

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NATIONAL GRID
COMMUNICATIONS, INC. D/B/A GRIDCOM
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION AND MAINTENANCE OF A
TELECOMMUNICATIONS FACILITY IN THE
CITY OF DERBY

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) DOCKET NO. 307
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) June 30, 2005

APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED

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SITING COUNCIL

National Grid Communications, Inc.
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Ludlow, Massachusetts 01056

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LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
1	Pre-Filed Testimony of David Vivian
2	Legal Notice
3	Notice to Abutting Landowners; List of Abutting Landowners; Certification of Service
4	Certification of Service on Governmental Officials
5	Alternate Site Analysis and Table of Towers within 4 miles
6	Site A: Description and Design of Proposed Facility
7	Site B: Description and Design of Proposed Facility
8	Site Plans for Site A and Site B
9	Visual Resource Evaluation Report for Site A and Site B
10	Correspondence from State Agencies
11	T-Mobile Radio Frequency Coverage Plots and Power Density Analysis
12	FAA Consultant Analysis of Site A and Site B
13	Correspondence with the City of Derby
14	Connecticut Siting Council Application Guide

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Docket No. _____

June 30, 2005

**APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED**

I. INTRODUCTION

A. Authority and Purpose

National Grid Communications, Inc. ("Gridcom" or "Applicant"), hereby applies (the "Application") to the Connecticut Siting Council (the "Council") for a Certificate of Environmental Compatibility and Public Need ("Certificate") for the construction and maintenance of a telecommunications facility (the "Facility") at one of two alternate locations on property located at 71 Pleasant View Road (Derby Tax Assessor's Map 5-6, Lots 101 & 113) in Derby, Connecticut. This Application and accompanying attachments are submitted by Gridcom pursuant to Connecticut General Statutes ("CGS") §§ 16-50g et seq., as amended, and the Regulations of Connecticut State Agencies ("R.C.S.A.") §§ 16-50j-1 et seq., as amended.

Pursuant to the Public Utility Environmental Standards Act, CGS §§ 16-50g to 16-50z inclusive, the location and type of the Facility proposed by Gridcom is within the exclusive jurisdiction of the Council. CGS §§ 16-50i (a) (6), 16-50k and 16-50x (a). The Council has jurisdiction over all facilities as defined in CGS § 16-50i (a). This jurisdiction

includes “telecommunications towers . . . used in a cellular system, as defined by the Code of Federal Regulations Title 47, Part 22...” CGS § 16-50i (a) (6).

Based on its experience and relationship with licensed wireless carriers, Gridcom determined that the proposed Facility is needed to provide mobile telecommunications service to an area where large gaps in coverage currently exist in the vicinity of Route 34 and Route 8 in the City of Derby (the “City”). The proposed Facility will allow carriers locating thereon to provide wireless telecommunications service within this area of the City.

B. Executive Summary

This proposal consists of a wireless telecommunications facility to be installed at one of two locations designated as Site A and Site B on property located at 71 Pleasant View Road and owned by St. Jude’s Roman Catholic Church.

At Site A, Gridcom proposes to install a monopole 130 feet in height within a 75-foot by 75-foot fenced compound area in the southeast corner of the property. Omnipoint Holdings d/b/a T-Mobile (“T-Mobile”) will flush mount panel antennas at a centerline height of approximately 127 feet above grade level (“AGL”). Vehicular access would extend from Pleasant View Road southeasterly along the existing paved driveway and then along a new 12-foot wide gravel access drive approximately 65 feet to the compound area. Utilities would extend underground from a new utility pole to be located at the end of the parking lot from the pole to the compound area.

At Site B, Gridcom proposes to construct a 130-foot stealth flagpole facility within a 75-foot by 75-foot fenced compound area in the southwestern section of the property, approximately 730 feet southwest of Site A. T-Mobile will internally mount panel antennas at a centerline height of approximately 127 feet AGL. Vehicular access

would extend from Sentinel Road and follow the existing paved driveway approximately 350 feet then branch off to the south to the proposed compound. Utilities would extend from Sentinel Road and follow the access drive into the compound area.

The facilities at Site A and Site B will be designed to accommodate use by up to three (3) additional wireless carriers. The monopole at Site A with appurtenances and the stealth flagpole at Site B will not exceed 130' AGL. The compound area at either site would be enclosed by a security fence six (6) feet in height.

Included in this Application in Attachments 6, 7, 8 and 9 are reports with survey based plans and other information detailing the Facility proposed at Site A and Site B and the potential environmental impacts associated therewith. A copy of the Council's Community Antenna and Television Facilities Application Guide with page references from this Application is included in Attachment 14.

C. Legal Name of the Applicant

National Grid Communications, Inc. ("Gridcom") is a Massachusetts corporation with its home office at 25 Research Drive, Westborough, Massachusetts, 01582.

D. Correspondence and Service

All communications and correspondence with regard to this Application should be addressed to:

David Vivian
Site Development Manager
Gridcom
733 Chapin Street, Suite 200F
Ludlow, Massachusetts 01056
(413) 583-3168

A copy of all such correspondence or communications should also be sent to the Applicant's attorneys:

Cuddy & Feder LLP
90 Maple Avenue
White Plains, New York 10601-5196
Attn: Lucia Chiocchio, Esq.
(914) 761-1300
For Gridcom

E. Section 16-50l (c) Compliance

In compliance with CGS § 16-50l(c), Gridcom hereby states that the telecommunication systems that are the basis of this Application have not been identified in any annual forecast report required under the statute. Gridcom is not engaged in generating electric power in Connecticut and, therefore, is not subject to the requirements of CGS § 16-50l(c).

II. SERVICE AND NOTICE REQUIRED BY CGS § 16-50l (b)

Public Notice, appearing in the form attached hereto in Attachment 2, was published on Tuesday, June 28, 2005 and Wednesday, June 29, 2005 in the Hartford Courant and the Norwich Bulletin, pursuant to CGS § 16-50l (b). A copy of each publisher's affidavit of publication will be submitted to the Council as soon as it is available.

In compliance with CGS § 16-50l (b), notice was sent to each person appearing of record as an owner of property that abuts either of the proposed Site A or Site B. A certification of service, a sample notice letter, and the list of property owners to whom notice was mailed are attached hereto at Attachment 3.

Copies of this Application were also sent by certified mail, return receipt requested, to municipal, regional, State and Federal officials pursuant to CGS § 16-50I (b). A certificate of service, along with a list of the parties served with a copy of the Application, is attached hereto at Attachment 4.

III. THE PROPOSED SITES: REQUIRED INFORMATION

The purpose of this section is to provide an overview and general description of the facility proposed to be installed at the Site A or Site B location.

A. General Information

In 1996, with the passage of the Federal Telecommunications Act (the “Act”), the United States Congress recognized a nationwide public need for high quality wireless telecommunication services. Gridcom assists carriers in fulfilling their license requirements by providing them with a variety of services, including locating, leasing, permitting and constructing personal wireless facilities for the carriers’ antennas and equipment in order to meet the carriers’ coverage and quality of service requirements.

B. Public Need

The proposed Facility will allow T-Mobile and other carriers licensed by the Federal Communications Commission (“FCC”) to provide wireless services to the Derby area, specifically along New Haven Avenue (Route 34) to the south and the General Samuel Jaskilka Highway (Route 8) to the west as well as adjacent local roads and areas. A Facility at either Site A or Site B will improve service in the areas surrounding it by providing coverage in conjunction with T-Mobile’s other sites in this area. The proposed Facility would provide the benefits of wireless telecommunications for both residents and businesses in the City.

The demand for high quality wireless telecommunications service use in this area of Derby is significant because it is part of the heavily traveled Route 8 corridor and Route 34 connector to the Wilbur Cross Highway (Route 15) and is home to many business and industrial entities, as well as persons living in the area who commute to and from Waterbury, New Haven and the business corridor along I-95 and the Connecticut shore. Adequate and reliable wireless telecommunication capabilities are, therefore, beneficial to persons traveling through, working and living in the area.

C. Site Selection

Either of the proposed Sites would allow telecommunication carriers to provide needed coverage in the City. Gridcom carefully reviewed both the type and the location for this Facility. In order to provide sufficient service to these areas that do not receive coverage, a wireless facility must be placed within a very specific region. The area within which the facility must be ideally located is in the center of the area that is not receiving coverage, referred to as a Search Area. The precise area, however, is greatly dependent upon ground elevation, topography, tree coverage and available sites or properties.

Gridcom conducted an exhaustive survey of sites within the Search Area to identify the best possible location. See Pre-Filed Testimony of David Vivian included in Attachment 1. Gridcom determined that there were no existing structures suitable for remedying the existing gaps in coverage experienced by licensed telecommunications carriers in this part of the City. Gridcom identified seventeen (17) existing towers within a four-mile radius from the area targeted for coverage by the proposed Facility. Investigation of these towers indicated that none of them could be used to provide coverage to the target area. This list of existing towers is included in Attachment 5. Only

after determining that there were no buildings or structures of sufficient height in or near the Search Area, Gridcom searched for an appropriate location for a new tower structure.

As discussed in detail in the pre-filed testimony of David Vivian included in Attachment 1, Gridcom investigated the use of three City-owned properties during its site search. After over a year of negotiations with the City to locate the proposed Facility on the Hotchkiss Hose Fire Company property, it was concluded that the City was not interested in developing a facility at this location.

Gridcom's goal in selecting this site was to locate a Facility in such a manner as to allow telecommunication carriers to build and operate high-quality communication systems with the least environmental impact. Gridcom believes that both Site A and Site B satisfy this goal and are necessary to fill the carriers' existing coverage gaps, thus allowing carriers to provide adequate and reliable service. See Attachment 5 for a list of alternative sites reviewed by Gridcom, the reasons why each was not chosen, and a topographic map depicting the locations of each of the alternate sites reviewed.

D. Description of the Proposed Prime and Alternate Facilities

The ground elevation at both Site A and Site B is approximately 366 feet AMSL. The property on which the proposed Site A and Site B Facilities would be located (the "property") is an approximately 16.6 acre property owned by St. Jude's Roman Catholic Church and located at 71 Pleasant View Road.

At Site A, Gridcom would lease a 5,635 square-foot parcel in the southeast portion of the property. Gridcom proposes to construct a 130-foot monopole with flush-mounted antennas and a 75-foot by 75-foot fenced compound area at the base of the monopole. T-Mobile will flush mount three (3) panel antennas at a centerline height of 127 feet AGL. The monopole at Site A with appurtenances will not exceed 130 feet AGL. The Facility

will be designed to accommodate the antennas and equipment of three (3) additional carriers at antenna centerline heights of 117 feet AGL, 107 feet AGL, and 97 feet AGL, as well as municipal or public safety antennas.

The compound area at the base of Site A will include locations for the equipment of four (4) telecommunications carriers, including the equipment proposed by T-Mobile. A six-foot high chain-link gated fence will enclose the compound.

Vehicular access to Site A would extend from Pleasant View Road southeasterly along the St. Jude's Church rear entrance, then following the existing paved driveway that runs behind the Rectory and Church building to a paved parking area for service vehicles and church employees. A newly constructed 12-foot wide gravel access driveway from the driveway to the compound area (approximately 65 feet) will be constructed. Utility service will run through an underground conduit from a new utility pole that will be set at the end of the parking lot to a transformer located within the lease area. The Site A Facility specifications, including site plans and a visual resource package are included in Attachments 6, 8 and 9.

At Site B, Gridcom would lease a 5,635 square-foot parcel in the southwest portion of the property, approximately 730 feet southwest from Site A. Gridcom proposes to construct a 130-foot stealth flagpole and a 75-foot by 75-foot fenced compound area at the base of the flagpole.

The Facility at Site B would also be built to accommodate a total of four (4) carriers. T-Mobile will internally mount three (3) panel antennas at a centerline height of 127 feet AGL. The Facility will be designed to accommodate the antennas and equipment of three (3) additional carriers at antenna centerline heights of 117 feet AGL, 107 feet AGL, and 97 feet AGL, as well as municipal or public safety antennas.

The compound area at the base of Site B will include locations for the equipment of four (4) telecommunications carriers, including the equipment proposed by T-Mobile. A six-foot chain-link gated fence would also enclose the compound at Site B.

Vehicular access and utility service would extend from the St. Jude's Church main entrance on Sentinel Hill Road and follow along the existing paved driveway approximately 350 feet, and then branch off to the south to the proposed compound. Site B Facility specifications, including site plans, a visual resource package are included in Attachments 7, 8 and 9.

The Facility at Site A or Site B will be unmanned except as required for periodic maintenance, approximately one visit per month.

E. Geographical Maps and Surveys

The U. S. G. S. topographic quadrangle map of the Facility (and alternate sites investigated) may be found in Attachment 5. A map of the Property and abutting parcels is included on Sheet C-1 of the site plans (Attachment 8). Site plans showing the proposed Site A and Site B Facilities, fall zones, existing and proposed contour elevations, 100 year flood zones, waterways, wetlands and all associated equipment and structures on the sites may be found on Sheets C-2 and C-3 in Attachment 8.

F. Environmental Compatibility

Pursuant to CGS § 16-50p, in reviewing the Application the Council must also determine the nature of the proposed Facility's environmental impact. This evaluation includes a specification of any probable environmental impacts of the Facility concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife.

As demonstrated below and in the materials included herein, the proposed Facility will have no impact or a negligible impact to: wetlands or watercourses; air quality; noise; visibility and aesthetics; vegetation; wildlife; and historic, architectural, archaeological, cultural and recreational resources.

1. Wetlands and Watercourses

At Site A, there were no wetlands or watercourses delineated within 50 feet of the proposed compound. Three wetland areas were delineated to the east of the proposed access drive (existing paved driveway running behind the Rectory and the Church building) and compound area. While no wetlands will be disturbed, a portion of the proposed access drive along the existing paved driveway will be located within 50 feet of these wetlands (the municipal uplands review area). See Wetlands Delineation on sheet C-2 included in Attachment 8. At Site B, there were no wetlands or watercourses delineated within any portion of the proposed access road or compound area.

In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation, soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility to protect the integrity of any nearby wetlands. As such, it is respectfully submitted that the proposed activity, as compared with other activities outlined in Section 4 of the Wetlands Regulations, would have no significant impact.

Furthermore, no adverse impacts on water resources are anticipated as a result of operation of the Facility at either Site A or Site B. No water usage or wastewater discharge is associated with the building site, and there is no water

supply or sanitary facilities proposed due to the fact that the Facility will be unmanned. A technician will visit the Facility only monthly to perform routine maintenance.

2. Air Quality

No air pollutants will be generated during the normal operation of the Facility at either Site A or Site B. The proposed Facility will be passive in nature. It will not create any smoke, ash, heat, glare or pollution.

3. Noise

The only noise associated with the Facility will be during construction of the Facility and addition of the carriers' equipment. Post construction, the Facility at either Site A or Site B will not create any noise.

4. Visibility, Aesthetics, Cultural and Recreational Resources

Visibility of the Facility will vary from location to location around the tower, depending upon the vegetation and topography of the area, the distance of nearby properties from the tower, and the location of other buildings and structures in a "sight line" to the tower.

A Comparative Viewshed Analysis, included in Attachment 9, includes existing conditions and photo simulations of the proposed Facility at both sites, based on the proposed tower height of 130 feet. Areas of visibility depicted over the Housatonic River and adjacent, undeveloped farmland account for the major portion of the viewshed for the Facility at Site A or Site B. In large measure, these views will be of the top of the tower structure above the tree line. The Visual Analysis demonstrates that, in both cases, the designs of the towers, a flush

mounted monopole (Site A) and a flagpole (Site B), would serve to minimize the visual profile of the proposed Facility.

The closest residential structure to the Site A monopole is approximately 251 feet away. Approximately 73 structures are located within 1,000 feet of the proposed Site A Facility. The closest residential structure to the Site B flagpole is approximately 242 feet away. Approximately 94 structures are located within 1,000 feet of the proposed Site B Facility.

The sole recreational resource identified in proximity to the proposed Facility is the Bradley Field recreational complex located to the northeast of either Site A or Site B. The visibility of either site from Bradley Field is limited to a portion of the proposed tower that is above the tree canopy in the area. The equipment compound will be entirely screened from view due to existing vegetation to the rear (east) of the church property.

5. Wildlife

No long-term impacts on wildlife are anticipated from the proposed Facility. Wildlife use of the area will remain intact following construction of the equipment pads and installation of the antennas on the monopole at either site. The Connecticut Department of Environmental Protection has stated that there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species under its jurisdiction known to occur at either Site A or Site B. See DEP correspondence included in Attachment 10.

6. Historic, Architectural or Archaeological Resources

The State Historic Preservation Office ("SHPO") has concluded that the proposed Facility will have no effect on historic, architectural, or archaeological

resources listed on or eligible for the National Register of Historic Places. Further, the SHPO has concluded that the proposed Facility will have no effect upon properties of traditional cultural importance to Connecticut's Native American Community. See SHPO correspondence included in Attachment 10.

7. Public Health and Safety

In August of 1996, the FCC adopted a hybrid ANSI/NCRP Standard for exposure to Radio Frequency ("RF") emissions from telecommunications facilities, such as the one proposed in this Application. The ANSI standard was adopted by Connecticut in General Statutes §§ 22a-162 and 22a-162a "for the purpose of preventing possible harmful effects in human beings from exposure to electromagnetic fields in the frequency range of 300 kilohertz (KHz) to 100 gigahertz (GHz). . . ."

To ensure compliance with the applicable standards, maximum power density calculations were prepared for the proposed Facility according to the methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) ("OET Bulletin 65"). The calculations assume that the antennas are operating at 100 percent capacity, that all antenna channels are transmitting simultaneously and that the radio transmitters are operating at full power. Obstructions, such as trees and buildings that would normally attenuate the signal were not taken into account. As a result, the predicted signal levels are much more conservative (higher) than the actual signal levels that will be experienced once the tower is constructed and the carrier's antennas are operational.

The calculated results indicate that radio frequency emissions expected from the proposed Facility are significantly less than the applicable regulatory emission limits for general public exposure, even using very conservative assumptions. As described in the Radio Frequency Emissions report, which is applicable to both Site A and Site B, the equipment proposed by T-Mobile is well below the exposure limits recommended by the Institute of Electrical and Electronic Engineers (“IEEE”) and the National Council on Radiation Protection and Measurement (“NCRP”). For the proposed 130-foot tower at either Site A or Site B, the power density for the antennas is 0.022620 mW/cm² which is 2.262% of the MPE standard. These calculations show that the power density is well below the FCC-mandated limits in all locations around the tower, even with extremely conservative assumptions. See RF Calculations for Site A and Site B, included in Attachment 11.

G. Land Use

Included in this Section is a summary of the consistency of the proposed Facility with the local municipality’s zoning and wetlands regulations and plan of conservation and development.

1. Derby’s Plan of Conservation and Development

The City of Derby’s Plan of Conservation and Development, a copy of which is included in the Bulk Filing, identifies wireless communication as an element of utility infrastructure. The Plan of Conservation and Development identifies existing towers on Route 8. The recommended strategy in the Plan of Conservation and Development for wireless facilities is to enhance the wireless regulations to encourage co-location.

2. Derby's Zoning Regulations

According to the City's zoning map, the Facility at both Site A and Site B are classified within the City of Derby's Public and Semi-Public ("P") Zoning District. Section 195-18 of the Derby Zoning Regulations (the "Regulations") provides that public utility buildings without repair facilities or outdoor storage are a permitted use in a P Zone. Section 195-27 of the Regulations provides that the attachment of wireless telecommunication antennas to *existing structures* is a permitted use in all zoning districts with the issuance of a Special Exception permit. As such, the Derby wireless law only addresses the collocation of antennas on existing structures, buildings and towers and does not address new tower facilities.

The following table sets forth certain bulk requirements in the P Zone in Derby and demonstrates whether the proposed Site A and Site B Facilities are in compliance with each such regulation:

Local Zoning Standards

Regulation	Requirement	Site A	Site B
Section 195-18 (E.1) Minimum Lot Size	10,000 Square Feet	Approx. 726,000 Square Feet	Approx. 726,000 Square Feet
Section 195-18 (E.2) Maximum Coverage	25%	Approx. 4%	Approx. 4%
Section 195-18 (E.4) Minimum Front Yard	25 Feet	Approx. 670 Feet	Approx. 390 Feet
Section 195-18 (E.5) Minimum Rear Yard	50 Feet	Approx. 135 Feet	Approx. 1,020 Feet
Section 195-18 (E.6) Minimum Side Yard	15 Feet	Approx. 315 Feet	Approx. 85 Feet

Section 195-18.E of the Zoning Regulations limits the heights of building to 50 feet in the P Zone, while Section 195-26(S) provides a height exception for spires, cupolas, chimneys, flagpoles, etc. as reasonable and necessary as determined by the Zoning Officer. Copies of the Zoning Regulations are provided in the Bulk Filing.

H. Description of Public Aspects of Site

The subject Property is zoned Public and Semi-Public ("P") and is currently improved with the St. Jude's Catholic Church and Rectory. The area surrounding the Property is primarily single-family residences with the Bradley Public School and ball field immediately to the north, and various commercial enterprises to the south along Route 34. There are currently no plans for further development of the lessor's parcel at either Site A or Site B.

I. Derby's Inland Wetlands and Watercourses Regulations

The City of Derby's Inland Wetlands and Watercourses Regulations regulate certain activities conducted on or adjacent to "wetlands" as defined therein. Once such regulated activity is "any obstruction, construction, alteration or pollution of such wetlands or watercourses and any earth moving, filling, construction or clear-cutting of trees, etc. within fifty (50) feet of wetlands or watercourses...." See Section 2 of the Wetlands Regulations included in the Bulk Filing.

According to the site survey and field investigations conducted at the Site A location, wetlands were delineated within 50 feet of the proposed access drive along the existing paved drive. The construction of the proposed Site A Facility will not disturb any wetlands. No watercourses or wetlands were delineated at the Site B location. See discussion for Section F.1 above.

IV. TECHNICAL INFORMATION

A. Forecast of Maximum Capability

The forecast of maximum capability for carriers proposing to locate on the Facility will be provided by each carrier.

B. List of Area Towers

For a complete list of existing towers within a four (4) mile radius of the proposed Site, see Attachment 5. There are no existing structures of sufficient height in or near the Search Area on which T-Mobile can locate its antennas and sufficiently remedy the existing coverage gap. See Pre-Filed Testimony of David Vivian in Attachment 1 and discussion for Section III.C above.

C. Efforts to Share Towers

Through its communications with T-Mobile, Gridcom determined that the carrier had gaps in its wireless coverage in this particular area of the City. The proposed 130-foot monopole tower at Site A or flagpole at Site B would each be capable of supporting four (4) carriers' antennas and equipment. Such a tower sharing arrangement will reduce, if not eliminate, the need for separate towers in this area of the City. In addition, Gridcom will also make space available on the tower for the City's public safety entities at no cost to the City.

D. Technological Alternatives and Justification for Site Selected

In Attachment 11, Gridcom has provided propagation plots from T-Mobile to demonstrate the need to locate its equipment on the proposed Facility to provide service in this portion of the City. These analyses utilize signal propagation maps and display the geographical area served by the carriers' wireless facilities within this coverage area. As

shown on the propagation plot labeled “Without CT11618”, T-Mobile currently has a gap in service along Route 8 and Route 34 in this area of the City. The propagation plots labeled “With CT11618F” and “With CT11618E”, depicting the proposed coverage from Site A and Site B respectively, clearly demonstrate that the proposed Facility at either site will fill this existing gap in service. None of the alternatives investigated offer a better location for a facility of this type. In fact, for the reasons outlined in Attachments 1 and 5, including topography, visibility, and sites being outside the Search Area (and thus too far to provide coverage), the alternative sites investigated in this area are much less suitable for a tower facility.

E. Cost Statement

The total estimated cost of construction for the proposed Facility is approximately \$95,000.00 for Site A and \$110,000 for Site B. These estimates include the following:

	<u>Site A</u>	<u>Site B</u>
Site Preparation	\$ 20,000.00	\$ 10,000.00
Tower Costs	\$ 40,000.00	\$ 65,000.00
Utilities	\$ 15,000.00	\$ 15,000.00
Misc. (testing/permits)	\$ 20,000.00	\$ 20,000.00
	=====	=====
TOTAL COSTS	\$ 95,000.00	\$110,000.00

F. Schedule

Site work would commence following Council approval of the Development and Management (“D&M”) Plan, and the issuance of a building permit from the City and is expected to be completed within four weeks. Installation of the tower, antennas and

equipment is expected to take an additional four weeks. It is expected that construction of the Facility would take approximately eight (8) weeks to complete.

G. Balloon Display

Weather permitting, Gridcom will raise a balloon with a diameter of at least three (3) feet, at Site A and Site B on the day of the Council's first hearing session on the Application, or at a time otherwise specified by the Council.

V. STATE AND FEDERAL CONSULTATION

Each site was evaluated in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969 ("NEPA"). Neither Site A nor Site B was identified as a Federal Wilderness Area or Wilderness Preserve. No National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands are located in the vicinity of the subject sites. Further, according to the site survey and field investigations, no federally regulated wetlands or watercourses will be impacted by the proposed Facilities. Federal Emergency Management Agency ("FEMA") Flood Insurance Rate Maps of the proposed sites indicated that both Site A and Site B are not located in a flood plain. As such, and based on the information contained in other reports included in this Application, Site A and Site B are both categorically excluded from any requirement for further environmental review by the FCC in accordance with NEPA and no permit is required by that agency prior to construction of the proposed Facility. See 47 CFR §§ 1.1306(b) and 1.1307(a).

Further, as demonstrated in the Aviation Systems, Inc. "FAR Part 77 Airspace Obstruction Report" included in Attachment 12, the proposed Facility at Site A or Site B will not require lighting or marking.

VI. LOCAL CONSULTATION

CGS Section 16-50l(e) requires an applicant to consult with the local municipality in which a proposed facility may be located. In compliance with CGS Section 16-50l(e), Gridcom submitted three copies of the Technical Report to Mayor Marc Garofalo on March 31, 2005. The Technical Report included specifics about the sites, addressed the public need for the Facility, the site selection process including the investigation of three City-owned properties and the environmental effects of the proposed Facility. As discussed in Section III.C and in the pre-filed testimony of David Vivian included in Attachment 1, Gridcom had been in negotiations with the City for over a year for the development of the proposed Facility on the Hotchkiss Hose Fire Company property to remedy the gap in service in vicinity of Route 34 and Route 8. On several occasions in April and May, Gridcom representatives attempted to speak with the Mayor concerning the proposed Facility. Gridcom did not receive any response from the Mayor's office. Representatives of Gridcom contacted the Planning and Zoning Department and the Building Department regarding the proposed Facility, however, no specific comments regarding the proposed Facility were received from either department. On June 6, 2005, Gridcom submitted another letter to the Mayor confirming that the City did not have any comments or suggestions regarding Gridcom's proposed Facility. A copy of this letter is included in Attachment 13.

Four (4) copies of the Technical Report are submitted in bulk with this Application.

VII. CONCLUSION

Based on the information and documentation contained in this Application, Gridcom submits that the construction of a telecommunications facility at either Site A or Site B is needed to provide wireless service in the City of Derby and will not have any substantial adverse environmental effects. A public need exists for high quality mobile and portable wireless service along Route 34 and Route 8 in this portion of Derby.

Specifically, Gridcom submits that it has demonstrated (1) the public need for the Facility to permit wireless telecommunications carriers to provide their services; (2) that the proposed Facility will not result in any adverse environmental impacts; (3) that the shared use of the Facility is feasible; and (4) the proposed Facility will not substantially affect the scenic, historic, recreational or ecological quality of the Site. The proposed Facility, furthermore, will help provide a level of service in and around Derby that is commensurate with current public demand for telecommunications service, as well as to meet such demand for the foreseeable future.

Respectfully submitted,

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