

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

UPDATED PRE-HEARING SUBMISSION OF
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Sandy M. Carter, Regulatory Manager, Cellco Partnership
2. Jaime Laredo, Radio Frequency Engineer, Cellco Partnership
3. Carlo F. Centore, P.E., Centek Engineering, Inc.
4. Michael Libertine, LEP, Director of Siting and Permitting, All-Points Technology Corp. P.C.
5. Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp. P.C.
6. Eric R. Davison, CSS, CPWS

7. Juan F. Latorre III, Radio Frequency Engineer, Cellco Partnership
8. Harry Rocheville, Jr., EIT, Centek Engineering, Inc.
9. Doug Talmadge, Structured Consulting Group

B. Exhibits to be offered

Cellco intends, at this time, to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco Partnership d/b/a Verizon Wireless dated May 13, 2014, including attachments and the following bulk file exhibits:
 - a. Orange Zoning Regulations;
 - b. Orange Plan of Conservation and Development;
 - c. Orange Inland Wetlands and Watercourses Regulations; and
 - d. Cellco's "Technical Report" dated January 31, 2014, filed with the Town of Orange.
2. Supplemental Submission dated July 10, 2014
 - a. May 13, 2014 letter from USFWS confirming that there are no threatened, endangered or candidate species and no critical habitat located in the proposed project area; and
 - b. May 14, 2014 letter from the Connecticut DEEP-NDDDB confirming the proposed facility will have no negative impacts on State listed species.
3. Cellco's Responses to Pre-Hearing Interrogatories from the Council dated July 1, 2014.
4. Pre-filed Testimony of Jaime Laredo dated July 8, 2014.
5. Sign Posting Affidavit dated April 17, 2014.

6. New Haven Register Certificate of Publication for notice published May 8 and 9, 2014 filed on July 14, 2014.
7. Revised abutters map C-1 dated March 25, 2014, and received July 17, 2014.
8. Applicant's Resubmittal All-Points Technology Corporation Wetland Investigation Report, dated May 2, 2014, including missing page 2 dated July 23, 2014.
9. Applicant's Response to Council Request for Additional Information dated August 5, 2014.
10. Applicant's Responses to Council Interrogatories, Set 2, dated August 5, 2014
11. Applicant's Responses to Intervenor Subbloie et al, Interrogatories, Part I, dated August 5, 2014.
12. Applicant's Responses to Intervenor Subbloie et al, Interrogatories, Part II, dated August 7, 2014.
13. Resume of Doug Talmadge.
14. Cellco's Responses to Council Pre-Hearing Interrogatories, Set 3 dated September 9, 2014.
15. Cellco's Responses to the Intervenors' Subbloie et al, Interrogatories (Set 2) dated September 9, 2014.
16. Supplemental Visual Assessment dated September 2014.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By: 

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Its Attorneys