ORIGINAL

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF CELLCO PARTNERSHIP, d/b/a VERIZON WIRELESS FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT THE GAYLORDSVILLE VOLUNTEER FIRE DEPARTMENT, NEW MILFORD, CONNECTICUT	:	**DOCKET NO. 347**
	:	**NOVEMBER 28, 2007**

PRE-HEARING INTERROGATORIES DIRECTED TO THE APPLICANT

The Intervenors, Theodore and Ellen Berson, hereby request that the Applicant respond to the follow Interrogatories:

1. What is the extent and quality of existing coverage, including coverage at levels below –85dBm, on Route 7 for the 2.4 miles that the Applicant states will be covered by the new facility?

2. State whether there is uninterrupted in-vehicle coverage presently for any portion of the 2.4 mile stretch of Route 7 and, if so, identify the specific locations within that 2.4 mile stretch where uninterrupted coverage occurs.

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3. With respect to the Gaylordsville United Methodist Church site, please identify any cellular carriers who are located at, or have approval to locate at, the Methodist Church site.

4. For any carrier located at the Methodist Church site, identify the antenna types on site, the orientation of the antennas, the antenna elevation, the exact coordinates of the site and the effective radiated power from the site facility.

5. Please provide the propagation maps which support your conclusion that the United Methodist Church site does not meet Cellco's coverage objectives in this area. Include all relevant data used to produce the maps, such as antenna types, heights, orientation and effective radiated power.

6. What height at the United Methodist Church location would Cellco need to achieve coverage approximating that to be achieved at the Applicant's preferred location?

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7. With respect to the farm silo located off Long Mountain Road discussed as an alternative site, please state the exact coordinates of this site, including how many feet above sea level the ground level of the silo is.

8. Please provide all propagation maps which support the Applicant's conclusion that this silo site would not provide adequate coverage. Include all relevant data used to produce the maps such as antenna types, heights, orientation and effective radiated power.

9. At this silo site, please state the height above ground level that would be necessary to place antennas in order to achieve approximately the same coverage as from the Applicant's preferred site.

10. With respect to co-locating on CL&P transmission line structures, explain in detail why co-location could not be achieved on a nearby transmission line 398 or line 568 transmission pole or structure such as was done pursuant to Petition No. 517 and Petition No. 675 before the Connecticut Siting Council. In your response, please give details concerning the ground level height above sea level of each CL&P pole within those transmission line rights of

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way within a ½ mile of the intersection of Route 7 and Route 55 and state the corresponding actual height of each such existing CL&P transmission structure.

11. The New Milford Zoning Commission proposed, as an alternative site, the 50 foot tall CL&P structure at elevation 320 feet located at coordinates 41° 39' 03.39"N, 73 °29'05.91"W with a ground level which is 80 feet higher than the Applicant's preferred location and which alternative site is located just approximately one quarter of a mile north of the Applicant's preferred location. Please describe in detail the coverage area that the Applicant's facilities would realize at this location. Provide propagation plots utilizing assumed antenna height necessary to provide coverage similar to that achieved at the Applicant's preferred site. Include all relevant data used to produce the maps, such as antenna types, heights, orientation and effective radiated power.

12. For the Applicant's preferred location at the Fire Department site, please explain in detail why the tower needs to be 120 feet tall (above ground level). How much space was allocated for additional wireless carriers and how does this space affect the overall height of the structure? Identify the specific carriers the space was reserved for. Please also explain or justify the reason for an additional 20 foot whip antenna on the top bringing the total height to 140 feet

above ground level and provide propagation maps for the coverage achieved with and without this antenna.

13. Why were drive tests not completed for the proposed coverage area? How was the Applicant's propagation model calibrated? Explain the benefits of drive tests.

14. What were the coverage criteria used to determine that there was a 4.1 mile coverage gap along Route 7? Please provide records of dropped calls/failed calls from adjacent sectors.

15. Do you claim that there is no coverage at –85dBm?

16. How large would the gap be at –90dBm?

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17. With reference to the Applicant's statements on page 18 of its application pertaining to "stealth" installations, please provide photo realistic renderings of how these facilities would appear from the residential homes surrounding the proposed tower site on three sides.

18. On page 20 in the application, the Applicant states that the maximum power density would be 3.84% of the "standard." Please identify which standard the Applicant is referring to.

19. With respect to the preparation of the propagation maps previously prepared by the Applicant, please state the technical parameters used including antenna type, antenna orientation, antenna elevation, antenna down tilt (if any), effective radiated power and the exact site coordinates.

20. Please state the specific formula, input parameters and any assumptions you used for the calculation of maximum power densities. Please show the actual calculations.

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21. If a calculation of maximum power density uses the base of the tower as the closest accessible point to the antennas, please explain why the base is appropriate in a scenario where there is no down tilt of the antennas.

22. Does the Applicant include potential contributions from the Fire Department and other potential carriers in calculating its conclusions concerning power density? If not, please provide this information, including the specific formula(s), assumptions and input parameters used. Please show the actual calculations.

23. Please provide the non-ionizing radio frequency radiation reports (RF reports) including all formulas, assumptions and calculations used to support the applicant's conclusion that its calculations were in accordance with the FCC OET Bulletin 65.

24. Is any RFR monitoring program proposed?

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25. On page 35 of the application, the Applicant refers to the use of EIA/TIA-222F Structural Standards in the design of the facility. Will the Applicant comply with the newer standard, 222G?

26. Is coverage for Verizon in all or some of the "gap" area which the Applicant seeks to provide coverage for pursuant to this application, currently being provided by roaming agreements with other wireless carriers?

27. If the answer to the last interrogatory is yes, then please identify the "roaming agreement" wireless carriers by name and identify the specific cellular tower locations of those carriers in the vicinity of the Applicant's preferred site which provide the roaming gap coverage.

28. Please state in detail why the applicant cannot co-locate on the roaming carrier facilities.

29. Please identify all locations where Cellco/Verizon have co-located on CL&P structures or within CL&P rights of way in the State of Connecticut.

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30. Please describe how there will not be any RF interference with Town of New Milford Emergency Service operations by locating the proposed service facilities at the Gaylordsville Volunteer Fire Department site.

31. Please provide all coverage or propagation maps prepared for or possessed by the Applicant for all alternative locations discussed in tab 9 attached to the Application. Please include all relevant data used to produce the maps, such as antenna types, heights, orientation and effective radiated power.

32. What type of trees in the area is the Applicant concerned will grow taller, necessitating a higher tower height, where are these "trees of concern" located, what is the present height of these trees and what is the ground level of the trees, and what is the present height of these trees in relation to the proposed tower height?

33. Please submit an updated abutters map which includes all existing, surrounding residential homes such as Berson and Flynn.

34. Please create a document similar to that attached hereto as Exhibit A which accurately (as opposed to our estimated hand drawn boundary) depicts on one plot the area of new service provided by the Applicant's proposed facility.

THE INTERVENORS,
THEODORE BERSON AND
ELLEN BERSON

By _____
Thomas W. Beecher
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CERTIFICATION

THIS IS TO CERTIFY that a copy of the foregoing has been mailed on the date hereof, postage prepaid, to all parties of record, to wit:

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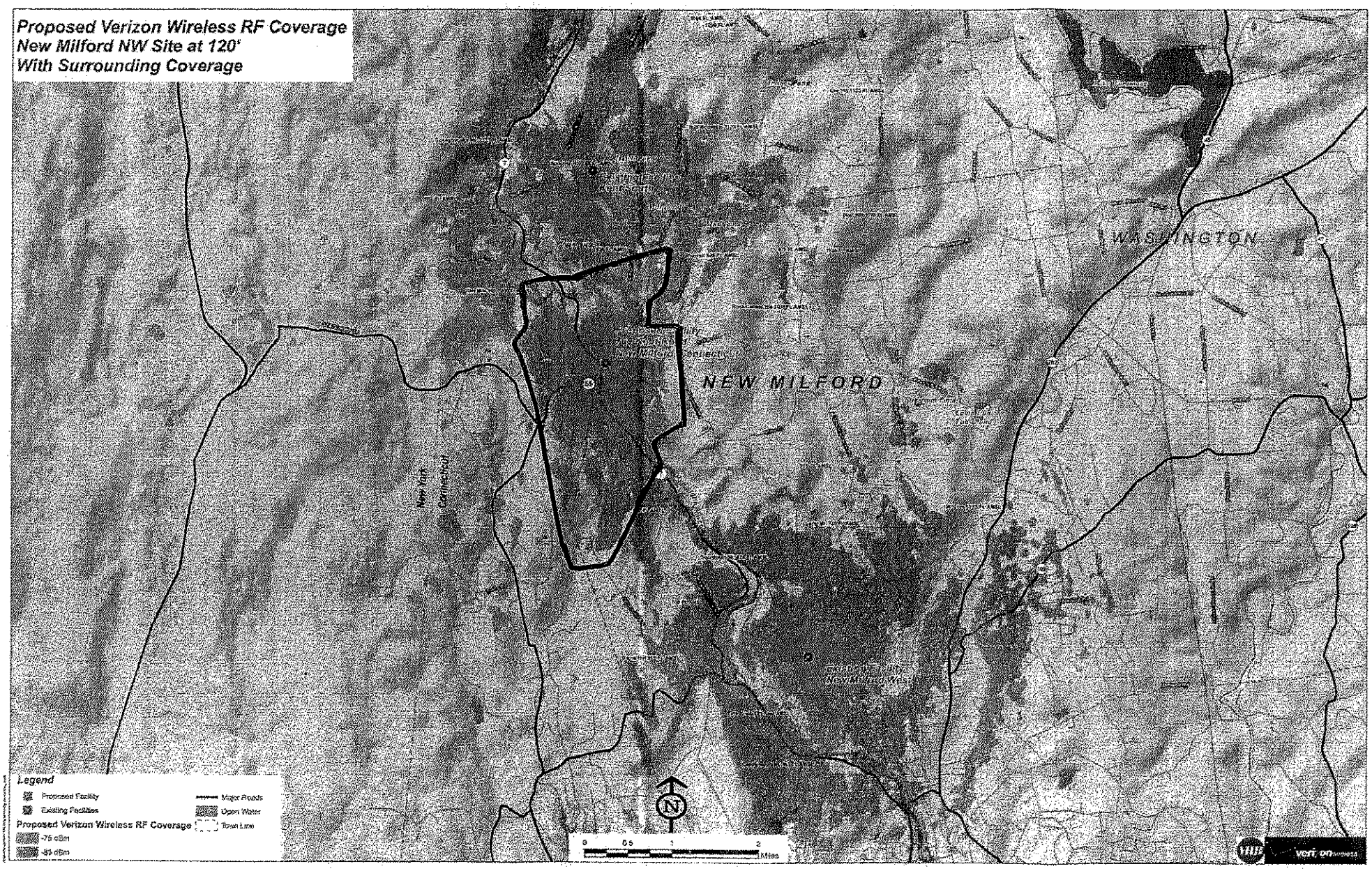
Commissioner of the Superior Court


Proposed Verizon Wireless RF Coverage
New Milford NW Site at 120'
With Surrounding Coverage
NEW MILFORD
WASHINGTON
New York
Connecticut
Legend
Proposed Facility
Existing Facilities
Proposed Verizon Wireless RF Coverage
-75 dBm
-85 dBm
Major Roads
Open Water
Town Line
N
0
0.5
1
2
Miles