

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC
(HOMELAND) 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 FACILITY LOCATED
AT THE CHESHIRE WASTEWATER
TREATMENT PLANT

DOCKET NO. 451

OCTOBER 23, 2014

**HOMELAND TOWERS, LLC (HOMELAND) and NEW CINGULAR WIRELESS,
PCS LLC (AT&T)
RESPONSES TO ARCESI
PRE-HEARING INTERROGATORIES - SET ONE**

Q1. To clarify, according to testimony, the need for a tower at this location was discovered by Homeland Towers. Not discovered at the request of Cheshire citizens, the Town of Cheshire, or any cellular carrier. Is that correct?

A1. Homeland towers identified the need as part of its own site search initiative based on its analysis of existing infrastructure and customer experience. This need was subsequently confirmed by AT&T which has a need for reliable service in this area Cheshire. Discussions with the Town of Cheshire also revealed that the Town's emergency services had their own needs for service in this area of Town.

Q2. Is there a need for this tower if ATT is the only cellular carrier currently interested in the site? The other major carriers show solid to good coverage of the area. (See maps submitted by Intervenor on 10/8/14)

A2. The applicants cannot attest to the needs of the other major carriers in the Connecticut market. However, the maps referenced appear to be prepared as part of general marketing materials, are not attested to, and include a number of conditions and caveats which limit their reliability as coverage maps. The Radio Frequency report included in the Application clearly expresses that AT&T has a need for reliable service in this area of Cheshire. As per the 1996 Federal Telecommunications Act, and subsequent clarifications provided by FCC, need is determined on a carrier-by-carrier basis and service by one carrier in an area does not eliminate the need of another carrier to serve the same area.

Q3. What percentage of cellular subscribers residing on the streets called out in the proposal as benefitting are current AT&T cellular customers? (Section 3, page 9). The proposal states the area includes over 5,000 residents, but testimony states only ATT cellular customers will benefit from improved service in this area.

A3. Data and information regarding specific customers is proprietary and confidential. As a general matter AT&T seeks to provide coverage to not only customers residing in a particular area but also to those customers traveling in or working in an area where its services needed as well as to new customers.

Q4. What specific effort is ATT making to access the other 45 existing towers within 4 miles of this site? The proposal states ATT is only on 17 of those towers. Are the existing towers maxed out?

A4. *AT&T looks first to use existing infrastructure such as existing towers, water tanks or rooftops in order to provide reliable service to areas of need. AT&T does not co-locate on a facility in an area where it does not have a need for reliable service (i.e. where service is already provided). It should be first noted that there are not 45 towers identified on the existing sites list. These are instead locations of existing wireless facilities; not all of which are towers. Approximately 25 of the sites identified in Attachment 3 of the Application or non-tower siting solutions including rooftops, water tanks, and attachments to electric transmission towers. While it is not uncommon to see different carriers to co-locate on the same non-tower structure, there are many instances when carriers for technical, lease, structural or other reasons do not co-locate on the same structure. The existing tower/ cell site listing and provided map make clear that carriers, as well as other entities, are deploying at different non-tower sites. Many of these sites are in very close proximity to one another (see e.g. along Interstate 691). In an area such as this, it is not uncommon for carriers such as AT&T to have only a few facilities in the area which are adequate to provide the reliable service needed. As noted AT&T would not seek to co-locate at another existing site if it does not have a need for reliable service.*

Q5. What is the typical range per height ratio of a monopole cell tower? Since the elevation is low (100') is maximum potential being achieved at this site for a tower of this height?

A5. *Every wireless site is different based on the area to be served and topography. As such there is no "typical range for height ratio" of a monopole cell tower and facilities often range in height from 100'AGL to over 190' AGL.*

Q6. To clarify, does a landowner need to be notified that his/her property is being evaluated as a potential tower site? How is the evaluation conducted? Does any equipment need to be on-site?

A6. *Properties can be evaluated using computer modeling technology which considers elevation, topography, existing sites and coverage, and other factors. As such having equipment on site is not necessary for evaluation of the technical feasibility of a property to serve as a wireless site.*

Q7. Will Homeland Towers please provide the site investigation results for Milone and MacBroom at 99 Realty Drive that show the testing at 170'-180.' The proposal states a rooftop tower was considered at 55' but testimony states 180' was also considered and coverage objectives were not met. This site is located in Cheshire's industrial zone, has a higher elevation (140') and the landowner has expressed interest in siting the tower. The site is only 6,000' or 1.13 miles +/- from the proposed site.

A7. *Please see attached coverage map. A site at that location would not adequately provide reliable service to the area of need. Moreover, due to its proximity to an existing AT&T site much of the coverage would be duplicative.*

Q8. Are the views and sight lines of a park relevant when siting a tower? (See Simulation photo 12 / Host Property) Are the views and sight lines of historic properties relevant when siting a tower? (See Simulation photo 14 / Allen Avenue) Note: The photographed property is an original Cheshire schoolhouse built in 1866. There are at least 4 historic properties within close proximity on Cheshire Street.

A8. *All views are relevant when siting a tower. Homeland Towers strives to balance several factors when siting its facilities, including the visual effects on surrounding areas. The Host Property is a large parcel that is utilized by the Town for multiple purposes, including its water treatment plant and recreational facilities. The tower was strategically placed to provide sufficient distances from those areas used by the public as well as surrounding neighbors in an*

effort to minimize visual effects, to the extent possible. With respect to historic properties, the degree to which views and/or sight lines are relevant is site specific. Homeland Towers consulted with the State Historic Preservation Office (SHPO) and the local Historical Society during its municipal consultation period. The properties referenced may be eligible for listing on the National Register of Historic Places however the SHPO determined that the proposed facility would have No Adverse Effect on the historic integrity of these properties or impair their ability to convey their significance. This determination was based on the fact that the project's impact on the visual setting and character of the properties along Cheshire Street is minimal and would not jeopardize their eligibility for the National Register of Historic Places.

Q9. Will the applicants please provide a real estate market analysis on the effect of the tower view on home values? An independent real estate appraiser should be able to provide an analysis using existing Cheshire property cards and the applicant's simulation photos.

A9. *No.*

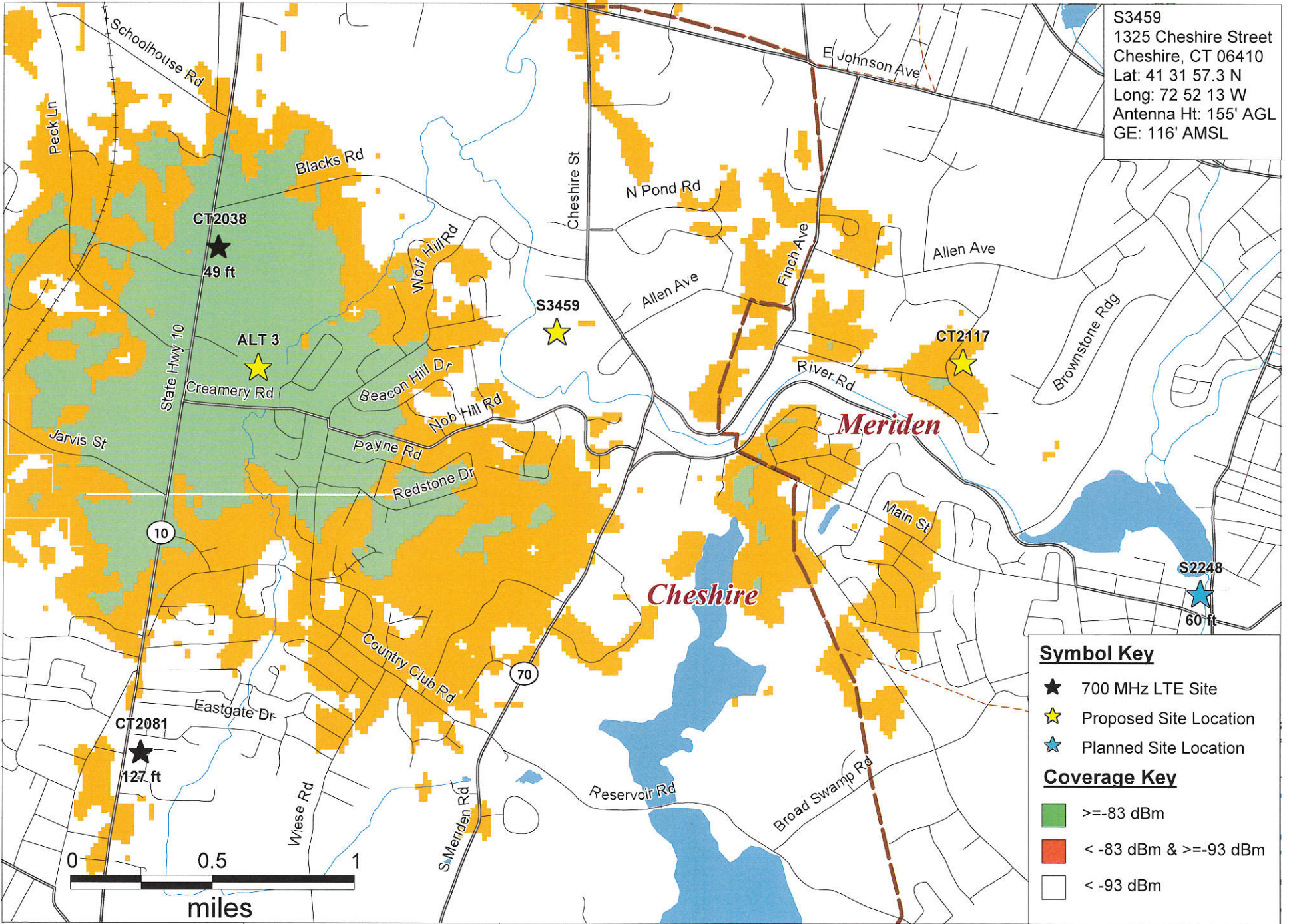
Q10. Are safety standards determined by radiation levels at the base of the tower or the top of the tower? What are the levels at the top of the tower where many residences are sited? (See Simulation photo 10 / Vista Terrace)
Note: Nob Hill Road, Vista Terrace and Oakridge Drive are abutting elevated neighborhoods.

A10. *RF Exposure levels presented are for the base of the tower. They assume a very conservative 10 dB of antenna discrimination. With respect to houses located at elevated areas, the nearest such houses are at least 1000 feet from the proposed tower. AT&T's emissions at these locations would be under 1% of the Federally regulated limit.*

Q11. What is the process for checking safety levels? How often are the levels checked and where will the results be posted for public review? Could the levels be posted on the information board located at the Quinnipiac Recreational Park? According to a recent Wall Street Journal article "Cellphone Boom Spurs Antenna-Safety Worries" published on Oct. 2, 2014, 1 in 10 towers may be running above regulation levels. The safety postings would provide necessary information to the public accessing the park.

A11. Each licensee is required to maintain compliance with federally regulated emissions levels and certify compliance to the FCC. AT&T's analysis shows that it is not physically possible for signals from these antennas to exceed the FCC limits. The noted article in the Wall Street Journal discusses Radio Frequency exposure not at "towers" generally, but mostly at rooftop and other locations where the antennas are relatively accessible. The antennas proposed in this Docket are 155 feet in the air and it is not possible for the general public to closely approach them.

ATTACHMENT 1



S3459
 1325 Cheshire Street
 Cheshire, CT 06410
 Lat: 41 31 57.3 N
 Long: 72 52 13 W
 Antenna Ht: 155' AGL
 GE: 116' AMSL

Symbol Key

- ★ 700 MHz LTE Site
- ★ Proposed Site Location
- ★ Planned Site Location

Coverage Key

- >=-83 dBm
- <-83 dBm & >=-93 dBm
- <-93 dBm

700 LTE Coverage
 of Alt 3

Cheshire, CT

1325 Cheshire Street
 Cheshire, CT 06410



PREPARED ON _____
 DATE: 10/01/2014
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