

**STATE OF CONNECTICUT  
SITING COUNCIL**

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 LOCATED AT  
199 BRICKYARD ROAD, FARMINGTON, CT

DOCKET NO. 454

MARCH 3, 2015

**PRE-HEARING INTERROGATORIES OF THE  
TOWN OF FARMINGTON TO AT&T**

The following interrogatories are directed to AT&T by the Town of Farmington ("Party"):

11. AT&T is collocated on approximately 50 lattice towers and approximately 200 monopole towers in Connecticut. *See* AT&T's Interrogatory (set one), Q2. Approximately how many of the 50 lattice towers located in Connecticut has AT&T mounted antennas on for cellular telecommunications purposes within the last ten years (dating back to February 2005)? Approximately how many of the 200 monopole towers located in Connecticut has AT&T mounted antennas on for cellular telecommunications purposes within the last ten years (dating back to February 2005)?
12. Did AT&T ever request from the Applicant that the design of the proposed tower be a monopole as opposed to a lattice structure?
13. According to Mr. Savino's testimony from the February 3rd, 2015 hearing (*see* Vol. I, page 36, lines 18-25, page 37, lines 1-2), the Applicant first determined that it needed a training facility, and, thereafter, found a carrier, AT&T, to locate onto its proposed tower to satisfy the Siting Council's process. When was AT&T contacted by the Applicant? By whom?
14. For approximately how long prior to being contacted by the Applicant was AT&T experiencing substandard service in the alleged underserved area?
15. Explain in detail the nature of the substandard service.
16. Did AT&T take any actions to improve service in the alleged underserved area other than its potential collocation on the Tower Holdings proposed lattice tower? If yes, what were those actions?
17. If the Siting Council denies the Applicant's application in its entirety, will AT&T seek permission from the Siting Council to construct a different facility in the Farmington area that would serve the alleged underserved area?

Respectfully Submitted,

Party, Town of Farmington

By:  \_\_\_\_\_

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**CERTIFICATION**

I certify that on this 3rd day of March, 2015, fifteen copies of the foregoing were sent by regular and electronic mail to all parties and intervenors of record, as follows:

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