

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF MESSAGE CENTER  
MANAGEMENT, INC. (MCM) 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 BATES WOODS PARK IN THE  
CITY OF NEW LONDON, CONNECTICUT

Docket No. 439

September 3, 2013

APPLICANTS' PRE-FILED STATEMENT OF FACTS IN LIEU OF DIRECT TESTIMONY

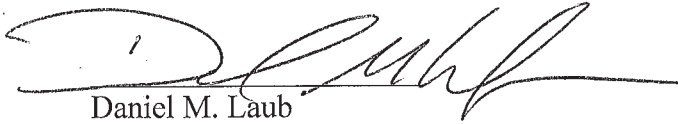
- Population density and interstate, state and local roadway usage in New London and Waterford Connecticut is substantial and creates significant demand for reliable wireless services.
- AT&T requires a new wireless facility in western New London to address the lack of reliable in-vehicle and in-building coverage and add capacity to its existing network.
- In 2010, AT&T requested that the City of New London ("City") lease it space on the rooftop of New London High School for a wireless facility to be collocated with T-Mobile's existing wireless facility on the roof of the school.
- The City, citing future plans related to the High School, declined to lease space to AT&T on the roof of the school and instead offered AT&T space for construction of a communications tower facility on City owned property.
- From 2011 through early 2013, the City, Message Center Management, and AT&T collaborated on a light pole replacement plan at one of the ballfields associated with the High School and in the City owned Bates Woods Park.
- The replacement light pole/communications tower facility was specifically designed to accommodate AT&T, eventual relocation of T-Mobile from the rooftop of New London High School, existing lighting and potential use of the structure for municipal emergency communications and future expansion if needed.

- The replacement light pole/communications tower facility was reviewed and favorably considered by the City's Planning & Zoning Commission, City Council and has the support of the Mayor and City's Fire Chief.
- No significant adverse environmental impacts associated with the replacement light pole/communications tower facility have been identified by the Applicants' consultants as part of federal, state and local reviews to date.
- The Applicants in consultation with the City proceeded with a full 16-50/ consultation and Certificate application (as compared with a Petition for Declaratory Ruling which the facts may support) in order to give all parties and the Council a full opportunity to inquire regarding the need for a new tower in this part of the State to provide reliable wireless services to the public.

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and fifteen copies of the foregoing was sent electronically and by overnight delivery to the Connecticut Siting Council:

Dated: September 3, 2013

A handwritten signature in black ink, appearing to read 'D. Laub', with a long horizontal flourish extending to the right. The signature is positioned above the printed name 'Daniel M. Laub'.

Daniel M. Laub