## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 434

D/B/A VERIZON WIRELESS FOR A

CERTIFICATE OF ENVIRONMENTAL

COMPATIBILITY AND PUBLIC NEED TO

RELOCATE AN EXISTING WIRELESS

TELECOMMUNICATIONS FACILITY AT

139 NORTH MAIN STREET, WEST

HARTFORD, CONNECTICUT : APRIL 17, 2013

# RESPONSES OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS TO CONNECTICUT SITING COUNCIL PRE-HEARING QUESTIONS, SET TWO

On April 4, 2013, the Connecticut Siting Council ("Council") issued Pre-Hearing Questions, Set Two to Cellco Partnership d/b/a Verizon Wireless ("Cellco"), relating to the above-captioned docket. Below are Cellco's responses.

#### Question No. 1

How many residences are located within 1,000-foot radius of the proposed relocated facility location?

#### Response

There are approximately 105 residences within 1,000 feet of the proposed clock tower structure.

#### Question No. 2

Where would the proposed relocated tower's electric utility service connect on the subject property? What is the approximate path of the underground electric service to the proposed relocated tower?

#### Response

Utilities will extend underground from existing service to the south of the Butterworth Infirmary building. (See attached lease exhibit).

#### Question No. 3

Page i of the Application states that campus of American School for the Deaf is 49.4 acres. Page 2 states that it is 51.5 acres. Provide the correct acreage of the subject property.

#### Response

The reference on page 2 of the Docket No. 434 application to 51.5 acres is incorrect. The correct acreage for the ASD campus is 49.4 acres.

#### Question No. 4

In Cellco Partnership d/b/a Verizon Wireless' (Cellco) response to question 8 of the first set of interrogatories, the sum of the coverage distances is 7.575 miles. However, the total road coverage (i.e. main + secondary) is listed as 8.25 miles in Cellco's response to question 10.

Provide a breakdown of the secondary road coverage distances by street and reconcile the two totals.

#### Response

The discrepancy identified results from a typographical error in the coverage calculated along Whitman Road. The distance covered is 0.75 miles, and not the .075 mile distance provided in Cellco's Set One Response No. 8. With that correction, the coverage on all roads in the area totals 8.25 miles as provided in Response to Question No. 10. We apologize for the confusion.

#### Question No. 5

Provide the numerical data for column three of the following matrix.

#### Response

		Existing Gallaudet Hall facility
Population Coverage (persons)	At in-building signal strength or higher	3,410
Population Coverage (persons)	At in-vehicle signal strength or higher	18,298
Area Covered (square miles)	At in-building signal strength or higher	0.97
Area Covered (square miles)	At in-vehicle signal strength or higher	6.44
Roadway Coverage (miles)	Main Roads	See below
Roadway Coverage (miles)	Secondary Roads	See below
Roadway Coverage (miles)	Total Roads (i.e. main + secondary)	8.1

Without a clear definition of what constitutes a "Main Road" or "Secondary Road" it is difficult to break down the coverage on area roadways as requested in the table provided.

Consistent with Cellco's Response to Set One, Question No. 8, the existing Gallaudet Hall facility provides coverage along a 1.0 mile portion of Farmington Avenue; a 1.75 mile portion of North Main Street; a 1.75 mile portion of Trout Brook Road; a 1.5 mile potion of Fern Street; a 0.5 mile portion of Mountain Road; a 0.5 mile portion of Whitman Road; and a 1.1 mile portion of Brookside Drive/Cliffmore Road.

### **CERTIFICATION**

I hereby certify that on this 17<sup>th</sup> day of April, 2013, a copy of the foregoing was sent, postage prepaid, to the following parties and intervenors:

Lucia Chiocchio, Esq. Christopher B. Fisher, Esq. Cuddy & Feder LLP 445 Hamilton Avenue, 14<sup>th</sup> Floor White Plains, NY 10601

Kenneth C. Baldwin

