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*Via Electronic Mail & First Class Mail*

October 25, 2012

Robert Stein  
Chairman  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: **Docket No. 432- Feasibility Study of Back-Up Power Requirements for  
Telecommunications Towers and Antennas Pursuant to Public Act 12-148**

Dear Chairman Stein:

Enclosed please find an original and fifteen (15) copies of the responses of T-Mobile Northeast LLC, d/b/a ("T-Mobile") to the Connecticut Siting Council's (the "Council") October 12, 2012 Pre-Hearing Questions in connection with the above-referenced proceeding.

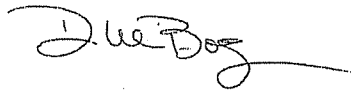
In addition, please note that Mr. Hans Fiedler will serve as the witness at the November 1, 2012 hearing to respond to questions on T-Mobile's behalf.

As for exhibits to be offered, T-Mobile refers to its October 1, 2012 submission to the Council, and the attached responses to the Council's Pre-Hearing Questions dated October 12, 2012. T-Mobile reserves the right to offer additional exhibits, testimony and witnesses as new and pertinent information and materials comes to its attention and in rebuttal to positions taken by the Council, or other participants.

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Please do not hesitate to contact the undersigned or Tara Trifon of this office (860-541-7740) should you have any questions with regard to this submission.

Very truly yours,

A handwritten signature in cursive script, appearing to read "D. W. Bogan".

David W. Bogan

DWB

cc: Service List

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**DOCKET NO. 432 – FEASIBILITY STUDY OF BACK-UP POWER REQUIREMENTS FOR  
TELECOMMUNICATIONS TOWERS AND ANTENNAS PURSUANT TO PUBLIC ACT 12-148**

**Interrogatories to T-Mobile Northeast LLC**

Pursuant to Public Act 12-148, T-Mobile Northeast LLC, d/b/a/ T-Mobile USA, Inc. (hereinafter “T-Mobile”) acknowledges the requirement that the Connecticut Siting Council (hereinafter “Council”), in consultation and in coordination with the Department of Energy and Environmental Protection, the Department of Emergency Service and Public Protection and the Public Utility Regulatory Authority, shall study the feasibility of requiring backup power for telecommunications towers and antennas. T-Mobile hereby responds in substance to the October 12, 2012 Interrogatory/Document Request. Nevertheless, T-Mobile states the following general objections, each of which is incorporated in to the specific responses contained in the Interrogatory / Document Request:

**T-MOBILE GENERAL OBJECTIONS**

**A**

T-Mobile objects to each and every interrogatory that is vague and ambiguous, and not calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

**B**

T-Mobile objects to these interrogatories to the extent that they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this proceeding.

**B**

T-Mobile objects to each and every interrogatory to the extent that it purports to seek information about matters outside the State of Connecticut.

**C**

T-Mobile objects to each and every interrogatory to the extent its purports to seek information or documents that are protected from disclosure by the attorney-client privilege, attorney work product doctrine or other privilege.

**D**

T-Mobile objects to each and every interrogatory to the extent the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons.

**E**

T-Mobile objects to each and every interrogatory to the extent that it purports to require disclosure of information or documents that are not available to T-Mobile or that are equally or more readily available to the Council than obtaining the information or documents from T-Mobile.

**F**

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**Interrogatories to T-Mobile Northeast LLC**

T-Mobile objects to these interrogatories to the extent that they are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

**G**

T-Mobile objects to these interrogatories to the extent they seek information that is already in the possession of the Council or already in the public record before the Council, or elsewhere.

**H**

T-Mobile objects to the interrogatories that seek to impose an obligation on T-Mobile to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this proceeding on the grounds that such requests are overly broad, unduly burdensome and oppressive.

**I**

T-Mobile objects to each and every interrogatory to the extent they seek information that is beyond the jurisdiction of the providing agency or the established forum.

**J**

T-Mobile object to each and every interrogatory to the extent it seeks disclosure of common carrier network information that the Federal Communications Commission ("FCC") has deemed critical infrastructure under 42 U.S.C. § 519C(e); and in collaboration with the Federal Department of Homeland Security have concluded must be presumptively treated confidential in order to ensure that national homeland security efforts are not compromised by the release of such service provider network information.

**K**

T-Mobile objects to these interrogatories on the grounds that the FCC pursuant to 47 C.F.R. § 4.1 has established rules related to reliability and security of communications infrastructure, and the Council's interrogatories seek information beyond the rules and process established by the FCC.

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**Interrogatories to T-Mobile Northeast LLC**

1. Provide a list of web-links for similar studies, laws or initiatives in other states other than those listed in the Council's Administrative Notice List.

Objection: T-Mobile objects to this question on the ground that the terms "similar studies", "laws", "initiatives" and "other than those listed in the Council's Administrative Notice List" are each individually and collectively read as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects that the information requested is equally available to the Council than obtaining the information or documents from T-Mobile. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this interrogatory to the extent that it purports to seek information about matters outside the State of Connecticut. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council's question as follows.

Response: In correspondence sent to the Council and dated October 1, 2012, CTIA-The Wireless Association® noted as a general matter no other state has enacted laws requiring a wireless provider to install backup power. T-Mobile further advises that as a condition of it receiving Federal Universal Service Fund High Cost and Low Income support in the state of Washington, its affiliate operating in Washington, along with all other competitive Eligible Telecommunications Carriers (ETCs), is required to meet certain battery backup power requirements in its designated service area. T-Mobile was designated as an ETC in Washington in 2011; and the Washington State Utilities and Transportation Commission ("UTC") granted T-Mobile a formal extension until the end of 2014 to comply with the battery backup requirement for some sites in its designated service area. The UTC extension was granted as a result of certain technical and operational constraints related to the employment of battery backup at certain tower and antenna sites.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
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**Interrogatories to T-Mobile Northeast LLC**

2. Of the laws listed in the Council’s Administrative Notice identify the states in which your company does business and describe how your company complies with these requirements

Objection: T-Mobile objects to this question on the ground that the terms “[o]f the laws listed”, “does business” and “requirements” are each individually and collectively read as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this interrogatory to the extent that it purports to seek information about matters outside the State of Connecticut. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Specific to the list of “[o]ther [s]tates” included in the Council’s Administrative Notice beginning at the bottom on unmarked page 3, T-Mobile states that its affiliates which provide commercial mobile radio service are not subject to the rules and orders detailed in items 33 thru 39. T-Mobile does not sell or market wireless services in the state of Alaska or South Dakota.

Respondent: Hans Fiedler  
Development Manager

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**Interrogatories to T-Mobile Northeast LLC**

3. Describe the Federal Communications Commission recent endeavors to resume/initiate an investigation of backup power.

Objection: T-Mobile objects to this question on the ground that the terms “describe”, “recent endeavors”, “resume” and “initiate” are each individually and collectively read as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects that the information requested is equally available to the Council than obtaining the information or documents from T-Mobile. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this interrogatory to the extent that it purports to seek information about matters outside the State of Connecticut. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: T-Mobile is not aware of any current proceeding established by the Federal Communications Commission to investigate backup power.

Respondent: Hans Fiedler  
Development Manager

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**Interrogatories to T-Mobile Northeast LLC**

4. Does the Safe Port Act and Stafford Act sufficiently address the carriers need to access each and every site in the State

Objection: T-Mobile objects to this question on the ground that the terms “sufficiently address” and “access” are each individually and collectively read within the question as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects that the information requested is equally available to the Council than obtaining the information or documents from T-Mobile. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that it seeks information that is beyond the jurisdiction of the state of Connecticut; and within the exclusive authority of the Federal Communications Commission (“FCC”) and the Federal Department of Homeland Security to ensure that national homeland security efforts are not compromised by the release of such information. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: T-Mobile is not aware of any limitations which would preclude our access to T-Mobile cell site locations in the State of Connecticut.

Respondent: Hans Fiedler  
Development Manager



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**Interrogatories to T-Mobile Northeast LLC**

5. Describe the need for backup power requirements.

Objection: T-Mobile objects to this question on the ground that the terms “need” and “requirements” are each individually and collectively read within the question as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to these interrogatories to the extent they seek information that is already in the possession of the Council or already in the public record before the Council, or elsewhere. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile generally states that a backup power mandate is not necessary to ensure the reliability of our network operation in the state of Connecticut. As concluded by PURA in Docket 11-09-09 – PURA Investigation of Public Service Companies’ Response to 2011 Storms, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut.

Respondent: Hans Fiedler  
Development Manager

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6. Describe the types of back-up power technologies for temporary/portable backup power and for permanent on-site backup power that are feasible, available and cost functional for deployment during a prolonged power outage. List the criteria used in determining what type of generator is utilized at any one particular antenna site.

Objection: T-Mobile objects to this question on the ground that the terms “cost functional for deployment” and “prolonged power outage” are each individually and collectively read within the question as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this question in that the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile generally states that it employs varied backup power technologies on a temporary and permanent basis within our network in the state of Connecticut.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
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**Interrogatories to T-Mobile Northeast LLC**

7. Discuss operating conditions as they relate to fuel type, availability and deliverables.

Objection: T-Mobile objects to this question on the ground that the terms “operating conditions” and “deliverable” are each individually and collectively read within the question as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to these interrogatories to the extent they seek information that is already in the possession of the Council or already in the public record before the Council, or elsewhere. T-Mobile objects to this interrogatory to the extent that it purports to seek information about matters outside the State of Connecticut. T-Mobile objects to this question in that the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan. The Business Continuity Plan includes process and procedures related to fuel.

Respondent: Hans Fiedler  
Development Manager

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**Interrogatories to T-Mobile Northeast LLC**

8. What is the useful life of a battery backup power source and when does it need to be replaced.

Objection: T-Mobile objects to this question on the ground that the term “useful life” is individually and collectively read within the question as vague and ambiguous, rendering the question incapable of response. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan which includes a program for the replacement of cell batteries every four to five years.

Respondent: Hans Fiedler  
Development Manager

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**Interrogatories to T-Mobile Northeast LLC**

9. Is a shared backup power source technically, environmentally, economically and legally feasible for sites with multiple carriers on cell towers/buildings

Objection: T-Mobile objects to this question on the grounds that the term “shared” is vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
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**Interrogatories to T-Mobile Northeast LLC**

10. What criteria are used to determine whether a particular site is critical or that a particular site would not require backup power.

Objection: T-Mobile objects to this question on the grounds that the term “critical” is vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. T-Mobile objects to these interrogatories to the extent they seek information that is already in the possession of the Council or already in the public record before the Council, or elsewhere. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan.

Respondent: Hans Fiedler  
Development Manager

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**Interrogatories to T-Mobile Northeast LLC**

11. Describe network reconfiguration associated with cell sites out of service? How does this strategy minimize lost coverage.

Objection: T-Mobile objects to this question on the grounds that the term “reconfiguration” is vague and ambiguous, rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. T-Mobile objects to these interrogatories to the extent they seek information that is already in the possession of the Council or already in the public record before the Council, or elsewhere. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
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**Interrogatories to T-Mobile Northeast LLC**

12. Provide the hierarchy for restoring commercial power for community infrastructure.

Objection: T-Mobile objects to this question on the grounds that the terms “hierarchy”, “restoring” and “community infrastructure” are vague and ambiguous as individually and collectively read within the question rendering the question incapable of response. T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: T-Mobile does not possess the ability to restore commercial power since it is within the exclusive control of the electric utility. In addition, T-Mobile does not operate community infrastructure.

Respondent: Hans Fiedler  
Development Manager



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13. Provide a copy of the CTIA The Wireless Association Business Continuity/Disaster Recovery Program. Identify each year the carrier has received CTIA certification. If not, identify all other best practices the carriers adhere to and include the web links, if applicable.

Objection: T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to these interrogatories to the extent they seek information that is already in the possession of the Council or already in the public record before the Council, or elsewhere. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that the Council seeks information or documents that are trade secret, highly confidential, proprietary and competitively sensitive. The release or disclosure of such information contained therein would cause substantial injury to the competitive position of T-Mobile, and potentially endanger the life or safety of a person or persons. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council's question as follows.

Response: T-Mobile has been certified each year since the inception of the program CTIA – The Wireless Association's Business Continuity/Disaster Recovery .

Respondent: Hans Fiedler  
Development Manager

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**Interrogatories to T-Mobile Northeast LLC**

14. Compare and contrast the CTIA program with Network Reliability & Interoperability Council (NRIC) Power-Related Best Practices.

Objection: T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that it seeks information that is beyond the jurisdiction of the state of Connecticut; and within the exclusive authority of the Federal Communications Commission (“FCC”) and the Federal Department of Homeland Security to ensure that national homeland security efforts are not compromised by the release of such information. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan which incorporates industry best practices, including but not limited to NRIC.

Respondent: Hans Fiedler  
Development Manager

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**Interrogatories to T-Mobile Northeast LLC**

15. Provide the total number of wireless antenna sites in the State and identify the percentage of back-up power for each following: None, 0-8 hours, 8-12 hours, 12-24 hours, one day, and more than one day.

Objection: T-Mobile objects to the question on the grounds that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that it seeks information that is beyond the jurisdiction of the state of Connecticut; and within the exclusive authority of the Federal Communications Commission ("FCC") and the Federal Department of Homeland Security to ensure that national homeland security efforts are not compromised by the release of such information. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council's question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
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**Interrogatories to T-Mobile Northeast LLC**

16. In response to the Statewide Hurricane Exercise that was held in July 2012, municipal representatives question whether their local emergency responders can assist with the provision of fuel or other assistance to re-start or maintain telecommunications towers. Please respond to this inquiry.

Objection: T-Mobile objects to this question on the grounds that the terms “municipal representatives”, “question”, “assist with the provision of fuel or other assistance”, “restart or maintain” are vague and ambiguous as individually and collectively read within the question rendering the question incapable of response. T-Mobile objects to the question on the grounds that it does not possess information to respond to this question. T-Mobile objects that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that it seeks information that is beyond the jurisdiction of the state of Connecticut; and within the exclusive authority of the Federal Communications Commission (“FCC”) and the Federal Department of Homeland Security to ensure that national homeland security efforts are not compromised by the release of such information. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
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TELECOMMUNICATIONS TOWERS AND ANTENNAS PURSUANT TO PUBLIC ACT 12-148**

**Interrogatories to T-Mobile Northeast LLC**

17. List the type(s) of permit(s) required for installing back up power.

Response: T-Mobile complies with all necessary permits required for installing backup power.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
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**Interrogatories to T-Mobile Northeast LLC**

18. List constraints that limit types of backup generators, including, but not limited to, space, weight, environmental, legal and safety.

Objection: T-Mobile objects to this question on the grounds that the terms “constraints that limit” is vague and ambiguous as individually and collectively read within the question rendering the question incapable of response. T-Mobile objects to the question on the grounds that it does not possess information to respond to this question. T-Mobile objects that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that it seeks information that is beyond the jurisdiction of the state of Connecticut; and within the exclusive authority of the Federal Communications Commission (“FCC”) and the Federal Department of Homeland Security to ensure that national homeland security efforts are not compromised by the release of such information. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan, in spite of various regulatory requirements, operational and capital considerations related to the use of backup generators.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**DOCKET NO. 432 – FEASIBILITY STUDY OF BACK-UP POWER REQUIREMENTS FOR  
TELECOMMUNICATIONS TOWERS AND ANTENNAS PURSUANT TO PUBLIC ACT 12-148**

**Interrogatories to T-Mobile Northeast LLC**

19. Identify alternative backup power sources to response to Question 18.

Objection: T-Mobile objects to this question on the grounds that the terms “municipal representatives”, “question”, “assist with the provision of fuel or other assistance”, “restart or maintain” are vague and ambiguous as individually and collectively read within the question rendering the question incapable of response. T-Mobile objects to the question on the grounds that it does not possess information to respond to this question. T-Mobile objects that the question is unduly burdensome, overbroad, and not narrowly tailored, would require a special study, and would cause unreasonable annoyance, oppression, burden and expense. T-Mobile objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of information relevant to this proceeding. T-Mobile objects to this question in that it seeks information that is beyond the jurisdiction of the state of Connecticut; and within the exclusive authority of the Federal Communications Commission (“FCC”) and the Federal Department of Homeland Security to ensure that national homeland security efforts are not compromised by the release of such information. Subject to and without waiving the foregoing objections, T-Mobile responds to the Council’s question as follows.

Response: Consistent with our detailed confidential Report submitted to the Council on October 1, 2012, T-Mobile is able to operate its network in an emergency situation in the state of Connecticut under the auspices of its Business Continuity Plan.

Respondent: Hans Fiedler  
Development Manager

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**DOCKET NO. 432 – FEASIBILITY STUDY OF BACK-UP POWER REQUIREMENTS FOR  
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**Interrogatories to T-Mobile Northeast LLC**

20. Provide a copy of the Wireless Proposal as approved in PURA's Docket 11-09-09 – PURA Investigation of Public Service Companies' Response to 2011 Storms. Is the wireless carrier a participant in the proposal? If not, would the wireless carrier be willing to participate in the proposal?

Response: A copy of The Wireless Proposal approved in PURA's Docket 11-09-09 ("Proposal"), can be accessed by using the following link: [11-09-09 Wireless Proposal](#). T-Mobile has voluntarily agreed to provide the information as detailed in the Proposal.

Respondent: Hans Fiedler  
Development Manager