STATE OF CONNECTICUT

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 AT
199 BRICKYARD ROAD, FARMINGTON, CONNECTICUT

DOCKET NO. 454

JANUARY 26, 2015

INTERVENOR NEW CINGULAR WIRELESS PCS, LLC (AT&T) RESPONSES TO THE TOWN OF FARMINGTON PRE-HEARING INTERROGATORIES

- Q1. Has AT&T considered using a monopole structure as opposed to a lattice structure at the proposed location? If not, why?
- A1. Given that AT&T is an intervenor in this proceeding and is not proposing the construction of the facility and will not be the facility owner, it has not considered any facility design options.
- Q2. How many lattice telecommunication towers has AT&T mounted antennas on in Connecticut in the last ten years (dating back to January 2005)? How many monopole telecommunication towers has AT&T mounted antennas on in Connecticut in the last ten years (dating back to January 2005)?
- A2. AT&T is collocated on approximately 50 lattice towers and approximately 200 monopole towers in Connecticut.
- Q3. Would AT&T be able to achieve their coverage objectives in the alleged underserved area if a monopole structure were used instead of a lattice structure at the proposed site? If not, why?
- A3. Yes, if the monopole location and elevation are the same as the proposed structure.
- Q4. The Application provides that "[t]here are no other practicable or feasible alternatives to the macro site proposed in this Application. Distributed antenna systems (DAS), repeaters, small cells and other types of transmitting technologies are not a suitable means by which to provide service within the sizeable coverage gap presented in this Application." Application, at 10-11. Acknowledging that the listed technologies may be

better suited in other contexts, please provide evidence why these technologies are entirely ill-suited for providing the desired coverage.

A4. Repeaters, microcell transmitters, distributed antenna systems (DAS) and other types of transmitting technologies are not a practicable or feasible means to providing service within the service area for this site. These technologies are better suited for specifically defined areas where new coverage is necessary, such as commercial buildings, shopping malls, and tunnels, or to address capacity. Closing the coverage gaps and providing reliable wireless services in this area of Farmington requires a tower site that can provide reliable service over a footprint that spans several hundred acres.

For example, one DAS node provides coverage to an area with an approximately 500-foot radius, or approximately 0.03 square miles. To replicate the coverage area of a single tower facility site, 30 or more DAS nodes would be required. However, this comparison assumes that the infrastructure to support DAS nodes (fiber, power, poles or available space on existing poles) is available. Thus, practically speaking, duplicating the coverage of a tower site from a DAS system is typically not feasible. In addition, it is important to note that emergency back-up power is not provided with a DAS system.

- Q5. The Application provides that "[t]here are no other structures that AT&T could use to alleviate the existing coverage gap." Application, at 11. During the site search, did AT&T consider the rooftop structure located at Acme Auto, 1371 Farmington Avenue, as a possible location to co-locate with Verizon, which currently has an antenna on this structure? Attachment 7. Would this rooftop structure enable AT&T to achieve the desired coverage? If not, why?
- A5. As noted in Attachment 9 of Tower Holdings Application, AT&T's RF engineers evaluated a rooftop facility on the Acme Auto building located at 1371 Farmington Avenue and determined that a rooftop facility at this location would not meet AT&T's coverage objectives. As shown in the propagation map included in Attachment 1, the height of the building is too low and it is located too far from the intended coverage area to provide adequate service.
- Q6. If AT&T were to co-locate on the rooftop structure located at Acme Auto, 1371 Farmington Avenue, how many residential wireless customers could AT&T serve?
- A6. Please see A.5 above. Since a rooftop facility at Acme Auto will not provide adequate service, AT&T will not collocate a facility at this location.
- Q7. What other locations on the proposed parcel were considered that would have a less significant impact on the residential area and why were they rejected?

- A7. AT&T did not consider other locations on the proposed site as AT&T is proposing to collocate on the proposed facility and is not proposing construction or ownership of the facility.
- Q8. Does AT&T possess any data on dropped calls, customer complaints, and/or ineffective attempts in the vicinity of the proposed facility? If so, what do they indicate? Does AT&T have any other indicators of substandard service in this area?
- A8. AT&T's dropped call data for the area where reliable service is needed, while proprietary, indicates elevated voice and data drops. In addition, data testing indicates that substandard or nonexistent data service is provided within the area identified as a need for this site.
- Q9. Please identify how many other future sites will be necessary, at a minimum, to accomplish adequate coverage for the target municipality.
- A9. At this time, in addition to the collocated facility proposed in this Docket, AT&T plans to collocate a facility on the rooftop of the Westfarms Mall and the existing tower located at 190 Colt Highway to provide reliable wireless services to the Town of Farmington.

 AT&T is also proposing a new tower facility at 598 Plainville Avenue.
 - Future proposed facilities beyond these planned facilities cannot be predicted at this time as they will depend on future technological developments and customer demands.
- Q10. Please identify any sites, in addition to the proposed facility, on which AT&T intends to seek permission from the Siting Council to construct or modify a facility in the Farmington area.
- A10. At this time, AT&T is proposing a tower facility in the western part of Farmington at 598 Plainville Avenue. AT&T does not currently have a schedule for the filing of an application with the Siting Council for this facility. As noted in A9 above, AT&T also plans to collocate a facility on the existing tower located at 190 Colt Highway.

CERTIFICATE OF SERVICE

I hereby certify that on this day, fifteen copies of the foregoing were sent electronically and by overnight mail to the Connecticut Siting Council and:

Jesse A. Langer, Esq.
Updike, Kelly & Spellacy, P.C.
One Century Tower
265 Church Street
New Haven, CT 06510
(203) 786-8317
JLanger@uks.com

Kenneth R. Slater, Jr., Esq. Duncan F. Forsyth, Esq. Kelly C. McKeon Halloran & Sage, LLP One Goodwin Square 225 Asylum Street Hartford, CT 06106 Forsyth@halloransage.com Slater@halloransage.com mckeon@halloransage.com

Dated: January 26, 2015

Lucia Chiocchio

cc: Jessica Rincon, AT&T

Adam Braillard, Smartlink

Martin Lavin, C Squared Systems

Christopher B. Fisher, Esq.

ATTACHMENT 1

