on the Property in the presence of the Police Union and T-Mobile representatives. Thereafter, Mr. Graiff completed a report, independently of T-Mobile, which concluded that the Facility would produce RF emissions well below any local, state, federal or international exposure standards. The report also concluded that the Facility, as proposed, would reduce some of the current exposure levels as the municipal equipment would be elevated to a greater height on the proposed Facility. On March 25, 2010, T-Mobile provided the Town with a copy of the report. See Application, Exhibit Q.

**Q12. Did T-Mobile meet with members of the community to discuss the proposed Facility and alternative locations for the Facility?**

A12. Yes. T-Mobile met with representatives of the community on several occasions. On July 15, 2010, representatives of T-Mobile met with representatives of the Town, the Police Union and the community to discuss the proposed Facility. T-Mobile answered questions about the Facility and agreed to work with the community to ensure that there were no other feasible alternatives to the Facility as proposed.

Additionally, on September 3, 2010, and December 3, 2010, representatives of T-Mobile met with representatives of the community to discuss alternative sites for the proposed Facility. The community representatives asked whether T-Mobile could locate a telecommunications facility at (1) the Stop & Shop Plaza located at 100 Quality Street; (2) an undeveloped parcel located at 5065 Main Street, adjacent to the Trumbull Mall; or



(3) any of the municipal properties rejected by the Town previously. T-Mobile investigated each of these suggestions (some for the second time) and determined that none were feasible alternatives. The reasons are outlined below (as discussed in response to Question 7 above):

1. 100 Quality Street. This parcel hosts a Stop & Shop plaza. T-Mobile's RF engineers reviewed the plaza's 25 foot rooftop and determined that it is too far north to provide coverage to the coverage objective. Additionally, the property owner is not interested in leasing space for a free-standing telecommunications facility.

2. 5065 Main Street. This parcel is undeveloped and located adjacent to the Trumbull Mall. The property owner is not interested in leasing space for a telecommunications facility. Additionally, T-Mobile is one of the wireless carriers using a rooftop installation on the Trumbull Mall.

3. 5866 Main Street. This parcel hosts the Town Hall. T-Mobile's RF engineers reviewed the cupola and determined that the height was insufficient to afford adequate coverage to the target area.

4. 366 Church Hill Road. This parcel hosts the Town's Department of Public Works/Highway Garage. There are no suitable structures on this parcel for co-location. The terrain would require a very tall structure on this parcel, perhaps in excess of 250 feet.

**Q13. Did T-Mobile meet with the Town and members of the community to discuss the Town's design for the regional dispatch platform?**

A13. Yes. On April 14, May 26 and June 30, 2011, representatives of T-Mobile met with representatives of the Town, representatives of Northeast Communications (the Town's telecommunications consultant) and representatives of the community. These discussions focused primarily on the Town's requirements for the regional platform, which would support police, fire and emergency service communications.

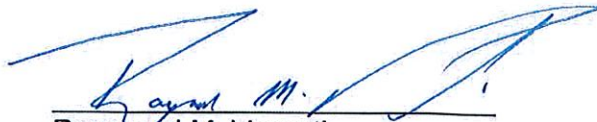
**Q14. Did the extensive municipal consultation yield any changes in the configuration of the Facility?**

A14. Yes. Although the focus of the community's concerns related to the regional dispatch platform, T-Mobile agreed to implement the following stealth measures: (1) flush mounts, as opposed to T-arms and (2) T-Mobile would include privacy slats to shield the Facility compound. Additionally, the Town agreed to implement the following stealth devices: (1) the use of fiberglass, slim line whip antennas (eliminate dipoles); (2) antennas painted sky blue to blend with the sky background; (3) the reduction of the overall height of the Facility from 173'4" to 171'6" AGL by reducing the height of the regional platform antennas to include 3 whip antennas at 3'2", 2 whip antennas at 9'6", 4 whip antennas at 16" and 1 whip antenna at 21'6"; and (4) the use of 4 foot standoff T-boom antenna mounts as opposed to a walk-around platform.

Moreover, the Facility would accommodate several other requests by the community. The Facility would be surrounded by an 8 foot fence (with privacy slats). The equipment within the fencing would comply with all applicable codes. Additionally, the Facility would only require lighting when a technician is on site to perform maintenance. Finally, T-Mobile's cables would be installed internally to minimize any adverse visual impact.

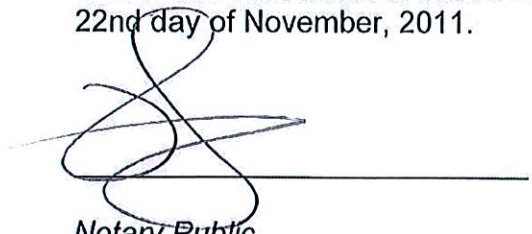
**Q15. Did T-Mobile post a sign giving the public notice of the hearing on this Application?**

A15. Yes. On or about November 21, 2011, T-Mobile posted a sign nearby the Property, giving public notice of T-Mobile's Application and the related public hearing. Photographs of the sign and an affidavit are appended hereto as Attachment A.

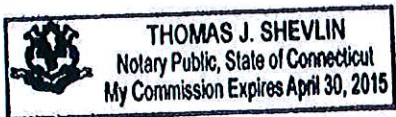


Raymond M. Vergati

Sworn and subscribed to before me this  
22nd day of November, 2011.



*Notary Public*  
*My Commission expires*



# **ATTACHMENT A**



11 18 11

## PUBLIC NOTICE

T-Mobile Northeast, LLC has filed an application with the Connecticut Siting Council ("Council") for the construction, management and operation of a telecommunications facility on this site (1588 Edison Road). The maximum height of this facility shall not exceed 172 feet. The Council will hold a public hearing on December 6, 2011, at the Trumbull Town Hall, in the Town Council Chambers, located at 5866 Main Street, Trumbull, Connecticut, at 3:00 p.m. and 7:00 p.m. A copy of the application can be reviewed at the town hall or at the offices of the Council in New Britain, Connecticut. For more information, please contact the Council by telephone at (860) 827-2935, electronically at [www.ct.gov](http://www.ct.gov), or by mail at 10 Franklin Square, New Britain, Connecticut, 06051.

11-18-11



11 18 11

**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 23, 2011

**PRE-FILED TESTIMONY OF ERIC FINE**

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

A1. Eric Fine and I am an Integration Engineer for Northeastern Communications, INC. ("Northeastern"). Northeastern is located at 7 Great Hill Road, Naugatuck, Connecticut.

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

A2. Northeastern designs, installs and sells two-way radio and wireless data systems. Northeastern provides such services to municipal and commercial clients, including public safety agencies, emergency services, public works departments, schools, transportation providers, hotels, farms, nurseries, manufacturing facilities and hospitals. Northeastern has provided these services since 1958.

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

A3. I have 33 years of experience in the telecommunications industry. I have extensive experience in the construction and installation of communication tower and antenna systems, primarily used by public safety agencies. I have also worked as a



contracted project manager for Motorola, Inc., implementing new public safety communications systems. I have also served in various capacities for municipalities overseeing the implementation of public safety communications systems. I am also certified as an Electronics Technicians Association International Telecommunications Installer and as an Anritsu Site Antenna and Transmission line sweep test technician. I have appended a copy of my *curriculum vitae* hereto as Attachment A.

**Q4. What services has Northeastern provided with respect to the proposed telecommunications facility?**

A4. Northeastern provides the Town of Trumbull ("Town") consultation services regarding the Town's public safety wireless land mobile radio system ("Public Safety System"). Northeastern has overseen the installation and service of the Public Safety System for approximately 10 years. The Town also retained Northeastern to oversee the installation of the Town's public safety equipment on the telecommunications facility ("Facility") proposed by T-Mobile Northeast LLC ("T-Mobile") at 158 Edison Road, Trumbull, Connecticut ("Property"). In that regard, I have evaluated the Public Safety System, the Town's current and future needs for public safety communications and the proposed Facility, as well as assisted the Town in negotiating the lease agreement between the Town and T-Mobile and participated in various local zoning hearings. I would also oversee the installation of the Facility, if approved, with respect to the Town's public safety equipment.

**Q5. Please describe the Public Safety System and the existing communications structure located at 158 Edison Road, Trumbull.**

A5. The Town installed the existing lattice tower located on the Property (“Existing Tower”) in the early 1980s. The Existing Tower is 100 feet above grade level (“AGL”) and supports police, fire, EMS and some regional law enforcement communication capabilities. The Existing Tower serves as the primary dispatch location for all the Town’s emergency service agencies.

The Police radio system utilizes seven sites, with the Existing Tower operating presently as a “receive site.” The Existing Tower also serves as a “transmit site” for the Fire Department and EMS, as well as a backup site for Public Works. The Town’s Police Department serves as the emergency operation center for the Town and, therefore, all emergency services need transmit capabilities from the Property in the event that phone lines become inoperable.

**Q6. What recommendation did Northeastern make to the Town regarding the Existing Tower?**

A6. The Existing Tower has reached the end of its designed service life span. Accordingly, Northeastern recommends that the Town replace the Existing Tower with a 150 foot AGL monopole structure and install its public safety communications equipment atop such a facility. A facility at that height would support the communication technologies utilized by the Town currently, as well as the next generation of radio frequency (“RF”) systems. A 150 foot structure would also help alleviate some of the current coverage gaps in the Public Safety System, which include gaps within the Town boundaries and in adjoining municipalities. Northeastern anticipates that the Town will

install the next generation RF systems within the next three to five years. The Town would use the proposed Facility as one of two back-up sites for the Public Safety System and would use the new facility as a “primary transmit site” once the Town moves to simulcast technology.

**Q7. What configuration did Northeastern propose initially for the Town’s public safety equipment?**

A7. Northeastern proposed a regional dispatch platform which would sit atop the 150 foot AGL monopole proposed by T-Mobile. The regional dispatch platform would include 3 whip antennas with a length of 10’3”, 4 whip antennas with a length of 17’6”, 2 dipoles with a length of 10’5” and 1 dipole with a length of 23’4”. The regional dispatch platform would consist of a circular platform with a walkway for maintenance workers. These specifications are depicted in T-Mobile’s Technical Report, submitted to the Town on December 23, 2009. See Bulk Filing, submitted contemporaneously with T-Mobile’s Application.

**Q8. What is the revised configuration of the Town’s public safety equipment?**

A8. After an extensive consultation with the Town, members of the community and T-Mobile, Northeastern recommended a revised configuration to incorporate stealth measures and to minimize potential visual impact. The Town would use a 3 to 4 foot standoff T-boom antenna mounts (as opposed to a full circular platform with walkway), which would sit atop the 150 foot monopole, and fiberglass, slim line whip antennas. The antennas would be painted sky blue to blend with the sky background. The revised configuration would also reduce the overall height of the Facility from 173’4” to 171’6”

AGL. The antenna inventory would consist of 3 whip antennas with a length of 3'2", 2 whip antennas with a length of 9'6", 4 whip antennas with a length of 16" and 1 whip antenna with a length of 21'6". The municipal equipment would be located in a separate shelter adjacent to the area leased by T-Mobile. The revised configuration would still meet the Town's needs regarding the Public Safety System. A copy of the antenna inventory is appended to T-Mobile's Responses to the Connecticut Siting Council's First Set of Interrogatories, dated October 25, 2011.

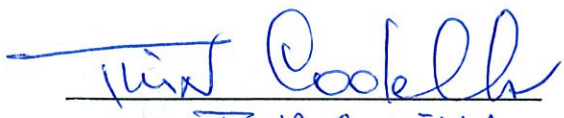
**Q9. In your professional opinion, based upon your review of the Public Safety System and T-Mobile's Application, would the proposed Facility with the revised configuration benefit the Town and its citizens?**

A9. Yes, the proposed Facility would provide several benefits to the Town and its citizens. First, T-Mobile would replace the Existing Tower, which has reached the end of its designed service life span. Northeastern has explored the costs associated with removing the Existing Tower and replacing it with a new 150 foot AGL monopole structure. Such a project would cost approximately \$250,000. Second, the Town's Public Safety System experiences noticeable coverage gaps. There are coverage gaps in the Town of Trumbull and in adjoining municipalities. The proposed Facility would enable the Town to reduce those coverage gaps. The Town's emergency service providers often have to move beyond the boundaries of the Town to reach hospitals. Third, the proposed Facility provides the Town with greater flexibility to address technological changes in the future, such as the deployment of next generation RF systems.



Eric Fine

Sworn and subscribed to before me this  
23rd day of November, 2011.



TINA CODELLA

Notary Public

My Commission expires 12/31/2012

# **ATTACHMENT A**

## **Town of Trumbull Police Department - Radio Tower Project Management**

Project Manager: Eric Fine  
Phone: 203-568-6950  
Fax: 203-568-6912  
Email: [efine@norcomct.net](mailto:efine@norcomct.net)

### **Executive Summary:**

Northeastern Communications, Inc has been servicing and installing quality two-way radio products and services for the commercial, public safety and industrial markets since 1958.

Headquartered in Naugatuck, CT Northeastern Communications, Inc. is a Motorola Premier Service Partner, Motorola Manufacturer's Representative, Motorola Authorized Two-Way Radio Dealer and Motorola System Specialist. In addition, Northeastern Communications has been certified as an ETA Certified Service Center and is a four-time Motorola Pinnacle of Excellence award and 2006 MotoExcellence Award recipient.

Our technical staff is unsurpassed in the industry. Each of our 16 service vehicles carries advanced testing and diagnostic equipment to service a radio or an entire communications system in the field. Services can also include project management, engineering and consultative services. We maintain a full service, in-house repair facility in Naugatuck, CT and our parts warehouse stocks over 3,000 items to ensure timely repairs. Drive-in service is available by appointment at either of our western Connecticut facilities located in Naugatuck and Stratford.

Our engineering, technical and sales staffs regularly attend manufacturer and in-house training sessions to ensure that their knowledge and skills are up-to-date with the latest technology. On-going evaluation and a quality control program assure that every customer will receive the highest level of service possible.

Critical system support is provided 24 hours a day. Our multi-tiered, on-call protocol ensures a manager, engineer and ETA Certified Technician are always available to respond to our customer's needs. Our custom designed customer service management software tracks customer requests and projects from beginning to end and can provide the field technician, engineer or project manager detailed history about a service issue, system or project instantly.

Northeastern Communications provides a variety of quality two-way radio products and services and strives to continue the tradition of exceptional customer service that our customers have come to expect. We look forward to the opportunity to serve your communications needs, large or small.



**Employment Profile:**

**Employee Name:** Eric Fine

**Position:** Integration Engineer/ Project Manager

**Northeastern Communications, Inc. date of hire:** April 1, 2008

**Responsibilities:** Project management and oversight of implementation team responsible for the installation of radio communication fixed network systems and dispatch centers. Responsibilities include pre-sales engineering of land mobile radio and data systems and solutions, customer and vendor coordination, training, and total customer satisfaction.

**Experience:** A combined 33 years of industry experience. Prior to his employment with Northeastern Communications, Inc., Eric worked in the antenna and tower industry and was responsible for the construction and installation of communication towers and antenna systems, primarily utilized by public safety agencies. He worked as a contracted project manager for Motorola Inc. responsible for the implementation of new public safety communications systems. He worked in the capacity of project manager for the Town of Westport and was responsible for the implementation of a new \$3.2 million dollar public safety communications system that included three monopole tower sites. Eric also filled the position of Chief Technical Specialist with the Westport Fire and Police Departments responsible for all aspects of public safety emergency telecommunications until retirement in April of 2008 after 27 years of service.

**Certifications:** Electronics Technicians Association International  
Certified R56 Telecommunications Installer  
Certification # R56119185 expiration December, 31 2014

Anritsu Site Master Antenna and Transmission line sweep test technician. Certification # F12569E





**Related Experience Projects In Progress:**

**Trumbull Police Department**

Installation of a 150ft Monopole tower structure for single wireless carrier and municipal use. Eric is working as the Town's technical representative and is responsible for making sure the Town's public safety needs are addressed in a joint venture between the Town of Trumbull and T-Mobile Northeast LLC to provide the replacement of a 30 year old antenna tower at Police Headquarters. The responsibility of Northeastern Communications includes:

- Providing a needs assessment related to present and future public safety communication systems requirements.
- Assisting the town's legal representatives with the negotiation of the lease agreement between the town and T-Mobile.
- Making a technical presentation to the Siting Council.
- Testimony at local zoning hearings.
- Pending tower installation oversight.

Northeastern Lead Representative - Eric Fine

Estimated Project Cost: \$200,000.00

End User Contact: Chief Thomas Kiely 203-261-3665

**Darien Police Department**

Installation of a 170ft Monopole tower structure for municipal use as part of police headquarters renovation project. Eric is acting as technical representative and has been coordinating with the building project architect and engineer in addressing tower and antenna related issues. Responsibility of Northeastern Communications includes:

- Providing a needs assessment related to present and future public safety communication systems requirements.
- Designing the new LMR antenna systems.
- Tower concept design.
- Development of RFP documents.
- Development of project budget and prequalifying potential bidders.

Northeastern Lead Representative - Eric Fine

Estimated Project Cost: \$250,000.00

End User Contact: Chief Duane Lovello 203-662-5310

**Stratford Fire Department**

Installation of a 130ft Monopole tower structure for municipal use as part of a public safety communications system enhancement project. Eric is acting on behalf of the Town for all zoning and building permit submissions and hearing presentations, is acting as construction manager, coordinating all construction and installation work, administering acceptance testing, completing final engineering and procuring project

sign off. Responsibility of Northeastern Communications includes:

- Providing a needs assessment related to present and future public safety communication systems requirements.
- Design of the new LMR antenna systems.
- Tower concept design and development of RFP documents.
- Development of project budget and prequalifying potential bidders.
- Assisting the Purchasing Department with the procurement of the tower structure.
- Contracting of sub contractors.

Northeastern Lead Representative - Eric Fine

Estimated Project Cost: \$250,000.00

End User Contact: Assistant Chief Tim Brennan 203-395-4070

**Monroe Police Department**

Installation of 120ft Monopole tower structure for municipal use as part of Police Headquarters renovation project. Eric is acting as technical representative and is coordinating with the building project architect and engineer in addressing tower and antenna related issues. Responsibility of Northeastern Communications includes:

- Providing a needs assessment related to present and future public safety communication systems requirements.
- Designing the new LMR antenna systems.
- Tower concept design.
- Development of RFP documents.
- Development of project budget and prequalifying potential bidders.

Northeastern Lead Representative - Eric Fine

Estimated Project Cost: \$250,000.00

End User Contact: Captain Mike Flick 203-452-2834

**Related Experience Past Projects:**

**Westport Police Department** - 100 ft Monopole municipal use tower structure as part of a public safety communications system upgrade project. Eric's responsibilities included providing a needs assessment related to present and future public safety communication systems requirements, design of the new LMR antenna systems, tower concept design and development of RFP documents, development of project budget, prequalified potential bidders, assisting the purchasing department with the procurement of the tower structure and the contracting of sub contractors. Eric was also responsible for all zoning, building permit submissions and hearing presentations, construction management, coordination of all construction and installation work,

administration acceptance testing and final engineering project sign off.

Town of Westport Lead Representative - Eric Fine

Project Cost: \$125,000.00

End User Contact: Deputy Chief Jonathan Gottfried 203-341-5002

**Westport Fire Department Headquarters** - 150ft Monopole tower for five wireless carriers and municipal use. Eric served as the Town's technical representative responsible for making sure the town's public safety needs were addressed in a joint venture between the Town of Westport and Sprint PCS. The intent of the project was to provide the replacement of a 20 year old antenna tower at fire headquarters. Responsibilities included providing a needs assessment related to present and future public safety communication systems requirements, assisting the town's legal representatives with the negotiation of the lease agreement between the town and Sprint PCS, making a technical presentation at local zoning hearings, providing Siting Council testimony and providing installation oversight of the tower structure assuring all town requirements were met.

Town of Westport Lead Representative - Eric Fine

Project Cost: \$225,000.00

End User Contact: Deputy Chief Jonathan Gottfried 203-341-5002

**Town of Westport - Bayberry Lane Tower Site** - 150ft Monopole tower for six wireless carriers and municipal use. Eric served as the Town's technical representative responsible for making sure the town's public safety needs were addressed in a joint venture between the Town of Westport and American Tower LLC to provide the replacement of a 20 year old cellular antenna tower at the 180 Bayberry Lane site. Responsibilities included providing a needs assessment related to present and future public safety communication systems requirements, assisting the town's legal representatives with the re-negotiation of the lease agreement between the town and American Tower, making a technical presentation at local zoning hearings and Siting Council testimony and provided installation oversight of the tower structure assuring all town requirements were met.

Town of Westport Lead Representative - Eric Fine

Project Cost: \$300,000.00

End User Contact: Deputy Chief Jonathan Gottfried 203-341-5002



**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: October 21, 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 surveys, wetland delineations, coastal consistency analyses and visual resource evaluations 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 15 years of experience in the telecommunications industry. My experience includes the zoning, design and construction of more than 1300 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 158 Edison Road, Trumbull, Connecticut ("Facility"). The site plan included the site access plan, the compound plan and tower elevation for the Facility ("Site Plan"). In addition, All-Points evaluated the proposed development and the 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 158 Edison Road, Trumbull, Connecticut ("Property"). The Property is a 2.30 acre parcel. The Property is currently developed and used as the Town of Trumbull's ("Town") police department. T-Mobile would lease a 490 square foot irregularly shaped area located towards the center of the Property. The Facility would replace an existing lattice tower used by the Town for emergency services communication, which is approximately 100 feet above grade level ("AGL").

**Q6. Please describe the access to the proposed Facility.**

A6. Vehicle access would be along an existing bituminous access and parking area used by the police department.

**Q7. Please describe the proposed Facility.**

A7. The Facility would consist of a 150 foot monopole structure, with T-Mobile's antennas flush mounted at a centerline of 140 AGL. T-Mobile's equipment would be located on the ground, near the base of the monopole, on a concrete equipment pad. The monopole and equipment would sit within a 490 square foot irregularly shaped compound. The compound would be enclosed and concealed by an 8 foot chain link fence. Subsequent to the publishing of the Site Plan, which is attached to the Application for Certificate, T-Mobile agreed to install privacy slats in the proposed chain link fence. T-Mobile would extend utility service underground from an existing utility pole located on Merwin Street. The utility routing would traverse an already developed area of the Property.

The Facility would also host a regional dispatch platform for emergency services situated atop the monopole. The height and configuration of the regional dispatch platform would be dictated by the needs and specifications of the Town. As designed currently, the regional platform would incorporate stealth characteristics, such as slim profile antennas and a slim profile mounting configuration. Subsequent to the publishing of the Plan, the Town agreed to paint its proposed antennas and mounting configuration blue to match the sky background. The municipal equipment would be located in a separate shelter adjacent to the area leased by T-Mobile.

**Q8. Please describe the initial configuration of the proposed Facility.**

A8. The Facility's initial configuration included a 150 foot monopole, with T-Mobile's antennas mounted on T-arms at 140 feet AGL. According to the Town's specifications, the regional dispatch platform would sit atop the monopole equipped with 3 whip antennas at 10'3", 4 whip antennas at 17'6", 2 dipoles at 10'5" and 1 dipole at 23'4". The regional dispatch platform would consist of a circular platform with a walkway for maintenance workers. The total height of the Facility to the top of the tallest municipal antenna would be approximately 173'4" AGL. These specifications are depicted in T-Mobile's Technical Report, submitted to the Town on December 23, 2009. See Bulk Filing, submitted contemporaneously with this Application.

**Q9. Please describe the difference between the initial configuration of the Facility and the configuration of the Facility as proposed in the Application.**

A9. T-Mobile changed its antenna mounting configuration from T-arms to flush mounts as shown on the Site Plan. Subsequent to the publishing of the Site Plan, T-Mobile also agreed to incorporate privacy slats into the compound fencing. The Town has agreed to alter the initial configuration to include the following stealth measures: (1) the use of fiberglass, slim line whip antennas (eliminate dipoles); (2) antennas painted sky blue to blend with the sky background (an agreement made subsequent to the publishing of the Site Plan); (3) the reduction of the overall height of the Facility from 173'4" to 171'6" AGL by reducing the height of the regional platform antennas to include 3 whip antennas at 3'2", 2 whip antennas at 9'6", 4 whip antennas at 16" and 1 whip antenna at 21'6"; and (4) the use of 4 foot standoff T-boom antenna mounts as opposed to a walk-around platform.

**Q10. Would the construction, operation and maintenance of the proposed Facility require the removal or relocation of any trees?**

A10. No. The Facility would be constructed adjacent to the existing Police Department building. T-Mobile would have to remove some existing shrubbery. The proposed compound area is immediately adjacent to a concrete sidewalk and existing bituminous parking area in the center of the Property.

**Q11. How much clearing and grading is necessary?**

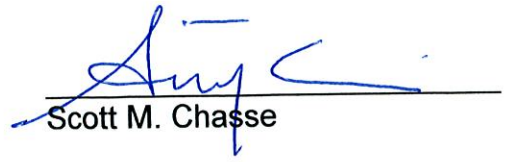
A11. The Facility compound would require approximately 40 cubic yards of cut, 40 cubic yards of fill and 10 cubic yards of crushed stone. The cut and fill volumes would be generated primarily from the utility trenching proposed along the existing bituminous parking area. The proposed compound area is generally flat and would require minimal grading. In my opinion this amount of disturbance would be minimal.

**Q12. Can the monopole be designed with a pre-engineered fault to prevent encroachment on adjacent properties?**

A12. Yes, it is common practice to design monopoles with such engineered faults and in fact many of the facilities approved by the Council have been designed in this manner.

**{SPACE LEFT BLANK INTENTIONALLY}**



  
Scott M. Chasse

Sworn and subscribed to before me this  
21<sup>st</sup> day of October, 2011.

  
Robin S. Chasse

*Notary Public*  
*My Commission expires*

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