STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:
APPLICATION OF 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 111 SECOND HILL ROAD IN THE TOWN OF BRIDGEWATER

DOCKET NO._____

March 4, 2013

APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

New Cingular Wireless PCS, LLC ("AT&T")
500 Enterprise Drive
Rocky Hill, Connecticut 06067

TABLE OF CONTENTS **Page**

LIST OF ATTACHMENTS

1. Radio Frequency Engineering Report with Coverage Plots
2. Site Search Summary with Map Identifying Sites Searched and Existing Tower/Cell Sites Listing
3. Description and Design of Proposed Facility with Drawings, Map and Aerial
4. Environmental Assessment Statement with Power Density Report, TOWAIR Results (No FAA Registration Required), Wetlands Investigation
5. Visibility Analysis with Photo Simulations
6. SHPO Correspondence & NDDB Review
7. Correspondence with the Town of Bridgewater[1]
8. Certification of Service on Governmental Officials including List of Officials Served
9. Copy of legal notice published twice in the Housatonic Times, Notice to Abutting Landowners; Certification of Service with List of Abutting Landowners
10. Connecticut Siting Council Application Guide

[1] A Copy of the Technical Report submitted to the Town is included in the Bulk Filing.

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I. Introduction

A. Purpose and Authority

Pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes ("CGS"), as amended, and Sections 16-50j-1 et seq. of the Regulations of Connecticut State Agencies ("RCSA"), as amended, New Cingular Wireless PCS, LLC ("AT&T" or the "Applicant"), hereby submits an application and supporting documentation (collectively, the "Application") for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a wireless communications facility (the "Facility") in the Town of Bridgewater. A Facility at the candidate location is a necessary component of AT&T's wireless network and its provision of personal wireless communications services for reliable service along Routes 67 and 133 and surrounding areas in the Town of Bridgewater. The candidate facility is proposed on a parcel owned by the Riebe Family.

B. Executive Summary

In 2009, AT&T commenced a search for a candidate location in the northern portion of Bridgewater. At the same time, AT&T was investigating the potential use of a site on Wewaka

Brook Road to serve the middle and southern sections of Bridgewater. The Wewaka Brook Road facility was approved in Docket 412. As part of its search for a site to provide needed service to the northern portion of Bridgewater, AT&T initially investigated use of an existing small wooden tower located on Second Hill Road and operated by the Connecticut Department of Transportation ("ConnDOT"). Upon review, AT&T determined that the ConnDOT tower is too small to accommodate AT&T's antennas and equipment without replacement. Thus, due to the small size of the tower, the small parcel on which its located and its location in an open area between two proximate residential homes, AT&T did not pursue replacement of the ConnDOT tower and sought more suitable alternatives to provide service to the northern area of Bridgewater.

AT&T's search for alternatives resulted in the proposed site at 111 Second Hill Road. A technical report was submitted to the Town of Bridgewater for this proposed Facility while Docket 412, for a facility at Wewaka Brook Road, was under review. As part of the Town's intervention in Docket 412 for the now approved facility at Wewaka Brook Road, the Town waived further consultation or review of the Technical Report for the Second Hill Road facility. As the Council will recall, the Town provided interrogatories indicating it was interested in seeing if a higher tower at the Second Hill Road site would provide coverage in the southern end of town.[2]

The proposed Facility site at 111 Second Hill Road is an approximately 4.5 acre parcel improved with a residence and garage. AT&T's proposed Facility consists of a 160-foot self-supporting tower and associated compound in the northeast portion of the parcel. The tower, antennas and ground equipment will be enclosed within a 45' x 90' fenced equipment compound

[2] The record in Docket 412 demonstrated hat a higher tower on Second Hill Road would not provide coverage in the southern end of Town or otherwise replace the Wewaka Brook Road facility.

area. Vehicular access to the facility will be provided from Second Hill Road over a new approximately 353' long 12' wide gravel drive extension.

Included in this Application and its accompanying attachments are reports, plans and visual materials detailing the proposed facility and the environmental effects associated therewith. A copy of the Council's Community Antennas Television and Telecommunication Facilities Application Guide with references from this Application is also included in Attachment 10.

C. The Applicant

The Applicant, New Cingular Wireless PCS, LLC, is a Delaware limited liability company with an office at 500 Enterprise Drive, Rocky Hill, Connecticut 06067. The company's member corporation is licensed by the Federal Communications Commission ("FCC") to construct and operate a personal wireless services system, which has been interpreted as a "cellular system", within the meaning of CGS Section 16-50i(a)(6). The company does not conduct any other business in the State of Connecticut other than the provision of personal wireless services under FCC rules and regulations.

Correspondence and/or communications regarding this Application shall be addressed to the attorneys for the applicant:

Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
(914) 761-1300
Attention: Daniel M. Laub, Esq.
Christopher B. Fisher, Esq.

A copy of all correspondence shall also be sent to:

AT&T
500 Enterprise Drive

Rocky Hill, Connecticut
Attention: Michele Briggs

D. Application Fee

Pursuant to RCSA Section 16-50v-1a(b), a check made payable to the Siting Council in the amount of $1,250 accompanies this Application.

E. Compliance with CGS Section 16-50*l*(c)

AT&T is not engaged in generating electric power in the State of Connecticut. As such, AT&T's proposed Facility is not subject to Section 16-50r of the Connecticut General Statutes. Furthermore, AT&T's proposed Facility has not been identified in any annual forecast reports, therefore AT&T's proposed Facility is not subject to Section 16-50*l*(c).

II. Service and Notice Required by CGS Section 16-50l(b)

Pursuant to CGS Section 16-50*l*(b), copies of this Application have been sent by certified mail, return receipt requested, to municipal, regional, State, and Federal officials. A certificate of service, along with a list of the parties served with a copy of the Application is included in Attachment 8. Pursuant to CGS 16-50*l*(b), notice of the Applicant's intent to submit this application was published on two occasions in the Housatonic Times, the paper utilized for publication of planning and zoning notices in the Town of Bridgewater and of general circulation in the area. A copy of the published legal notice is included in Attachment 9. The publisher's affidavits of service will be forwarded upon receipt. Further, in compliance with CGS 16-50*l*(b), notices were sent to each person appearing of record as owner of a property which abuts the proposed facility site. Certification of such notice, a sample of the notice and letter, and the list of property owners to whom the notice was mailed are included in Attachment 9.

III. Statements of Need and Benefits

A. Statement of Need

1. United States Policy & Law

United States policy and laws continue to support the growth of wireless networks. In 1996, the United Sates Congress recognized the important public need for high quality wireless communications service throughout the United States in part through adoption of the Telecommunications Act (the "Act"). A core purpose of the Act was to "provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans." H.R. Rep. No. 104-458, at 206 (1996) (Conf. Rep.). With respect to wireless communications services, the Act expressly preserved state and/or local land use authority over wireless facilities, placed several requirements and legal limitations on the exercise of such authority, and preempted state or local regulatory oversight in the area of emissions as more fully set forth in 47 U.S.C. § 332(c)(7). In essence, Congress struck a balance between legitimate areas of state and/or local regulatory control over wireless infrastructure and the public's interest in its timely deployment to meet the public need for wireless services.

Sixteen years later, it remains clear that the current White House administration, The Congress and the FCC continue to take a strong stance and act in favor of the provision of wireless service to all Americans. In December 2009, President Obama issued Proclamation 8460 which included wireless facilities within his definition of the nation's critical infrastructure and declared in part:

> Critical infrastructure protection is an essential element of a resilient and secure nation. Critical infrastructure are the assets, systems, and networks, whether physical or virtual, so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, public health or safety. From water systems to computer networks,

> power grids to cellular phone towers, risks to critical infrastructure can result from a complex combination of threats and hazards, including terrorist attacks, accidents, and natural disasters.[3]

President Obama further identified the critical role of robust mobile broadband networks in his 2011 State of the Union address.[4] In 2009, The Congress directed the FCC to develop a national broadband plan to ensure that every American would have access to "broadband capability" whether by wire or wireless. What resulted in 2010 is a document entitled "Connecting America: The National Broadband Plan" (the "Plan").[5] Although broad in scope, the Plan's goal is undeniably clear:

> [A]dvance consumer welfare, civic participation, public safety and homeland security, community development, health care delivery, energy independence and efficiency, education, employee training, private sector investment, entrepreneurial activity, job creation and economic growth, and other national purposes.[6] [internal quotes omitted]

The Plan notes that wireless broadband access is growing rapidly with "the emergence of broad new classes of connected devices and the rollout of fourth-generation (4G) wireless technologies such as Long Term Evolution (LTE) and WiMAX."[7] A specific goal of the Plan is that "[t]he United States should lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation." [8] In April 2011, the FCC issued a Notice of Inquiry concerning the best practices available to achieve wide-reaching broadband capabilities across

[3] Presidential Proclamation No. 8460, 74 C.F.R. 234 (2009).
[4] Cong. Rec. H459 (Jan. 25, 2011), also *available at* http://www.whitehouse.gov/the-press-office/2011/01/25/remarks-president-state-union-address. Specifically the President stressed that in order "[t]o attract new businesses to our shores, we need the fastest, most reliable ways to move people, goods, and information—from high-speed rail to high-speed Internet."
[5] Connecting America: The National Broadband Plan, Federal Communications Commission (2010), *available at* http://www.broadband.gov/plan/.
[6] Id. at XI.
[7] Id. at 76.
[8] Id. at 25.

the nation including better wireless access for the public.[9] The public need for timely deployment of wireless infrastructure is further supported by the FCC's Declaratory Ruling interpreting § 332(c)(7)(B) of the Telecommunications Act and establishing specific time limits for decisions on land use and zoning permit applications.[10] More recently, the critical importance of timely deployment of wireless infrastructure to American safety and economy was confirmed in the Middle Class Tax Relief and Job Creation Act of 2012, which included a provision, Section 6409, that preempts a discretionary review process for eligible modifications of existing wireless towers or base stations.[11]

2. United States Wireless Usage Statistics

Over the past thirty years, wireless communications have revolutionized the way Americans live, work and play.[12] The ability to connect with one another in a mobile environment has proven essential to the public's health, safety and welfare. As of June 2012, there were an estimated 321.7 million wireless subscribers in the United States.[13] Wireless network data traffic was reported at 341.2 billion megabytes, which represents a 111% increase from the prior year.[14] Other statistics provide an important sociological understanding of how critical access to wireless services has

[9] FCC 11-51: Notice of Inquiry, In the Matter of Acceleration of Broadband Deployment: Expanding the Reach and Reducing the Cost of Broadband Deployment by Improving Policies Regarding Public Rights of Way and Wireless Facilities Siting, available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0407/FCC-11-51A1.pdf.

[10] WT Docket No. 08-165- Declaratory Ruling on Petition for Declaratory Ruling to Clarify Provisions of Section 332(c)(7)(B) to Ensure Timely Siting Review and to Preempt Under Section 253 State and Local Ordinances that Classify All Wireless Siting Proposals as Requiring a Variance ("Declaratory Ruling").

[11] Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, §6409 (2012), available at http://gpo.gov/fdsys/pkg/BILLS-112hr3630enr/pdf/BILLS-112hr3630enr.pdf; see also H.R. Rep. No. 112-399 at 132-33 (2012)(Conf. Rep.), available at http://www.gpo.gov/fdsys/pkg/CRPT-112hrpt399/pdf/CRPT-112hrt399.pdf.

[12] See, generally, History of Wireless Communications, *available at* http://www.ctia.org/media/industry_info/index.cfm/AID/10388 (2011)

[13] CTIA's Wireless Industry Indices: Semi-Annual Data Survey Results, A Comprehensive Report from CTIA Analyzing the U.S. Wireless Industry, Mid-Year 2012 Results (Semi-Annual Data Survey Results). See also, "CTIA-The Wireless Association Semi-Annual Survey Reveals Historical Wireless Trend" *available at http://www.ctia.org/media/press/body.cfm/prid/2133.*

[14] Id.

become. In 2005, 8.4% of households in the United States had cut the cord and were wireless only.[15] By 2011, that number grew exponentially to an astonishing 35.8% of all households.[16] Connecticut in contrast lags behind in this statistic with 18.7% wireless only households.[17]

Wireless access has also provided individuals a newfound form of safety. Today, approximately 70% of *all* 9-1-1 calls made each year come from a wireless device.[18] Parents and teens have also benefited from access to wireless service. In a 2010 study conducted by Pew Internet Research, 78% of teens responded that they felt safer when they had access to their cell phone.[19] In the same study, 98% of parents of children who owned cell phones stated that the main reason they have allowed their children access to a wireless device is for the safety and protection that these devices offer.[20]

Wireless access to the internet has also grown exponentially since the advent of the truly "smartphone" device. Cisco reported in 2011 that global mobile data traffic grew in 2010 at a rate faster than anticipated and nearly tripling again for the third year in a row.[21] It was noted in 2010, mobile data traffic alone was three times greater than all global Internet traffic in 2000. Indeed, with the recent introduction of tablets and netbooks to the marketplace, this type of growth is expected to persist with Cisco projecting that mobile data traffic will grow at a compound annual growth rate (CAGR) of 92% from 2010 to 2015.[22]

3. Site Specific Public Need

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[15] CTIA Fact Sheet (2010), *available at* http://www.ctia.org/media/industry_info/index.cfm/AID/10323 *citing* Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January - June 2010, National Center for Health Statistics, December 2010Fact Sheet
[16] CTIA Fact Sheet
[17] CTIA Fact Sheet
[18] Wireless 911 Services, FCC, *available at* http://www.fcc.gov/guides/wireless-911-services
[19] Amanda Lenhart, *Attitudes Towards Cell Phones*, Pew Research, *available at* http://www.pewinternet.org/Reports/2010/Teens-and-Mobile-Phones/Chapter-3/Overall-assessment-of-the-role-of-cell-phones.aspx
[20] Id.
[21] Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2010–2015, February 1, 2011.
[22] Id.

The facility proposed in this Application is an integral component of AT&T's network in its FCC licensed areas throughout the state. There is a significant coverage deficiency in the existing AT&T wireless communications network along New Milford Road (State Route 67), Main Street North (State Route 133) and the surrounding roads and areas in Bridgewater. A deficiency in coverage is evidenced by the inability to adequately and reliably transmit/receive quality calls and/or utilize data services offered by the network. The proposed Facility, in conjunction with other existing and approved facilities in and around Bridgewater is needed by AT&T to provide its wireless services to people living in and traveling through this area of the state. Attachment 1 of this Application includes a Radio Frequency ("RF") Engineering Report with propagation plots and other information which identify and demonstrate the specific need for a facility in this area of the State to serve the public and meet its need and demand for wireless services.

B. Statement of Benefits

Carriers have seen the public's demand for traditional cellular telephone services in a mobile setting develop into a requirement for anytime-anywhere wireless connectivity with critical reliance placed on the ability to send and receive, voice, text, image and video. Provided that network service is available, modern devices allow for interpersonal and internet connectivity, irrespective of whether a user is mobile or stationary, which has led to an increasing percentage of the population to rely on their wireless devices as their primary form of communication for personal, business and emergency needs. The proposed facility would allow AT&T and other carriers to provide these benefits to the public that are not offered by any other form of communication system.

Moreover, AT&T will provide "Enhanced 911" services from the Facility, as required by the Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, 113 Stat. 1286 (codified in relevant part at 47 U.S.C. § 222) ("911 Act"). The purpose of this federal legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. In enacting the 911

Act, Congress recognized that networks that provide for the rapid, efficient deployment of emergency services would enable faster delivery of emergency care with reduced fatalities and severity of injuries. With each year since passage of the 911 Act, additional anecdotal evidence supports the public safety value of improved wireless communications in aiding lost, ill, or injured individuals, such as motorists and hikers. Carriers are able to help 911 public safety dispatchers identify wireless callers' geographical locations within several hundred feet, a significant benefit to the community associated with any new wireless site.

In 2009, Connecticut became the first state in the nation to establish a statewide emergency notification system. The CT Alert ENS system utilizes the state Enhanced 911 services database to allow the Connecticut Department of Homeland Security and Connecticut State Police to provide targeted alerts to the public and local emergency response personnel alike during life-threatening emergencies, including potential terrorist attacks, Amber Alerts and natural disasters. Pursuant to the Warning, Alert and Response Network Act, Pub. L. No. 109-437, 120 Stat. 1936 (2006) (codified at 47 U.S.C. § 332(d)(1) (WARN), the FCC has established the Personal Localized Alerting Network (PLAN). PLAN will require wireless service providers to issue text message alerts from the President of the United States, the U.S. Department of Homeland Security, the Federal Emergency Management Agency and the National Weather Service using their networks that include facilities such as the one proposed in this Application. Telecommunications facilities like the one proposed in this Application enable the public to receive e-mails and text messages from the CT Alert ENS system on their mobile devices. The ability of the public to receive targeted alerts based on their geographic location at any given time represents the next evolution in public safety, which will adapt to unanticipated conditions to save lives.

C. Technological Alternatives

The FCC licenses granted to AT&T authorize it to provide wireless services in this area of the State through deployment of a network of wireless transmitting sites. The proposed Facility is a

necessary component of AT&T's wireless network. Closing the coverage gap in this area of the State requires technology that can reach a coverage footprint that spans thousands of acres. Repeaters, microcell transmitters, distributed antenna systems (DAS) and other types of transmitting technologies are not a practicable or feasible means to providing service within the service area for this site. These technologies are better suited for specifically defined areas where new coverage is necessary, such as commercial buildings, shopping malls, and tunnels or highway and urban capacity. Accordingly, AT&T has determined that DAS, repeaters, microcell transmitters and other types of transmitting technologies are not viable as an alternative to the need for a macrocell site in this area of the State. The Applicants submit that there are no effective technological alternatives to construction of a new cell site facility for providing reliable personal wireless services in this area of Connecticut.

IV. Site Selection & Tower Sharing

A. Site Selection

AT&T's investigation of the area has been guided by benchmark data on gaps in its wireless coverage in Bridgewater that was used to establish a "site search area" for the placement of a new facility. This site search area is the general geographical location where the installation of a wireless facility would address an identified service problem while still allowing for orderly integration of a site into AT&T's network, based on the engineering criteria of hand-off, frequency reuse and interference and physical terrain in the area.

In any site search area, AT&T seeks to avoid the unnecessary proliferation of towers and to reduce the potential adverse environmental effects of a needed facility, while at the same time ensuring the quality of service provided by the site to users of its network. There are 25 existing communications facilities located within approximately four (4) miles of the proposed Facility. (See Attachment 2 for a list of the existing facilities). AT&T already uses a number of these

sites to provide service. Other existing sites are outside of the site search area and would not provide reliable coverage to the area where service is needed.

Representatives for AT&T identified 31 sites for a potential Facility and ultimately identified the proposed site at 111 Second Hill Road as one which could host a Facility and provided reliable service to the targeted coverage area. (See Attachment 2 for the sites investigated). AT&T initially investigated use of an existing small wooden tower located on Second Hill Road and operated by the Connecticut Department of Transportation ("ConnDOT"). Upon review, AT&T determined that the ConnDOT tower is too small to accommodate AT&T's antennas and equipment without replacement. Thus, due to the small size of the tower, the small parcel on which its located and its location in an open area between two proximate residential homes, AT&T did not pursue replacement of the ConnDOT tower and sought more suitable alternatives to provide service to the northern area of Bridgewater.

B. Tower Sharing

To maximize co-location opportunities and minimize the potential for towers needed by other carriers, the proposed facility will be designed to accommodate at least three additional carriers' antennas and ground equipment.

V. Facility Design

AT&T has leased a 100' x 100' area in the northeastern portion of an approximately 4.5 acre parcel of property owned by Robert Reibe located at 111 Second Hill Road in Bridgewater. The proposed Facility would consist of a 160' AGL high self-supporting monopole within a 45' x 90' fenced equipment compound. AT&T would install up to twelve (12) panel antennas on a platform at a centerline height of 157'AGL and unmanned equipment in an equipment shelter located within an equipment compound. The equipment compound would be enclosed by an 8'

chain link fence. Both the monopole and the equipment compound are designed to accommodate the facilities of three other wireless carriers and equipment. Vehicle access to the facility will provided from Second Hill Road over a new approximately 353' long by 12' wide gravel drive extension. Utility connections will be routed underground from existing CL&P pole #4777 to provide necessary power and telecommunication service to the proposed facility. Attachment 3 to this Application contains the specifications for the proposed Facility including a site access map, a compound plan, tower elevation, and other relevant details of the proposed Facility. Also included is a Visibility Analysis and information related to the Environmental Assessment of the proposed Facility. Some of the relevant information included in Attachments 3 through 6 reveals that:

- The property is classified locally in the R-3 residential 3 acre zoning district;
- Minimal grading and clearing of the proposed compound area would be required for the construction of the proposed Facility;
- The proposed Facility will have no impact on water flow, water quality, or air quality;
- Topography and vegetation screen visibility of the tower from a large portion of the viewshed analysis study area;
- Visibility of the tower is largely limited to open agricultural fields in the Second Hill Road area, and

Approximately 112 acres within the 8,042 acre Study Area, or slightly more than 1%, may have some visibility of the proposed Facility above the tree canopy year-round (during both "leaf-off" and "leaf-on" conditions).

VI. Environmental Compatibility

Pursuant to CGS Section 16-50p, the Council is required to find and to determine as part of the Application process any probable environmental impact of the facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity, fish and wildlife and aesthetic or scenic neighborhood qualities. As demonstrated in this Application and the accompanying Attachments and documentation, the proposed Facility will not have a significant adverse environmental impact.

A. Visual Assessment

It is anticipated that the proposed 160' AGL monopole will be visible year-round from approximately 112 acres or slightly more than 1% of the 8,053 acre Study Area. As demonstrated in the Visibility Analysis included in Attachment 5, the majority of year-round visibility would occur on the open, undeveloped agricultural areas located off Second Hill Road. The Visibility Analysis estimates that 19 residential properties may have partial year-round views of the proposed Facility and 22 residential properties will have some views during "leaf-off" conditions. The proposed Facility is not located within 250 feet of a school or commercial day-care center.

Weather permitting, AT&T will raise a balloon with a diameter of at least three (3) feet at the proposed Facility site on the day of the Council's first hearing session on this Application, or at a time otherwise specified by the Council.

B. Solicitation of State and Federal Agency Comments

Various consultations with municipal, State and Federal governmental entities and AT&T consultant reviews for potential environmental impacts are summarized and included in Attachments 6 and 7. AT&T submitted requests for review from Federal, State and Tribal

entities including the United States Fish & Wildlife ("USFW") Service and the Connecticut State Historic Preservation Officer ("SHPO") and Department of Energy and Environmental Protection ("DEEP").

It has been determined that there will be no impact on historical resources according to SHPO. No endangered or threatened species habitat was identified based on a review of the State of Connecticut's Natural Diversity Database for the Candidate Facility as per the Natural Diversity Database Map information included in Attachment 6. Confirmation of these findings is pending with DEEP and will be provided to the Siting Council as soon as received. As required, this Application is being served on State and local agencies which may choose to comment on the Application prior to the close of the Siting Council's public hearing.

C. Power Density

In August 1996, the FCC adopted a standard for exposure to Radio Frequency ("RF") emissions from telecommunications facilities like the one proposed in this Application. To ensure compliance with applicable standards, a maximum power density report was prepared by AT&T for the proposed Facility and is included in Attachment 4. As demonstrated in this report, the calculated worst-case emissions from the proposed Facility is just 6.9% of the Federal MPE standard.

D. Other Environmental Factors

The proposed Facility would be unmanned, requiring monthly maintenance visits approximately one hour long. AT&T's equipment would be monitored 24 hours a day, seven days a week from a remote location. The Facility requires neither water supply nor wastewater utilities. No outdoor storage or solid waste receptacles will be needed. Further, the Facility will not create or emit any smoke, gas, dust or other air contaminants, noise, odors or vibrations other

than installed heating and ventilation equipment. Temporary power outages could require the limited use of an on-site 210 gallon diesel fuel generator. Overall, the construction and operation of AT&T's proposed Facility will have no significant impact on the air, water, or noise quality of the area.

AT&T utilized the FCC's TOWAIR program to determine if he Candidate Facility would require registration with the Federal Aviation Administration ("FAA"). The TOWAIR program results for the proposed Facility, included in Attachment 4, indicates that registration with the FAA is not required let alone FAA review as a potential air navigation obstruction or hazard. As such, no FAA lighting or marking would be required for the Facility proposed in this Application.

AT&T has evaluated the Site in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969 ("NEPA"). The proposed site was not identified as a wilderness area, wildlife preserve, National Park, National Forest, National Parkway, Scenic River, State Forest, State Designated Scenic River or State Gameland. Further, according to the site survey and field investigations, no Federally regulated wetlands or watercourses or threatened or endangered species will be impacted by the proposed Facility.

VII. Consistency with the Town of Bridgewater's Land Use Regulations

Pursuant to the Council's Application Guide, included in this section is a summary of the consistency of the project with the local municipality's zoning and wetland regulations and plan of conservation and development. A description of the zoning classification of the Site and the planned and existing uses of the proposed site location are also detailed in this Section.

A. Bridgewater's Plan of Conservation and Development

The Bridgewater Plan of Conservation and Development, dated February 2001, does not addresses wireless facilities under its consideration of utilities, nor even generally. See Bulk Filing.

B. Bridgewater's Zoning Regulations and Zoning Classification

The proposed site is classified in the Town of Bridgewater's R-3 residential 3 acre zoning district. The Town of Bridgewater Zoning Regulations Section 5.11 is entitled "Telecommunications Facilities". (See Town of Bridgewater Zoning Regulations, Applicant's Bulk Filing). Consistency of the proposed Facility with the substantive provisions of this section is set forth in the table below. The first two columns include the guidelines and the third column applies these standards to the proposed monopole Facility.

C. Local Zoning Guidelines and Dimensional Requirements

Section from the Zoning Regulations	Standard or Preference	Proposed Facility
5.11.06(a)(1) Height	Towers shall be no taller than necessary to reasonable accommodate the proposed use	The proposed tower height is required to provide services to the targeted coverage area
5.11.06(a)(2) Location	Applications should include a review of the search for and reason to use the proposed locations as well as review alternative/existing locations.	An exhaustive site search was conducted that included existing and approved structures, towers within and outside of the search area.
5.11.06(a)(3) Fall Zone	Provide a fall zone entirely located on the parcel (or on adjoining parcels with owners consent).	The proposed tower is 110' from the eastern and northern property lines. All other distances are greater than the height of the tower.
5.11.06(a)(4) Co-Location	Provide space for collocation of at least two (2) other carriers if the tower is over 100' in height.	The proposed Facility, which is over 100' in height, is designed to accommodate up to three (3) carriers in addition to AT&T.
5.11.06(b)(1) Visibility	Adequate evidence that the visibility of the proposed	The proposed Facility will be visible from various vantage points in the community but

	telecommunications facilities from surrounding areas has been minimized to the extent possible (including provision of a viewshed analysis, balloon float and other methods). No lights shall be on the tower unless required.	will not have a detrimental impact to any documented scenic area or vista. A viewshed and photosimulations were provided to the Town as part of the technical report and as part of this application. A balloon float was conducted as part of the analysis and will also be conducted at the Siting Council's hearing on this matter. No tower lighting is proposed.
5.11.06(b)(2) Safety	The facility must comply with state and federal requirements regarding electromagnetic emissions and aviation safety and not interfere with public safety communications	The proposed facility complies with applicable state and federal radio frequency emissions standards. The proposed facility poses no hazard to air travel and no tower lighting is required or proposed. No interference with other FCC licensed operators is anticipated and any interference issues will be properly responded in accordance with FCC regulations.
5.11.06(b)(3) Protection of Natural and Historic Resources	Consider the extent to which the proposed telecommunications facility may unreasonably harm or otherwise affect any natural or historic resources on or near the lot on which the facility has been proposed and demonstrate that such resources have been considered in formulating the proposal for the facility.	AT&T conducted an in depth analysis of potential impacts to the natural and historic resources of the proposed tower site. There are no impacts to any critical wildlife habitats or historic or archaeological resources are anticipated. While a DEEP determination is pending, all indications are that that there are no known extant populations of Federal or State endangered, threatened or special concern species occurring at the site. SHPO issued a "no effect" determination regarding historic or archaeological resource. Wetlands impacts have been avoided and mitigated to the extent practicable.

D. Planned and Existing Land Uses

Properties immediately surrounding the subject site include low-density single family residential homes, agricultural uses, and a ConnDoT relay facility. Consultation with municipal officials did not indicate any planned changes to the existing or surrounding land uses. A copy of the Town's Zoning Map is included in the accompanying Bulk Filing.

E. Bridgewater's Inland Wetlands and Watercourses Regulations

The Town of Bridgewater's Inland Watercourses Regulations ("Local Wetlands Regulations") regulate certain activities conducted in "Wetlands" and "Watercourses" and

"Buffer Areas" as defined therein. Wetlands are delineated on the property as detailed in the Wetlands Investigation report included in Attachment 4. The Town of Bridgewater upland review area ("Buffer" area) includes those areas 100' from a wetland or watercourse. The Wetlands Investigation report includes an analysis of on-site wetlands and finds that the proposed activities will not result in adverse impacts to wetland resources. All appropriate sediment and erosion control measures will be designed and employed in accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation. Soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility.

VIII. Consultation with Local Officials

A technical consultation process regarding the proposed Facility with the Town of Bridgewater was commenced in February 2011. As part of that consultation, the Town expressed its preference to have the Application brought in to the Siting Council for consideration with the then ongoing Docket 412 for a facility at Wewaka Brook Road and waived further consultation. Due to funding priorities, AT&T could not submit the application until this year. During the course of Docket 412, however, no objections were noted to the proposed site at Second Hill Road.

IX. Estimated Cost and Schedule

A. Overall Estimated Cost

The total estimated cost of construction for the proposed Facility is as follows:

Tower & Foundation	$ 90,000
Site Development	$ 45,000
Utility Installation	$ 30,000

Facility Installation	$ 93,000
Antennas and Equipment	$ 250,000
	$ 508,000

B. Overall Scheduling

Site preparation work would commence immediately following Council approval of a Development and Management ("D&M") Plan and the issuance of a Building Permit by the Town of Bridgewater. The site preparation phase for the Facility is expected to be completed within three (3) to four (4) weeks. Installation of the monopole, antennas and associated equipment is expected to take an additional two (2) weeks. The duration of the total construction schedule is approximately six (6) weeks. Facility integration and system testing is expected to require an additional two (2) weeks after the construction is completed.

X. Conclusion

This Application and the accompanying materials and documentation clearly demonstrate that a public need exists in this portion of the Town of Bridgewater and surrounding areas for the provision of AT&T's wireless services to the public. The foregoing information and attachments also demonstrate that the proposed Facility will not have any substantial adverse environmental effects. The Applicant respectfully submits that the public need for the proposed Facility outweighs any potential environmental effects resulting from the construction of the proposed Facility. As such, the Applicant respectfully requests that the Council grant a Certificate of Environmental Compatibility and Public Need to AT&T for the proposed Facility in the Town of Bridgewater.

Respectfully Submitted,

By:_____

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