



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

May 17, 2017

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597

RE: **DOCKET NO. 473** - Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 515 Morehouse Road, Easton, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than May 31, 2017. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as send a copy via electronic mail. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's pending proceedings website.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Yours very truly,

Melanie Bachman
Executive Director

MB/RM

c: Parties and Intervenors
Council Members



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**Docket No. 473 – Easton
Pre-Hearing Interrogatories
Homeland Towers, LLC and
Cellco Partnership d/b/a Verizon Wireless**

May 17, 2017

1. Which frequencies would Cellco initially install at the proposed site? What is the determining factor for the deployment of additional frequencies within the proposed service area?
2. How do the different frequencies interact? Are all frequencies used to transmit voice and data services? Are all frequencies LTE capable? Please explain.
3. What is Cellco's service design threshold for each frequency?
4. Application page 8 describes existing wireless service gaps in the proposed service area. Please provide the area, in square miles, of existing inadequate service for each frequency that will be initially deployed within the target service area. Would any service gaps remain in the proposed service area after deployment of the Easton facility? If so, indicate their location and size.
5. Could the proposed coverage and capacity services be met by a series of small cell facilities or a distributed antenna system instead of the proposed macro-tower facility? If small cells are feasible, approximately how many would be required, assuming optimum placement.
6. Does Cellco have any statistics on dropped calls and/or ineffective attempts in the vicinity of the proposed facility? If so, what do they indicate? Does Cellco have any other indicators of substandard service in this area?
7. Application page 8 states the proposed site would provide capacity relief to the Fairfield Alpha and Plattsville Gamma sectors. Provide the following related information:
 - a) Identify the frequencies that have exhausted at these sectors.
 - b) What are the issues at adjacent sites/sectors that result in deficient service within the target service area?
 - c) What is the percentage of service from of each of these exhausting sectors that would be now served by the proposed site?
 - d) Would the deployment of Easton facility be sufficient to address these capacity concerns or would an additional facility be required in the near term to off-load traffic.
 - e) Once the proposed site is on-line and providing capacity relief to adjacent sites, what would be the effective service area for the 700 MHz frequency from the proposed site?
8. Provide an estimate of the residential population living within the 700 MHz target service area.
9. Provide a traffic count for major roads that would be served by the proposed facility.
10. Can the proposed facility support text-to-911 service? Is additional equipment required for this purpose? Is Cellco aware of any Public Safety Answering Points in the area of the proposed site that are able to accept text-to-911?



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11. Would Cellco's installation comply with the intent of the *Warning, Alert and Response Network Act of 2006*?
12. When did Cellco issue a search ring for this area? Provide a map depicting the search ring. Did Cellco investigate other sites prior to selecting the proposed site? If so, provide a listing/map of the sites investigated and the reason(s) for rejection.
13. The power density analysis in Application Tab 14 does not have a value for the Town antenna located at a tower height of 95 feet above ground level. Please revise if necessary.
14. Referencing Application Tab 14, provide the following information: number of channels per sector for each antenna system, effective radiated power per channel for each antenna system, height of each antenna system, and the frequency at which each antenna system would operate.
15. What measures are proposed to ensure site security?
16. Identify the safety standards and/or codes by which equipment, machinery, or technology would be used or operated at the proposed facility.
17. Page 8 of the Application states, "The back-up generator would be used to recharge the batteries." If the generator failed to start, about how long could the batteries alone supply power to Cellco's proposed telecommunication facility?
18. Describe any spill and/or leak prevention features of the diesel generator for fuel storage and tank re-filling.
19. Does the Town's equipment have an emergency backup power source?
20. Is it feasible to install a single generator within the compound capable of supplying emergency power to multiple carriers? Please explain.
21. Can the proposed facility be relocated towards the southwest property line?
22. Was a site considered behind the animal control shelter? If not, why not?
23. What is the distance/direction to the nearest National Audubon Society designated Important Bird Area?
24. Would the proposed facility comply with the United States Fish and Wildlife Service recommended guidelines for reducing impacts to migratory birds?
25. Is the site within an area defined as core forest? If so, how would development of the site affect core forest values?
26. Were return receipts received for each abutting landowner identified in the application? If not, list the abutters that did not receive notice and describe any additional effort to serve notice.