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April 6, 2017

**VIA ELECTRONIC MAIL AND FIRST CLASS MAIL**

Attorney Melanie Bachman  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

Re: Docket No. 471 – Interrogatories to Application from Ms. Sorrentino

Dear Attorney Bachman:

Enclosed please find an original and fifteen copies of interrogatories directed to the Applicant in this Docket submitted on behalf of Ms. Patricia Sorrentino.

Based on the pre-hearing schedule, responses to the interrogatories are due on or before April 25, 2017.

Please feel free to contact the undersigned if you have any questions concerning this submission.

Thank you for your consideration.

Respectfully submitted,

By: 

Burton B. Cohen  
Attorney for Patricia Sorrentino

Enclosures

cc: Service List – Docket No. 471

**Docket No. 471 – Pre-hearing Interrogatories directed to Cellco Partnership d/b/a Verizon Wireless from Ms. Patricia Sorrentino**

1. For the record, please identify the partners in Cellco Partnership. Indicate the percentages of each partner's partnership interest at the present time and identify the general or managing partner.
2. Does Cellco Partnership use other d/b/a's in addition to Verizon Wireless? If so, what are those d/b/a's and where are they used.
3. Do entities other than Cellco Partnership use Verizon Wireless as a d/b/a? If so, what are those entities?
4. For each of these entities named in your responses to Interrogatories 1-3, please list any completed or pending litigation, regulatory proceedings or arbitrations during the period of April 1, 2012 through and including March 31, 2017, alleging violations of federal, state or municipal laws, statutes, regulations, certificates, ordinances, or agreements concerning the installation, construction, operation, and maintenance of wireless telecommunications facilities owned or constructed by or on behalf of any entity using the d/b/a of Verizon Wireless. For each such entry, please summarize the issue and the disposition.
5. Reference the Application at p.11 ("Cell Site Selection") concerning the Applicant's "goal in selecting cell sites." Does Cellco Partnership or any entity using Verizon Wireless as a d/b/a have any written manual and/or policies concerning the siting of wireless telecommunications tower facilities in residential areas? If so, please submit any such documents into the record of this Docket.
6. Reference the "Photo Log" in Tab 9 of the Attachments to the Application. Please resubmit depicting Country Club Road in its entirety, including the *cul de sac* area at the top thereof.
7. Reference the Visibility Analysis in Tab 9 of the Attachments to the Application. Are there any photographs depicting the view of the proposed tower from the Sorrentino home?
8. Please submit into the record in this Docket at least four (4) photographs, without any lens enhancement or distortion, from the proposed tower site to the Sorrentino home:
  - a. One photograph from the tree where the tower is proposed directed to the front side window of the Sorrentino home.
  - b. One photograph from a point of the proposed fence area closest to the Sorrentino home directed to the front side window of the Sorrentino home:

- c. One photograph from the front side window of the Sorrentino home directed to the proposed tree where the tower is proposed to be constructed.
  - d. One photograph from the front side window of the Sorrentino home directed to the proposed tree or trees where the equipment cabinet is proposed to be constructed
9. Reference the All Points Technology letter to the Applicant in Tab 10 of the Attachments to the Application, which in part states that “[t]he project would result in [plus or minus] 0.4 acre of tree removal.” And on p. 7 of the Application it is stated that “[a]pproximately twenty-nine (29) trees, 6 inches or greater at breast height will need to be cleared. . . .”
- a. If the Application is approved as submitted, please state exactly how many trees in total would be removed in order to construct the facility, its twelve (12) foot wide access road and related utility conduits?
  - b. Please produce an exhibit in the form of a map, photograph or other schematic depicting all of the trees that would need to be removed.
  - c. For purposes of the scheduled site visit, are all of the trees currently “marked” those that the Applicants intends to remove?
  - d. Please explain how the proposed tree removal required to accommodate the Applicant’s facility comports with the legislative finding and purpose set forth in Conn. Gen. Stat. § 16-50g concerning “. . . the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values . . . with minimal damage to the environment. . . .”
  - e. Has the Applicant considered other areas in the vicinity that would not require the destruction of so many trees?
10. Please provide actual distance in feet for the following:
- a. Distance from actual tower as proposed to the Sorrentino home property line.
  - b. Distance from actual tower as proposed to the Sorrentino home.
  - c. Distance from site fencing as proposed to the Sorrentino home property line.
  - d. Distance from site fencing as proposed to the Sorrentino home.
11. Reference p. 11 of the Application wherein it is stated that “Cellco submits that there are no equally effective technological alternatives that would allow Cellco to provide its wireless service to the area than those described in this Application.” Please elaborate and provide any supporting documentation for this statement. Also, explain whether “small cell” facilities could provide the coverage gaps that are claimed on p. 7 of the Application.

12. Concerning coverage gaps, anecdotally Verizon Wireless customers in this area of Hamden do not experience any dropped calls. Please provide any documentation and a non-technical explanation that supports the claim of coverage gaps in this area of Hamden, CT.
13. Reference Tab 8 of the Application and Attachment 1 to the response to Siting Council Interrogatory No. 9 concerning the purported "sites investigated."
  - a. For each of the parcels rejected, please describe each of the "Hamden 8 wireless service objectives" that could not be satisfied and describe to what extent in percentage terms that each of those objectives could not be satisfied.
  - b. The 3 parcels in the Application that were rejected were the same three parcels that were identified during the Town Meeting in Hamden with Verizon Wireless representatives, and it became evident at that meeting that there would be overwhelming local opposition to the proposed site. Did the Applicant do any further investigation of other sites since that Town Meeting? If not, why not?
14. Reference Attachment 17 of the Application, specifically Lease Exhibit designated L-2.
  - a. The Lease Exhibit shows the location of a "proposed AT&T CSC Cabinet." Inasmuch as AT&T's wireless entity has indicated that it has no interest in this site, please explain its inclusion and the purpose of such cabinet.
  - b. The Lease Exhibit shows a proposed "1000 gal. propane tank" on a "conc. pad at grade." Please confirm whether the Applicant plans to utilize a 1000 gallon propane tank on the site.
  - c. The Lease Exhibit depicts "proposed plantings, size and type to be coordinated with Lessor" substantially around most of the proposed compound. This depiction does not appear to be consistent with the "Partial Site Plan" Sheet Number C-3 in Attachment 1 of the Application. In fact, C-3 appears to depict only screening to a portion of the area, mostly relating to the Lessor's house and tree farm. Please clarify the Applicant's intention with respect to screening.