STATE OF CONNECTICUT SITING COUNCIL

American Towers, LLC/New Cingular Wireless PCS, LLCDOCKET # 463Application for a Certificate of Environmental
Compatibility and Public Need for the construction,
Maintenance, and operation of a telecommunications
Facility located at
351A Boston Post Road, East Lyme, Connecticut.DOCKET # 463

: DECEMBER 23, 2015

INTERROGATORIES TO INTERVENING PARTY TOWN OF EAST LYME

The following Interrogatories are directed to the Town of East Lyme by the Intervenor, BHSO Community Conservancy. The requests should be answered by the representative of the Town best suited to provide the response.

1. With regard to the site behind Tab #2 of the Application, Site #9 6 Stone Ranch Road (Military Reservation), please describe what efforts the Town has made to verify if the state police radio tower site can be made available to the Applicants for a tower to provide coverage to the west side of the hill on which the existing to-be-decomissioned cell tower is located.

2. Please state whether the Town would make site #18 behind Tab 2 of the Application,

the existing water tank site available for location of a replacement tower.

3. With respect to Site #19 behind Application Tab 2, Marion Drive owned by the Town

of East Lyme, please state whether this site is subject to a conservation easement,

conservation restriction, charitable use restriction, deed restriction, has been dedicated

as open space as defined under CGS §7-131 et seq, or has otherwise been

encumbered by any Town entity or town meeting as open space upon which a cell

tower cannot be constructed.

4. With respect to Site #19 behind Application Tab 2, Marion Drive owned by the Town of East Lyme, if the assessor has designated the site as open space, please state whether that designation is for tax map classification purposes only or whether it encumbers the property in any respect for the purpose of municipal development, including a leased cell tower site.

5. With respect to Site #19, Marion Drive, mentioned in the previous interrogatory, please state whether the Town would be willing to provide this site as an alternative location for a replacement cell tower to the tower proposed in the Application in this Docket.

6. If Site #19, Marion Drive, were to be made available by the Town of East Lyme, please state the number of homes within 1000 ft of a tower centrally-located on this site.

7. Please state the number of residences within 1000ft of Site #18, the water tank property.

8. Please state the number of homes within 1000ft of Site #9 at Stone Ranch.

9. With respect to Site #19 Marion Drive, please state whether this site has been included in any Planning & Zoning decision of the Town of East Lyme as open space as part of a subdivision application, and if so, please provide a map of which portions of the property are so encumbered.

10. Please state the number of homes within 1000ft of the proposed tower in this

Docket.

11. Please state whether the Town believes there are feasible and prudent alternatives to the proposed tower in this Docket and upon what evidence the Town relies in this belief.

Respectfully Submitted,

BHSO Community Conservancy,

By_____ Keith R. Ainsworth Law Offices of Keith R., Suite 201 New Haven, CT 06510-2049 (203)435-2014/ (203) 865-1021 fax keithrainsworth@live.com

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 23rd day of December, 2015 and addressed to:

Ms. Melanie Bachman, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic) (US Mail/electronic).

And electronic copies to:

New Cingular Wireless PCS, LLC c/o Daniel Laub, Esq, Cuddy & Feder, LLP, 445 Hamilton Avenue, 14th Floor White Plains, NY 10601 (914) 761-1300 (914) 761-5372 fax cfisher@cuddyfeder.com dlaub@cuddyfeder.com

Michele Briggs AT&T 500 Enterprise Drive Rocky Hill, CT 06067-3900 michele.g.briggs@cingular.com Matthew Russell, American Towers, LLC 10 Presidential Way Woburn, MA 01801 Matthew.Russell@AmericanTower.com

Tracey Collins, Esq. Waller, Smith & Palmer, PC (for Town of East Lyme) 52 Eugene O'Neill Drive New London, CT 06320 tmcollins@wallersmithpalmer.com

(all by e-mail)

Keith R. Ainsworth, Esq.