

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: MESSAGE CENTER MANAGEMENT
APPLICATION FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE, AND OPERATION OF A
REPLACEMENT TELECOMMUNICATIONS
FACILITY LOCATED AT 4 DITTMAR ROAD,
IN THE TOWN OF REDDING, CONNECTICUT

DOCKET NO. 425

Date: March 20, 2012

**INTERROGATORY RESPONSES TO TOWN OF REDDING
FROM T-MOBILE NORTHEAST LLC**

T-Mobile Northeast LLC ("T-Mobile") submits the following responses to the first set of Pre-Hearing Interrogatories propounded by the Town of Redding in connection with the above-captioned Application.

TM-1. Explain whether T-Mobile customers using cell or data services in the proximity of the current guyed tower can obtain T-Mobile Services. If yes, explain why T-Mobile is planning to install an antenna in the location of the proposed tower.

A1. T-Mobile's current level of existing wireless service in the area surrounding the proposed facility is below its minimum design threshold. In the majority of the area surrounding the proposed facility T-Mobile customers will experience very poor signal quality to no useable service at all. However, as signal degrades from surrounding facilities at differing distances due to perspective to attenuating objects, there may be varied localized spots where a T-Mobile customer may be able to receive a small amount of useable service. This level of service is typically only useable to customers outside of a vehicle or building structure. Additionally, these small pockets are not contiguous throughout the designed coverage objective and in averaging coverage over the given sample area the composite coverage throughout the targeted objective area is well below the minimum design threshold and is unreliable for T-Mobile's customers in this area. Lack of consistent coverage in this area causes routine call reliability and 911/emergency call reliability to suffer.

TM-2. Explain why T-Mobile has not sought to locate an antennae on the current guyed tower in a previous timeframe. Explain what has caused T-Mobile to install antennae at the proposed location at this time.

A2. T-Mobile initiated a site search in this area of Redding on or about November, 2007. The guyed tower located at 4 Dittmar Road is one of four pre-existing wireless facility locations that T-Mobile identified for review as a possible coverage solution. Please see response to TM-1 for the basis of T-Mobile's need to install a site at the proposed facility at this time.

TM-3. Provide a list of backup electric generation equipment projected to be installed at the tower and whether T-Mobile expects to use the backup electric generation while new or replacement electric service is installed at the tower. If backup electric generation is expected to be required, provide the expected timeframe for its use.

A3. T-Mobile intends to install a battery backup system to provide supplemental electrical power. The backup battery system will provide 12-16 hours of service. As T-Mobile is not currently installed on the existing facility, it will not need backup generation during the replacement of the current electrical service at the property.

TM-4. When did T-Mobile first sign a lease for locating an antenna at the proposed tower? Provide a copy of the lease. Explain what caused the delay in placing antennae on the guyed tower.

A4. T-Mobile executed a lease for the use of this facility on February 27, 2009. A copy of the Memorandum of License is attached hereto. T-Mobile regional/market network prioritizations delayed the location of its equipment at the existing facility during the 2009 and 2010 calendar years.

Respectfully submitted,

T-MOBILE NORTHEAST LLC


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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:

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