

# STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051 Phone: (860) 827-2935 Fax: (860) 827-2950 E-Mail: siting.council@ct.gov Web Site: portal.ct.gov/csc

### VIA ELECTRONIC MAIL

November 17, 2022

Jeffrey Barbadora Crown Castle 1800 West Park Drive, Suite 250 Westborough, MA 01581 jeff.Barbadora@crowncastle.com

RE: **EM-T-MOBILE-014-221018** - T-Mobile notice of intent to modify an existing telecommunications facility located at 150 North Main Street, Branford, Connecticut.

## Dear Jeffrey Barbadora:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on October 18, 2022. On November 8, 2022 the Council issued a letter (enclosed) stating that the RF analysis provided with the request does not include a **cumulative** far-field RF analysis for all carriers on the tower and therefore not compliant with the Council's September 23, 2022 far-field memorandum. The Council recommended that T-Mobile provide an RF analysis including a rigorous cumulative far-field analysis for all carriers on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, on or before December 9, 2022.

On November 16, 2022, the Council received an electronic mail with a revised RF analysis dated November 16, 2022. However, the RF analysis provides a far field %MPE for T-Mobile in addition to the near field %MPE values from other wireless carriers located on the tower. The RF analysis does not provide a rigorous **cumulative** far-field analysis for all entities located on the tower.

Therefore, the exempt modification request remains incomplete at this time. The Council recommends that T-Mobile provide a revised **cumulative** RF Analysis that includes a rigorous far-field analysis for T-Mobile's proposed installation and other entities located on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, on or before December 16, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to December 16, 2022.

Please provide an electronic version of the requested information for the incomplete exempt modification to be rendered complete and processed. Please include the Council's exempt modification identification number referenced above with the submittal.

This notice of incompletion shall have the effect of tolling the FCC 60-day timeframe in accordance with Paragraph 217 of the FCC Wireless Infrastructure Report and Order issued on October 21, 2014 (FCC 14-153).

Thank you for your attention to this matter. Should you have any questions, please feel free to contact me at 860-827-2951.

Sincerely,

Melanie Bachman Executive Director

MAB/IN/emr

Enclosure: Incomplete letter dated November 8, 2022



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RE: **EM-T-MOBILE-014-221018** - T-Mobile notice of intent to modify an existing telecommunications facility located at 150 North Main Street, Branford, Connecticut.

Dear Jeffrey Barbadora:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on October 18, 2022.

According to Section 16-50j-71 of the Regulations of Connecticut State Agencies, "...any modification, as defined in Section 16-50j-2a of the Regulations of Connecticut State Agencies, to an existing tower site, except as specified in Sections 16-50j-72 and 16-50j-88 of the Regulations of Connecticut State Agencies, may have a substantial adverse environmental effect."

Staff has reviewed this exempt modification request for completeness and has identified a deficiency in the radio frequency (RF) analysis. On September 23, 2022, the Council issued a memorandum to telecommunications industry representatives requiring a cumulative far-field RF Analysis to be provided with all telecommunications exempt modification requests. The RF analysis prepared by Fox Hill Telecom, dated August 24, 2022, and provided with the request does not include a cumulative far-field RF analysis. A copy of the memorandum is available on the Council's website at the following link: <a href="https://doi.org/10.2022/9923-farfieldmemo\_final.pdf">20220923-farfieldmemo\_final.pdf</a> (ct.gov).

Therefore, the exempt modification request is incomplete at this time. The Council recommends that T-Mobile provide an RF Analysis including a rigorous cumulative far-field analysis for all carriers on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, on or before December 9, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to December 9, 2022. Please provide an electronic version of the requested information for the incomplete exempt modification to be rendered complete and processed. Please include the Council's exempt modification identification number referenced above with the submittal.

This notice of incompletion shall have the effect of tolling the Federal Communications Commission (FCC) 60-day timeframe in accordance with Paragraph 217 of the FCC Wireless Infrastructure Report and Order issued on October 21, 2014 (FCC 14-153).

Thank you for your attention to this matter. Should you have any questions, please feel free to contact me at 860-827-2951.

Sincerely,

Melanie Bachman Executive Director