

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NORTH ATLANTIC TOWERS, LLC  
and NEW CINGULAR WIRELESS PCS, LLC (AT&T)  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR THE  
CONSTRUCTION, MAINTENANCE AND OPERATION  
OF A TELECOMMUNICATIONS TOWER FACILITY  
AT ONE OF TWO SITES: 171 SHORT BEACH ROAD,  
BRANFORD, OR 82 SHORT BEACH ROAD,  
EAST HAVEN, CONNECTICUT

DOCKET NO. 427

August 7, 2012

RESPONSES TO INTERVENOR RICHARD MORELAND'S INTERROGATORIES

- Q1. Some insurance companies have my property at 8 Hilton Ave, East Haven, designated as a high wind zone and require storm shutters on my house in order for them to insure me. The cell tower in East Haven must also fall in that zone being a few hundred feet from my property. Are you aware that this area you're proposing to build a cell tower is designated has a high wind zone by some?
- A1. *Yes, the Applicants are aware of wind speeds for the area as incorporated into the State Building Code.*
- Q2. What is the impact of building in a high wind zone? Please include impact to worker safety, and impact to structural integrity, including the long term impact.
- A2. *The State Building Code incorporates regional wind speeds for tower design purposes which will be incorporated in the specific design for any tower facility approved by the Siting Council. Structural integrity and worker safety are both considerations and accounted for when designing both the tower and the foundation.*
- Q3. Based on the EIA/TIA 222-G: the Telecommunications Industrial Association Structural Standards for Steel Antenna Towers and Antenna Supporting Structures, please provide your classification of the proposed cell tower in East Haven for the following categories: Structure Classification, Exposure Categories, Topographic Category and Geological Classification. Please include your wind speed up calculations.
- A3. *Structure Classification is Class II, Exposure D (because of the proximity to the water), Topographic Category I. Geological Classification will be determined at the time of a geotechnical analysis.*
- Q4. Please provide the noise impact estimates for when the generators are routine maintenance runs and assume the worst case when four generators are running at the same time.
- a. For homes within 500 feet, please describe in addition to using scientific measurements, details such as, will we be able to hold a normal conversation, in our yards, in our homes with the windows open, or, will we need to yell to be heard, need to go inside and close all the windows in order to hold normal conversation.

- b. Will we be able to talk on the phone, or will we need to hang up the phone and call back when the generators are turned off.
- A4. *Please see the Applicants' Supplemental Submission for noise studies for both proposed alternative sites. With respect to all potential generators operating at the same time, this situation would only occur during an emergency where long term and severe power outages are experienced in the community.*
- Q5. For EIA/TIA 222-G, Geological Classifications Class E and Class F, please explain how a tower would fall based on the possible scenarios which could include an earth quake or even a simple issue with soil water saturation and water erosion that spawn mud slides.
- A5. *As stated in this proceeding, the tower will be designed according to the localized EIA/TIA 222-G standards and the local soil conditions. Those design considerations are used to design a tower that will comply with code which takes into consideration various conditions, and contingencies with appropriate factors of safety.*
- Q6. For EIA/TIA 222-G, Geological Classifications Class E and Class F, please explain how a fuel supply could stay secure based on the possible scenarios which could include an earth quake or even a simple issue with soil water saturation and water erosion that spawn mud slides.
- A6. *The fuel supply for the generator is in a double contained tank with remote monitoring. The design of this containment system is governed by both State and Federal standards, which consider all relevant safety factors.*
- Q7. Please describe the impact to the Farm River state park and wet lands assuming the above worst case scenario and the fuel supplies rupture. What's the amount of fuel that would enter the stream that runs behind our properties, this stream starts near the edge of the proposed tower location.
- A7. *In a worst case scenario, the double containment tank is ruptured with 210 gallons of diesel fuel present. The monitoring system would immediately notify of a spill in this situation. The spill is then immediately reported to both the State and the EPA. At first, the diesel fuel would absorb into the soil. A Spill Response team would typically be onsite within a few hours. They would use impermeable barriers to contain the spill from "flowing" any further. Excavation would commence and all contaminated soils would be removed. Oversight by government agencies would require soil and water testing to ensure the spill was contained and the contaminants completely removed.*
- Q8. There have been wireless issues in Connecticut where even though there is a strong signal, there is no network available, for both ATT and Verizon, there seems to be a bigger underlying problem, how can residences be assured that adding more towers to a system that seems to have problems is going to help and not hurt the situation?
- A8. *The record in this proceeding demonstrates through empirical data that there are coverage gaps in wireless service in this area of Branford and East Haven. The record also demonstrates that either of the facilities proposed in this proceeding is designed to provide reliable wireless service to this area. The question nevertheless raises capacity which can also be an issue requiring development of additional infrastructure in areas of the State. Capacity is, however, not the principal factor driving development of the proposed facility.*

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of the foregoing was sent electronically and by overnight mail to the Connecticut Siting Council and:

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Christopher Fisher

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