

**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

**IN RE:**

APPLICATION BY TOWER HOLDINGS, LLC FOR A  
CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY  
AND PUBLIC NEED FOR THE CONSTRUCTION  
MAINTENANCE AND OPERATION OF A WIRELESS  
TELECOMMUNICATIONS FACILITY  
AT 199 BRICKYARD ROAD, FARMINGTON, CONNECTICUT

DOCKET NO. 454

December 10, 2014

**TOWN OF FARMINGTON'S REQUEST TO PARTICIPATE**  
**IN THIS PROCEEDING AS A PARTY**


Pursuant to Section 16-50n of the Connecticut General Statutes and Section 16-50j-14 of the Regulations of Connecticut State Agencies, the Town of Farmington (the "Town") respectfully requests the Connecticut Siting Council's (the "Council") permission to participate as a party in the application and hearing process for Docket # 454. Because the proposed wireless telecommunications facility that Tower Holdings, LLC ("Tower Holdings") proposes to construct will be located in Farmington, CT, the Town qualifies as the site municipality under Conn. Gen. Stat. § 16-50l and has automatic party status.

Pursuant to Conn. Gen. Stat. § 16-50x and 16-50gg, the Siting Council (the "Council") is obligated to consider a municipality's "location preferences or criteria" for the siting of telecommunication towers. While a tower of the typical design employed for telecommunication facilities may be properly suited for this location, the primary purpose of the 180-foot lattice structure proposed by Tower Holdings is to serve as a training tower which is not suitable at that location both as a matter of design and use. In an effort to avoid the municipal land use review process which would otherwise be applicable to the construction and use of a training tower, Tower Holdings will affix AT&T communications equipment onto the training tower in an

attempt to transform the tower (to be used for training by an affiliated entity called Northeast Towers, Inc.) into a telecommunications tower. The Town proposes to participate in this application proceeding to offer testimony regarding those facts and why, as proposed, the facility as presently designed should not receive Siting Council approval.

For all of the foregoing reasons, the Town respectfully requests that it be named as a party in the above-captioned proceeding.

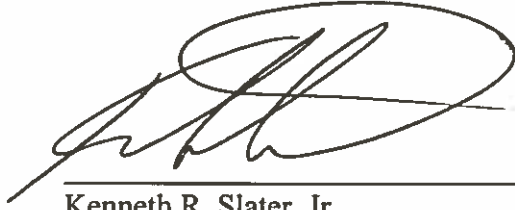
Town of Farmington,

By   
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Juris No. 26105  
Its Attorneys

**CERTIFICATION**

I hereby certify that on this 10<sup>th</sup> day of December, 2014, fifteen copies of the foregoing were sent by regular and electronic mail to the Connecticut Siting Council and by electronic mail to:

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Kenneth R. Slater, Jr.