STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF OPTASITE TOWERS LLC AND OMNIPOINT COMMUNICATIONS, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A TELECOMMUNICATIONS FACILITY AT 1 DEERFIELD LANE, ANSONIA, CONNECTICUT

DOCKET NO. 340

Date: AUGUST 30, 2007

INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL FROM CO-APPLICANTS OPTASITE TOWERS LLC AND OMNIPOINT COMMUNICATIONS, INC.

Co-applicants Optasite Towers LLC ("Optasite") and Omnipoint Communications, Inc. ("T-Mobile") submit the following responses to the interrogatories from the Connecticut Siting Council in connection with the above captioned Docket.

- Q1. On Exhibit G of Optasite Towers LLC's and Ominipoint Communications, Inc's (Applicant) Application for a Certificate of Environmental Compatibility and Public Need (Application), coverage plots are provided to show the existing coverage and the coverage with the proposed antennas centered at 177'. Provide two coverage plots (using the same scale provided) assuming the antennas are located at 167' and 157', respectively.
- A1. See propagation maps attached hereto as Exhibit 1.
- Q2. What is T-Mobile's existing signal strength in the area that would be covered by this facility?
- A3. T-Mobile's existing coverage level in the area of the proposed facility varies from -85 dBm to -110 dBm.
- Q3. What is the minimum signal level T-Mobile would consider acceptable for service in the vicinity of the proposed site?
- A3. T-Mobile's minimum design signal level for acceptable service is -84 dBm.

- Q4. What is the minimum signal level that T-Mobile requires in order to provide adequate in-vehicle coverage?
- A4. The minimum design signal strength to provide adequate in vehicle coverage is 84 dBm.
- Q5. Identify the distance, direction, structure heights, antenna heights, and addresses of adjacent facilities with which the proposed facility would hand off traffic.
- A5. All T-Mobile existing facilities that the proposed facility could potentially hand off traffic to (including on-street coverage) include:
 - CT11210B: 1.51 miles south west of the proposed facility Christ Episcopal Church, 56 South Cliff Street, Ansonia, CT Building height: 75 feet, Antenna centerline: 68 feet AGL
 - CT11332C: 2.69 miles north of the proposed facility Self-Support Tower, 2 Progress Avenue, Seymour CT Tower Height: 280 feet AGL, Antenna Centerline: 250 feet AGL
 - CT11810A: 2.22 miles west of the proposed facility Self Support Tower, 401 Wakelee Avenue, Ansonia, CT Tower Height: 196 feet AGL, Antenna Centerline: 148 feet AGL
 - CT11618E: 2.72 miles southwest of the proposed facility Monopole, 71 Pleasant View drive, Derby, CT Tower height: 120 feet AGL, Antenna Centerline: 117 feet AGL
 - 5) <u>CT11085C</u>: 3.18 miles southeast of the proposed facility Power pole attachment (extension), 1114 Johnson Road, Woodbridge, CT Pole height: 81 feet AGL, Antenna centerline: 95 feet AGL
 - CT11084B: 3.27 miles southeast of the proposed facility Monopole, 800 Ogg Meadow Road, Orange, CT Tower Height: 160 feet AGL, Antenna centerline: 125 feet AGL
 - CT11461A: 3.81 miles east of the proposed facility
 Billboard, 86 Amity Road, New Haven, CT
 Billboard Height: 57 feet AGL, Antenna Centerline: 52 feet AGL

- Q6. Identify the area (in square miles) that would be covered by the proposed facility.
- A6. The total area of the proposed facility with antennas at 177 feet AGL is 8.156 square miles.
- Q7. Approximately how long (in miles) is the existing coverage gap on Route 313? Approximately how far (in miles) would the proposed facility cover on Route 313?
- A7. T-Mobile's existing coverage gap along Route 313 is approximately 4.53 miles. The proposed facility at 177' AGL would cover approximately 3.11 miles
- Q8. Approximately how long (in miles) is the existing coverage gap on Peck Hill Road? Approximately how far (in miles) would the proposed facility cover on Peck Hill Road?
- A8. T-Mobile's existing coverage gap along Peck Hill Road is approximately 2.1 miles. The proposed facility at 177' AGL would cover approximately 1.3 miles Along Peck Road. Of note, south of Route 313 Peck Hill Road becomes Northrop Road, extending down to State Hwy 243 (Pulaski Hwy). Along this segment the following distances apply: T-Mobile's existing coverage gap along Northrop Rd road is approximately 1.58 miles. The proposed facility at 177' AGL would cover approximately 1.2 miles along Northrop Road.
- Q9. Calculate the amounts of cut and fill that would be required to develop this facility.
- A9. Minimal grading is required to develop the proposed compound and access road locations since the existing flat grade will be maintained. In order to install the gravel for the compound and access road, 220 cubic yards of topsoil needs to be cut. No fill is required to develop the road or compound.
- Q10. If required by the Council, could the tower be designed with a yield point to ensure that the tower setback radius, i.e. tower fall zone, would remain within the boundaries of the Macabee Properties LLC property?
- A10. Yes, it is possible to design the tower with a yield point to ensure that the tower setback radius remains within the boundaries of the Macabee Properties LLC property.
- Q11. Would any blasting be required at the proposed site?
- A11. The geotechnical report has not been completed at this time so we are not aware of the sub-grade conditions in the area of the proposed facility. However, some stone and ledge was visible near the proposed facility, so it is possible ledge may

be encountered during excavation. Chipping is preferred to blasting if ledge is encountered.

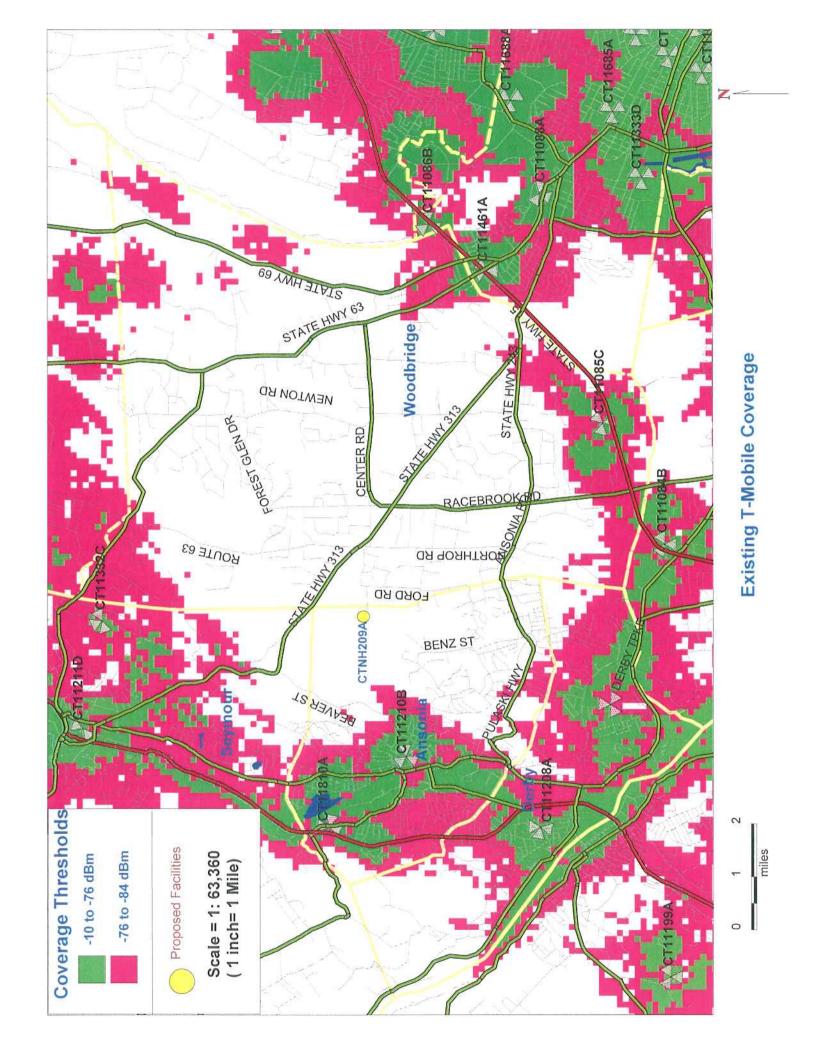
- Q12. Is the site located within a flood zone (e.g. 100 yr, 500 yr.)?
- A12. The site is located in flood zone X, which is outside the 500 year flood plain. This is based on flood insurance rate map for the city of Ansonia, community panel number 090071 0001 C, dated May 18, 1992.
- Q13. Has the Applicant considered using a fuel cell for backup power at this site? Does the Applicant have fuel cells at other Connecticut sites?
- A13. T-Mobile is currently investigating the use of fuel cells as an alternate back up power source. However, at this time, T-Mobile's corporate headquarters have not approved any fuel cells as acceptable and reliable power sources. T-Mobile will be willing to utilize fuel cells once they are fully tested and approved. At present, T-Mobile does not have any fuel cells at any other Connecticut sites

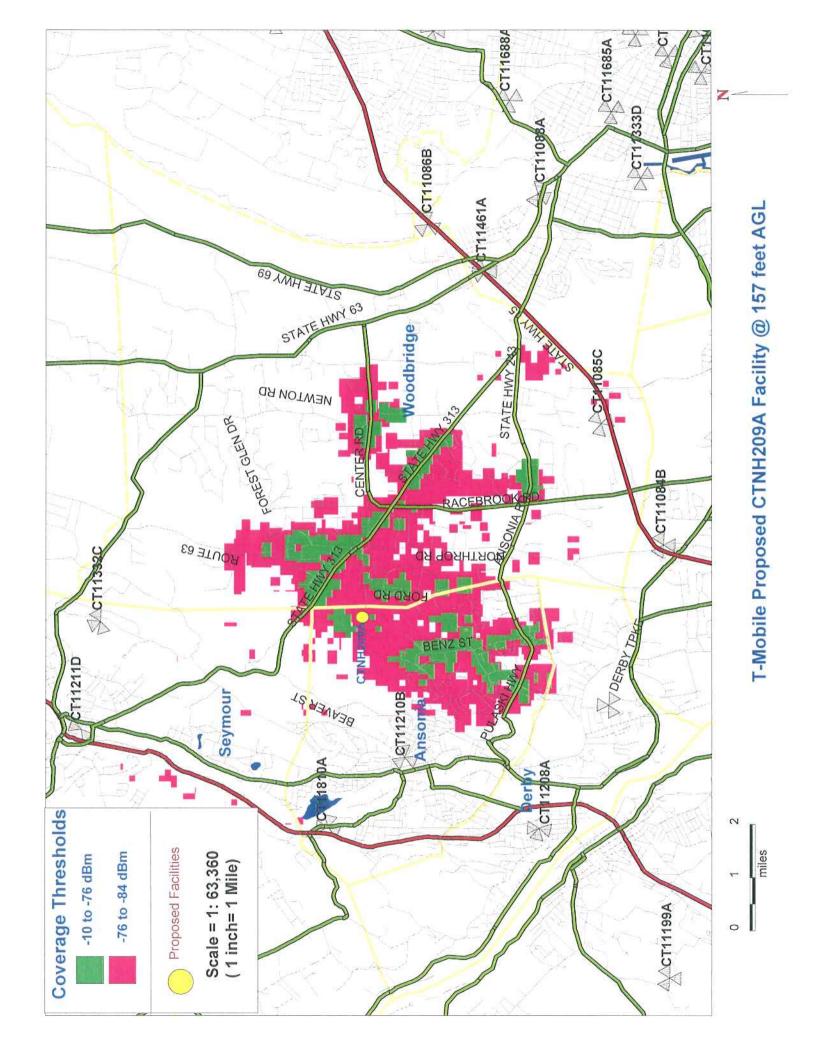
Respectfully Submitted,

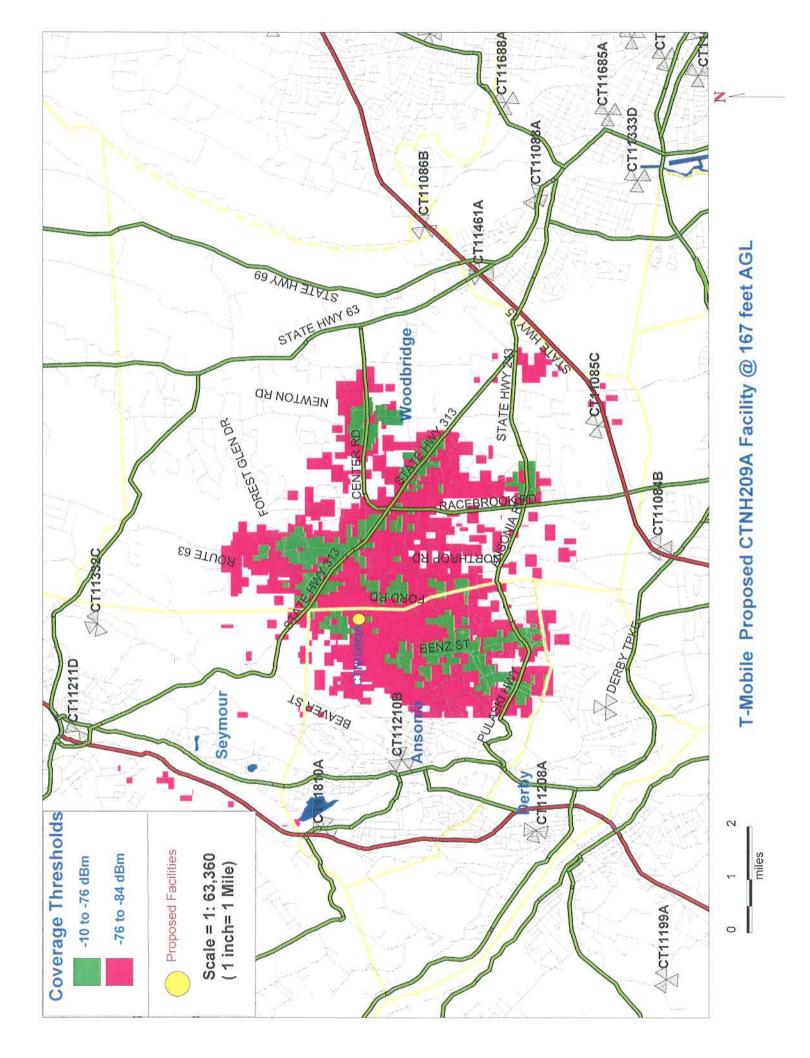
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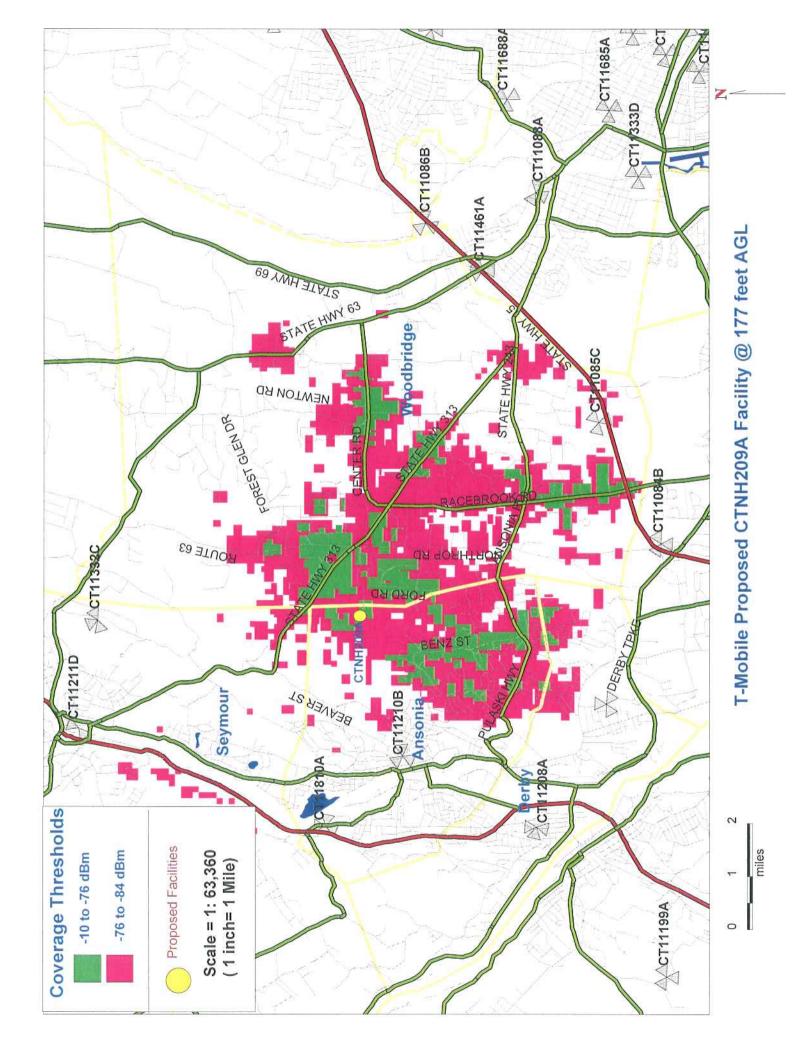
Attorneys for the Applicants Julie D. Kohler, Esq. jkohler@cohenandwolf.com Carrie L. Larson, Esq. clarson@cohenandwolf.com Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604 Tel. (203) 368-0211 Fax (203) 394-9901

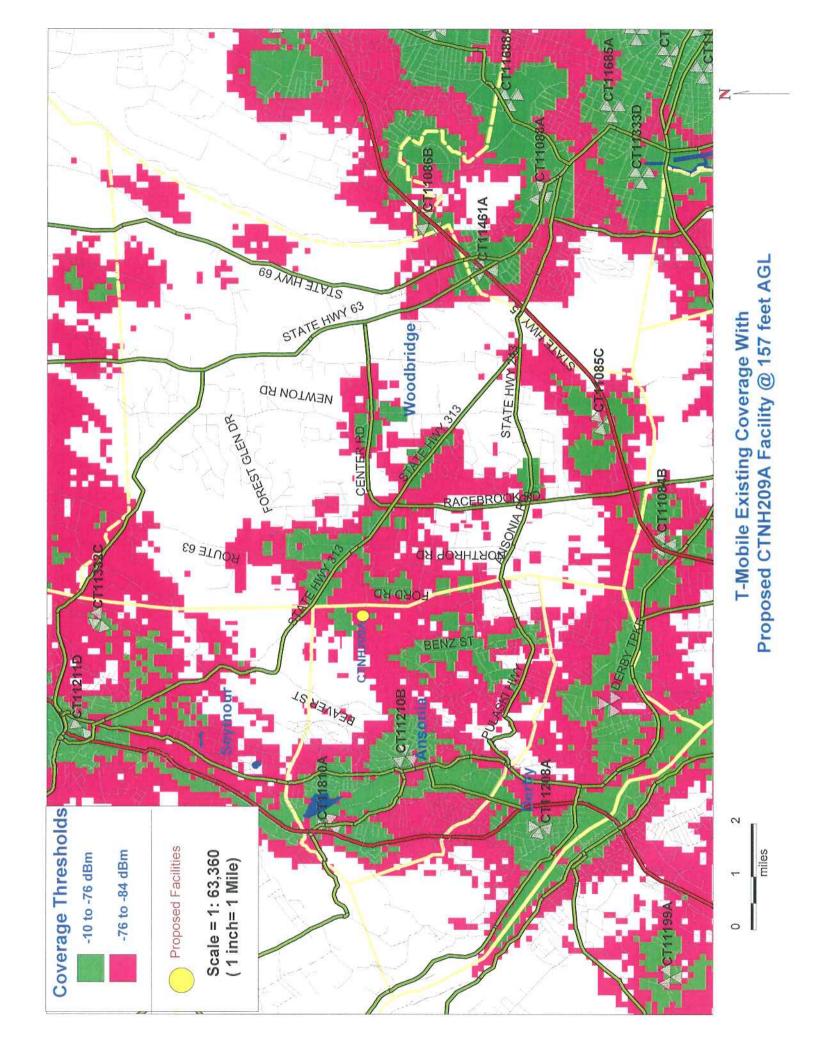
EXHIBIT 1

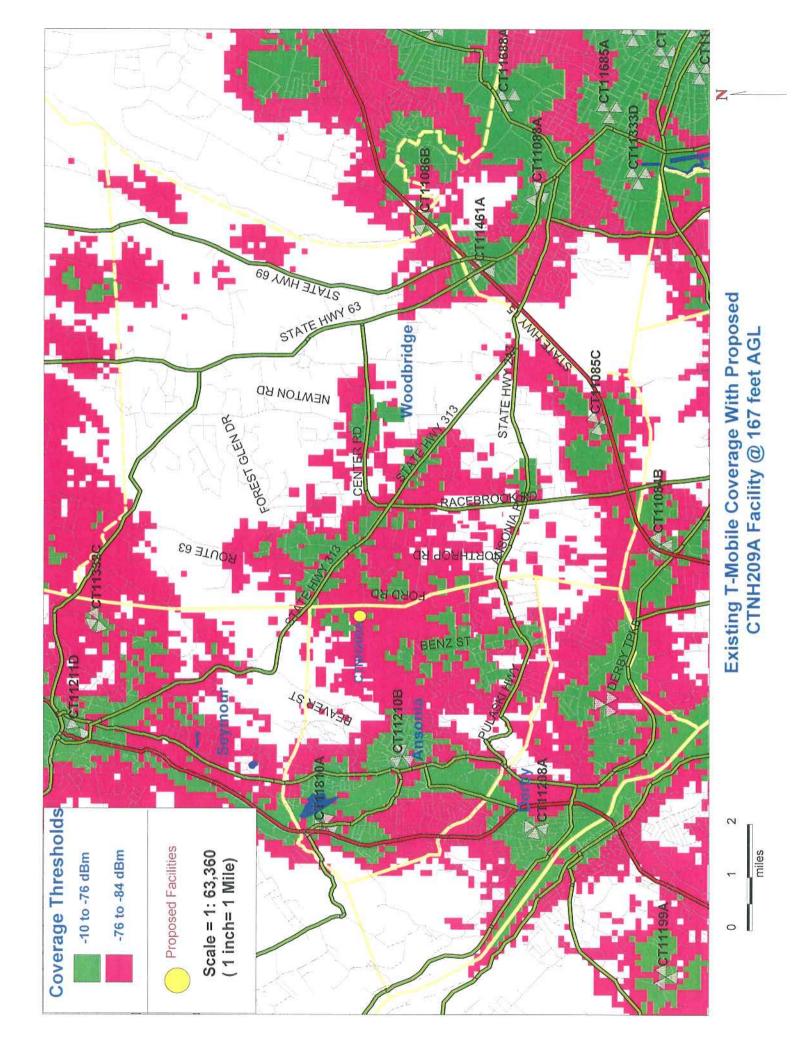


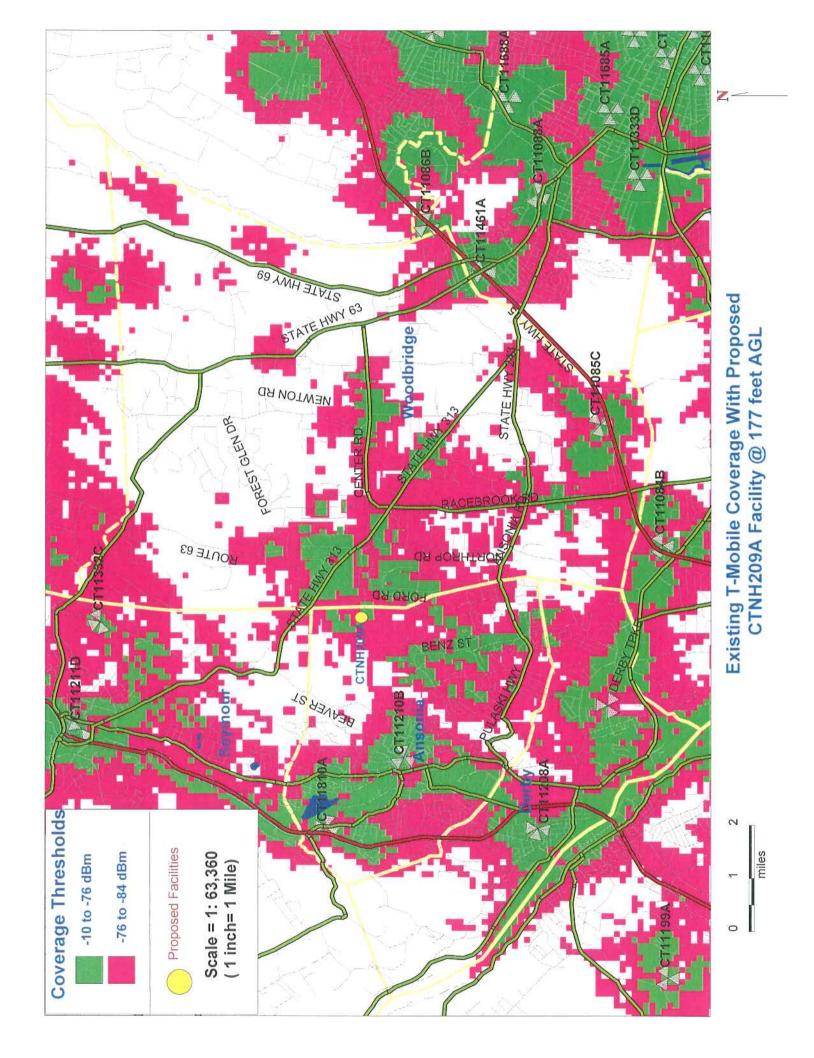












Certification

This is to certify that a copy of the foregoing has been mailed, this date to all parties and intervenors of record.

Keith A. Russo Osborne Lane Associates, LLC. c/o The Fieber Group 47 Elm Street New Canaan, CT 06840

Cerle L. Larson