

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

In re Application of New Cingular Wireless	:	
PCS, LLC (AT&T) Application for a	:	Docket No. 428
Certificate of Environmental Compatibility and	:	
Public Need for the Construction, Maintenance	:	October 15, 2012
and Operation of a telecommunications tower	:	
facility in Roxbury, Connecticut	:	

Interrogatories of  
Bronson Mountain Farm Homeowners' Association  
Set Two

1. The response to Question 6 of the Association's Pre-Hearing Interrogatories, which sought specific details of the proposed road to Candidate A and the road's environmental impacts, provides that, because "AT&T does not have control over the development of [the proposed road] and has not developed plans for the access drive . . . , AT&T's project engineers do not have the data or information requested." Please provide any provisions included in the lease between AT&T and the property owner, or any other contract, that precludes AT&T from obtaining that information from the property owner.

2. To the extent that AT&T's failure to provide details regarding the proposed road to Candidate A is premised upon its belief that the Council does not have jurisdiction over the

road, please state so explicitly and provide the legal and factual basis for that conclusion. In responding, please reference the documents included in Roxbury Inland Wetland Commission Application No. 04-10 #1, which the Association has requested be made an exhibit to this Docket, pursuant to a Request to File Added Exhibits, of even date.

Respectfully submitted,

Bronson Mountain Farm  
Homeowners Association,  
Intervenors

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Certification

This is to certify that a copy of the foregoing has been mailed this date to:

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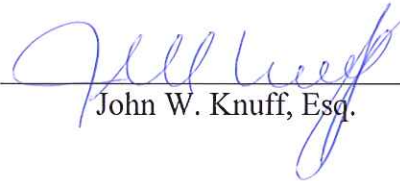
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