

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
 :
 APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 448
 D/B/A VERIZON WIRELESS FOR A :
 CERTIFICATE OF ENVIRONMENTAL :
 COMPATIBILITY AND PUBLIC NEED FOR :
 THE CONSTRUCTION, MAINTENANCE :
 AND OPERATION OF A WIRELESS :
 TELECOMMUNICATIONS FACILITY AT :
 831 DERBY MILFORD ROAD, ORANGE, :
 CONNECTICUT : SEPTEMBER 9, 2014

RESPONSES OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS
TO INTERVENORS' PRE-HEARING INTERROGATORIES AND
REQUESTS FOR PRODUCTION (SET 2) DATED SEPTEMBER 2, 2014

On September 2, 2014, the Intervenors, Albert Subbloie, Jaqueline Barbara, Glenn MacInnes, and Jill MacInnes (“Intervenors”) issued Pre-Hearing Interrogatories and Requests for Production to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to the above-captioned docket (the “Intervenors’ Filing”).

General Note: Several of the Pre-Hearing Interrogatories and Requests for Production are incorrectly numbered. In addition, some of the questions maintain references to other, prior questions that are incorrectly numbered. Cellco has attempted to respond to the questions as it believes they were intended. The numbering of the questions below is as they were presented in the Intervenors’ Filing. The numbers presented in bold-type and in [brackets] are what Cellco believes to be the correct paragraph numbers.

Question No. 1

Please identify by name, position and address, any person answering or assisting in responding to these interrogatories and requests for production on behalf of Cellco Partnership d/b/a Verizon Wireless (hereinafter “Verizon” or “Cellco”).

Response

Sandy M. Carter, Regulatory Manager, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Jaime Laredo, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Jay F. Latorre III, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Michael P. Libertine, L.E.P., Director of Siting & Permitting, All-Points Technology Corp., P.C., 3 Saddlebrook Drive, Killingworth, CT 06419; Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp., P.C., 3 Saddlebrook Drive, Killingworth, CT 06419; Eric Davison, Wildlife Biologist, Davison Environmental 10 Maple Street, Chester, CT 06412; Carlo F. Centore, PE, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405; and Harry Rocheville, Civil Engineer, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405.

Question No. 2

Since the last hearing of the Connecticut Siting Council (“CSC”) on August 12, 2014, has Verizon obtained any additional information or records regarding the viability of the Mount Saint Peter’s Cemetery property at 219 New Haven Avenue, Derby, CT (“Mt. St. Peter’s Cemetery”) as an alternative location?

Response

See Cellco’s Response to Siting Council (“Council”) Pre-Hearing Questions Set 3, No. 11 dated September 9, 2014.

Question No. 3

If you answered Interrogatory 2 in the affirmative, what information did Verizon obtain regarding Mt. St. Peter's Cemetery?

Response

See Cellco's Response to Siting Council ("Council") Pre-Hearing Questions Set 3, No. 11 dated September 9, 2014.

Question No. 4

If you answered Interrogatory 2 in the affirmative, please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) regarding the Mt. St. Peter's Cemetery.

Response

Documents and electronic communications received from the Catholic Cemetery Association are included in Attachment 1.

Question No. 5

If you answered Interrogatory 2 in the affirmative, please identify the name, position and address of any person who has reviewed, inspected and/or analyzed the Mt. St. Peter's Cemetery on behalf of Verizon?

Response

Jaime Laredo, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Jay F. Latorre III, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Michael P. Libertine, L.E.P., Director of Siting & Permitting, All-Points Technology Corp., P.C., 3 Saddlebrook Drive, Killingworth, CT 06419; Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology

Corp., P.C., 3 Saddlebrook Drive, Killingworth, CT 06419; Carlo F. Centore, PE, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405; and Harry Rocheville, Civil Engineer, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405.

Question No. 6

Are there any locations on the Mt. St. Peter's Cemetery where a cell tower and related facilities could be located?

Response

See Cellco's Response to Council Pre-Hearing Questions Set 3, No. 11 dated September 9, 2014.

Question No. 7

If you answered Interrogatory 6 in the affirmative, please describe each location on the Mt. St. Peter's Cemetery where a cell tower and related facilities could be located. If possible, please also designate those possible locations on a map.

Response

See Cellco's Response to Council Pre-Hearing Questions Set 3, No. 11 dated September 9, 2014.

Question No. 8

If you answered Interrogatory 6 in the affirmative, for each such location please explain whether or not said location could be used by Verizon to achieve any part of the coverage and/or capacity needs that Verizon seeks to achieve as part of Docket No. 448.

Response

See Cellco's Response to Council Pre-Hearing Questions Set 3, Question No. 11 dated September 9, 2014.

[No Question No. 9 was included in the Intervenor's Filing.]

Question No. 10

In the prefiled testimony of Jamie Laredo, Jr., dated July 8, 2014, Mr. Laredo testified that – “[o]nce a capacity problem is identified we look at several options before we issue a search ring for a new cell site.” Did Verizon consider any “options” before issuing a search ring for the subject property at 813 Derby Milford Road, Orange, CT (the “Subject Property”)? If so, what “options” did Verizon consider?

Response

The options that are considered are as described in Mr. Laredo’s testimony. They include, analyze ways to optimize the surrounding cell sites in an effort to relieve capacity problems; identify coverage or capacity solutions related to a specific use or customer, if one exists; and before proposing a new tower site, search for existing towers, buildings, water tanks or other tall structures that may satisfy Cellco’s wireless service objective in an area.

More recently, Cellco deployed its new 2100 MHz frequencies at the Derby, Derby North and Shelton 2 cell sites. The addition of these frequencies did not, however, resolve the existing capacity problems.

Question No. 11

Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing “Shelton 2” cell site?

Response

No.

Question No. 12

If you answered Interrogatory 11 in the affirmative, please describe any such adjustments and/or changes that were made.

Response

No response required.

Question No. 13

If you answered Interrogatory 11 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

Response

No response required.

Question No. 14

If you answered Interrogatory 11 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

Response

No response required.

Question No. 15

If Verizon did not make any adjustments or changes to any antennas at its existing "Shelton 2" cell site, please explain why.

Response

Making adjustments or changes to cell site antennas does not result in an increase in capacity at that cell site.

Question No. 16

Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing "Derby" cell site?

Response

No.

Question No. 17

If you answered Interrogatory 16 in the affirmative, please describe any such adjustments and/or changes that were made.

Response

No response required.

Question No. 18

If you answered Interrogatory 16 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

Response

No response required.

Question No. 19

If you answered Interrogatory 16 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

Response

No response required.

Question No. 20

If Verizon did not make any adjustments or changes to any antennas at its existing “Derby” cell site, please explain why.

Response

Making adjustments or changes to cell site antennas does not result in an increase in capacity at that cell site.

Question No. 21

Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing “Derby North” cell site?

Response

No.

Question No. 22

If you answered Interrogatory 21 in the affirmative, please describe any such adjustments and/or changes that were made.

Response

No response required.

Question No. 23

If you answered Interrogatory 21 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

Response

No response required.

Question No. 24

If you answered Interrogatory 21 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

Response

No response required.

Question No. 25

If Verizon did not make any adjustments or changes to any antennas at its existing “Derby North” cell site, please explain why.

Response

Making adjustments or changes to cell site antennas does not result in an increase in capacity at that cell site.

Question No. 36 [26]

Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing “Orange 2” cell site?

Response

No.

Question No. 27

If you answered Interrogatory 27 [26] in the affirmative, please describe any such adjustments and/or changes that were made.

Response

No response required.

Question No. 28

If you answered Interrogatory 27 [26] in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

Response

No response required.

Question No. 29

If you answered Interrogatory 27 [26] in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

Response

No response required.

Question No. 30

If Verizon did not make any adjustments or changes to any antennas at its existing "Orange 2" cell site, please explain why.

Response

Making adjustments or changes to cell site antennas does not result in an increase in capacity at that cell site. Also, making adjustments or changes to the Orange 2 Gamma sector antennas will not increase capacity at those surrounding sites that are operating at or near their existing capacity limits.

[No Question No. 31 was included in the Intervenors' Filing.]

Question No. 32

Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing "Orange 3" cell site?

Response

No.

Question No. 32 [33]

If you answered Interrogatory 32 in the affirmative, please describe any such adjustments and/or changes that were made.

Response

No response required.

Question No. 34

If you answered Interrogatory 32 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

Response

No response required.

Question No. 35

If you answered Interrogatory 32 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

Response

No response required.

Question No. 26 [36]

If Verizon did not make any adjustments or changes to any antennas at its existing "Orange 3" cell site, please explain why.

Response

Making adjustments or changes to cell site antennas does not result in an increase in capacity at that cell site. Also, making adjustments or changes to the Orange 3 Alpha and

Gamma sectors antennas will not increase capacity at those surrounding sites that are operating at or near their existing capacity limits.

Question No. 27 [37]

Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing “Milford NE” cell site?

Response

No.

Question No. 28 [38]

If you answered Interrogatory 27 [37] in the affirmative, please describe any such adjustments and/or changes that were made.

Response

No response required.

Question No. 29 [39]

If you answered Interrogatory 27 [37] in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

Response

No response required.

Question No. 30 [40]

If you answered Interrogatory 27 [37] in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

Response

No response required.

Question No. 31 [41]

If Verizon did not make any adjustments or changes to any antennas at its existing “Milford NE” cell site, please explain why.

Response

Making adjustments or changes to cell site antennas does not result in an increase in capacity at that cell site.

Question No. 32 [42]

Did Verizon determine whether the capacity needs that it is claiming as part of this Docket 448 “relate to a specific use or customer”?

Response

No. The capacity problems described in the Docket No. 448 proceeding do not relate to a specific use or customer.

Question No. 33 [43]

If you answered Interrogatory 32 [42] in the affirmative, please describe the manner in which the capacity needs relate to a specific use or customer.

Response

No response required.

Question No. 34 [44]

If you answered Interrogatory 32 [42] in the affirmative, please describe any information which supports that conclusion and please provide copies of any records and/or documents which were relied upon by Verizon to make said conclusion.

Response

No response required.

Question No. 35 [45]

If Verizon did not make a determination as to whether or not the capacity needs that it is claiming as part of this Docket 448 “relate to a specific use or customer”, please explain why.

Response

See Cellco’s response to Question No. 32 [42] above.

Question No. 36 [46]

Defining “Sunnyside” as the area of development in Shelton that is located west of the Housatonic River, generally bounded by the bend of the river that is generally west of the Subject Property, did Verizon consider the Sunnyside area for a search ring? If not, please explain why.

Response

No. The Sunnyside area is located approximately one mile west of the proposed Orange North cell site. Coverage and capacity needs in the so-called Sunnyside area would be satisfied by the proposed Orange North cell site.

Question No. 37 [47]

If you answered Interrogatory 36 [46] in the affirmative, please provide any information pertaining to Verizon’s efforts to consider the Sunnyside area.

Response

No response required.

Question No. 38 [48]

Please provide any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to consider the Sunnyside area.

Response

No response required.

[No Question No. 39 was included in the Intervenor's Filing.]

Question No. 40 [49]

Did Verizon developing any "small cell installations" in the Sunnyside area? If not, please explain why.

Response

No. Cellco has no plans for any small cell installations in the Sunnyside area. Coverage and capacity needs in the Sunnyside area would be satisfied by the proposed Orange North cell site.

Question No. 41 [50]

If you answered Interrogatory 40 [49] in the affirmative, please provide any information pertaining to Verizon's efforts to consider the implementation of any small cell installations in the Sunnyside area.

Response

No response required.

Question No. 42 [51]

Please provide any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to consider the implementation of any small cell installations in the Sunnyside area.

Response

No response required.

Question No. 43 [52]

In the prefiled testimony of Jamie Laredo, Jr., dated July 8, 2014 (Pg. 4, Question 6), Mr. Laredo testified that “historic cell site performance and utilization data...allows Cellco to forecast when any individual or combination of cell sites will reach their capacity limits.” Is the information submitted by Verizon on August 5, 2014, titled “Applicant’s Response to the Siting Council’s Request for Additional Information”, Attachment 2, the only “performance and utilization data” relied upon in establishing the Orange North search ring? If so, please explain why.

Response

Yes.

Question No. 44 [53]

If you answered NO to interrogatory No. 43 [52], what other performance and utilization data, if any, did Verizon rely upon to evaluate capacity needs to the selection of a search ring for the Orange North facility?

Response

No response required.

Question No. 45 [54]

Was Verizon able to produce any performance and utilization data for 2100 MHz LTE? If yes, please produce any such performance and utilization data. If no, please explain why.

Response

Yes. See Cellco’s Response to Council Pre-Hearing Questions Set 3, No. 9 (Attachment 4), dated September 9, 2014. Attachment 4 contains information for those sectors of the adjacent sites where 2100 MHz (AWS) antennas were installed.

Question No. 46 [55]

Who was authorized on behalf of Verizon to release the Orange North search ring for a site search?

Response

The RF Design Engineer responsible for cell sites in New Haven County would have been responsible for initially releasing the Orange North search ring. The Orange North cell site and other sites in New Haven County were reassigned to Jaime Laredo in October of 2013.

Question No. 47 [56]

Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to establish and/or release the Orange North search ring.

Response

All of the records, reports and information relied upon to justify the need for the Orange North cell site have been provided in the Docket No. 448 proceeding.

Question No. 48 [57]

In the prefiled testimony of Jamie Laredo, Jr., dated July 8, 2014 (Pg. 4, Question 6), Mr. Laredo testified that "population" was part of the historic cell site performance and utilization data that Verizon considers. Therefore, was there any research and/or analysis of population performed in the process of establishing a search ring in the vicinity of the Subject Property? If so, please describe any applicable research and/or analysis and please provide a copy any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which Verizon relied upon or referenced in order to conduct any such population research and/or analysis.

Response

Cellco does not perform any specific research on population, but uses publicly available population, land use and development data and information as a way to review and analyze the system performance data it compiles. The future development of large residential or commercial areas, for example, may assist Cellco in understanding the capacity needs in a particular area. This type of analysis played less of a role for the Orange North facility because the cell site performance and utilization data for Cellco's Derby, Derby North, Milford NE and Shelton 2 cell sites clearly demonstrate the need for capacity relief in the area.

Question No. 49 [58]

If Verizon did not perform any research and/or analysis of population in the process of establishing a search ring in the vicinity of the Subject Property, please explain why.

Response

See Cellco's response to Question No. 48 [57] above.

Question No. 50 [59]

In the process of establishing the Orange north search ring, were any population counts, or other population assessments, performed on any of the sectors listed as having a substantial capacity relief from the proposed Orange North facility? If so, what information did Verizon obtain? If not, why?

Response

No. Use of population counts is not necessarily an accurate and reliable way for Cellco to analyze the need of its customers who may live in a particular service area, may work in a particular service area or who are simply passing through a particular service area.

Question No. 51 [60]

Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any population counts, or other population assessments, performed on any of the sectors listed as having a substantial capacity relief from the proposed Orange North facility.

Response

No response required.

Question No. 52 [61]

In the process of establishing the Orange North search ring, did Verizon evaluate the population that would be diverted to the Orange North facility and away from utilizing each of the relevant existing sectors. If so, what information did Verizon obtain? If not, why?

Response

No. The loading on the network is a more accurate portrayal of need for service than population data, which does not take into account Celco's user penetration information for a particular area.

Question No. 53 [62]

Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any information that Verizon obtained to evaluate whether the population would be diverted to the Orange North facility and away from utilizing each of the relevant sectors.

Response

No response required.

Question No. 54 [63]

In the process of establishing the Orange North search ring, did Verizon perform any research and/or analysis of the geographic areas to which any or each particular existing sector is the dominant server? If so, what information did Verizon obtain? If not, why?

Response

Yes. Cellco's RF Design Engineers review topographic and geographic information through the use of its proprietary "Geo Plan" RF Propagation modeling tool.

Question No. 55 [64]

Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any research and/or analysis that Verizon performed of the geographic areas to which any or each particular existing sector is the dominant server.

Response

Data and information incorporated into Cellco's Geo Plan modeling tool is proprietary and cannot be disclosed.

Question No. 56 [65]

In the process of establishing the Orange North search ring, did Verizon perform any research and/or analysis where existing and proposed Orange North sectors will be the dominant server? If so, what information did Verizon obtain? If not, why?

Response

Yes. Cellco's RF Design Engineers review dominant server information through its proprietary "Geo Plan" RF Propagation modeling tool.

Question No. 57 [66]

Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any research and/or analysis that Verizon performed where the existing and proposed Orange North sectors will be the dominant server.

Response

Data and information incorporated into Cellco's Geo Plan modeling tool is proprietary and cannot be disclosed.

Question No. 58 [67]

In the process of establishing the Orange North search ring, did Verizon prepare and/or review any so-called traffic maps of the eight existing sectors reported in this Application? If so, what information did Verizon obtain? If not, why?

Response

Cellco assumes that the term "traffic map" as used in this question refers to specific "mapped" locations of data sessions and/or data use traffic concentration information. Cellco's RF Design Engineers use this customer specific data, along with other data, as a part of its overall needs analysis.

Question No. 59 [68]

Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any traffic maps of the eight existing sectors that Verizon prepared and/or reviewed.

Response

The customer specific information described in response to Question 58 [67] above is confidential information that Cellco cannot disclose.

Question No. 60 [69]

Does Verizon have any other search rings or facilities planned or in process (collectively, “Planned Facilities”) that would affect the capacity utilization of any of the eight sectors in the Application? If not please explain why. If so, please provide the following:

- A) the location, antenna height and other transmission characteristics of each Planned Facility;
- B) identify the existing sectors that each of those Planned Facilities would provide significant capacity relief to;
- C) identify any Orange North sectors that any Planned Facilities would provide significant capacity relief to;
- D) identify any Orange North sectors that any Planned Facilities would reduce the geographic area served by the Orange North sectors; and
- E) Please provide a copy of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any of the information referenced in response to Interrogatory No. 60.

Response

Cellco has three (3) active search rings in the general area around the proposed Orange North facility. In Cellco’s “Derby South” search area, discussed in response to Council Pre-Hearing Questions Set 3, No. 10, Cellco anticipates establishing a small cell type facility that would provide 2100 MHz service to a portion of a coverage gap along Route 34 between the

proposed Orange North and the existing Derby North cell sites. Cellco has not identified a location for this planned Derby South facility.

Cellco's Orange North 2 search area, located to the east of the Derby South small cell ring, will also provide service to a portion of the 2100 MHz coverage gap along Route 34. Cellco has not entered into a lease for any candidate in this ring. Cellco is, however, investigating the installation of antennas on the roof of an existing structure in this area.

Due to the specific service requirements of the prospective Derby South and Orange North 2 sites, Cellco does not anticipate that either site would provide any significant capacity relief to existing or proposed cell sites in the area.

Cellco's Milford North 4 search area is generally located along Route 15 (Wilbur Cross Parkway) between Cellco's existing Milford NE and Orange 3 cell sites. No candidate sites have been leased for this search ring. The primary objective of the Milford North 4 cell site is to provide for enhanced coverage along Route 15. Depending upon where the site is ultimately located, Milford North 4 could provide some capacity relief to the Milford NE Alpha sector antennas.

Question No. 61 [70]

Is the lessor amenable to relocating the facility to the location that is shown on the attached Exhibit 1 as "Point", and located at 41°17'50.90"N 73° 3'29.30"? If not, please explain why.

Response

No. See Cellco's Response to Council Pre-Hearing Questions No. 5.

Question No. 62 [71]

Is the lessor amenable to relocating the facility to the location that is shown on the attached Exhibit 1 as “Garage”, and located at 41°17’49.91”N 73° 328.17”W? If not, please explain why.

Response

No. See Cellco’s Response to Council Pre-Hearing Questions No. 5.

Question No. 63 [72]

Is the lessor amenable to relocating the facility to the location that is shown on the attached Exhibit 1 as “Barn”, and located at 41°17’52.90”N 73° 3’22.17”W. If not, please explain why.

Response

No. See Cellco’s Response to Council Pre-Hearing Questions No. 5.

Question No. 64 [73]

Please provide a copy of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to respond to any of these interrogatories.


Response

No response required.

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 2014, a copy of the foregoing was sent via electronic and first class mail, postage prepaid, to the following:

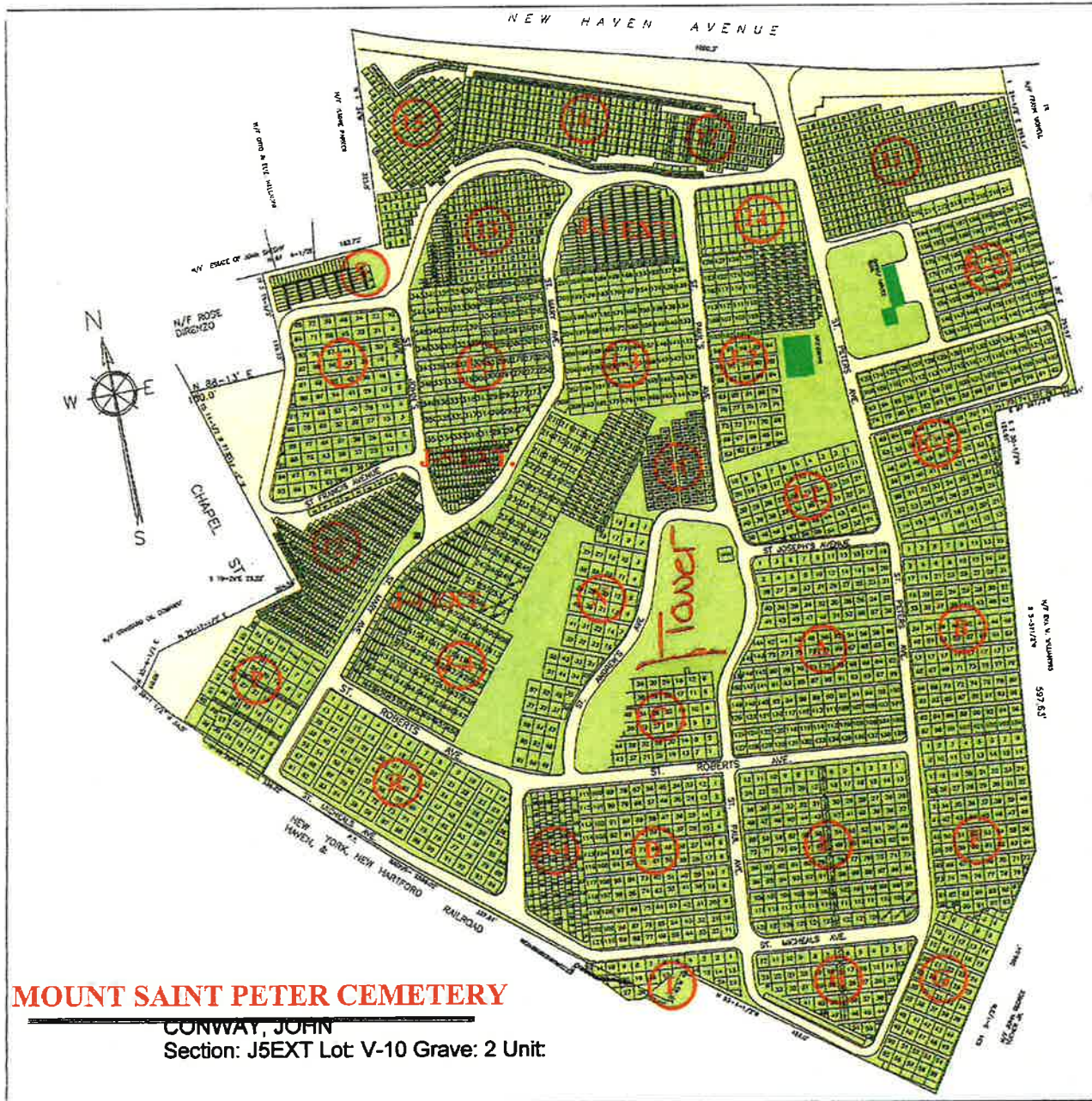
Albert Subbloie c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880 mcoppola@bmdlaw.com mkovack@bmdlaw.com	Jacqueline Barbara c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880 mcoppola@bmdlaw.com mkovack@bmdlaw.com
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State Representative Themis Klarides Legislative Office Building Room 4200 Hartford, CT 06106 themis.klarides@housegop.ct.gov	State Representative James Maroney Legislative Office Building Room 5006 Hartford, CT 06106 james.maroney@cga.ct.gov



Kenneth C. Baldwin

ATTACHMENT 1

Mt. St. Peter Cemetery



Baldwin, Kenneth

From: John Pinone <JPinone@ccacem.org>
Sent: Wednesday, August 13, 2014 1:33 PM
To: Baldwin, Kenneth
Subject: FW: Cell Tower (Derby Property)
Attachments: Scan002135.pdf

Ken

This is what I have as of now

John

John Pinone
Executive Director
Catholic Cemeteries Association
Archdiocese of Hartford
jpinone@ccacem.org
www.ccacem.org

(203) 239-2557 (Work)
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From: Kevin Gerckens
Sent: Tuesday, August 12, 2014 1:20 PM
To: John Pinone
Subject: Cell Tower (Derby Property)

John here's the map I marked Tower on the section its almost in the center of the map. It is the highest elevation in the cemetery. The same applies in Section C in Derby (All Ledge)

Hope this helps.
Kevin A. Gerckens Manager
Mount Saint Peter Cemetery
219 New Haven Ave.
Derby, Ct. 06418
Office (203) 735-8026
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Email KGerckens@ccacem.org
www.ccacem.org

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Baldwin, Kenneth

From: John Pinone <JPinone@ccacem.org>
Sent: Wednesday, August 13, 2014 2:34 PM
To: Baldwin, Kenneth
Cc: dtalmadge@structureconsulting.net
Subject: Re: Cell Tower (Derby Property)

Will do

Sent from my iPhone

On Aug 13, 2014, at 2:32 PM, "Baldwin, Kenneth" <KBALDWIN@RC.com> wrote:

Thanks John.

Please include Doug Talmadge, Verizon's Real Estate Consultant, in on all future e-mails if you would. We'll be in touch with you shortly to arrange for a site visit.

Ken

From: John Pinone [<mailto:JPinone@ccacem.org>]
Sent: Wednesday, August 13, 2014 1:33 PM
To: Baldwin, Kenneth
Subject: FW: Cell Tower (Derby Property)

Ken

This is what I have as of now

John

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(203) 239-5035 (Fax)
(860) 402-1900 (Cell)

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Thank You.

From: Kevin Gerckens
Sent: Tuesday, August 12, 2014 1:20 PM
To: John Pinone
Subject: Cell Tower (Derby Property)

John here's the map I marked Tower on the section its almost in the center of the map. It is the highest elevation in the cemetery. The same applies in Section C in Derby (All Ledge)

Hope this helps.
Kevin A. Gerckens Manager
Mount Saint Peter Cemetery
219 New Haven Ave.
Derby, Ct. 06418
Office (203) 735-8026
Fax (203) 734-2831
Email KGerckens@ccacem.org
www.ccacem.org

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Baldwin, Kenneth

From: Baldwin, Kenneth
Sent: Tuesday, August 19, 2014 9:17 AM
To: 'John Pinone'; Kevin Gerckens
Cc: Shiela Parizo; Robert Marek
Subject: RE: Cell phone tower

John

If it works for you and Kevin, members of our team would like to visit the cemetery site tomorrow (Wednesday) at 12:00 PM. Please confirm that that time will work for you. Thanks.

Kevin – the team members will include Doug Talmadge, Harry Rocheville and Dean Gustafson.

Ken Baldwin

From: John Pinone [<mailto:JPinone@ccacem.org>]
Sent: Monday, August 18, 2014 1:49 PM
To: Kevin Gerckens
Cc: Shiela Parizo; Robert Marek; Baldwin, Kenneth
Subject: Cell phone tower

Kevin

There may be a rep from Verizon and also Centex the engineering company coming out on either Wed or Thurs to look at the spot you marked on the drawing you sent me.

I have cc'd Ken Baldwin who is the attorney involved in the deal

Just a FYI

John

John Pinone
Executive Director
Catholic Cemeteries Association
Archdiocese of Hartford
jpinone@ccacem.org
www.ccacem.org

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Baldwin, Kenneth

From: John Pinone <JPinone@ccacem.org>
Sent: Tuesday, August 19, 2014 9:21 AM
To: Baldwin, Kenneth
Cc: Kevin Gerckens; Shiela Parizo; Robert Marek
Subject: Re: Cell phone tower

Ken

I just spoke with Sheila in our Derby office and noon on Wed works

Please go to the office and Kevin will take you to the location as well as a tour of the cemetery

John

Sent from my iPhone

On Aug 19, 2014, at 9:17 AM, "Baldwin, Kenneth" <KBALDWIN@RC.com> wrote:

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Baldwin, Kenneth

From: Baldwin, Kenneth
Sent: Tuesday, August 19, 2014 9:24 AM
To: 'John Pinone'
Cc: Kevin Gerckens; Shiela Parizo; Robert Marek
Subject: RE: Cell phone tower

Thanks John. Will it be Sheila of Kevin meeting our folks out there? Should they go somewhere in particular when they get there or just gather at the identified location?

From: John Pinone [<mailto:JPinone@ccacem.org>]
Sent: Tuesday, August 19, 2014 9:21 AM
To: Baldwin, Kenneth
Cc: Kevin Gerckens; Shiela Parizo; Robert Marek
Subject: Re: Cell phone tower

Ken

I just spoke with Sheila in our Derby office and noon on Wed works

Please go to the office and Kevin will take you to the location as well as a tour of the cemetery

John

Sent from my iPhone

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John

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Ken Baldwin

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Sent: Monday, August 18, 2014 1:49 PM
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Cc: Shiela Parizo; Robert Marek; Baldwin, Kenneth
Subject: Cell phone tower

Kevin

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Just a FYI

John

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Baldwin, Kenneth

From: John Pinone <JPinone@ccacem.org>
Sent: Tuesday, August 26, 2014 8:23 AM
To: Baldwin, Kenneth
Subject: RE: Cell Tower (Derby Property)

What is the time frame ?

From: Baldwin, Kenneth [<mailto:KBALDWIN@RC.com>]
Sent: Tuesday, August 26, 2014 8:20 AM
To: John Pinone
Subject: RE: Cell Tower (Derby Property)

Still evaluating.

From: John Pinone [<mailto:JPinone@ccacem.org>]
Sent: Monday, August 25, 2014 4:47 PM
To: Baldwin, Kenneth
Subject: Re: Cell Tower (Derby Property)

Where do we stand with this? Is our site a viable location

Sent from my iPhone

On Aug 25, 2014, at 4:34 PM, "Baldwin, Kenneth" <KBALDWIN@RC.com> wrote:

Thank you.

From: John Pinone [<mailto:JPinone@ccacem.org>]
Sent: Monday, August 25, 2014 4:33 PM
To: Baldwin, Kenneth
Subject: Re: Cell Tower (Derby Property)

Sept 9th we have a meeting. I hope to have an answer then

Sent from my iPhone

On Aug 25, 2014, at 4:28 PM, "Baldwin, Kenneth" <KBALDWIN@RC.com> wrote:

John

Do you have any idea when you might here about the moratorium?

Ken

From: John Pinone [<mailto:JPinone@ccacem.org>]
Sent: Wednesday, August 13, 2014 1:33 PM
To: Baldwin, Kenneth
Subject: FW: Cell Tower (Derby Property)

Ken

This is what I have as of now

John

John Pinone
Executive Director
Catholic Cemeteries Association
Archdiocese of Hartford
jpinone@ccacem.org
www.ccacem.org

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Thank You.

From: Kevin Gerckens
Sent: Tuesday, August 12, 2014 1:20 PM
To: John Pinone
Subject: Cell Tower (Derby Property)

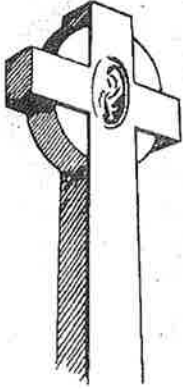
John here's the map I marked Tower on the section its almost in the center of the map. It is the highest elevation in the cemetery. The same applies in Section C in Derby (All Ledge)

Hope this helps.
Kevin A. Gerckens Manager
Mount Saint Peter Cemetery
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Catholic Cemeteries Association
OF THE ARCHDIOCESE OF HARTFORD, INC.

700 MIDDLETOWN AVENUE, P.O. BOX 517, NORTH HAVEN, CONNECTICUT 06473-0517
TELEPHONE (203) 239-2557 • FAX (203) 239-5035
E-mail jpinone@ccacem.org

JOHN PINONE
Executive Director

July 29, 2014

Connecticut Siting Council
C/o Melanie Bachman, Executive Director
Ten Franklin Square
New Britain, CT 06051

RECEIVED
JUL 30 2014

Re: Connecticut Siting Counsel, Docket No. 448
Application of Cellco Partnership d/b/a Verizon Wireless

CONNECTICUT
SITING COUNCIL

Dear Ms. Bachman and Connecticut Siting Council Members:

I am writing on behalf of the Catholic Cemeteries Association of the Archdiocese of Hartford (the "Catholic Cemeteries Association"). The Catholic Cemeteries Association owns the Mount Saint Peter's Cemetery ("Mt. St. Peter's Cemetery") which is located at 219 New Haven Avenue, Derby, CT.

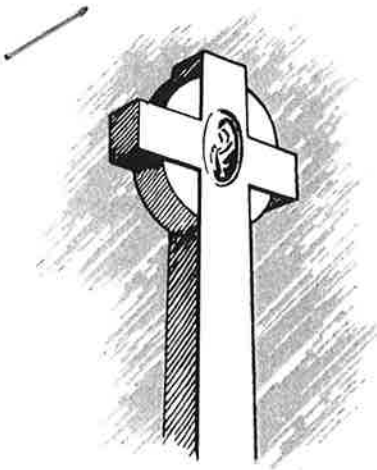
I have been informed that Verizon Wireless is interested in constructing a cell tower and related facilities in the Town of Orange in the area near Mt. St. Peter's Cemetery. The Catholic Cemeteries Association is interested in having Verizon Wireless consider Mt. St. Peter's Cemetery for the possible alternate location for the subject cell tower.

A representative from Verizon Wireless should contact me directly regarding this possibility. I hope to hear soon from a representative of Verizon Wireless. Thank you for your time and consideration.

Sincerely,

JOHN PINONE
Executive Director,
Catholic Cemeteries Association of the Archdiocese of Hartford

Cc: Kenneth Baldwin, Esq. on behalf of Cellco d/b/a Verizon Wireless
Mario F. Coppola, Esq. on behalf of Intervenors



Catholic Cemeteries Association

OF THE ARCHDIOCESE OF HARTFORD, INC.

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E-mail jpinone@ccacem.org

JOHN PINONE
Executive Director

July 29, 2014

Kenneth Baldwin, Esq.
Robinson & Cole, LLP
280 Trumbull St.
Hartford, CT 06103

Re: Connecticut Siting Counsel, Docket No. 448
Application of Cellco Partnership d/b/a Verizon Wireless

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Executive Director,
Catholic Cemeteries Association of the Archdiocese of Hartford

Cc: Melanie Bachman, Executive Director of CT Siting Council
Mario F. Coppola, Esq.