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 ONE OF TWO SITES IN THE TOWN OF KENT, CONNECTICUT	DOCKET NO. 488 July 16, 2020

RESPONSES TO CSC PRE-HEARING INTERROGATORIES SET TWO

Q41. Would fuels be stored on site during construction? If so, provide fuel storage/ spill prevention control details.

A41. No fuels will be stored on site during construction. Construction vehicles are fueled prior to mobilization and any subsequent fueling will take place off-site.

Q42. Would the backup generator have containment measures to protect against fuel leakage? Please describe.

A42. Yes. The emergency back-up generator's fuel tank is double-walled and includes leak detection alarms. The alarms are monitored 24 hours a day/7 days a week. The generator is also equipped with a secondary containment for engine oil and coolant within the generator's weather enclosure. The generator is placed within a containment pit with a capacity larger than the tank capacity. Thus, in the unlikely event of a tank rupture, the containment pit will ensure that no fuel or fluids leak outside of the containment pit area.

Q43. Would the backup generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

A43. Yes. The back-up emergency generator will comply with the "permit by rule" criteria pursuant to R.C.S.A. Section 22a-174-3b.

Q44. Referring to the Applicants' response to PDA Interrogatory 18, it states that neither tower would be visible from the public boat launch on South Spectacle Pond. Please identify the location of photograph 21 that is included in the Application Site B Visibility Assessment?

A44. Photograph 21 was taken via drone over open water approximately 100' south of the public boat launch.

Q45. The Application Viewshed Analysis maps for both proposed sites have a designation for scenic highways in the legend. Does this designation include Town of Kent Scenic Roads? If not please include this information as well as expected visibility from these roads.

A45. The Application Viewshed Analysis Maps only account for State of Connecticut Scenic Highways. Included in Attachment 1 are updated Viewshed Analysis Maps which include the

Town of Kent Scenic Roads. Site A has no expected visibility from any of the Town of Kent Scenic Roads. Site B has expected spot year-round visibility along Geer Mountain Road and a small portion of expected seasonal visibility along the northern extent of Treasure Hill Road. No expected visibility is predicted along the other Town of Kent Scenic Roads for Site B.

Q46. Referring to PDA's response to Council Interrogatory 1a, please respond in detail regarding Isotrope LLC's hypothetical small cell deployment along Route 341 as to its viability and accuracy in modeling AT&T's coverage from such a system.

A46. As set forth in the Application, DAS systems or small cells are not a practical or feasible alternative for addressing the coverage gap in Kent. The RF maps included in Application Attachment 1 and drive test maps provided in Applicants' April 17, 2020 Responses to Siting Council Interrogatories Attachment 10 clearly demonstrate a significant coverage gap in this area of Kent. The significance of the coverage gap is evident by the fact that there are no existing hand-off facilities to the north, east and south and little overlap with AT&T's site to the west. In addition to providing reliable wireless services to AT&T's customers, the proposed Facility is being built as part of the AT&T's FirstNet public safety network, where wide area coverage is of paramount importance. DAS or small cells cannot technologically provide reliable wireless service to cover this area of need. Small cells and DAS are best suited for specifically defined areas where capacity is necessary, such as more urban environments, shopping malls, stadiums and other densely populated areas.

AT&T does use small cells in Connecticut to provide capacity relief in targeted areas. The Council is referred to PURA Docket No. 18-06-13, which includes over 200 small cells approved and either constructed or planned for deployment in urban/downtown areas and more densely populated areas of the state. This area of Kent is rural and simply does not have the same usage patterns and density like Bridgeport, New Britain, Waterbury, Danbury, New London and Greenwich. This area of Kent is typical of the rural coverage gaps many communities across the United States are seeking to address and which are in many cases subsidized for deployment by the FCC and an area of Connecticut that has never had reliable wireless services dating back to a 1G environment. Portions of the coverage area in Kent have in fact been included in FCC initial mapping for future and potential subsidies to facilitate deployment by the private sector of rural wireless services in this part of Connecticut. https://www.fcc.gov/reports-research/maps/5g-fund-option-a-eligibility-analysis/.

Isotrope's DAS analysis is simply as its stated by PDA's counsel – a hypothetical with no real world information provided to even consider its viability by the Siting Council, let alone evaluation as an actual alternative to the tower sites proposed in the Docket. We noted several deficiencies even in what was supplied including that:

- *The assumed 50' height of each small cell would require all new towers on the other side of the road from existing distribution poles as the poles in this area carry primary power and Eversource does not permit pole-top antenna placements on existing or replacement poles in such circumstances; and*
- *The coverage maps include no data on output power, clutter, assumed antenna type or data that it has been verified with real world base line drive data for use in rural environments like Kent.*

Additionally, there is no report provided by Isotrope to accompany the plots which add nothing of substance to realistically evaluate the hypothetical apparently presented by PDA or the assertions by PDA in their interrogatory responses on tower heights. Ultimately, it is PDA's obligation to provide more technical information from Isotrope if they are asking the Council to consider their arguments by counsel for lower tower heights or small cell alternatives substantively in this proceeding. In the absence of that, we note cross-examination of Mr. Maxson would be of limited utility, and AT&T objects to the submission of the coverage plots by Isotrope at this time as lacking a proper foundation and notes there is very little that the Applicant can do to evaluate the "accuracy" in response to the Siting Council's request.

What we can share with the Council as a reaction to PDA's position that small cells should be considered as an alternative to the towers proposed in this Docket is that:

- *Most all of the distribution poles in this area of Kent carry primary power and any small cell antenna located thereon would be relegated to the communications zone on the pole which is about 17' to 25' AGL on the pole.*
- *Small cell coverage along Route 341 and even secondary streets would be linear given tree cover and essentially only provide services along the roadways with little or no coverage reaching the surrounding areas including homes and other land uses.*
- *This AT&T project is a FirstNet public safety project in conjunction with national and state priorities where wide area coverage is required for first responders which extends to areas beyond just the roads and homes and into even more remote areas of Kent.*
- *New towers involving small cells along Route 341 at heights of 50' would realistically only achieve line-of-sight coverage on average of an 1/4 mile radius (some more, some less) and would require at least two to three times the number of small cell towers suggested by Isotrope and PDA.*
- *Even if the coverage were adequate, which it is not, CONNDOT has not established any process for new towers, even small cell facilities, in state rights of way such as Route 341.*
- *The proposed Facility includes a backup generator to provide uninterrupted service and it is not practical or feasible to provide long duration backup power at small cells installed on poles in the right of way which are depending on commercial power.*

The above points are clearly demonstrated in the RF maps and statistics included in Attachment 2. The RF maps model coverage from a DAS with proposed antenna heights of 52', assuming top mounted antennas, which as noted above is not a realistic assumption as well at antenna heights of 25', which is a more accurate height given that the majority of utility poles in this area support primary power, which precludes top-mounted antennas. Even at a design threshold of -108cdBm, which is suitable outdoor coverage, DAS does not remedy the existing coverage gap. These RF maps clearly demonstrate that DAS is not a feasible or viable alternative to the sites proposed in this proceeding. Indeed, the statistics included in Attachment 2 show a significant loss in coverage when comparing DAS to the proposed tower sites. With an average of approximately 21,000 AT&T monthly customers served by AT&T's existing Site CT1288 to the west, the data in Attachment 2 illustrate that a DAS covering only portions of Rt. 341 would serve significantly less customers.

AT&T's position that it is not technically viable to provide reliable wireless service and emergency communication service through a DAS or small cell system as an alternative to the tower proposed in this Docket. AT&T's analysis is supported with precedent by the Siting Council in decisions in other proceedings, including those where opposition groups relied on the testimony of Isotrope. (See Petition 1010 Greenwich; 2/22/12 Transcript pg. 69-72; CSC Approval 8/21/14; Docket 427 Branford, Siting Council Decision & Order 12/13/12).

With respect to Isotrope's claim that AT&T's coverage objectives could be met by building 7 new towers "only slightly higher than the tree line", it is important to note that all of these sites would need to be acquired, permitted and developed along with the potential for tower extensions for any and all collocators under State tower sharing policies. In addition to AT&T, there are currently two other nationwide wireless operators and the potential for a third, all of which might request to collocate on these towers in the future. This would require the extension of the poles, in most cases by an additional 30 feet or more above a tower with an "only slightly higher than the tree line" height. The result would be up to seven towers with cumulatively more visibility in Kent above the trees instead of only one tower as proposed in this Docket and contrary to the Siting Council's statutory obligation to minimize the proliferation of towers.

Q47. Referring to the Applicants' response to PDA Interrogatory 10 and Attachment 3, it appears there is little difference in modeled coverage from both sites at a height of 150 feet and a height of 110 feet. Please describe in detail why a tower height of 150 feet rather than 110 feet is necessary for each proposed site.

A47. Please see the tables included in Attachment 3 which quantify the anticipated loss in coverage of a 110' tall tower at Site A and Site B. The first two pages of tables include the coverage statistics for heights of 150' and 110' at each proposed site. The third and fourth pages include tables showing the difference in the coverage statistics for Site A and Site B in both numerical form and percentages.

Q48. Would an antenna height of 110 feet at Site B provide comparable coverage to an antenna height of 150 feet at Site A? Please explain.

A48. No. Please see the tables included in Attachment 3 which demonstrate the significant loss in coverage that would result in a tower at 110' in height at Site B.

Q49. Referring to the Applicants' response to Council Interrogatory 5, if blasting was required, what are the protocols that would be followed to protect adjacent residences, wells and structures from potential damage?

A49. Homeland does not anticipate the need for blasting to construct the proposed Facility. Before construction, a geotechnical survey will be performed to evaluate subsurface conditions. If ledge is encountered, chipping is preferred to blasting. If blasting were required, an appropriate protocol would be followed in accordance with state and municipal regulations.

Q50. Referring to the Applicants' response to Council Interrogatory 6, what tower extension height would be included in the design of the tower/foundation?

A50. Homeland would design the tower and foundation to accommodate a 20' extension.

Q51. Referring to the Applicants' response to Council Interrogatory 10, please submit an aerial image of the proposed site with the correct, surveyed lot lines.

A51. Please see the Aerial Image included in Attachment 4.

Q52. Is a stealth lookout tower at either site a feasible alternative to a monopine/monopole?

A52. Homeland would need to look further into the feasibility of a stealth lookout tower at either site. While it may be technically feasible, it is our opinion that a stealth lookout tower would not be appropriate as an alternative to a monopine/monopole given the proposed height of 154'. A stealth structure such as a lookout tower at this height may have a greater visual impact to the area than the proposed monopole given the additional mass of such a stealth structure. And, a lookout tower design may be more of an attractive nuisance than a monopole or monopine (someone may try to climb up the tower).

Q53. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies the locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

A53. Please see the Remote Field Review photo documentation reports included in Attachments 5 and 6.

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing was sent electronically to the Connecticut Siting Council and to the service list below with one hard copy sent to the Connecticut Siting Council via first class mail in accordance with Connecticut Siting Council directives:

Keith R. Ainsworth, Esq.
Law Offices of Keith R. Ainsworth, Esq.
51 Elm Street, Suite 201
New Haven, CT 06510-2049

Anthony F. DiPentima, Esq.
Michael D. Rybak, Jr., Esq.
Guion, Stevens & Rybak, LLP
93 West Street
P.O. Box 338
Litchfield, CT 06759

Daniel E. Casagrande, Esq.
Cramer & Anderson, LLP
30 Main Street, Suite 204
Danbury, CT 06810
(203) 744-1234
dcasagrande@crameranderson.com

Daniel S. Rosemark, Esq.
Rosemark Law, LLC
100 Mill Plain Rd., Third Floor
Danbury, CT 06811
(203) 297-8574
daniel@rosemark.law

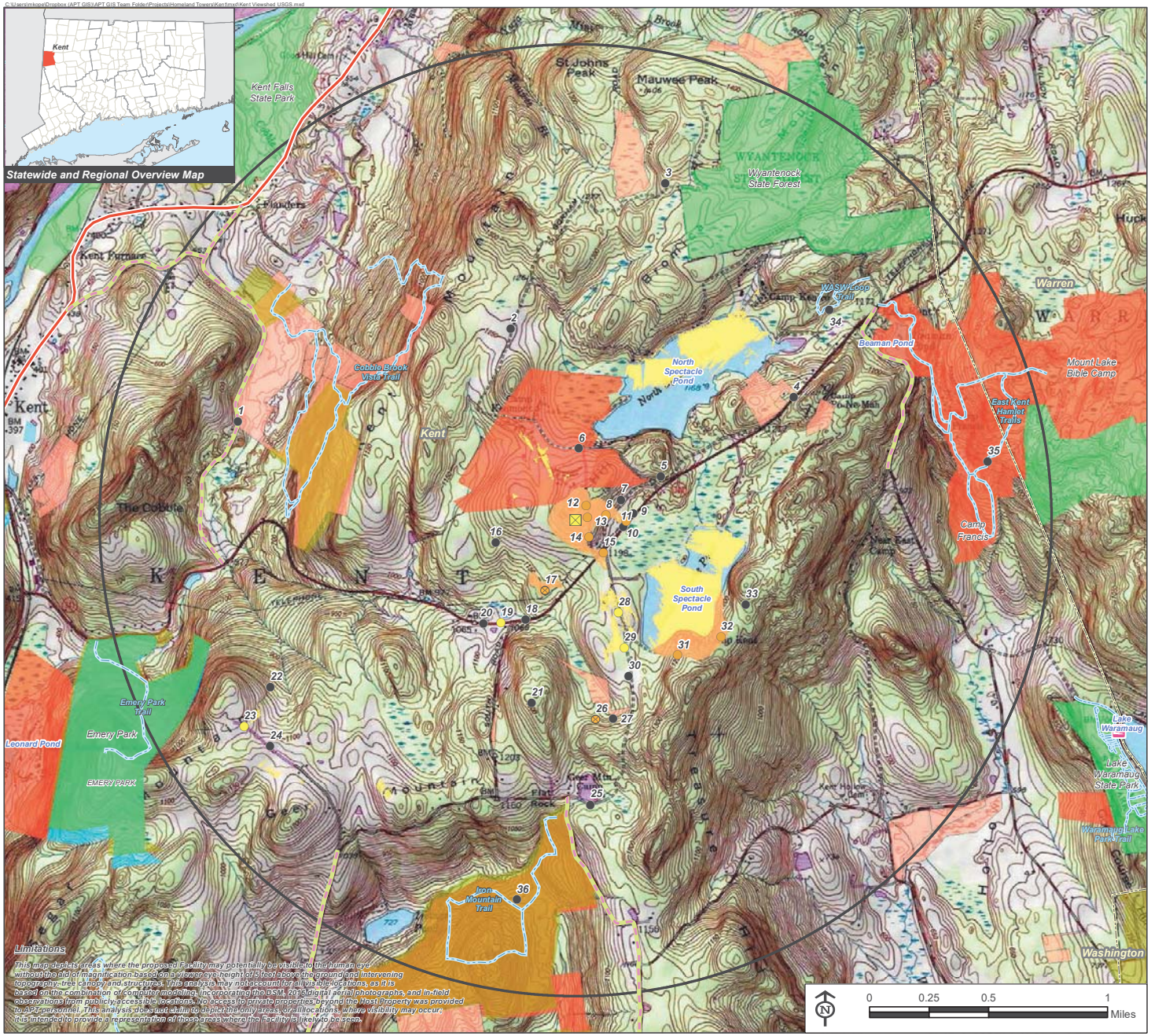
July 16, 2020

Lucia Chiocchio
Cuddy & Feder LLP
445 Hamilton Ave,14th Floor
White Plains, NY 10601
(914)-761-1300
Attorneys for the Applicants

cc: Homeland Towers; AT&T; APT; C Squared

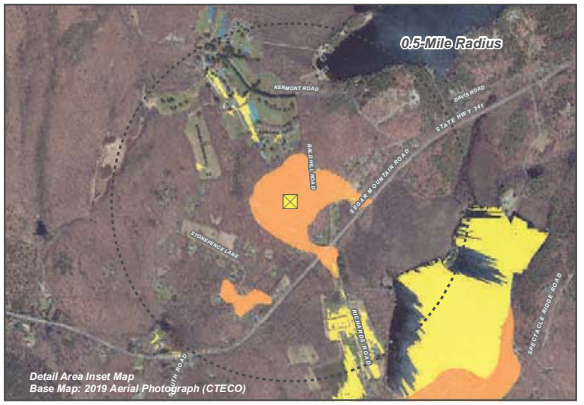
ATTACHMENT 1

C:\Users\mkope\Dropbox (APT GIS\APT GIS Team Folder\Projects\Homeland Towers\Kent\mxd\Kent Viewshed USGS.mxd



Limitations:

This map depicts areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of 5 feet above the ground and intervening topography, tree canopy and structures. This analysis may not be accurate in all locations as it is based on the combination of computer modeling, incorporating the DSM, 2016 digital aerial photographs, and in-field observations from publicly accessible locations. No access to private properties beyond the Host Property was provided to APT personnel. This analysis does not claim to depict the only areas, or all locations, where visibility may occur. This intended to provide a representation of those areas where the Facility is likely to be seen.



Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
CT757 - Kent
Bald Hill Road
Kent, Connecticut

Proposed facility height is 153 feet AGL.
Forest canopy height is derived from LiDAR data.
Study area encompasses a two-mile radius and includes 8,042 acres.
Map information field verified by APT on April 11, 2019
Base Map Source: USGS 7.5 Minute Topographic Quadrangle Map, Ellsworth, CT (1969) and Kent, CT (1971)
Map Date: June 2020

Legend

- Proposed Site
- Study Area (2-Mile Radius)

Photo Locations (April 11, 2019)

- Not Visible
- Seasonal Visibility
- Balloon Visible Through Trees
- Year-Round Visibility
- Predicted Year-Round Visibility (131 Acres; *46 Acres and 63 Acres Over Open Water on N. Spectacle Pond and S. Spectacle Pond, Respectively)
- Areas of Potential Seasonal Visibility (55 Acres)
- Municipal Boundary
- Trail
- Scenic Highway
- Town of Kent Scenic Roads
- DEEP Boat Launches
- Municipal and Private Open Space Property
- State Forest/Park

Protected Open Space Property

- Federal
- Land Trust
- Municipal
- Private
- State

Data Sources:

Physical Geography / Background Data

A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.

Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)

Dedicated Open Space & Recreation Areas

Connecticut Department of Energy and Environmental Protection (DEEP); DEEP Property (May 2007; Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)

Connecticut Forest & Parks Association, Connecticut Walk Books East & West

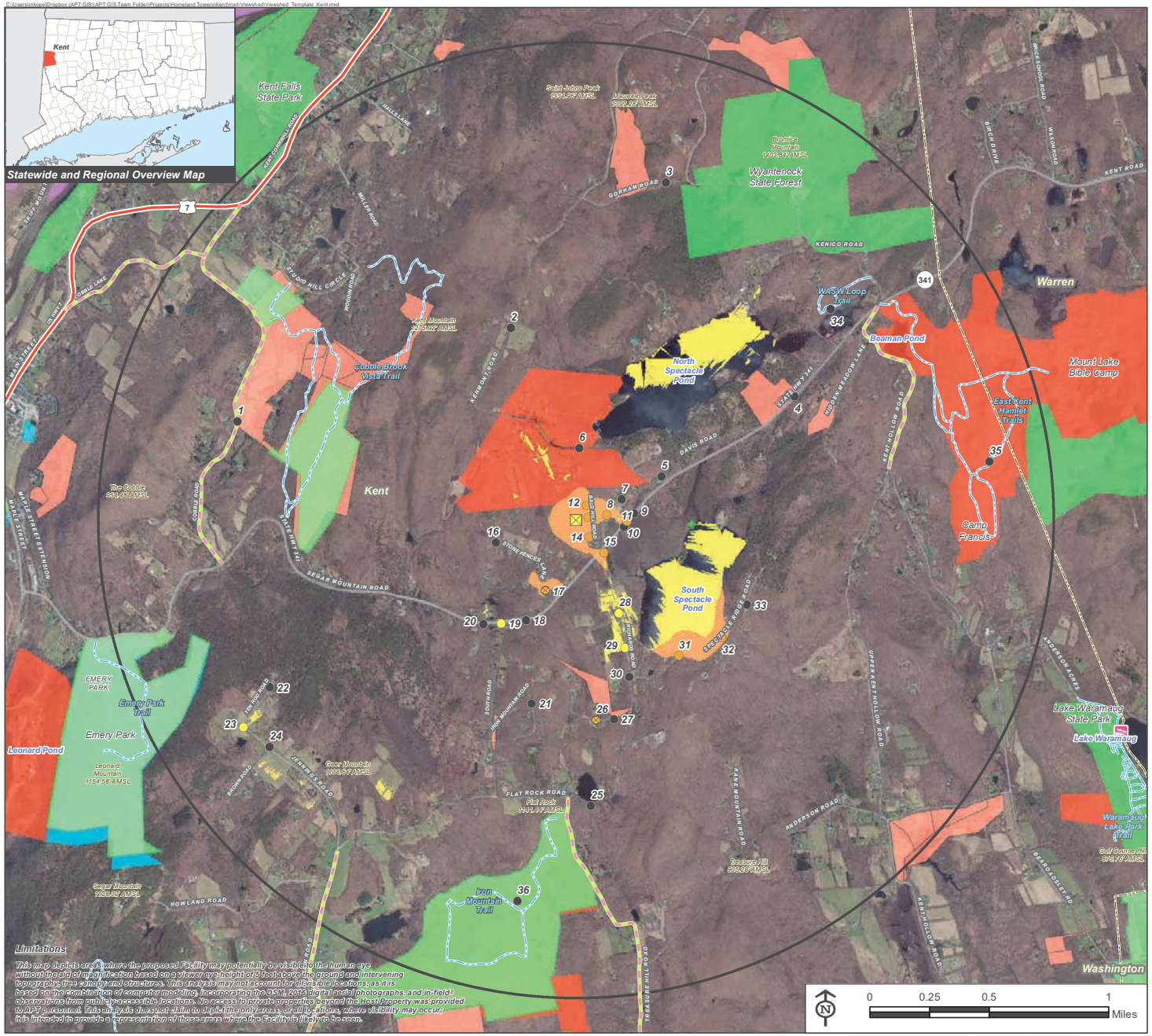
Other

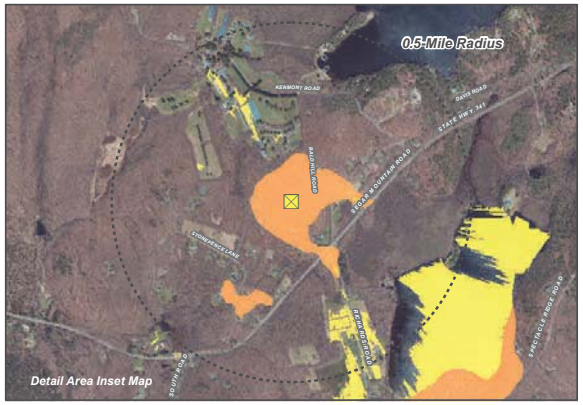
CTDOT Scenic Strips (based on Department of Transportation data)

Notes

***Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.*

C:\Users\mkope\Dropbox (APT GIS)\APT GIS Team Folder\Projects\Homeland Towers\Kent\mxd\Viewshed\Viewshed_Template_Kent.mxd





Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
CT757 - Kent
Bald Hill Road
Kent, Connecticut

Proposed facility height is 153 feet AGL.
Forest canopy height is derived from LiDAR data.
Study area encompasses a two-mile radius and includes 8,042 acres.
Map information field verified by APT on April 11, 2019
Base Map Source: 2019 Aerial Photograph (CTECO)
Map Date: June 2020

Legend

- Proposed Site
- Study Area (2-Mile Radius)

Photo Locations (April 11, 2019)

- Not Visible
- Balloon Visible Through Trees
- Seasonal Visibility
- Year-Round Visibility
- Predicted Year-Round Visibility (131 Acres; *46 Acres and 63 Acres Over Open Water on N. Spectacle Pond and S. Spectacle Pond, Respectively)
- Areas of Potential Seasonal Visibility (55 Acres)
- Municipal Boundary
- Trail
- Scenic Highway
- Town of Kent Scenic Roads
- DEEP Boat Launches
- Municipal and Private Open Space Property
- State Forest/Park

Protected Open Space Property

- Federal
- Land Trust
- Municipal
- Private
- State

Data Sources:

Physical Geography / Background Data

A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.

Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)

Dedicated Open Space & Recreation Areas

Connecticut Department of Energy and Environmental Protection (DEEP); DEEP Property (May 2007; Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)

Connecticut Forest & Parks Association, Connecticut Walk Books East & West

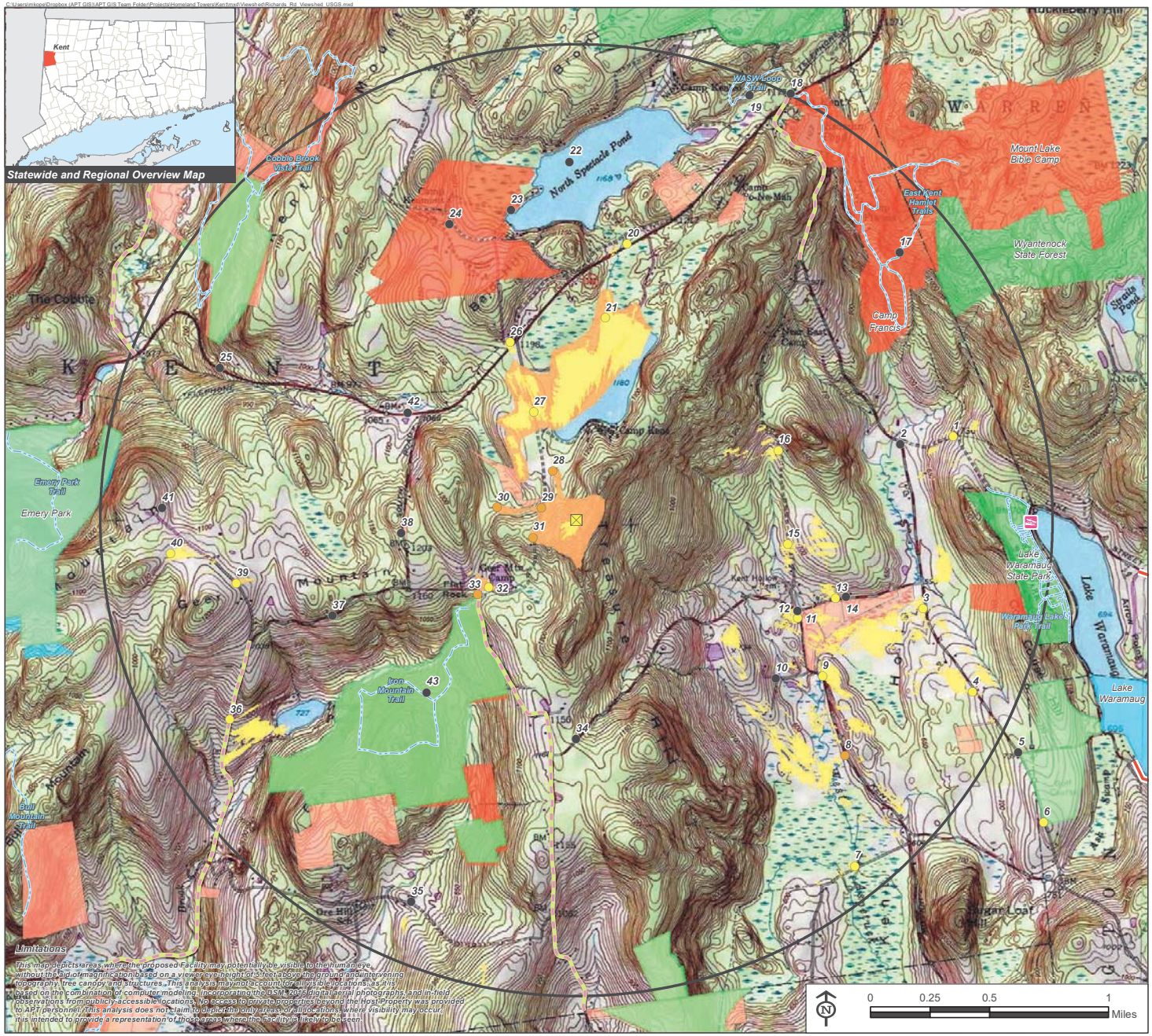
Other

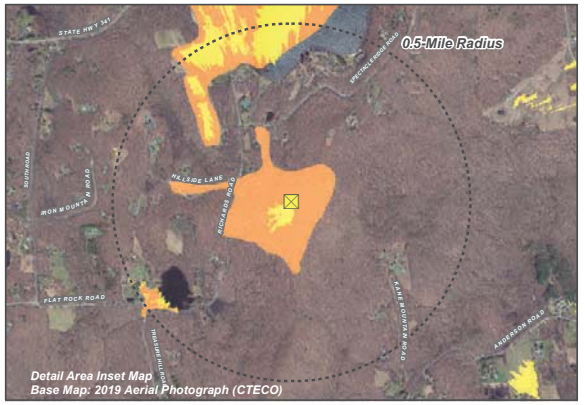
CTDOT Scenic Strips (based on Department of Transportation data)

Notes

***Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.*

C:\Users\mkope\Dropbox (APT GIS\APT GIS Team Folder\Projects\Homeland Towers\Kent\mxd\Viewshed\Richards_Rd_Viewshed_USGS.mxd





Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
CT757 - Kent
93 Richards Road
Kent, Connecticut

Proposed facility height is 154 feet AGL.
Forest canopy height is derived from LiDAR data.
Study area encompasses a two-mile radius and includes 8,042 acres.
Map information field verified by APT on January 18, 2020
Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps, Ellsworth, CT (1969) and Kent, CT (1971)
Map Date: June 2020

Legend

- Proposed Site
- Study Area (2-Mile Radius)

Photo Locations (January 18, 2020)

- Not Visible
- Seasonal Visibility
- Year-Round
- Predicted Year-Round Visibility (205 Acres; +/- 54 acres occurs over South Spectacle Pond)
- Areas of Potential Seasonal Visibility (96 Acres)
- Trail
- Scenic Highway
- Town of Kent Scenic Roads
- DEEP Boat Launches
- Municipal and Private Open Space Property
- State Forest/Park

Protected Open Space Property

- Federal
- Land Trust
- Municipal
- Private
- State

Data Sources:

Physical Geography / Background Data

A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.

Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)

Dedicated Open Space & Recreation Areas

Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007; Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)

Connecticut Forest & Parks Association, Connecticut Walk Books East & West

Other

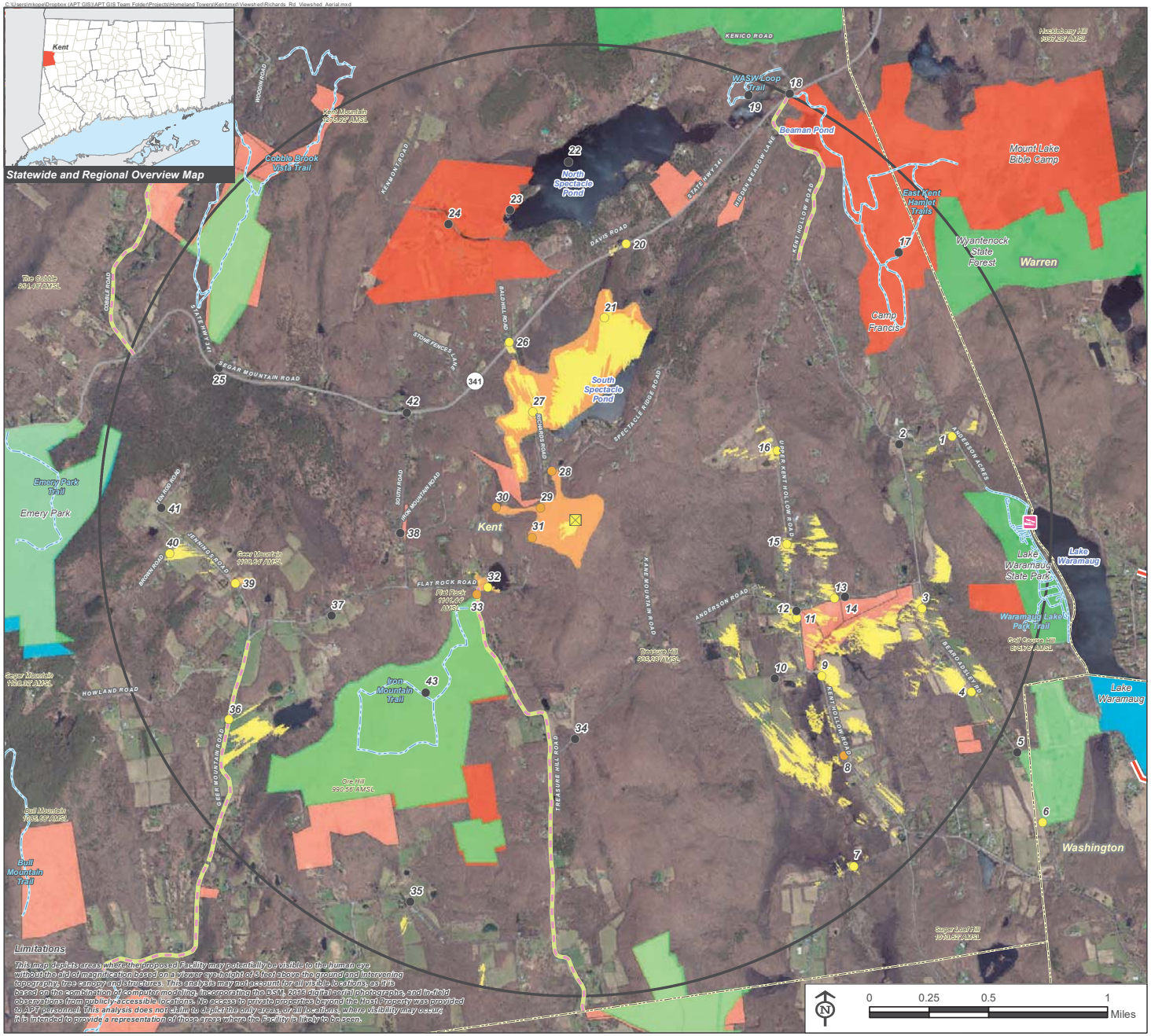
CTDOT Scenic Strips (based on Department of Transportation data)

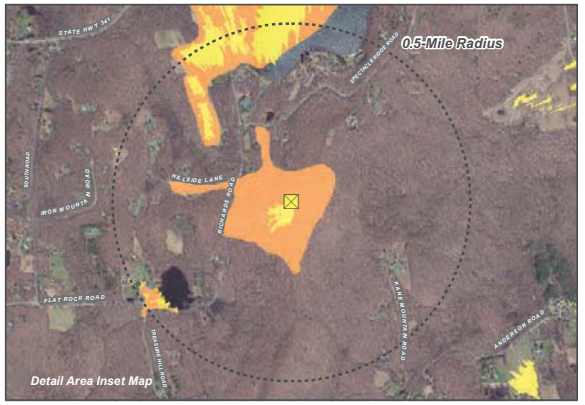
Notes

***Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.*

ALL-POINTS TECHNOLOGY CORPORATION

C:\Users\mkoperski\Dropbox (APT GIS\APT GIS Team Folder\Projects\Homeland Towers\Kent\mxd\Viewshed\Richards_Rd_Viewshed_Aerial.mxd





Viewshed Analysis Map

Proposed Wireless Telecommunications Facility
CT757 - Kent
93 Richards Road
Kent, Connecticut

Proposed facility height is 154 feet AGL.
Forest canopy height is derived from LiDAR data.
Study area encompasses a two-mile radius and includes 8,042 acres.
Map information field verified by APT on January 18, 2020
Base Map Source: 2019 Aerial Photograph (CTECO)
Map Date: June 2020

Legend

- Proposed Site
- Study Area (2-Mile Radius)

Photo Locations (January 18, 2020)

- Not Visible
- Seasonal Visibility
- Year-Round
- Predicted Year-Round Visibility (205 Acres; +/- 54 acres occurs over South Spectacle Pond)
- Areas of Potential Seasonal Visibility (96 Acres)
- Municipal Boundary
- Trail
- Scenic Highway
- Town of Kent Scenic Roads
- DEEP Boat Launches
- Municipal and Private Open Space Property
- State Forest/Park

Protected Open Space Property

- Federal
- Land Trust
- Municipal
- Private
- State

Data Sources:

Physical Geography / Background Data

A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.

Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)

Dedicated Open Space & Recreation Areas

Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007; Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)

Connecticut Forest & Parks Association, Connecticut Walk Books East & West

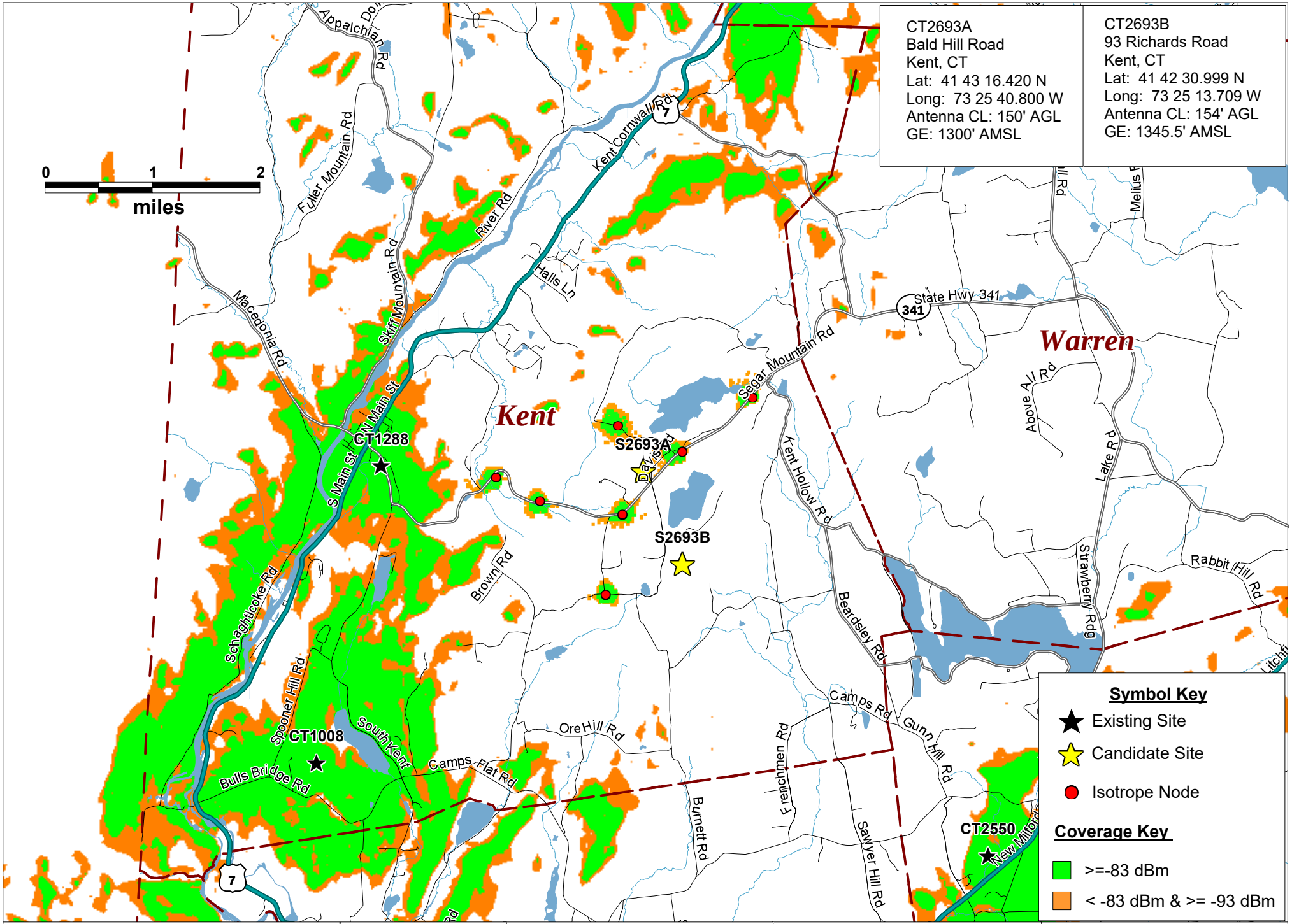
Other

CTDOT Scenic Strips (based on Department of Transportation data)

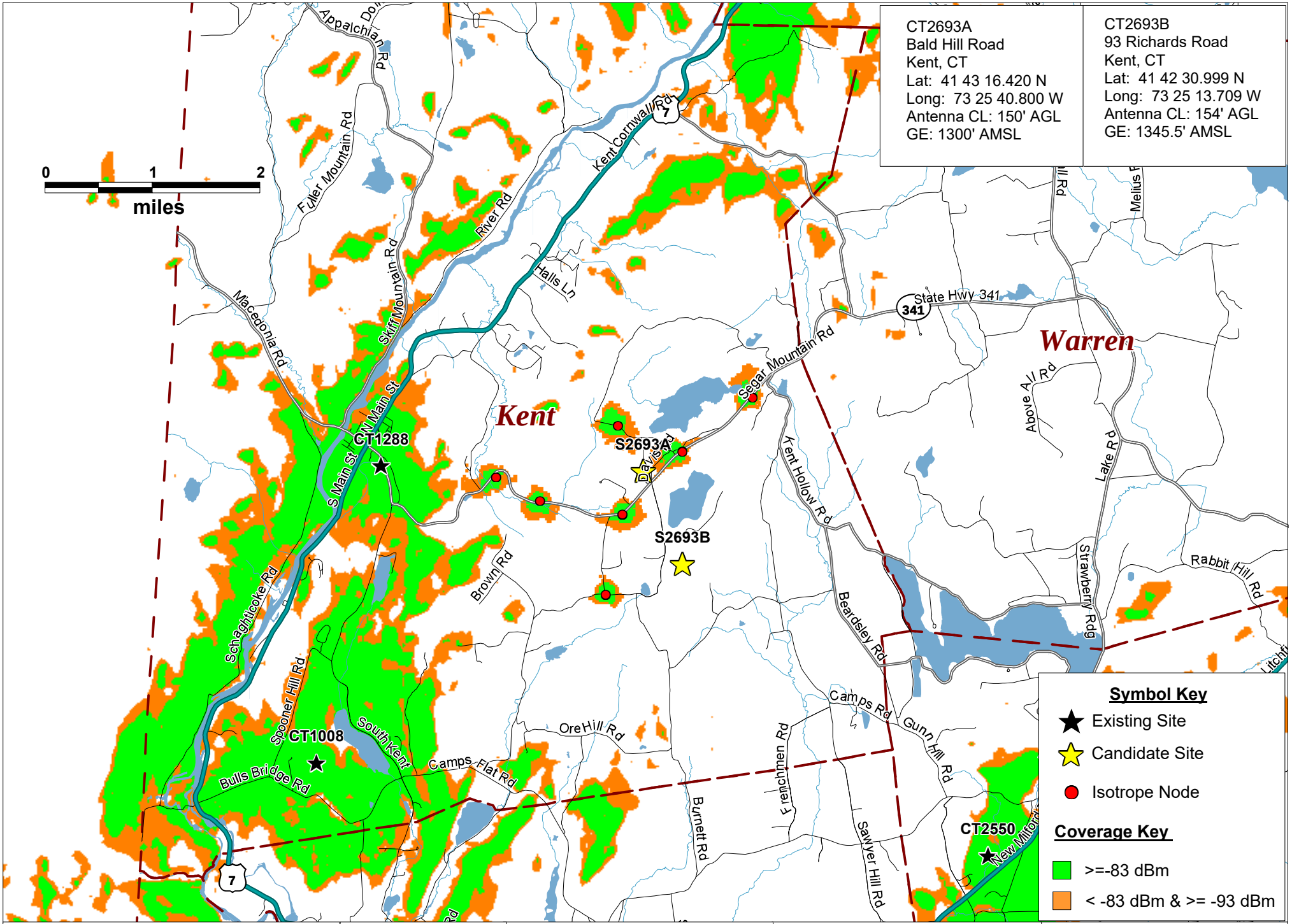
Notes

***Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.*

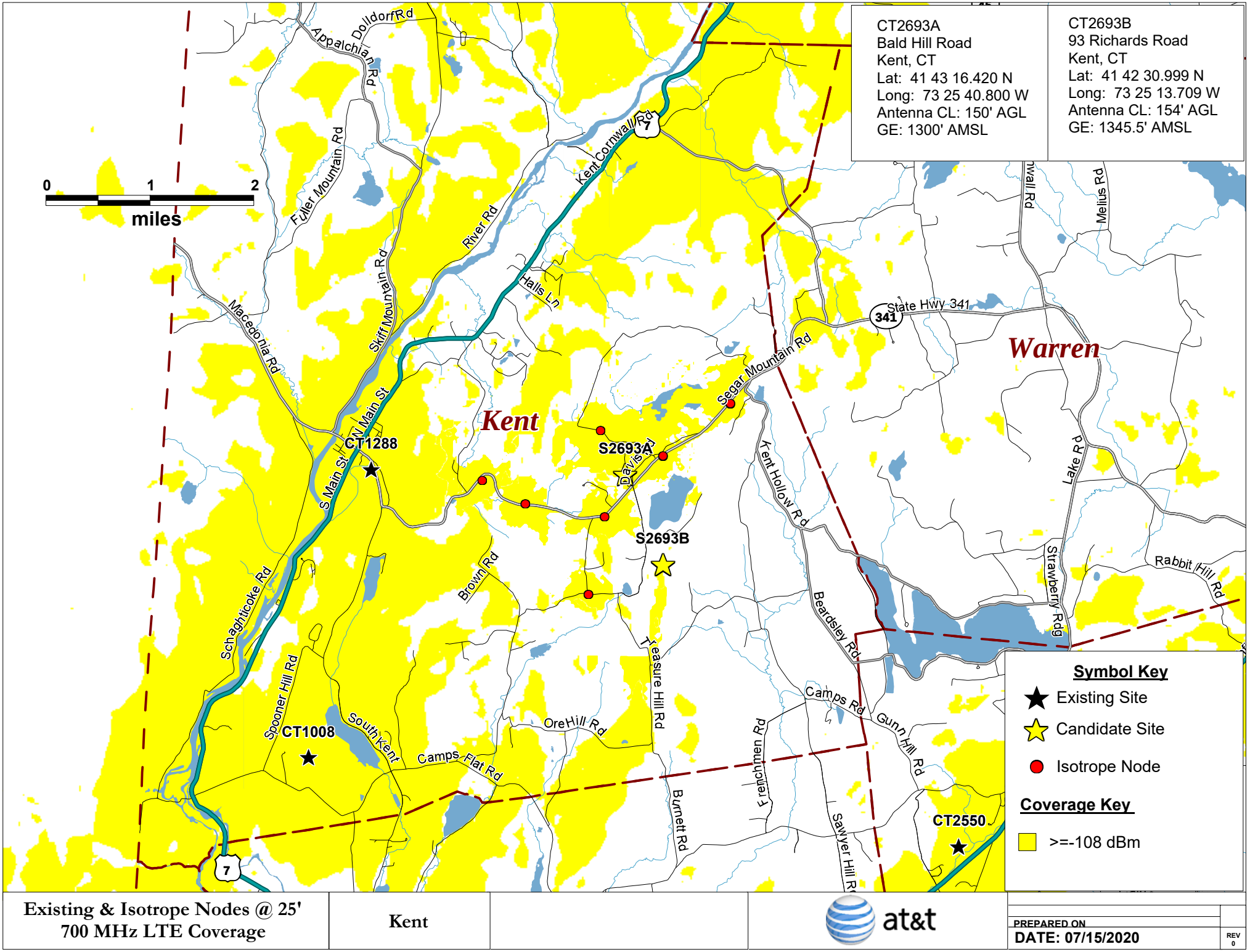
ATTACHMENT 2

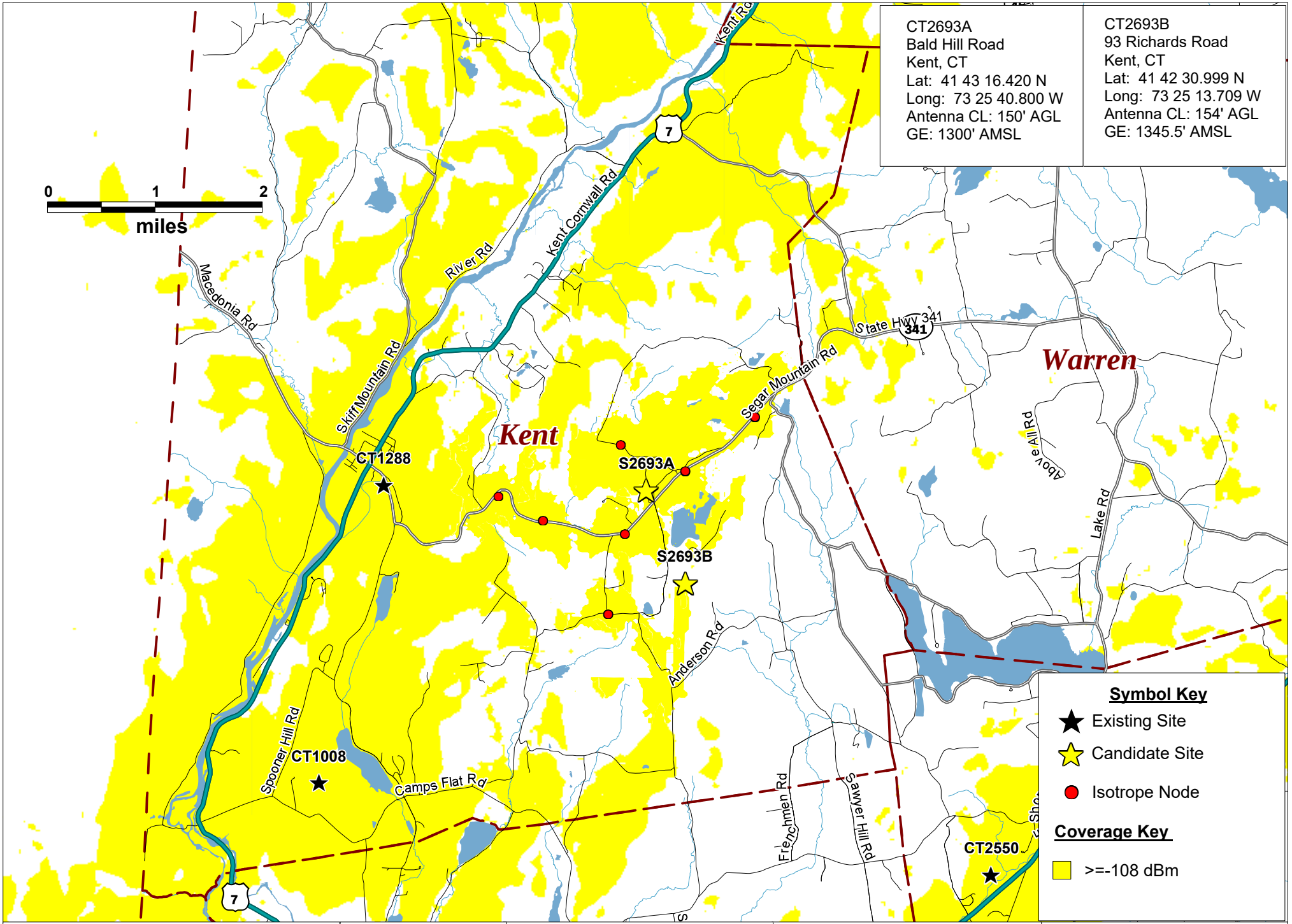


Existing & Isotrope Nodes @ 25' 700 MHz LTE Coverage	Kent		at&t	PREPARED ON DATE: 07/15/2020 REV 0



Existing & Isotrope Nodes @ 52' 700 MHz LTE Coverage	Kent		at&t	PREPARED ON DATE: 07/15/2020 REV 0


CT2693A
Bald Hill Road
Kent, CT
Lat: 41 43 16.420 N
Long: 73 25 40.800 W
Antenna CL: 150' AGL
GE: 1300' AMSL
CT2693B
93 Richards Road
Kent, CT
Lat: 41 42 30.999 N
Long: 73 25 13.709 W
Antenna CL: 154' AGL
GE: 1345.5' AMSL
0
1
2
miles
Kent
Warren
CT1288
S2693A
S2693B
CT1008
CT2550
Appalachian Rd
Dolldorf Rd
Fuller Mountain Rd
Kent Cornwall Rd
River Rd
Halls Ln
Skiff Mountain Rd
Macedonia Rd
N Main St
S Main St
State Hwy 341
Segar Mountain Rd
Davis Ln
Kent Hollow Rd
Lake Rd
Melius Rd
Strawberry Rdg
Rabbit Hill Rd
Beardsley Rd
Brown Rd
Treasure Hill Rd
Schaghticoke Rd
Spooner Hill Rd
South Kent
Camps Flat Rd
Ore Hill Rd
Camps Rd
Gunn Hill Rd
Frenchmen Rd
Burnett Rd
Sawyer Hill Rd
Symbol Key
Existing Site
Candidate Site
Isotrope Node
Coverage Key
>=-108 dBm
Existing & Isotrope Nodes @ 25'
700 MHz LTE Coverage
Kent
at&t
PREPARED ON
DATE: 07/15/2020
REV
0


CT2693A
Bald Hill Road
Kent, CT
Lat: 41 43 16.420 N
Long: 73 25 40.800 W
Antenna CL: 150' AGL
GE: 1300' AMSL
CT2693B
93 Richards Road
Kent, CT
Lat: 41 42 30.999 N
Long: 73 25 13.709 W
Antenna CL: 154' AGL
GE: 1345.5' AMSL
0
1
2
miles
Macedonia Rd
River Rd
Kent Cornwall Rd
Skiff Mountain Rd
Segar Mountain Rd
State Hwy 341
341
7
Kent
Warren
CT1288
S2693A
S2693B
CT1008
CT2550
Spooner Hill Rd
Camps Flat Rd
Anderson Rd
Frenchmen Rd
Sawyer Hill Rd
Lake Rd
Symbol Key
Existing Site
Candidate Site
Isotrope Node
Coverage Key
>=-108 dBm
Existing & Isotrope Nodes @ 52'
700 MHz LTE Coverage
Kent
at&t
PREPARED ON
DATE: 07/15/2020
REV
0

	New Coverage from oDAS at 25' AGL	
Population:[1]	(≥ -83 dBm)	84
	(≥ -93 dBm)	154
	(≥ -108 dBm)	156
Business Pops: [2]	(≥ -83 dBm)	1
	(≥ -93 dBm)	1
	(≥ -108 dBm)	15
Area (mi²):	(≥ -83 dBm)	0.17
	(≥ -93 dBm)	0.36
	(≥ -108 dBm)	2.08
Roadway (mi):	Main (-93 dBm):	1.6
	Secondary (-93 dBm):	1.2
	Total (-93 dBm):	**2.8**
	Main (-108 dBm):	3.6
	Secondary (-108 dBm):	4.8
	Total (-108 dBm):	**8.4**

[1] Population figures are based upon 2010 US Census Block Data
[2] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	New Coverage from oDAS at 52' AGL	
Population:[3]	(≥ -83 dBm)	87
	(≥ -93 dBm)	221
	(≥ -108 dBm)	215
Business Pops: [4]	(≥ -83 dBm)	1
	(≥ -93 dBm)	2
	(≥ -108 dBm)	24
Area (mi²):	(≥ -83 dBm)	0.19
	(≥ -93 dBm)	0.55
	(≥ -108 dBm)	3.33
Roadway (mi):	Main (-93 dBm):	2.0
	Secondary (-93 dBm):	1.6
	Total (-93 dBm):	**3.5**
	Main (-108 dBm):	4.2
	Secondary (-108 dBm):	7.4
	Total (-108 dBm):	**11.7**

[3] Population figures are based upon 2010 US Census Block Data
[4] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	Coverage Loss: oDAS@25' vs Site A	
Population:[5]	(≥ -83 dBm)	83
	(≥ -93 dBm)	181
	(≥ -108 dBm)	823
Business Pops: [6]	(≥ -83 dBm)	8
	(≥ -93 dBm)	26
	(≥ -108 dBm)	92
Area (mi²):	(≥ -83 dBm)	3.18
	(≥ -93 dBm)	6.37
	(≥ -108 dBm)	15.71
Roadway (mi):	Main (-93 dBm):	0.5
	Secondary (-93 dBm):	7.8
	Total (-93 dBm):	**8.3**
	Main (-108 dBm):	2.4
	Secondary (-108 dBm):	20.5
	Total (-108 dBm):	**22.9**

[5] Population figures are based upon 2010 US Census Block Data
[6] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	Coverage Loss: oDAS@52' vs Site A	
Population:[7]	(≥ -83 dBm)	80
	(≥ -93 dBm)	114
	(≥ -108 dBm)	764
Business Pops: [8]	(≥ -83 dBm)	8
	(≥ -93 dBm)	25
	(≥ -108 dBm)	83
Area (mi²):	(≥ -83 dBm)	3.16
	(≥ -93 dBm)	6.18
	(≥ -108 dBm)	14.46
Roadway (mi):	Main (-93 dBm):	0.1
	Secondary (-93 dBm):	7.5
	Total (-93 dBm):	**7.6**
	Main (-108 dBm):	1.7
	Secondary (-108 dBm):	18.0
	Total (-108 dBm):	**19.6**

[7] Population figures are based upon 2010 US Census Block Data
[8] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	Coverage Loss: oDAS@25' vs Site B	
Population:[9]	(≥ -83 dBm)	312
	(≥ -93 dBm)	860
	(≥ -108 dBm)	2872
Business Pops: [10]	(≥ -83 dBm)	39
	(≥ -93 dBm)	108
	(≥ -108 dBm)	264
Area (mi²):	(≥ -83 dBm)	6.96
	(≥ -93 dBm)	15.17
	(≥ -108 dBm)	33.41
Roadway (mi):	Main (-93 dBm):	4.0
	Secondary (-93 dBm):	25.7
	Total (-93 dBm):	**29.7**
	Main (-108 dBm):	8.4
	Secondary (-108 dBm):	60.7
	Total (-108 dBm):	**69.1**

[9] Population figures are based upon 2010 US Census Block Data
[10] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	Coverage Loss: oDAS@52' vs Site B	
Population:[11]	(≥ -83 dBm)	309
	(≥ -93 dBm)	793
	(≥ -108 dBm)	2813
Business Pops: [12]	(≥ -83 dBm)	39
	(≥ -93 dBm)	107
	(≥ -108 dBm)	255
Area (mi²):	(≥ -83 dBm)	6.94
	(≥ -93 dBm)	14.98
	(≥ -108 dBm)	32.16
Roadway (mi):	Main (-93 dBm):	3.6
	Secondary (-93 dBm):	25.3
	Total (-93 dBm):	**28.9**
	Main (-108 dBm):	7.7
	Secondary (-108 dBm):	58.1
	Total (-108 dBm):	**65.8**

[11] Population figures are based upon 2010 US Census Block Data
[12] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

Coverage Loss Statistics

Comparison: DAS at 25' height vs. proposed Site A

	Coverage Loss: oDAS@25' vs Site A	
Population:[1]	(≥ -83 dBm)	50%
	(≥ -93 dBm)	54%
	(≥ -108 dBm)	84%
Business Pops: [2]	(≥ -83 dBm)	89%
	(≥ -93 dBm)	96%
	(≥ -108 dBm)	86%
Area (mi²):	(≥ -83 dBm)	95%
	(≥ -93 dBm)	95%
	(≥ -108 dBm)	88%
Roadway (mi):	Main (-93 dBm):	25%
	Secondary (-93 dBm):	87%
	Total (-93 dBm):	**75%**
	Main (-108 dBm):	40%
	Secondary (-108 dBm):	81%
	Total (-108 dBm):	**73%**

[1] Population figures are based upon 2010 US Census Block Data

[2] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

Coverage Loss Statistics

Comparison: DAS at 52' height vs. proposed Site A

	Coverage Loss: oDAS@52' vs Site A	
Population:[3]	(≥ -83 dBm)	48%
	(≥ -93 dBm)	34%
	(≥ -108 dBm)	78%
Business Pops: [4]	(≥ -83 dBm)	89%
	(≥ -93 dBm)	93%
	(≥ -108 dBm)	78%
Area (mi²):	(≥ -83 dBm)	94%
	(≥ -93 dBm)	92%
	(≥ -108 dBm)	81%
Roadway (mi):	Main (-93 dBm):	6%
	Secondary (-93 dBm):	83%
	Total (-93 dBm):	**68%**
	Main (-108 dBm):	28%
	Secondary (-108 dBm):	71%
	Total (-108 dBm):	**63%**

[3] Population figures are based upon 2010 US Census Block Data

[4] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

Coverage Loss Statistics

Comparison: DAS at 25' height vs. proposed Site B

	Coverage Loss: oDAS@25' vs Site B	
Population:[5]	(≥ -83 dBm)	79%
	(≥ -93 dBm)	85%
	(≥ -108 dBm)	95%
Business Pops: [6]	(≥ -83 dBm)	98%
	(≥ -93 dBm)	99%
	(≥ -108 dBm)	95%
Area (mi²):	(≥ -83 dBm)	98%
	(≥ -93 dBm)	98%
	(≥ -108 dBm)	94%
Roadway (mi):	Main (-93 dBm):	72%
	Secondary (-93 dBm):	96%
	Total (-93 dBm):	**91%**
	Main (-108 dBm):	70%
	Secondary (-108 dBm):	93%
	Total (-108 dBm):	**89%**

[5] Population figures are based upon 2010 US Census Block Data

[6] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

Coverage Loss Statistics

Comparison: DAS at 52' height vs. proposed Site B

	Coverage Loss: oDAS@52' vs Site B	
Population:[7]	(≥ -83 dBm)	78%
	(≥ -93 dBm)	78%
	(≥ -108 dBm)	93%
Business Pops: [8]	(≥ -83 dBm)	98%
	(≥ -93 dBm)	98%
	(≥ -108 dBm)	91%
Area (mi²):	(≥ -83 dBm)	97%
	(≥ -93 dBm)	96%
	(≥ -108 dBm)	91%
Roadway (mi):	Main (-93 dBm):	65%
	Secondary (-93 dBm):	94%
	Total (-93 dBm):	**89%**
	Main (-108 dBm):	64%
	Secondary (-108 dBm):	89%
	Total (-108 dBm):	**85%**

[7] Population figures are based upon 2010 US Census Block Data

[8] Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

ATTACHMENT 3

Site A Bald Hill Road

Coverage Statistics

CT2693A @ 150

	≥ -83dBm	≥ -93dBm	
Area	3.35	6.73	square miles
Population	167	335	pops
Business Pops	9	27	employees
New Roads Coverage	N/A	11.1	miles
	Main	2.1	miles
	Secondary	9.0	miles

CT2693A @ 110

	≥ -83dBm	≥ -93dBm	
New Coverage Area	2.55	5.39	square miles
New Pops Coverage	129	255	pops
Business	5	17	employees
New Roads Coverage	N/A	8.9	miles
	Main	1.7	miles
	Secondary	7.2	miles

Site B 93 Richards Road

Coverage Statistics

CT2693B @ 150

	≥ -83dBm	≥ -93dBm	
New Coverage Area	7.14	15.53	square miles
New Pops Coverage	396	1,014	pops
Business	40	109	employees
New Roads Coverage	N/A	32.5	miles
	Main	5.6	miles
	Secondary	26.9	miles

CT2693B @ 110

	≥ -83dBm	≥ -93dBm	
New Coverage Area	4.12	10.47	square miles
New Pops Coverage	269	699	pops
Business	13	62	employees
New Roads Coverage	N/A	23.1	miles
	Main	3.0	miles
	Secondary	20.1	miles

Site A Bald Hill Road

Coverage Loss: CT2693A @ 150->110

	≥ -83dBm	≥ -93dBm	
New Coverage Area	0.80	1.34	square miles
New Pops Coverage	38	80	pops
Business	4	10	employees
New Roads Coverage	N/A	2.23	miles
	Main	0.39	miles
	Secondary	1.84	miles

Coverage Loss: CT2693A @ 150->110

	≥ -83dBm	≥ -93dBm	
New Coverage Area	24%	20%	square miles
New Pops Coverage	23%	24%	pops
Business	44%	37%	employees
New Roads Coverage	N/A	20%	miles
	Main	19%	miles
	Secondary	20%	miles

Site B 93 Richards Road

Coverage Loss: CT2693B @ 150->110

	≥ -83dBm	≥ -93dBm	
Area	3.01	5.06	square miles
Population	127	315	pops
Business Pops	27	47	employees
New Roads Coverage	N/A	9.34	miles
	Main	2.57	miles
	Secondary	6.77	miles

Coverage Loss: CT2693B @ 150->110

	≥ -83dBm	≥ -93dBm	
New Coverage Area	42%	33%	square miles
New Pops Coverage	32%	31%	pops
Business	68%	43%	employees
New Roads Coverage	N/A	29%	miles
	Main	46%	miles
	Secondary	25%	miles

ATTACHMENT 4

C:\Users\Erin\Dropbox (APT GIS)\APT GIS Team Folder\Projects\Homeland Towers\Kent\mxd\Alternate_Site\Kent Richards Rd CSC Site Location Aerial.mxd

Legend

- Site
- Subject Property
- Approx. Parcel Boundary

N
W E
S

400 200 0 400
Feet

Site Location Map

Proposed Wireless
Telecommunications Facility
CT757-Kent
93 Richards Road
Kent, Connecticut

HOMELAND TOWERS

ALL-POINTS TECHNOLOGY CORPORATION

Map Notes:
Base Map Source: 2016 CT ECO Imagery
Map Scale:1 inch = 400 feet
Map Date: July 2020

ATTACHMENT 5

REMOTE FIELD REVIEW

CONNECTICUT SITING COUNCIL DOCKET NO. 488
SITE A
BALD HILL ROAD
KENT, CT 06785

In Response to Siting Council Interrogatory Question 53, issued June 10, 2020.

PREPARED FOR:

HOMELAND TOWERS

PREPARED BY:
ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

Photographed July 9, 2020

PHOTO LOG

- Photo Location
- Photo Marker
- Site
- Limits of Disturbance
- Monopole
- Gravel Access Road & Compound
- Compound Fence
- Underground Elec/Telco
- Carrier Equipment Areas
- Equipment / Utilities
- Evergreen Trees
- Tree to be Protected
- Tree to be removed

N W E S

60 30 0 60 Feet

1 inch = 60 feet

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
1	**BALD HILL ROAD LOOKING SOUTH**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
2	**BALD HILL ROAD LOOKING NORTH**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

EXISTING

PHOTO	DESCRIPTION
3	**BALD HILL ROAD LOOKING WEST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
4	**PROPOSED ACCESS ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
5	**PROPOSED ACCESS ROAD LOOKING NORTHWEST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
6	**PROPOSED ACCESS ROAD - FOUR CARDINAL POINTS**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
7	**PROPOSED ACCESS ROAD LOOKING WEST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
8	**PROPOSED ACCESS ROAD LOOKING SOUTHWEST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
9	**LOOKING SOUTH**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
10	**APPROXIMATELY 85 FEET NORTH OF PROPOSED SITE - FOUR CARDINAL POINTS**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
11	**LOOKING SOUTH**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
12	**LOOKING WEST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
13	**LOOKING WEST**

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
14	**FROM SOUTHERN PROPERTY LINE LOOKING NORTHWEST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

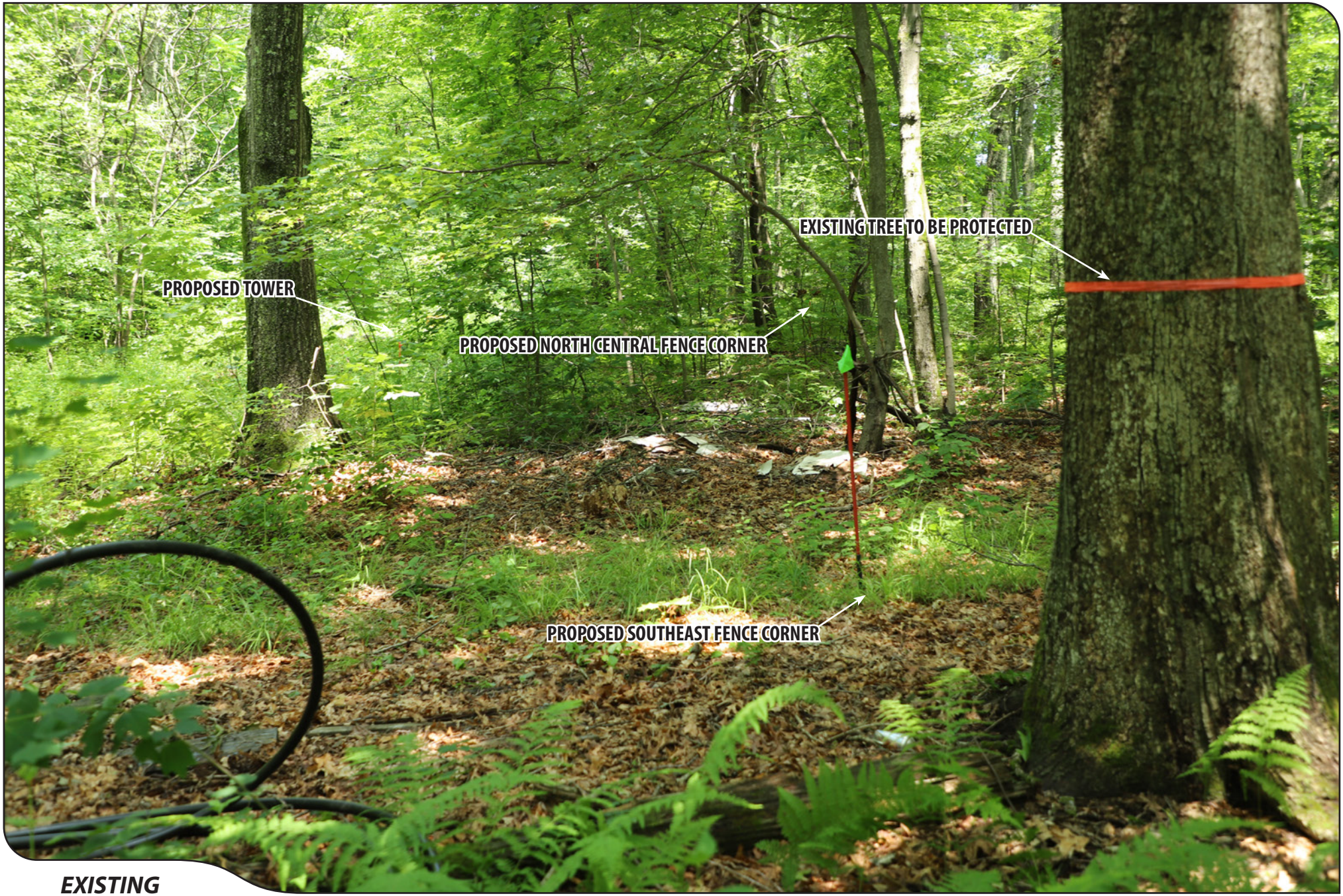
PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
14A	**FROM SOUTHERN PROPERTY LINE LOOKING SOUTHEAST TOWARDS 15 BALD HILL ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS



PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
15	**FROM SOUTHERN PROPERTY LINE LOOKING NORTH**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
15A	**FROM SOUTHERN PROPERTY LINE LOOKING SOUTHEAST TOWARDS 15 BALD HILL ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
16	**FROM SOUTHERN LIMIT OF DISTURBANCE LOOKING NORTHWEST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
17	**FROM WESTERN PROPERTY LINE - FOUR CARDINAL POINTS**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
18	**FROM WESTERN PROPERTY LINE LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

ATTACHMENT 6

REMOTE FIELD REVIEW

CONNECTICUT SITING COUNCIL DOCKET NO. 488
SITE B
93 RICHARDS ROAD
KENT, CT 06785

In Response to Siting Council Interrogatory Question 53, issued June 10, 2020.

PREPARED FOR:

HOMELAND TOWERS

PREPARED BY:
ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

Photographed July 9, 2020

PHOTO LOG

- Photo Location
- Photo Marker
- Site
- Limit of Disturbance
- Monopole
- Compound Fence
- Underground Elec/Telco
- Equipment / Utilities
- Carrier Equipment Areas
- Evergreen Trees
- Tree to be removed

N W E S

120 60 0 120 Feet

1 inch = 120 feet

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
1	**RICHARDS ROAD LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
2	**RICHARDS ROAD LOOKING NORTH**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
3	**LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
4	**DRIVEWAY LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

EXISTING

PHOTO	DESCRIPTION
4A	**DRIVEWAY LOOKING WEST TOWARDS RICHARDS ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
5	**DRIVEWAY LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
6	**DRIVEWAY - FOUR CARDINAL POINTS**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
7	**DRIVEWAY LOOKING NORTHEAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
8	**DRIVEWAY LOOKING NORTHEAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
9	**DRIVEWAY LOOKING NORTHEAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
10	**DRIVEWAY - FOUR CARDINAL POINTS**

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
11	**DRIVEWAY LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
12	**DRIVEWAY LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

EXISTING

PHOTO	DESCRIPTION
13	**DRIVEWAY LOOKING NORTHEAST TOWARDS PROPOSED COMPOUND**

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
14	**PROPERTY LINE LOOKING NORTHWEST TOWARDS PROPOSED COMPOUND**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
14A	**PROPERTY LINE LOOKING SOUTHEAST TOWARDS #44 UPPER KENT HOLLOW ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
15	**LOOKING SOUTHWEST TOWARDS PROPOSED COMPOUND**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
15A	**PROPERTY LINE LOOKING SOUTHEAST TOWARDS #44 UPPER KENT HOLLOW ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

EXISTING

PHOTO	DESCRIPTION
16	**LOOKING SOUTHWEST TOWARDS PROPOSED COMPOUND**

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
16A	**LOOKING WEST TOWARDS #43 RICHARDS ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
17	**LOOKING NORTHEAST TOWARDS PROPOSED COMPOUND**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
17A	**LOOKING NORTH TOWARDS #43 RICHARDS ROAD**

ALL-POINTS TECHNOLOGY CORPORATION

HOMELAND TOWERS

PHOTOGRAPHED ON 7/9/2020

EXISTING

PHOTO	DESCRIPTION
18	**FROM PROPOSED TOWER LOCATION**