

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

June 18, 2020

**SECOND SET OF INTERROGATORIES**

Hugh Wiley, a Party in the above captioned docket, by and through the undersigned counsel, respectfully requests that the HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T (hereinafter “Homeland”, and “AT&T”, respectively, and collectively, the “Applicants”) answer the following interrogatories:

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.”

1. With respect to Applicants’ answer to Interrogatory 29:

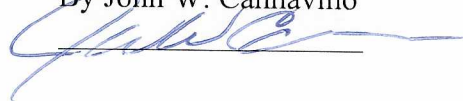
(a) please identify the radio frequency engineers who evaluated 1160 Smith Ridge Road, New Canaan (“1160 Smith Ridge”) as a possible site for a tower facility;

- (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?

2. 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?

3. Please identify the person(s) who provided the information contained in the Applicants' April 24, 2020 answers to Hugh Wiley's interrogatories?
4. Please identify the persons who provided the information contained in the answers to these interrogatories?
5. 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?
6. 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?.

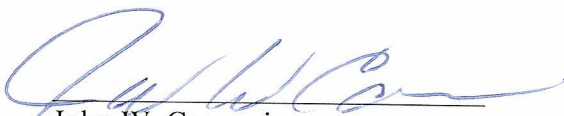
Hugh Wiley  
By Cummings & Lockwood  
Six Landmark  
Stamford, CT 06901  
His Attorneys  
By John W. Cannavino



CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing was sent electronically to the Connecticut Siting Council and the service list below.

June 18, 2020



John W. Cannavino  
Cummings & Lockwood

St. Luke's School/St. Luke's Foundation, Inc.

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