



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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www.ct.gov/csc

VIA ELECTRONIC MAIL

April 5, 2018

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

RE: **DOCKET NO. 482** - 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 on town-owned property behind Lyman Memorial High School located at 917 Exeter Road, Lebanon, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 19, 2018. 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 website under the "Pending Matters" link.

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.

Sincerely,

Melanie Bachman
Executive Director

c: Parties and Intervenors

MB/RM





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Docket No. 482 – Lebanon Cellco Partnership d/b/a Verizon Wireless

Pre-Hearing Interrogatories April 5, 2018

General

1. Of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners?
2. How is the cost of facility construction recovered?

Site/Tower

3. What is the distance and direction from the proposed site to the nearest residence outside of the host property?
4. Would the tower be designed for EIA/TIA-222 structural standards version G, H, or both?
5. What is the structural design standard applicable to antenna mounts?
6. Identify the safety standards and/or codes by which equipment, machinery, or technology would be used or operated at the proposed facility.
7. Referring to Application p. 18, what is the area in square feet of prime farmland soil and “locally important” farmland soils that would be disturbed by project construction?
8. Referring to Application p. 23, what were the other two locations on the property that were considered for a tower site? What were the reasons for their rejection?

Coverage/Capacity

9. For the frequencies that will be initially deployed (700 MHz and 2100 MHz), what is Cellco’s service design threshold for each frequency? Are both frequencies used to transmit voice and data services? How do they interact?
10. What is the determining factor for the deployment of additional frequencies within the proposed service area?
11. The Application states the site is designed for coverage needs. Would the site also provide capacity relief at adjacent sectors? If so, are any of these adjacent sectors nearing exhaustion? If yes, identify the sectors, frequencies and estimated exhaustion dates.
12. Application page 7 describes “gaps” in wireless service in the area of the proposed site. Provide information regarding the size of the existing wireless coverage gaps (700 MHz and 2100 MHz) that will be served by the proposed facility.



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Affirmative Action / Equal Opportunity Employer

13. Besides propagation modeling, were other indicators of substandard service used to identify a need in this area? If so, please describe.
14. Could the target service area be adequately served by a series of small cell facilities or a distributed antenna system instead of the proposed macro-tower facility?
15. Does Cellco intend to locate a 700 MHz facility at 122 Waterman Road in Lebanon? If so, would the 122 Waterman Road facility meet some of the coverage/capacity objectives of the proposed site? Provide revised coverage plots if necessary.
16. If some of the coverage/capacity objectives are met by the 122 Waterman Road, Lebanon facility, can Cellco achieve wireless service objectives from the proposed site using a lower antenna height?

Public Safety

17. 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?
18. Would Cellco's installation comply with the intent of the *Warning, Alert and Response Network Act of 2006*?

Backup Power

19. What measures would the applicant implement or employ to ensure an adequate supply of backup power for the site in the event of a propane fuel shortage?
20. What is the estimated run time for the emergency power generator before it would need to be refueled, assuming it is running at under normal loading conditions? How long could the battery backup alone supply power to the facility in the event that the generator fails to start?

Environment/Cultural

21. Would site development affect core forest? (refer to C.G.S. §16a-3k for core forest definition)
22. Referring to Application Tab 11 would the tower access road and compound serve to act as a barrier to vernal pool species, thus causing underutilization of the vernal pool Critical Terrestrial Habitat area west of the proposed facility?
23. Could the tower site be relocated to the area east of the agricultural field and north of Wetland 2?
24. Has Cellco received a response from the State Historic Preservation Office regarding the proposed project? If so, please provide.
25. Is the proposed facility within a Department of Energy and Environmental Protection-designated Aquifer Protection Area?