

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

APPLICATION OF MCF
COMMUNICATIONS bg, INC. AND
OMNIPOINT COMMUNICATIONS, INC.
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE AND
OPERATION OF A TELECOMMUNICATIONS
FACILITY AT RICH ROAD IN THE
TOWN OF THOMPSON, CONNECTICUT

DOCKET NO. 344

DATE: September 21, 2007

**INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL FROM
CO-APPLICANTS MCF COMMUNICATIONS BG, INC.
AND OMNIPOINT COMMUNICATIONS, INC.**

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

Q1. How many of the return receipts for the notices sent to abutting landowners did MCF receive? If some return receipts were not received, did MCF make other attempts to notify the landowners? If yes, explain.

A1. MCF has received return receipts for every abutting landowner.

Q2. When did MCF begin looking for a site in this area of Thompson?

A2. MCF began its search for a site in this area in 2003. In May, 2005, MCF was assigned this search ring from T-Mobile.

Q3. What prompted MCF's search in this area?

A3. MCF's site search was prompted by the need for a site in this area expressed by T-Mobile.

Q4. Has MCF received any indications that the Town of Thompson might be interested in using this tower for its antennas?

A4. The Town of Thompson has indicated that, while it does not have an immediate need to locate on the proposed tower, it does have a need and would like to

reserve space on the tower. MCF will provide space on the tower to the Town free of charge.

Q5. To what engineering standard would the proposed tower be built?

A5. ANSI/TIA-222-G, Structural Standards for Steel Antenna Towers and Antenna Supporting Structures (EIA) in accordance with the International Building Code.

Q6. What is the distance and direction to the nearest residential property? Who is the owner?

A6. The closest residence is 243' to the northeast. This residence is owned by Wladyslawa & Eugeniosz Wojtarowicz.

Q7. How much cut and fill would be required to develop the proposed site?

A7. The existing grade is flat and requires minimal grading for the proposed facility and access road. Cutting is required to remove the topsoil for installation of the gravel road and gravel compound surface. Approximately 123 cubic yards of cutting is required. Fill is not required.

Q8. Would any blasting be required to develop this site?

A8. Exposed ledge was visible on the property so it is possible ledge may be encountered during excavation. The presence of ledge will be confirmed upon completion of a geotechnical investigation. If ledge is encountered, chipping is preferred to blasting.

Q9. Exhibit H of the Application states that "MCF investigated numerous other parcels that were not leasable . . ." Does this statement indicate that MCF concluded these parcels were not leasable after contacting their respective owners? Did MCF know beforehand that the parcels were not likely to be leased?

A9. MCF uses the term "not leasable" to indicate that MCF did make contact with these various property owners, had discussions with those property owners and those property owners ultimately rejected the possibility of leasing a portion of their property for the development of a telecommunications facility.

Q10. Provide a map showing the locations of the parcels cited in Exhibit H, including those owned by Ms. McHugh.

A10. See map attached hereto as Exhibit 1. MCF would like to clarify Exhibit H from the Application. Two of the parcels identified in the site search, assessors lots 97/29/2 and 97/28/3 are incorrectly listed as being owned by Ms. McHugh. In fact, both of those parcels are owned by Woodward Adams and Jean Adams.

Ms. McHugh does own two parcels in the area including 97/29/3 and 97/29/3A. MCF has a lease with Ms. McHugh on the parcel identified as 97/29/3 and that is the parcel that MCF originally filed a technical report on, prior to entering into a lease with the Town for the facility proposed in this Application.

Q11. What are the licensed frequencies T-Mobile would use at this facility?

A11. T-Mobile's Licensed Frequencies for this area are:

TX: 1935.000 MHz to 1945.000 MHz
RX: 1855.000 MHz to 1865.000 MHz

and

TX: 1983.000 MHz to 1984.000 MHz
RX: 1903.000 MHz to 1904.000 MHz

Q12. Would T-Mobile's ground equipment be housed in a shelter, as stated in the application, or would it consist of cabinets on a concrete pad, as has been the practice in the past?

A12. T-Mobile's ground equipment would consist of cabinets on a concrete pad.

Q13. What would T-Mobile use for back up power?

A13. T-Mobile will utilize battery back-up power.

Q14. Does T-Mobile currently use fuel cells as backup generators at any of its Connecticut tower sites? If yes, how many? Does T-Mobile plan to use a fuel cell at the proposed site or have any plans to install them at any existing or future sites in Connecticut?

A14. T-Mobile does not currently have any sites in Connecticut using fuel cells as a back-up power source. T-Mobile does not have plans to install any fuel cells at any existing or future sites in Connecticut at the present time.

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.

Q15. What is the design signal strength for in-vehicle coverage for T-Mobile's system? For in-building coverage?

A15. T-Mobile's minimum design receive signal level threshold is -84 dBm. This level is the lower limit to where T-Mobile can provide in vehicle coverage to its network

users. A more robust signal level is required to provide reliable coverage to subscribers inside building structures. The lower limit for in building design is -76 dBm for average residential and business dwelling environments.

Q16. What is the existing signal strength in the area T-Mobile would serve from this proposed site?

A16. The existing signal strength in the area T-Mobile would serve from this proposed site ranges from -84 dBm down to -105 dBm.

Q17. What would be the total area T-Mobile could cover from the proposed site?

A17. The total area T-Mobile could cover from the proposed site is 6.984 square miles.

Q18. What is the length of T-Mobile's coverage gap on 1-395?

A18. The length of T-Mobile's coverage gap on 1-395 is 1.72 miles.

Q19. What is the distance T-Mobile could cover on 1-395 from this location?

A19. The distance T-Mobile could cover on 1-395 from this location is 2.2 miles.

Q20. Identify, by address and identifying number, sites with which T-Mobile's antennas at the proposed site would hand off signals. Provide the heights of the structures at these locations and the heights at which T-Mobile's antennas are located at these sites.

A20. 1) WL780: MCF Webster,
310 Thompson Road, Webster, MA
190 foot Monopole
T-Mobile Antenna Height: 170 feet AGL

2) CT11160B: Johnson Cyclone
720 Thompson Road, Thompson, CT
140 foot Monopole
T-Mobile Antenna Height: 140 feet AGL

Q21. What are the distances to these hand-off sites?

A21. The distances to these handoff sites are:

WL780: 1.33 miles

CT11160B: 2.34miles

Q22. What is the minimum height at which T-Mobile could achieve its coverage objectives from this site?

A22. The minimum height at which T-Mobile could achieve its coverage objectives from this site is 147 feet AGL.

Q23. Provide a propagation map, at the same scale as the maps provided in the application, showing what T-Mobile's coverage would be at 10 feet below its antennas' proposed height of 147 feet.

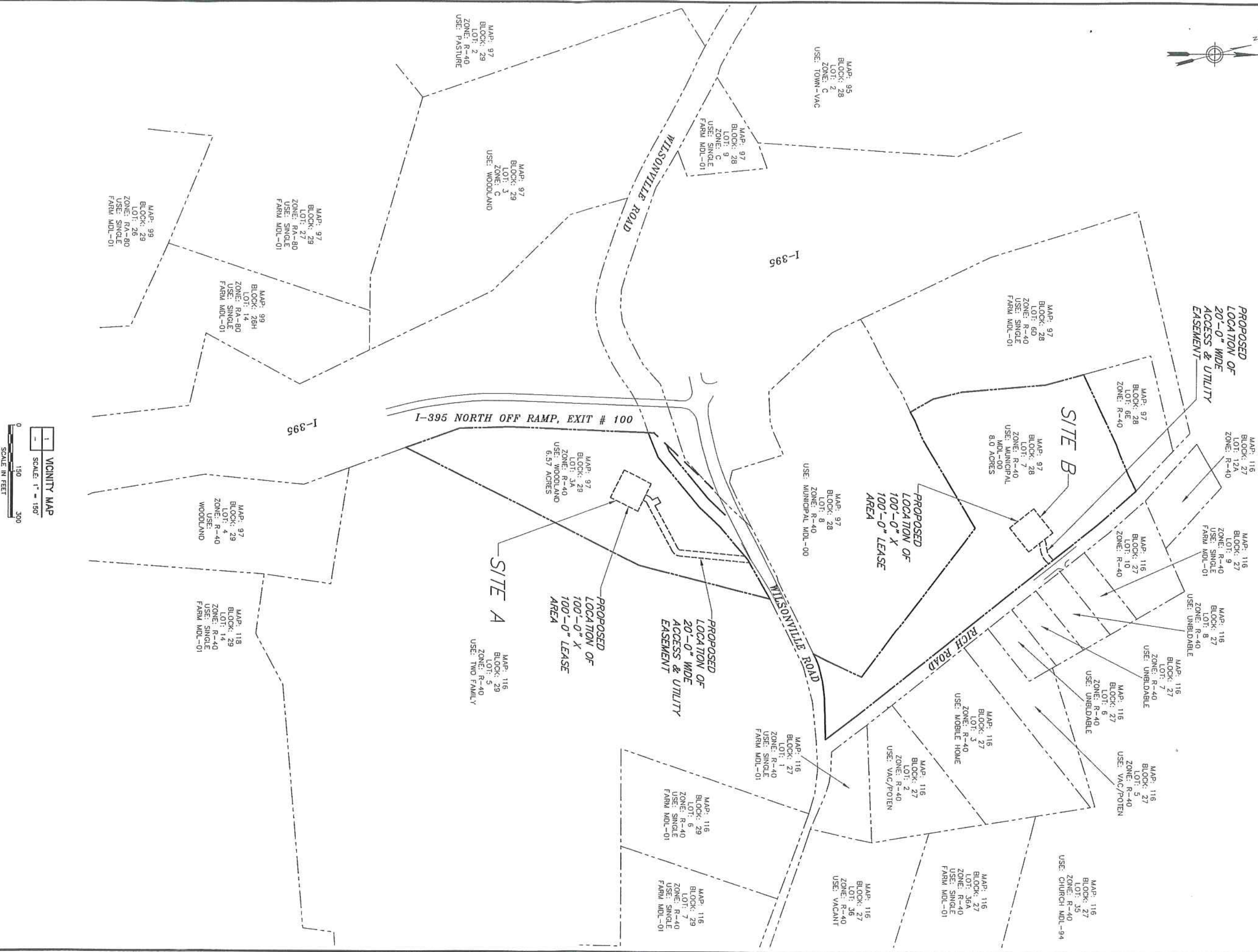
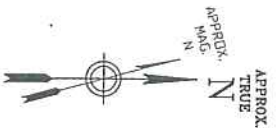
A23. See propagation maps attached hereto as Exhibit 2.

Respectfully Submitted,

By:  _____

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EXHIBIT 1



Drawing Copyright © 2007 Clough Harbour & Associates LLP



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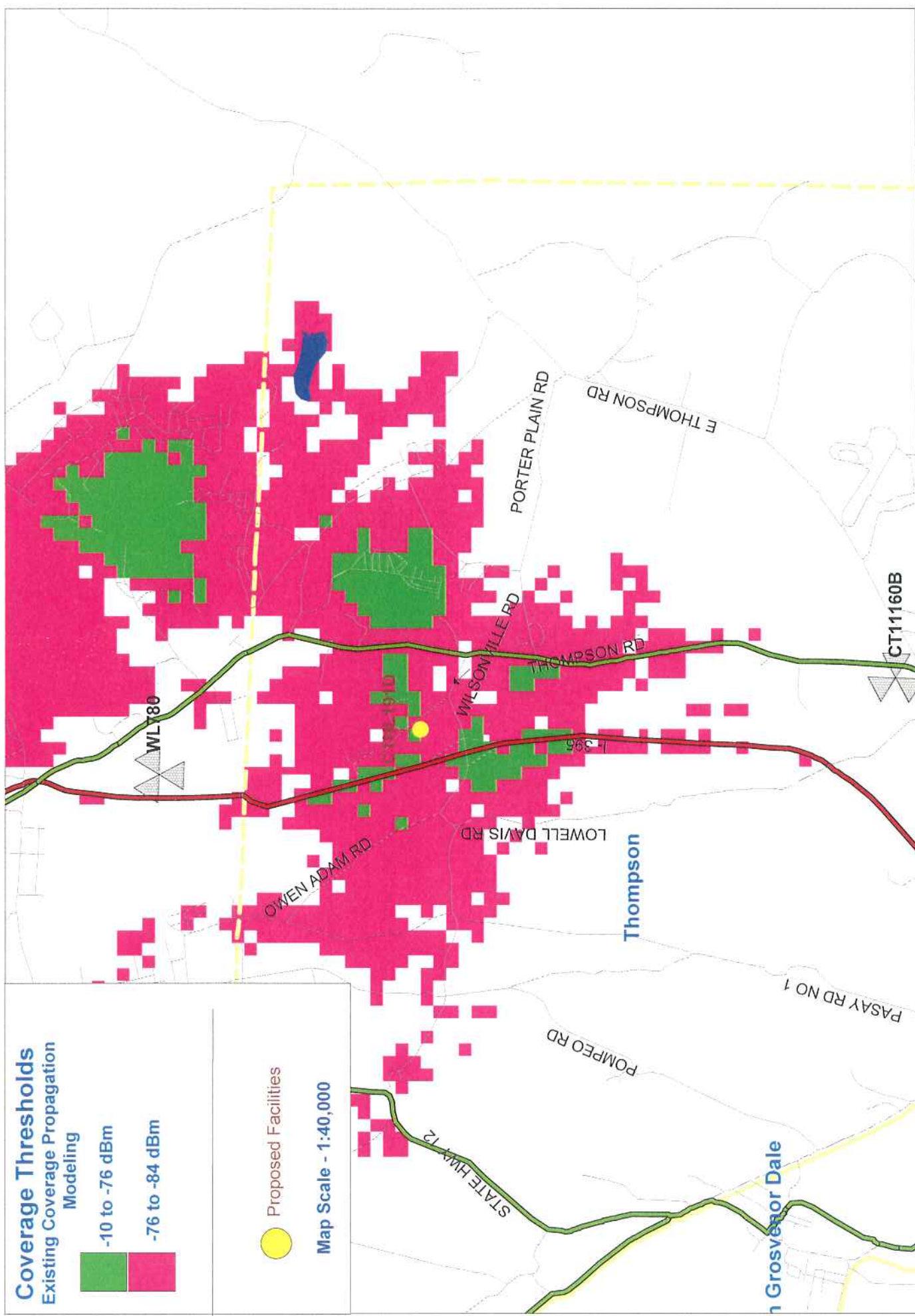
SITE NAME:
THOMPSON 100

SITE ADDRESS:
WILSONVILLE ROAD
THOMPSON, CT
06277

WINDHAM COUNTY

PROJECT NO. 14957-1006
07/17/07
VICINITY MAP FIGURE 01

EXHIBIT 2



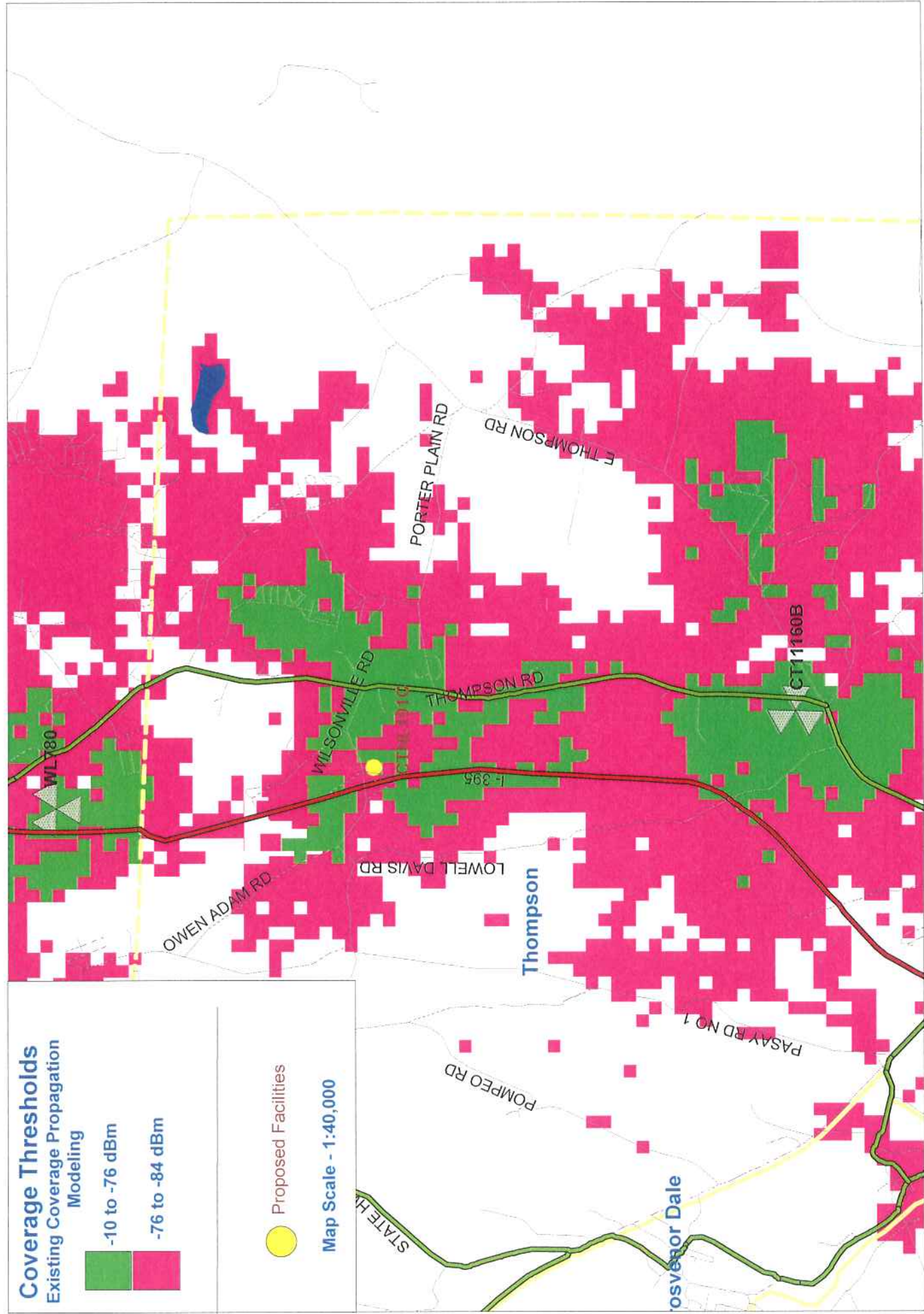
Proposed CTNL191D @ 137'

Coverage Thresholds
Existing Coverage Propagation Modeling



Proposed Facilities

Map Scale - 1:40,000



Existing T-Mobile On Air Coverage With CTNL191C @ 137°

Certification

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

Kenneth C. Baldwin
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597

A handwritten signature in cursive script, appearing to read "Carrie L. Larson", is positioned above a horizontal line.

Carrie L. Larson