

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC  
AND NEW CINGULAR WIRELESS PCS, LLC  
d/b/a AT&T FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY AND  
PUBLIC NEED FOR THE CONSTRUCTION,  
MAINTENANCE, AND OPERATION OF A  
TELECOMMUNICATIONS FACILITY AT  
183 SOUNDVIEW LANE, TOWN OF NEW  
CANAAN, CONNECTICUT

DOCKET NO. 487

July 2, 2020

**RESPONSES TO INTERVENOR HUGH WILEY'S INTERROGATORIES**  
**SET TWO**

In Applicants' April 24, 2020 response to Hugh Wiley's Interrogatory 29 ("Interrogatory 29"), Applicants stated that "AT&T's radio frequency engineers evaluated this property and determined that a tower facility at this property would not provide service to the area intended for covered by the Proposed Facility."

- Q1. With respect to Applicants' answer to Interrogatory 29:
- (a) please identify the radio frequency engineers who evaluated 1160 Smith Ridge Road, New Canaan ("1160 Smith Ridge") as a possible site for a tower facility;
  - (b) please describe all work that was done by the radio frequency engineers in evaluating 1160 Smith Ridge;
  - (c) when was this engineering work done;
  - (d) was a written report prepared, and, if so, what was communicated in the written report;
  - (e) were there any written communications between either Applicant and the radio frequency engineers regarding 1160 Smith Ridge, and, if so, what was communicated;
  - (f) was a propagation analysis performed by the engineers, and, if so, what did the propagation analysis show;
  - (g) what assumptions did the radio frequency engineers make with regard to the height of a tower at 1160 Smith Ridge;
  - (h) how did the coverage from a tower at 1160 Smith Ridge compare to the coverage from the Applicants' Proposed Facility;
  - (i) what portion of the coverage area for the Applicants' Proposed Facility would not be served by a tower at 1160 Smith Ridge Road;
  - (j) would a tower at 1160 Smith Ridge Road provide greater coverage to vehicles traveling on Smith Ridge Road (Connecticut State Route 123) than the proposed facility; and
  - (k) would a tower at 1160 Smith Ridge Road provide better coverage to New Canaan residents living in northern New Canaan west of Smith Ridge Road?
- A1. *Included in Attachment 1 are propagation maps prepared by C<sup>2</sup> Squared Systems on behalf of AT&T and in consultation with AT&T's RF Engineers. The enclosed maps include a depiction of AT&T's existing service and AT&T's existing service with a proposed tower facility at 1160 Smith Ridge Road with antenna centerline heights of 81', 106' and 146'. These propagation maps demonstrate that a proposed tower facility at 1160 Smith Ridge Road is too far west to provide service to the area where AT&T needs*

*coverage from the Proposed Facility in this proceeding. At the lower antenna centerline elevations, a proposed facility at 1160 Smith Ridge Road would fill in a gap in reliable service in a different area of Town west of the Proposed Facility. This RF analysis was done after the April 8, 2020 correspondence from the 1160 Smith Ridge Road property owner's attorney advising Homeland Towers that the property owner was now interested in leasing space on his property for a wireless tower facility.*

- Q2. How does the incremental coverage for the Proposed Site as shown on page 5 of the September 19, 2019 Radio Frequency Analysis Report prepared by C Squared Systems, LLC compare to the incremental coverage that would be obtained from a tower facility at 1160 Smith Ridge Road?
- A2. *There is no comparison as a tower facility at 1160 Smith Ridge Road would not provide adequate coverage to the area intended for coverage by the Proposed Facility. See A1.*
- Q3. Please identify the person(s) who provided the information contained in the Applicants' April 24, 2020 answers to Hugh Wiley's interrogatories?
- A3. *The persons who provided the information contained in the Applicants' April 24, 2020 responses to Hugh Wiley's interrogatories include members of the Applicants' team:  
Raymond Vergati, Regional Manager, Homeland Towers LLC  
Robert Burns, P.E., Project Manager, All Points Technology Corp. P.C.  
Michael Libertine, LEP, Director of Siting and Permitting, All Points Technology Corp. P.C.  
Brian Gaudet, Project Manager All Points Technology Corp. P.C.  
Martin Lavin, Radio Frequency Engineer, C2 Systems on behalf of AT&T*
- Q4. Please identify the persons who provided the information contained in the answers to these interrogatories?
- A4. *See Response A3.*
- Q5. Have the Applicants or Applicants' representatives had any communications with the owner of 1160 Smith Ridge Road since April 24, 2020, and, if so, what was communicated?
- A5. *Yes, Homeland Towers has communicated with the owner of 1160 Smith Ridge Road since April 24th, 2020 via phone calls and emails. Homeland Towers sent a follow up proposal to the owner of 1160 Smith Ridge Road to determine their interest in leasing to Homeland Towers for the purpose of constructing a wireless facility. As noted in Response A1 above, a wireless facility at 1160 Smith Ridge Road will serve as a separate search/coverage area intended for the north central section of New Canaan and will be in addition to the facility proposed in this proceeding located at 183 Soundview Lane which is intended to provide coverage to the north east section of New Canaan.*
- Q6. Have the Applicants or Applicants' representatives had any communications with any New Canaan government official(s) regarding the Proposed Facility; if so, what was communicated?
- A6. *Yes. Please see the Section VIII, consultation with Town Officials and Attachment 10 of the Application.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day the foregoing was sent electronically to the Connecticut Siting Council with a hard copy sent via first class mail and sent electronically to the service list below, in accordance with Connecticut Siting Council directives.

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July 2, 2020

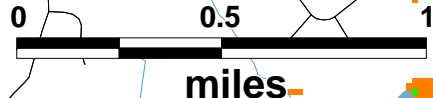
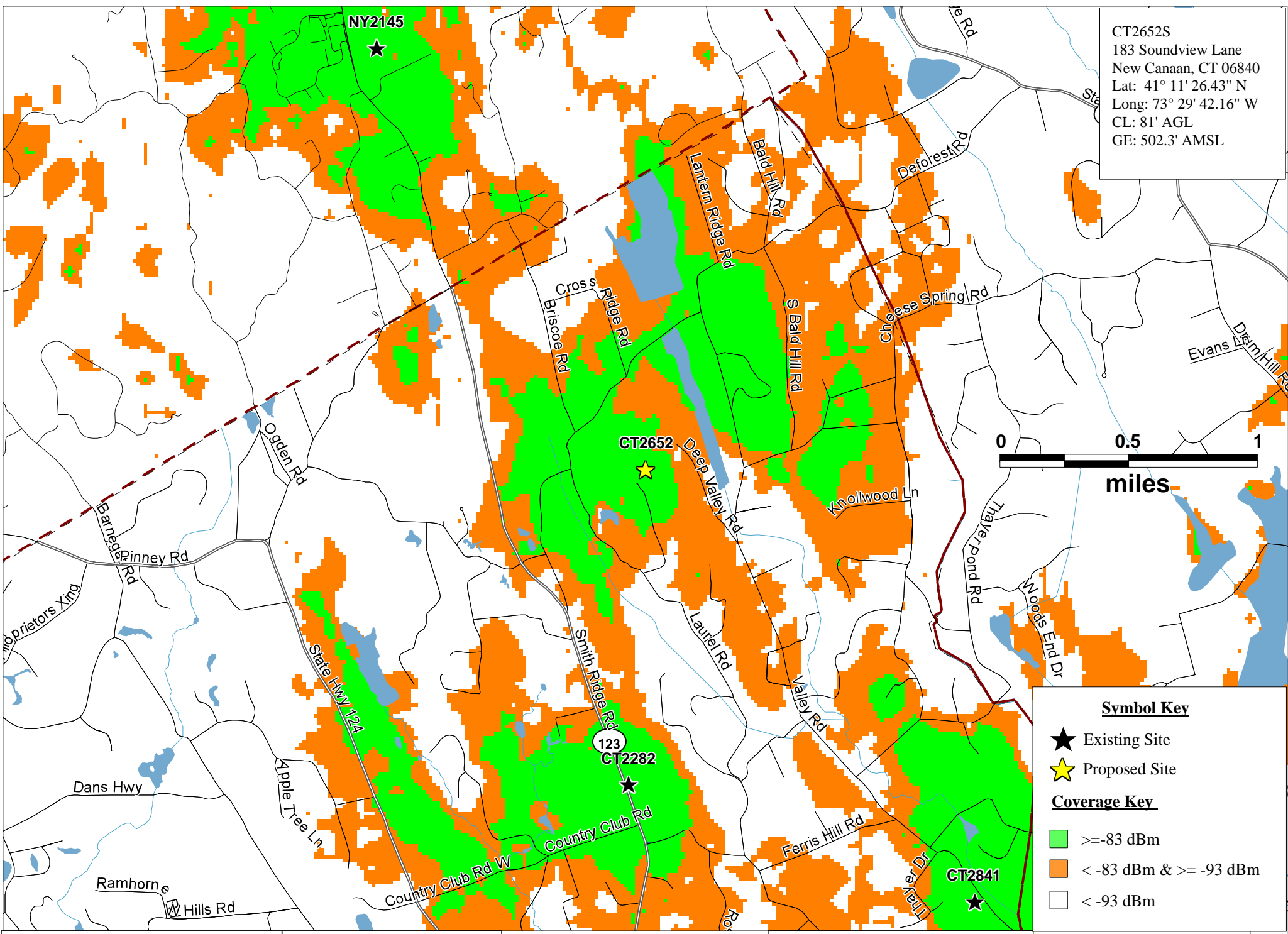


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ATTACHMENT 1

CT2652S  
 183 Soundview Lane  
 New Canaan, CT 06840  
 Lat: 41° 11' 26.43" N  
 Long: 73° 29' 42.16" W  
 CL: 81' AGL  
 GE: 502.3' AMSL



**Symbol Key**

- ★ Existing Site
- ★ Proposed Site

**Coverage Key**

- Green:  $\geq -83$  dBm
- Orange:  $< -83$  dBm &  $\geq -93$  dBm
- White:  $< -93$  dBm

Existing & Proposed  
 700 MHz LTE Coverage

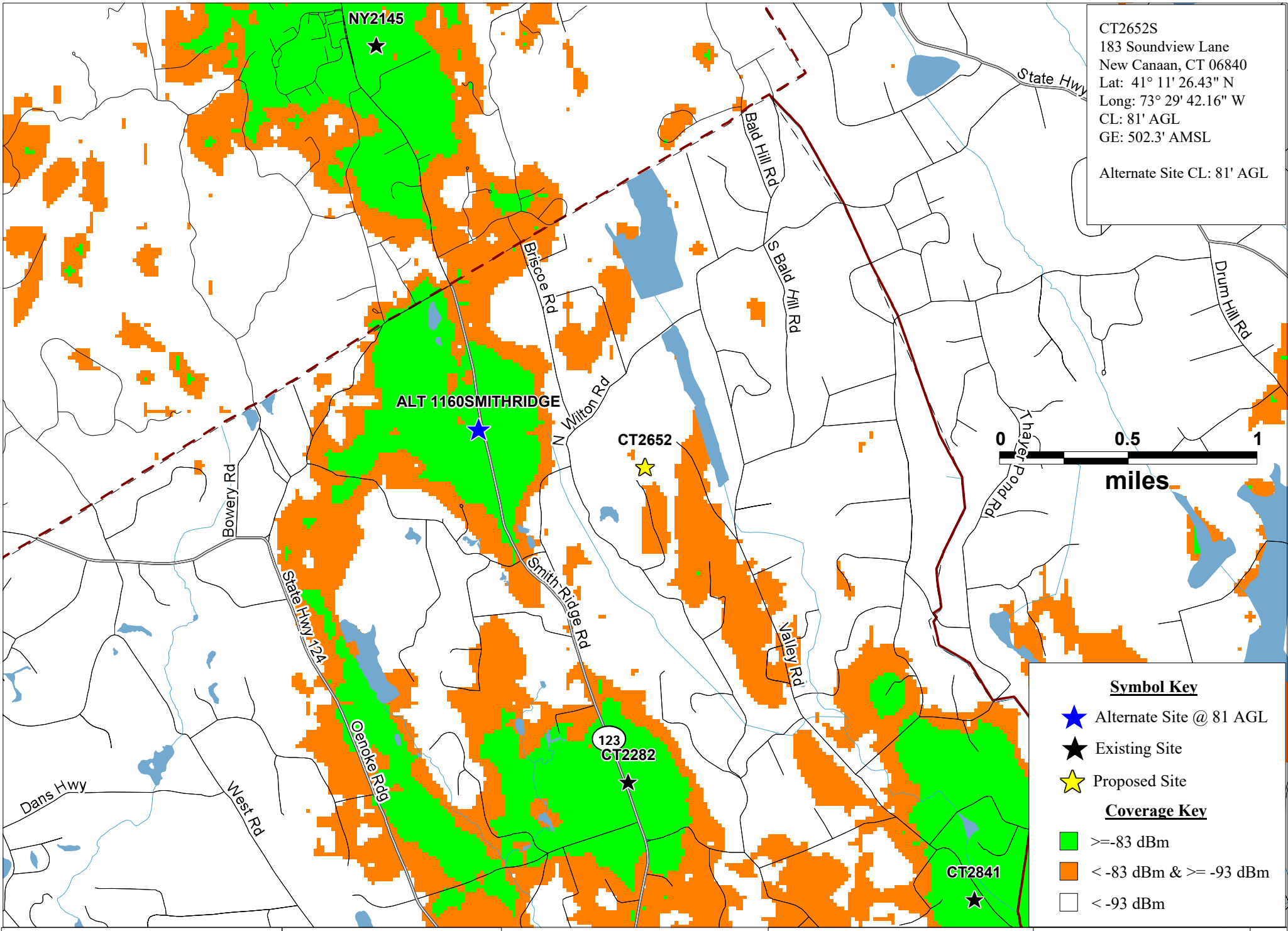
CT2652S

183 Soundview Lane  
 New Canaan, CT 06840

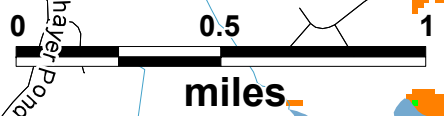


PREPARED ON \_\_\_\_\_  
 DATE: 09/09/2019

REV 0



CT2652S  
 183 Soundview Lane  
 New Canaan, CT 06840  
 Lat: 41° 11' 26.43" N  
 Long: 73° 29' 42.16" W  
 CL: 81' AGL  
 GE: 502.3' AMSL  
 Alternate Site CL: 81' AGL



**Symbol Key**

- ★ Alternate Site @ 81 AGL
- ★ Existing Site
- ★ Proposed Site

**Coverage Key**

- >=-83 dBm
- <-83 dBm & >=-93 dBm
- <-93 dBm

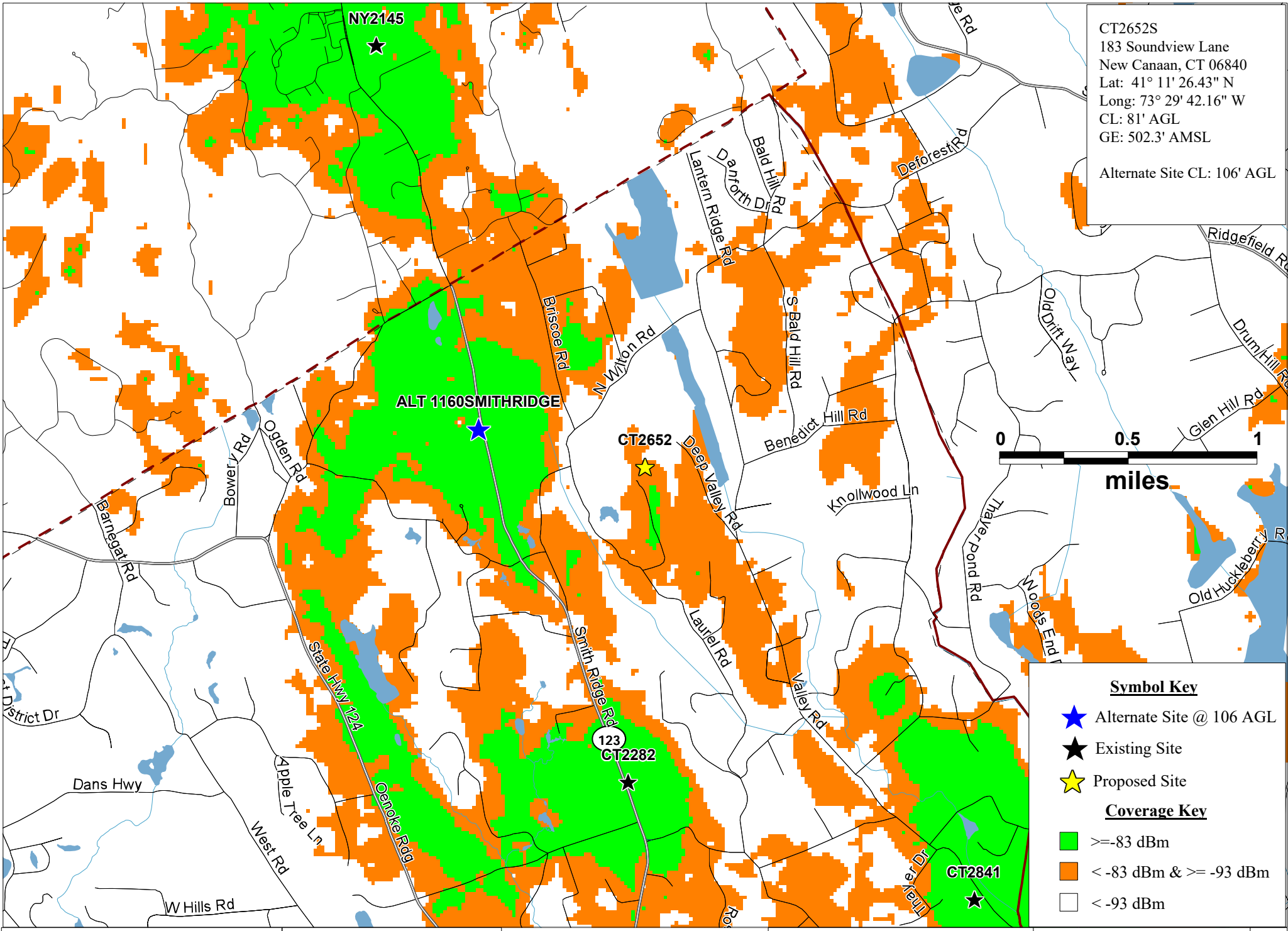
Existing & Alternate  
700 MHz LTE Coverage

CT2652S

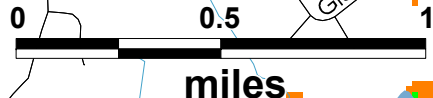
183 Soundview Lane  
New Canaan, CT 06840



PREPARED ON \_\_\_\_\_  
 DATE: 06/29/2020  
 REV 0



CT2652S  
 183 Soundview Lane  
 New Canaan, CT 06840  
 Lat: 41° 11' 26.43" N  
 Long: 73° 29' 42.16" W  
 CL: 81' AGL  
 GE: 502.3' AMSL  
 Alternate Site CL: 106' AGL



**Symbol Key**

- ★ Alternate Site @ 106 AGL
- ★ Existing Site
- ★ Proposed Site

**Coverage Key**

- >=-83 dBm
- <-83 dBm & >=-93 dBm
- <-93 dBm

Existing & Alternate  
700 MHz LTE Coverage

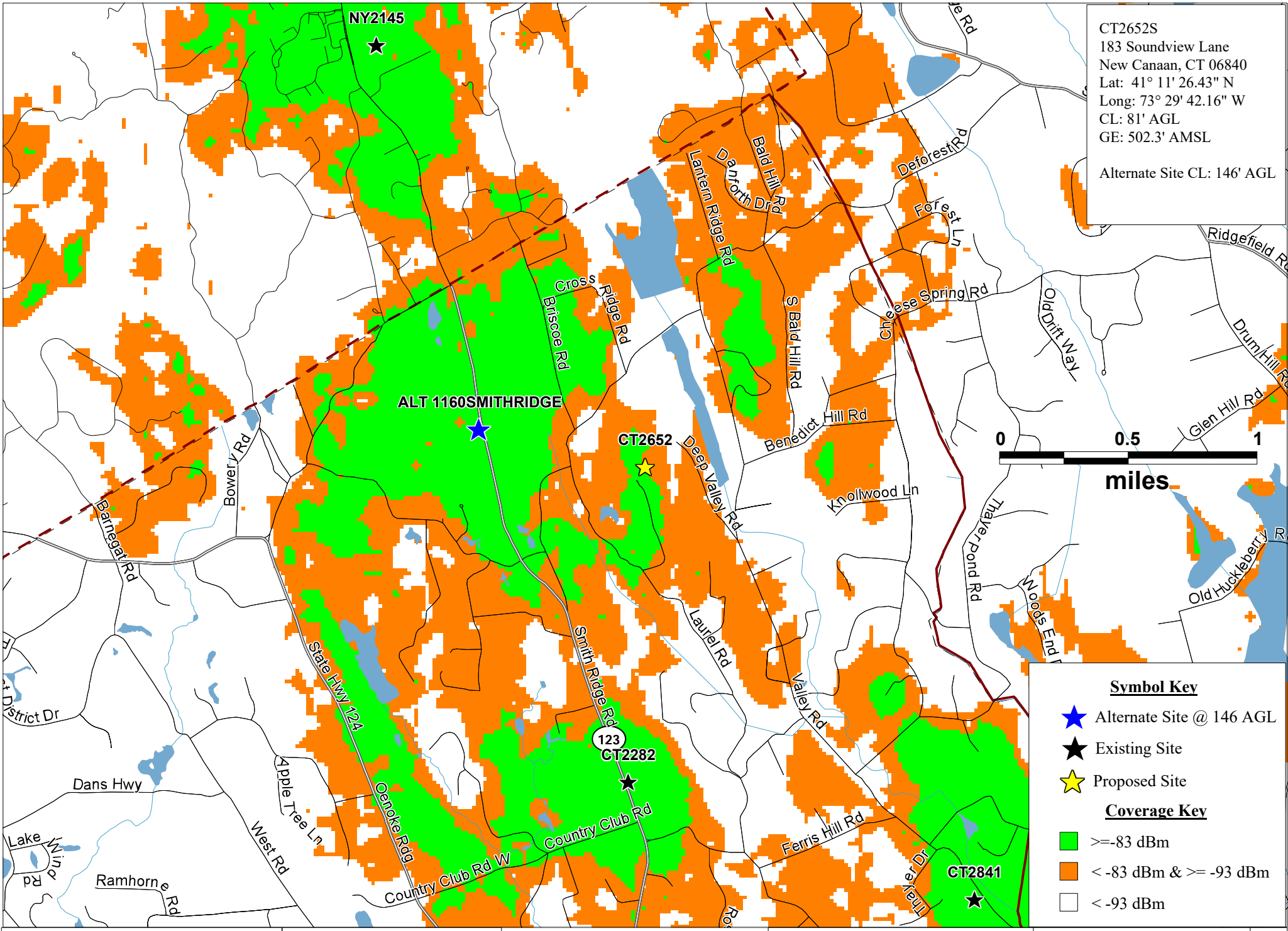
CT2652S

183 Soundview Lane  
New Canaan, CT 06840

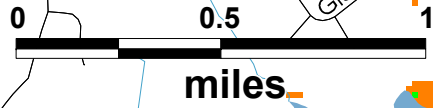


PREPARED ON \_\_\_\_\_  
 DATE: 06/29/2020

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CT2652S  
 183 Soundview Lane  
 New Canaan, CT 06840  
 Lat: 41° 11' 26.43" N  
 Long: 73° 29' 42.16" W  
 CL: 81' AGL  
 GE: 502.3' AMSL  
 Alternate Site CL: 146' AGL



**Symbol Key**

- ★ Alternate Site @ 146 AGL
- ★ Existing Site
- ★ Proposed Site

**Coverage Key**

- >=-83 dBm
- <-83 dBm & >=-93 dBm
- <-93 dBm

Existing & Alternate  
700 MHz LTE Coverage

CT2652S

183 Soundview Lane  
New Canaan, CT 06840



PREPARED ON \_\_\_\_\_  
 DATE: 06/29/2020  
 REV 0