STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:
APPLICATION OF HOMELAND TOWERS, LLC   DOCKET NO. 445
(HOMELAND TOWERS) AND NEW CINGULAR
WIRELESS PCS, LLC (AT&T) FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC   March 21, 2014
NEED FOR THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF A TELECOMMUNICATIONS
TOWER FACILITY IN RIDGEFIELD, CONNECTICUT

APPLICANTS' INTERROGATORY QUESTIONS TO RIDGEFIELDERS AGAINST the CELL TOWER (RACT)

The Applicants respectfully request RACT's responses to the following pre-hearing interrogatories by April 1, 2014 in accordance with the Siting Council's schedule:

Q1.   Please identify the date on or about which the Ridgefielders Against the Cell Tower ("RACT") was organized as a voluntary association.

Q2.   How many members are there of RACT?

Q3.   Please identify all persons that are members of RACT.

Q4.   Please identify the property address of all members of RACT.

Q5.   Please identify each witness RACT intends to call to testify in support of its intervention in Docket 445.

Q6.   For any witness not a member of RACT, please identify the purpose of such witnesses' testimony and provide a curriculum vitae along with pre-filed direct testimony and/or any witness report RACT intends to submit as evidence in Docket 445.

Q7.   Please provide any facts or source supporting the statement in RACT's intervention request that "members of the group are likely to suffer property value loss different from and greater than that of the public in general".

Q8.   As offered in RACT's intervention request, please identify any specific alternate locations and/or tower configurations RACT believes can be used to meet the public need for service in Docket 445 including coordinates and drawings for such locations and/or configurations.

Q9.   As offered in RACT's intervention request, provide specific details as to what alternative solution/technology of lesser impact RACT believes exists for meeting the public need for wireless and emergency communications services in northwestern Ridgefield.

Q10.   Please identify what scenic vistas in Ridgebury and Ridgefield RACT submits will be negatively impacted by the proposed facility in Docket 445 as stated in its intervention request.

Q11.   Please provide technical information supporting the statement in RACT's intervention that there exists an alternative means of providing adequate coverage by utilizing "an array at the high school and several smaller just above the tree line height facilities."

Q12.   Please provide technical information supporting the statement in RACT's intervention that wireless carriers and town emergency communications can use "combined technology".

Q13.   Please provide technical information supporting the statement in RACT's intervention that closer than 10 foot spacing between carrier arrays is physically achievable to provide reliable wireless services in the area intended to be served by Docket 445.

Q14.   Please provide technical information supporting the statement in RACT's intervention that lower height towers can be utilized by AT&T, other wireless carriers and the Town to achieve adequate coverage in the area intended to be served in Docket 445.

Q15.   Does RACT know whether or not the Town of Ridgefield would lease property at the high school and other elementary schools in northwestern Ridgefield for purposes of building wireless facilities? Has RACT proposed such a plan to the Town of Ridgefield?

Q16.   Please identify a facility design that RACT believes incorporates the "best available technology" and provide it as an exhibit in the form of a drawing.

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and fifteen copies of the foregoing was sent electronically and by first class mail to the Connecticut Siting Council with copy to:

RACT
c/o Keith R. Ainsworth, Esq.
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Dated: March 21, 2014

Christopher B. Fisher