

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

INTERROGATORIES

Hugh Wiley, who has petitioned to become 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:

1. How much of an increase in height is the proposed tower being designed to accommodate?
2. What other wireless carriers have expressed an interest in co-locating on the tower?
3. The Application shows that AT&T will locate its antennas at 81’ AGL, and that additional carriers will be located at ten foot intervals below the AT&T antennas; will those locations be at a sufficient elevation to serve the service objectives of the other carriers?
4. Will an increase in the height of the tower be necessary in order for other carriers to achieve their service objectives from the proposed site?

5. What is the lowest height at which AT&T and the other carriers antennas could achieve their wireless service objectives from the proposed site?
6. Is a stealth monopole containing internally mounted antennae feasible for the proposed location? If not, why not?
7. When will the “noise analysis” be available (referred to in Applicants’ answer to the Siting Council’s interrogatory 31)?
8. Why was the proposed tower not located away from property lines at least as far as the height of the tower, as required by the Town of New Canaan’s zoning regulations?
9. Why is the proposed security fencing in excess of the six feet in height as suggested by the Town of New Canaan’s zoning regulations?
10. Why is the proposed equipment cabinet not a “shed” or “other building type” found in New Canaan, as required by New Canaan’s zoning regulations?
11. Why is the equipment cabinet not constructed at least fifty feet from the property boundary, as required by New Canaan’s zoning regulations?
12. Will the access drive, tower or any associated equipment be located within the existing 20’ wide drainage easement?
13. Are there any deed restrictions, easements, or other encumbrances that would affect the installation of wireless communication facilities at the proposed site?
14. The Application states that the proposed facility is located approximately 420’ west of the nearest wetlands; who marked the location of those wetlands?
15. Will additional generators be required for other carriers that co-locate on the proposed tower?

16. What steps is the Applicant taking to assure that there is no leakage of fuel at the proposed site?
17. Will additional fuel tanks be required for other carriers who co-locate on the tower?
18. Please describe AT&T's site search effort (referred to on page 5 of the Application).
19. Will Town of New Canaan fire, police and EMS be accommodated on the tower?
20. Is there any need to accommodate Town of New Canaan fire, police, or EMS on the tower, given the existing antennae installation at St. Luke's School?
21. Is the tower being designed to accommodate Town fire, police, and EMS.
22. What is the factual basis for the statement on page 5 of the Application, that the proposed tower "will not have any substantial adverse effect on the aesthetics or scenic quality of the neighborhood"?
23. Which roads are the "several State and other arterial roads" referred to in Section B, 2) on page 12 of the Application?
24. What carriers, other than AT&T, have been "engaged in site searches in the New Canaan area over a period of years", as set forth on page 14 of the Application, and what were the results of those search efforts?
25. Other than sending letters, what investigation was conducted by Homeland with respect to the sites identified in the section of the Technical Report labeled "Properties Investigated by Homeland Towers" as sites B through W ("Alternative Sites").
26. In the communications to the owners of the Alternative Sites, what did Homeland communicate with regard to the terms of its proposal?
27. Were the financial terms of the proposal disclosed to the owners of the Alternative Sites?

28. Did Homeland make any effort to contact the owners of any of the Alternative Sites by telephone?
29. Did Homeland conduct a prorogation analysis for any of the Alternative Sites?
30. With respect to Alternative Site “C”, 1160 Smith Ridge Road, was a propagation analysis performed?
31. Why did the owner of 1160 Smith Ridge Road decide “not to pursue a lease with Homeland Towers”, as stated in the Technical Report?
32. What monthly base rental was offered to the owner of 1160 Smith Ridge Road?
33. What percentage of the rental from other carriers who co-locate on the tower was offered to the owner of 1160 Smith Ridge Road?
34. Have either of the Applicants had communications with the owner of 1160 Smith Ridge Road, since their receipt of a letter from counsel informing them of the owner’s interest in locating a tower on his property?
35. In a New Canaan Advertiser article that was published April 17, 2018, Mr. Richey is quoted as having said that the rental from his lease with Homeland is expected to be “in the range of \$2,500 - \$3,000”. Is this statement accurate?
36. In that same article, Mr. Richey is quoted as having said that in the unlikely event four carriers locate on the tower, rent could be “in the \$4,000 area”. Is that statement accurate.
37. What percentage of the rent paid by other carriers who co-locate on the proposed tower is payable to Mr. Richey?
38. In a September 19, 2019 article, Mr. Richey indicated that the base rent under the lease is \$2,500; Is this accurate?
39. How much do carriers generally pay to co-locate on towers in Connecticut?

40. What is the annual rent that is being paid by AT&T to Homeland?
41. Which entity is funding the construction of the tower?
42. Does Homeland intend to transfer the certificate to InSite Towers Development, LLC?

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