

CONNECTICUT SITING COUNCIL

APPLICATION OF CELLCO PARTNERSHIP)
d/b/a VERIZON WIRELESS TO THE) DOCKET NO. 448
CONNECTICUT SITING COUNCIL FOR A)
CERTIFICATE OF ENVIRONMENTAL) JULY 29, 2014
COMPATIBILITY AND PUBLIC NEED)
FOR THE CONSTRUCTION MAINTENANCE)
AND OPERATION OF A TELE-)
COMMUNICATIONS FACILITY LOCATED)
AT ORANGE TAX ASSESSOR MAP 77,)
BLOCK 3, LOT 1, 831 DERBY MILFORD)
ROAD, ORANGE, CT)

**PRE-HEARING INTERROGATORIES & REQUESTS FOR PRODUCTION DIRECTED
TO CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS**

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”).
2. Please identify the name, position and address of all persons who participated on behalf of Verizon to identify and/or evaluate the subject property at 831 Derby Milford Road, Orange, CT (hereinafter the “Property”) with regard to voice and data radio frequency coverage and capacity (collectively hereinafter “service”).
3. For any persons who evaluated the Property with regard to service, please describe the work those persons performed and/or any documents/records that those persons produced on behalf of Verizon.
4. Please provide copies of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which show research, analysis or plans pertaining to voice and data radio frequency coverage and capacity for Docket No. 448.

5. Please identify the name, position and address of all persons who participated on behalf of Verizon to evaluate the Property with regard to any potential environmental impact from the proposed cell tower and related facilities at the Property (hereinafter the "proposed facilities").

6. For any persons who evaluated the Property with regard to any potential environmental impact from the proposed facilities, please describe the work those persons performed and/or any documents/records that those persons produced on behalf of Verizon.

7. Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which show the potential environmental impact of the proposed facilities.

8. Please identify the name, position and address of all persons who participated on behalf of Verizon to evaluate the proposed facilities with regard to compliance with any local, state or federal regulations.

9. For any persons who evaluated the proposed facilities with regard to compliance with any local, state or federal regulations, please describe the work those persons performed and/or any documents/records that those persons produced on behalf of Verizon.

10. Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which demonstrate compliance or non-compliance of the proposed facilities with any local, state or federal regulations.

11. State the names, addresses and titles of all experts who you intend to use as expert witnesses in support of this Docket No. 448.

12. For each witness identified in response to the preceding interrogatory, state:
 - (a) the qualifications of each expert witness;
 - (b) the subject matter on which each expert witness is expected to testify;

- (c) the substance of the facts and opinions on which each expert witness is expected to testify; and
- (d) a summary of the grounds for each opinion of each expert witness expected to testify.

13. Please provide resume or curriculum vitae of any expert witness whom Verizon intends to use to support its application for Docket No. 448.

14. State the names, address and titles of any fact witnesses you intend to call to testify in support of this Docket No. 448.

15. Within the last three (3) years, did Verizon communicate with any staff or officials from the Town of Orange (hereinafter “Orange” or “the Town”) with regard to the Property or any alternative locations for Verizon’s coverage needs associated with Docket No. 448?

16. If any part of your response to the preceding interrogatory is in the affirmative, state:

- (a) the name(s) and position(s) of the any Orange official(s) or employee(s);
- (b) to the best of your recollection, the date(s) (and or approximate date(s)) during which the communication(s) took place; and
- (c) to the best of your recollection, what issues were discussed?

17. Please provide copies of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) in which Verizon, or any of its representatives, communicated with any Orange officials or employees pertaining to the Property or any alternative locations for Verizon’s coverage needs associated with Docket No. 448.

18. Referencing the map in Attachment 6 – Coverage Maps, entitled *Existing Verizon Wireless 700 MHz coverage without Proposed Orange North Facility Antenna Centerline at 100 Feet AGL*, as a basis, please identify by highlight or outline the “series of coverage gaps” at 700 MHz “in the central Orange area” that the proposed facility “will provide reliable wireless service to”.

19. Referencing the map in Attachment 6 – Coverage Maps, entitled *Existing Verizon Wireless 700 MHz coverage without Proposed Orange North Facility Antenna Centerline at 100 Feet AGL*, as a basis, please identify by highlight or outline the “series of coverage gaps” at 700 MHz “in the portions of southeast Derby” that the proposed facility “will provide reliable wireless service to”.

20. Referencing the map in Attachment 6 – Coverage Maps, entitled *Existing Verizon Wireless 700 MHz coverage without Proposed Orange North Facility Antenna Centerline at 100 Feet AGL*, as a basis, please identify by highlight or outline the “series of coverage gaps” at 700 MHz “in eastern Shelton” that the proposed facility “will provide reliable wireless service to”.

21. What is the land area of the “series of coverage gaps” at 700 MHz identified in the Interrogatories 18 to 20 that the proposed facility will provide reliable wireless service to?

22. Referencing the map in Attachment 6 – Coverage Maps, entitled *Existing Verizon Wireless 700 MHz coverage with Proposed Orange North Facility Antenna Centerline at 100 Feet AGL*, as a basis, what is the total land area to which the proposed facility would provide 700 MHz coverage?

23. What is the name(s), address(s), affiliation(s) and credentials of the individual(s) who prepared the coverage maps in Attachment 6?

24. Please provide the curriculum vitae or resume of any individuals who prepared the coverage maps in Attachment 6.

25. How do you define and/or describe “55% cell loading” as indicated on the coverage maps in Attachment 6?

26. Can you provide two link budgets that explain the selection of “-85 dBm” as the thresholds of coverage at 700 MHz and 2100 MHz, respectively? If so, please provide information regarding these link budgets.

27. Notwithstanding the presence of some of this information in the CSC facilities databases, some of which information may be incomplete, inaccurate or not up to date, please provide the following information about the existing and proposed 700 MHz and 2100 MHz facilities depicted in Attachment 6:

- (a) site ID;
- (b) latitude;
- (c) longitude;
- (d) antenna centerline elevation(s) above ground;
- (e) ground elevation;
- (f) antenna make(s);
- (g) antenna model(s) and nominal gain(s) (specify if dBd or dBi);
- (h) antenna azimuth(s);
- (i) antenna tilt(s); and

(j) antenna input power(s) (or alternatively EIRP(s)) that were used to generate the respective maps in Attachment 6.

28. How do the coverage plots included in Attachment 6 demonstrate that the “Orange North Facility will also provide significant capacity relief to Cellco's existing Milford NE... cell sites”?

29. How do the coverage plots included in Attachment 6 demonstrate that the “Orange North Facility will also provide significant capacity relief to Cellco's existing... Shelton 2... cell sites”?

30. How do the coverage plots included in Attachment 6 demonstrate that the “Orange North Facility will also provide significant capacity relief to Cellco's existing... Derby... cell sites”?

32. How do the coverage plots included in Attachment 6 demonstrate that the “Orange North Facility will also provide significant capacity relief to Cellco's existing... Derby North... cell sites”?

33. How do the coverage plots included in Attachment 6 demonstrate that the “Orange North Facility will also provide significant capacity relief to Cellco's existing Orange 2... cell sites”?

34. How do the coverage plots included in Attachment 6 demonstrate that the “Orange North Facility will also provide significant capacity relief to Cellco's existing... Orange 3 cell sites”?
35. Were the capacity determinations made by Verizon as part of this Docket No. 448 measured in “dBm”?
36. What is the metric (or metrics) that Verizon uses to assess capacity needs with respect to its 700 MHz and 2100 MHz facilities?
37. Based on the 700 MHz and 2100 MHz metrics referenced in interrogatory 29, how did Cellco determine that the relevant sectors of the existing facilities are “reaching or [are] forecast to reach their respective capacity limits by 2016”?
38. What are the relevant sections of the FCC regulations “containing technical standards for wireless systems, including design standards, in order to ensure the technical integrity of each system and nationwide compatibility among all systems” with respect to Verizon’s licensed 700 MHz and 2100 MHz frequencies?
39. What are “the FCC's technical standards with respect to coverage” to which Verizon’s 700 MHz and 2100 MHz licensed cell site transmissions are “carefully tailored”?

40. What are “the FCC's technical standards with respect to... interference” to which the applicant’s 700 MHz and 2100 MHz licensed cell site transmissions are “carefully tailored”?

41. What are “the FCC's technical standards... to minimize the amount of power that is transmitted” to which Verizon’s 700 MHz and 2100 MHz licensed cell site transmissions are “carefully tailored”?

42. What is the means by which the 700 MHz and 2100 MHz systems at the Property will be connected to the “Mobile telephone switching offices (“MTSOs”) in Windsor and Wallingford” when the system is turned on?

43. If the proposed facilities are constructed to the proposed height and “designed to be extended up to 20 feet” as proposed, and assuming the current regulatory (federal, state and local) scheme is in place at the time of a proposed height extension, what permits or regulatory review would be required for Verizon to extend the height of the tower up to 20 feet to install antennas belonging to Verizon and/or any co-locators at the higher positions on the extended tower?

44. If this Docket No. 448 application is approved by the Connecticut Siting Council (hereinafter “CSC”), pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), and the proposed facility is constructed, would the owner of the constructed facility need to obtain approval from the CSC, or any other state or local board or agency, in order to make any modifications to the proposed facility which do not “substantially change” the physical dimensions of the proposed facility?

45. If you responded in the affirmative (i.e., “yes”) to the preceding interrogatory, what approvals would a Cellco or any future owner of the proposed facilities need to obtain in order to make any modifications to the proposed facilities which do not “substantially change” the physical dimensions of the proposed facilities?

46. If you responded in the negative (i.e., “no”) to the interrogatory 44, why do you believe that Cellco or any future owner of the proposed facilities would not need to obtain any approvals from any state or local board or agency in order to make any modifications to the proposed facilities which do not “substantially change” the physical dimensions of the proposed facilities?

47. If either CSC approval and/or local zoning approval are not among the approvals required as reported in interrogatory 44, please explain why.

48. Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a ten (10) foot extension of the height of the tower at the proposed facilities a “substantial change” to the physical dimensions? If not, why?

49. Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a fifteen (15) foot extension of the height of the tower at the proposed facilities a “substantial change” to the physical dimensions? If not, why?

50. Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a twenty (20) foot extension of the height

of the tower at the proposed facilities a “substantial change” to the physical dimensions? If not, why?

51. Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a twenty five (25) foot extension of the height of the tower at the proposed facilities a “substantial change” to the physical dimensions? If not, why?

52. Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a thirty (30) foot extension of the height of the tower at the proposed facilities a “substantial change” to the physical dimensions? If not, why?

53. With respect to the consideration of “capacity relief”, what is the basis for the proposed antenna height of 103 feet AGL?

54. Is it possible to obtain the necessary “capacity relief” with an antenna height that is lower than 103 feet AGL? If so, what is the lowest possible antenna height that Verizon could use in order to obtain the necessary “capacity relief”, and why?

55. Do proposed facilities comply with the Orange zoning regulations? If not, please specify those provisions which the proposed facilities do not comply and the manner in which the proposed facilities do not comply.

56. Do proposed facilities comply with the Orange inland-wetlands regulations? If not, please specify those provisions which the proposed facilities do not comply and the manner in which the proposed facilities do not comply.

57. Did Verizon consider the use of “small cells” (including but not limited distributed antenna systems, micro-cells, and pico-cells) as an alternative to the proposed facilities? If so, in what manner did Verizon consider the use of “small cells”? If not, why did Verizon not consider the use of “small cells” as an alternative to the proposed facilities?

58. Please provide copies of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which demonstrate any research or analysis that Verizon conducted with regard to the use of “small cells” as an alternative to the proposed facilities.

59. What were the specific reasons why the property owners of 814 Glenbrook Road, Orange, CT were not interested in leasing space to Verizon?

60. Please provide copies of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) pertaining to Verizon trying to lease space at 814 Glenbrook Road, Orange, CT and Verizon’s evaluation of 814 Glenbrook Road, Orange, CT.

61. What were the specific reasons why the property owners of 870 Garden Road, Orange, CT were not interested in leasing space to Verizon?

62. Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) pertaining to Verizon trying to lease space at 870 Garden Road, Orange, CT and Verizon's evaluation of 870 Garden Road, Orange, CT.

63. What were the specific reasons why Verizon determined that the property at 414 Cold Spring Lane, Orange, CT "did not maintain adequate ground space for the development of a telecommunications facility compound"?

64. Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) pertaining to Verizon's research, analysis, plans or studies of the property at 414 Cold Spring Lane, Orange, CT as a potential alternative location?

65. What were the specific reasons why Verizon determined that the ground elevation at the property at 1730 Derby Milford Road, Orange, CT "was too low to allow Cellico to satisfy its wireless service objectives in the area?"

66. Did Verizon consider the Mount Saint Peter's Cemetery property at 219 New Haven Avenue, Derby, CT as an alternative location (attached hereto as **Exhibit 1** is records pertaining to said property)? If yes, what were the specific reasons why Verizon did not choose said property as the location for Docket No. 448? If no, why did Verizon not consider said property as an alternative location for Docket No. 448?

67. Does Verizon believe that the Mount Saint Peter's Cemetery property at 219 New Haven Avenue, Derby, CT is a viable alternative location? If not, please explain why?

68. Did Verizon consider the Housatonic Overlook and Tucker's Ridge property in Orange, CT as an alternative location (attached hereto as **Exhibit 2** is records pertaining to said property)? If yes, what were the specific reasons why Verizon did not choose said property as the location for Docket No. 448? If no, why did Verizon not consider said property as an alternative location for Docket No. 448?

69. Does Verizon believe that the Housatonic Overlook and Tucker's Ridge property in Orange, CT is a viable alternative location? If not, please explain why?

70. Did Verizon consider the property at 803 Derby Milford Road, Orange, CT as an alternative location (attached hereto as **Exhibit 3** is records pertaining to said property)? If yes, what were the specific reasons why Verizon did not choose said property as the location for Docket No. 448? If no, why did Verizon not consider said property as an alternative location for Docket No. 448?

71. Does Verizon believe that the property at 803 Derby Milford Road, Orange, CT is a viable alternative location? If not, please explain why?

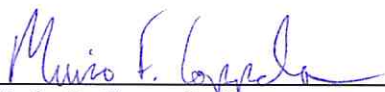
72. At the end of High Ridge Road in Orange, CT is a cul de sac (i.e., public street) at the entrance to the Housatonic Overlook and Tucker's Ridge property (a picture of this location is attached hereto as **Exhibit 4**). Did Verizon consider placing a small cell or any type on a utility pole on or near said location?

73. Does Verizon believe that the property described in interrogatory No. 72 is a viable alternative location? If not, please explain why?

74. Did Verizon consider any locations for utility pole installations (existing or new poles) for the placement of the proposed facilities? If yes, please explain any such considerations. If not, please explain why Verizon did not consider any locations for utility pole installations for the placement of the proposed facilities?

75. 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.

**RESPECTFULLY SUBMITTED BY:
ALBERT SUBBLOIE, JACQUELINE BARBARA, GLENN
MACINNES, JILL MACINNES**

BY: 
Mario F. Coppola, Esq.
Berchem, Moses, and Devlin, P.C.
1221 Post Road East
Westport, CT 06880
Tel: 203-227-9545; Fax: 203-226-1641
Email: mcoppola@bmdlaw.com
Their Attorneys

CERTIFICATE OF SERVICE

This is to certify that on the above date a true copy of the foregoing has been sent by U.S.

Mail, first-class, postage pre-paid, to the following parties of record:

Melanie Bachman, Esq., Executive Director, Connecticut Siting Council, 10 Franklin Sq., New Britain, CT 06051 (1 original, 15 copies, plus 1 electronic)

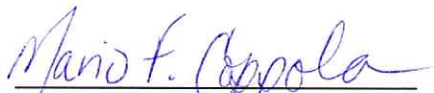
Cellco Partnership d/b/a Verizon Wireless, Kenneth Baldwin, Esq.; Robinson & Cole, 280 Trumbull Street, Hartford, CT 06103

Senator Gayle Slossberg, Legislative Office Building, Room 2000, Hartford, CT 06106

State Representative Paul Davis, Legislative Office Building, Room 4045, Hartford, CT 06106

State Representative Themis Klarides, Legislative Office Building, Room 4200, Hartford, CT 06106

State Representative James Maroney, Legislative Office Building, Room 5006, Hartford, CT 06106



Mario F. Coppola, Esq.

EXHIBIT 1

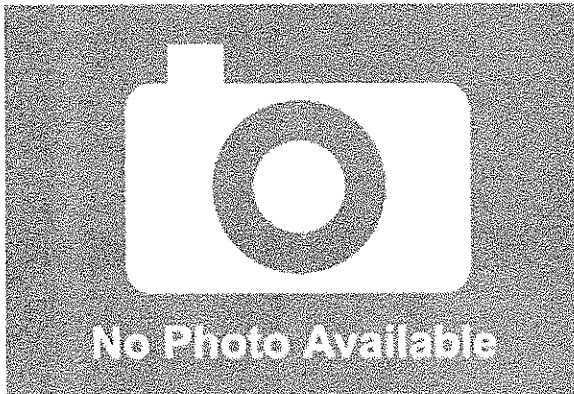


Property Information

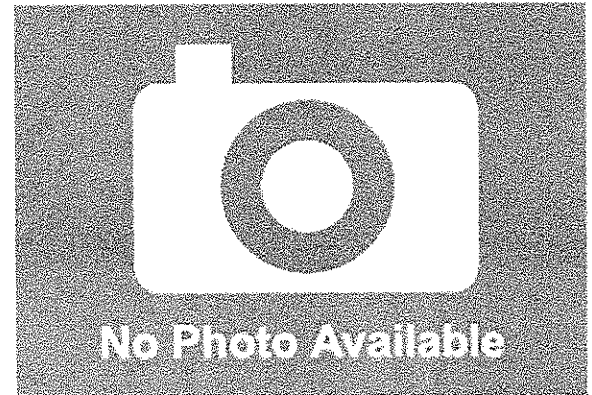
Owner	CATHOLIC CEMETERIES ASSOC OF
Address	219 NEW HAVEN AVE
Mailing Address	700 MIDDLETOWN AVE NORTH CT 06573-0000
Land Use	
Land Class	E E

Neighborhood	102
Zoning	P
Acreage	39
Utilities	ALL PUBLIC ALL PUBLIC
Lot Description	ROLLING
Census Tract	1201

Photo



Sketch



Construction Details

Year Built	
Stories	
Building Style	
Building Condition	
Total Rooms	
Bedrooms	
Bathrooms	
Roof Style	
Primary Ext. Wall	
Heating Type	
Heating System	
Heating Fuel	
First Floor Area	
Total Living Area	

Parcel Valuations

(Assessed value = 70% of Appraised Value)

	Appraised	Assessed
Buildings	1046500	
Land	1505000	
Total	2551500	1786050

Sales History:

Sale Date	0
Sale Price	0
Book/ Page	216 643

EXHIBIT 2

Directions and Parking:

The scenic part of the trail is best accessed via the northerly parking area at the end of High Ridge Road. Take the Wilbur Cross Parkway to Exit 55 and follow Wheeler's Farm Road north to Derby-Milford Road. Take a left and then another left onto High Ridge Road.

The southerly parking area at the end of Cedar Grove Street leads directly to the fairly level inland trails. From Wheeler's Farm Road, take Herbert Street to Wolcott Lane, left on Windy Hill, right on Wagon Trail, right on Broadview Road, a right on Aspen Lane, and a left on Cedar Grove Street.

Permitted Activities:

This property is for passive use only. Hiking all-year round with snowshoeing or cross-country skiing during winter months. Dogs are permitted on leash. Please bag and remove any dog waste.

For more information about this location, contact:

Town of Orange
Conservation Commission
(203) 891-2122, ext 768

This project made possible through a grant from the National Recreational Trails Program, the Federal Highway Administration, and the Connecticut Department of Environmental Protection.



South Central Regional Council of Governments
127 Washington Avenue, 4th Floor West
North Haven, CT 06473

Phone: (203) 234-7555
Fax: (203) 234-9850
E-mail: trails@scrcog.org

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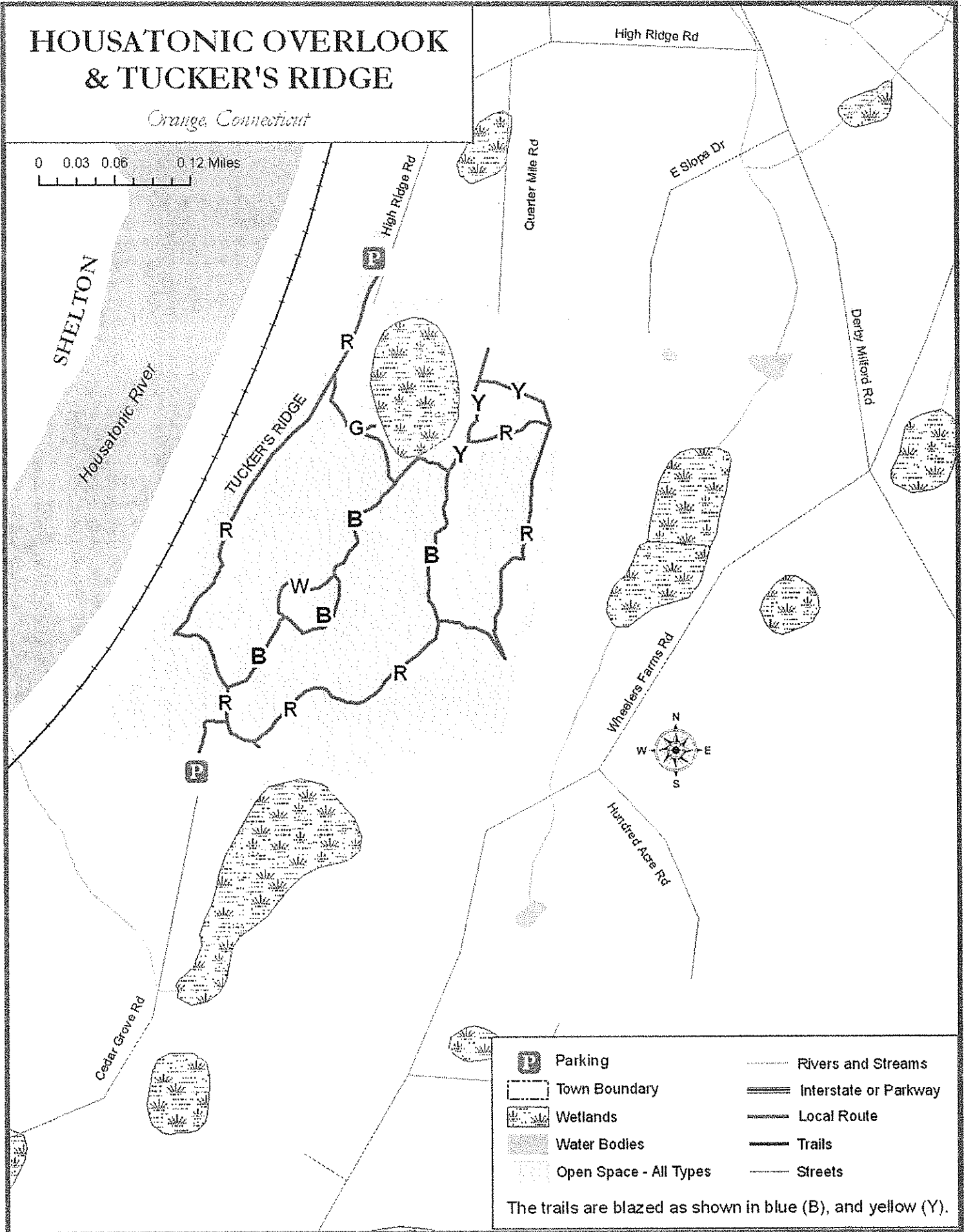
HOUSATONIC OVERLOOK & TUCKER'S RIDGE

Orange, CT

HOUSATONIC OVERLOOK & TUCKER'S RIDGE

Orange, Connecticut

0 0.03 0.06 0.12 Miles



- | | |
|------------------------|-----------------------|
| Parking | Rivers and Streams |
| Town Boundary | Interstate or Parkway |
| Wetlands | Local Route |
| Water Bodies | Trails |
| Open Space - All Types | Streets |

The trails are blazed as shown in blue (B), and yellow (Y).

EXHIBIT 3



Map/Lot/Unit : 68/ 3/ 1/1
 Location: 803 DERBY MILFORD RD
 Owner Name: WINKLE CHRISTIAN F IV TRUSTEE
 Account Number: 123400

Parcel Value

Current Assessed Value 302,000 | FY 2011 Assessed Value 461,500

Owner of Record

WINKLE CHRISTIAN F IV TRUSTEE
 815 DERBY MILFORD RD
 ORANGE, CT 06477

Ownership History

Owner Name	Book/Page	Sale Date	Sale Price
WINKLE CHRISTIAN F IV TRUSTEE	492/ 492	4/25/2003	0

Land Use

Land Use Code	Land Use Description
101	Res Dwelling

Land Information

Size
 1.35 AC

Construction Detail

Building # 1		Stories 2	Occupancy 1
STYLE	Old Style	Roof Structure	Gable
Exterior Wall 1	Wood Shingle	Roof Cover	Asphalt
Interior Wall 1	Drywall	Interior Floor 1	Hardwood
Heat Type	Forced Hot Air	AC Type	Central
Full Baths	3	Half Baths	1
Fireplace(s)	2	Gas Fireplace(s)	0
Frame	Wood	Bsmt Gar(s)	0
		Bedrooms	3
		Extra Fixtures	0
		Attic	None
		SF FBM	0

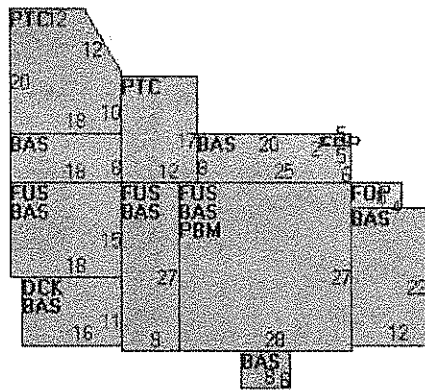
Extra Features

Code	Description	Units
	No Extra Building Features	

Outbuildings

Code	Description	Units
FCP	Carpport	490 UNITS
FGR2	Garage w/ Loft	600 UNITS
FGR1	Garage	2260 UNITS

Building Sketch



Subarea Summary

Code	Description	Gross Area	Living Area
BAS	First Floor	2091	2091
DCK	Deck	176	0
FOP	Open Porch	42	0
FUS	Finished Upper Story	1269	1269
PBM	Partial Bsmt	756	0
PTC	Concrete Patio	534	0

EXHIBIT 4

669 High Ridge Rd



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41°17'50.97" N 73°03'50.17" W elev 220 ft

