STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square
New Britain, Connecticut 06051
Phone: (860) 827-2935
Fax: (860) 827-2950

October 4, 2000

Christopher B. Fisher, Esq.
Cuddy & Feder & Worby LLP
90 Maple Avenue
White Plains, NY 10601-5196

RE: **TS-AT&T-015-000901** - AT&T Wireless PCS, LLC d/b/a AT&T Wireless Services request for an order to approve tower sharing at an existing telecommunications facility located at 1875 Noble Avenue, Bridgeport, Connecticut.

Dear Attorney Fisher:

At a public meeting held Monday, October 2, 2000, the Connecticut Siting Council (Council) ruled that the shared use of this existing tower site is technically, legally, environmentally, and economically feasible and meets public safety concerns, and therefore, in compliance with General Statutes § 16-50aa, the Council has ordered the shared use of this facility to avoid the unnecessary proliferation of tower structures. This facility has also been carefully modeled to ensure that radio frequency emissions are conservatively below State and federal standards applicable to the frequencies now used on this tower.

This decision is under the exclusive jurisdiction of the Council. Any additional change to this facility may require an explicit request to this agency pursuant to General Statutes § 16-50aa or notice pursuant to Regulations of Connecticut State Agencies Section 16-50j-73, as applicable. Such request or notice shall include all relevant information regarding the proposed change with cumulative worst-case modeling of radio frequency exposure at the closest point uncontrolled access to the tower base, consistent with Federal Communications Commission, Office of Engineering and Technology, Bulletin 65. Any deviation from this format may result in the Council implementing enforcement proceedings pursuant to General Statutes § 16-50u including, without limitation, imposition of expenses resulting from such failure and of civil penalties in an amount not less than one thousand dollars per day for each day of construction or operation in material violation.

This decision applies only to this request for tower sharing and is not applicable to any other request or construction.

The proposed shared use is to be implemented as specified in your letters dated August 31, 2000 and September 29, 2000.

Thank you for your attention and cooperation.

Very truly yours,

Mortimer A. Gelston
Chairman

MAG/RKE/laf

c: Honorable Joseph P. Ganim, Mayor, City of Bridgeport
Ms. Melanie J. Howlett, Assistant City Attorney, City of Bridgeport
Linda Grant, Cuddy & Feder & Worby LLP
J. Brendan Sharkey, VoiceStream Wireless

I:\siting\em\AT&T\bridgeport\dc100200.doc

CUDDY & FEDER & WORBY LLP

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WHITE PLAINS, NEW YORK 10601-5196

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ROBERT L. OSAR (also TX)
MARYANN M. PALERMO
ROBERT C. SCHNEIDER
LOUIS R. TAFFERA

August 31, 2000

VIA FEDERAL EXPRESS

Hon. Mortimer Gelston, Chairman and Members
of the Siting Council
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

Re: Request by AT&T Wireless Services for the Shared Use of an Existing Tower on 1875 Noble Avenue, Bridgeport, Connecticut

Hon. Mortimer Gelston, Chairman and Members of the Siting Council:

Pursuant to Connecticut General Statutes (C.G.S.) § 16-50aa, AT&T Wireless PCS LLC, by and through its agent AT&T Wireless Services, Inc. ("AT&T Wireless") hereby requests an order from the Connecticut Siting Council (the "Council") to approve the proposed shared use of an approved communications tower in construction and located at the Beardsley Zoological Gardens, 1875 Noble Avenue in the City of Bridgeport, owned by VoiceStream Communications (the "Beardsley Facility"). The Applicant has entered into an agreement with the tower owner to permit the installation of a wireless communications facility at the approved Beardsley Facility. See license signature page annexed hereto as Exhibit A.

The Beardsley Facility

The Beardsley Facility will consist of the development of an approved 120' monopole tower and other equipment at grade within a fenced compound. The facility was approved by the City of Bridgeport as a stealth flagpole tower designed for co-location by four (4) wireless providers. Currently, VoiceStream and AT&T plan to install antennas in the flagpole. Additionally, SNET has expressed an interest in co-locating on the tower. In addition to the zoo, the surrounding land uses include a municipal park and residential property.

AT&T Wireless' Facility

As shown on the enclosed plans prepared by Natcomm, LLC, including a site plan and elevation, AT&T Wireless proposes shared use of the facility to provide FCC licensed services. AT&T Wireless will install three panel antennas within the proposed flagpole with centerlines at approximately 98' AGL and will construct a 12' x 20' equipment shelter within the leased parcel.

Connecticut General Statutes § 16-50aa provides that, upon written request for shared use approval, an order approving such use shall be issued, "if the council finds that the proposed shared use of the facility is technically, legally, environmentally and economically feasible and meets public safety concerns." (C.G.S. § 16-50aa(c)(1).) Further, upon approval of such shared use, it is exclusive and no local zoning or land use approvals are required C.G.S. § 16-50x. Shared use of the Beardsley Facility satisfies the approval criteria set forth in C.G.S. § 16-50aa as follows:

A. Technical Feasibility The Beardsley Facility tower has been designed and approved to accommodate co-location by four (4) wireless providers. The proposed shared use of this tower is therefore technically feasible.

B. Legal Feasibility Pursuant to C.G.S. § 16-50aa, the Council has been authorized to issue an order approving shared use of the approved Beardsley Facility. (C.G.S. § 16-50aa(c)(1)). Under the authority vested in the Council by C.G.S. § 16-50aa, an order by the Council approving the shared use of a tower would permit the Applicant to obtain a building permit for the proposed installation. It should be noted that the City Attorney's Office has been contacted and the City does not object to the Council's review and approval of AT&T's proposed facility.

C. Environmental Feasibility The proposed shared use would have a minimal environmental effect, for the following reasons:

1. The proposed installation would have a de minimis visual impact, and would not cause any significant change or alteration in the physical or environmental characteristics of the approved facility;

2. The proposed installation by AT&T Wireless would not increase the height of the tower itself and would not extend the boundaries of VoiceStream's lease parcel;

3. The proposed installation would not increase the noise levels at the existing facility boundaries by six decibels or more;

4. Operation of AT&T Wireless' antennas at this site would not exceed the total radio frequency electromagnetic radiation power density level adopted by the FCC and Connecticut Department of Health. The "worst case" exposure calculated for the operation of this facility for VocieStream and AT&T, would be approximately 0.10% of the standard. See Bell Labs Report dated April 28, 2000 annexed hereto as Exhibit B;

5. The proposed shared use of the Beardsley Facility would not require any water or sanitary facilities, or generate air emissions or discharges to water bodies. Further, the installation will not generate any traffic other than for periodic maintenance visits.

D. Economic Feasibility As evidenced in Exhibit A annexed hereto, the Applicant and the tower owner have entered into a mutual agreement to share use of the Beardsley Facility on terms agreeable to both parties. The proposed tower sharing is therefore economically feasible.

E. Public Safety As stated above and evidenced in the Bell Labs Report annexed hereto as Exhibit B, the operation of AT&T Wireless' antennas at this site would not exceed the total radio frequency electromagnetic radiation power density level adopted by the FCC and Connecticut Department of Health. Additionally, the compound is completely fenced for security purposes. Further, the addition of AT&T Wireless' telecommunications service in the Bridgeport area through shared use of the Beardsley Facility is expected to enhance the safety and welfare of local residents and travelers through the area resulting in an improvement to public safety in this area of Bridgeport.

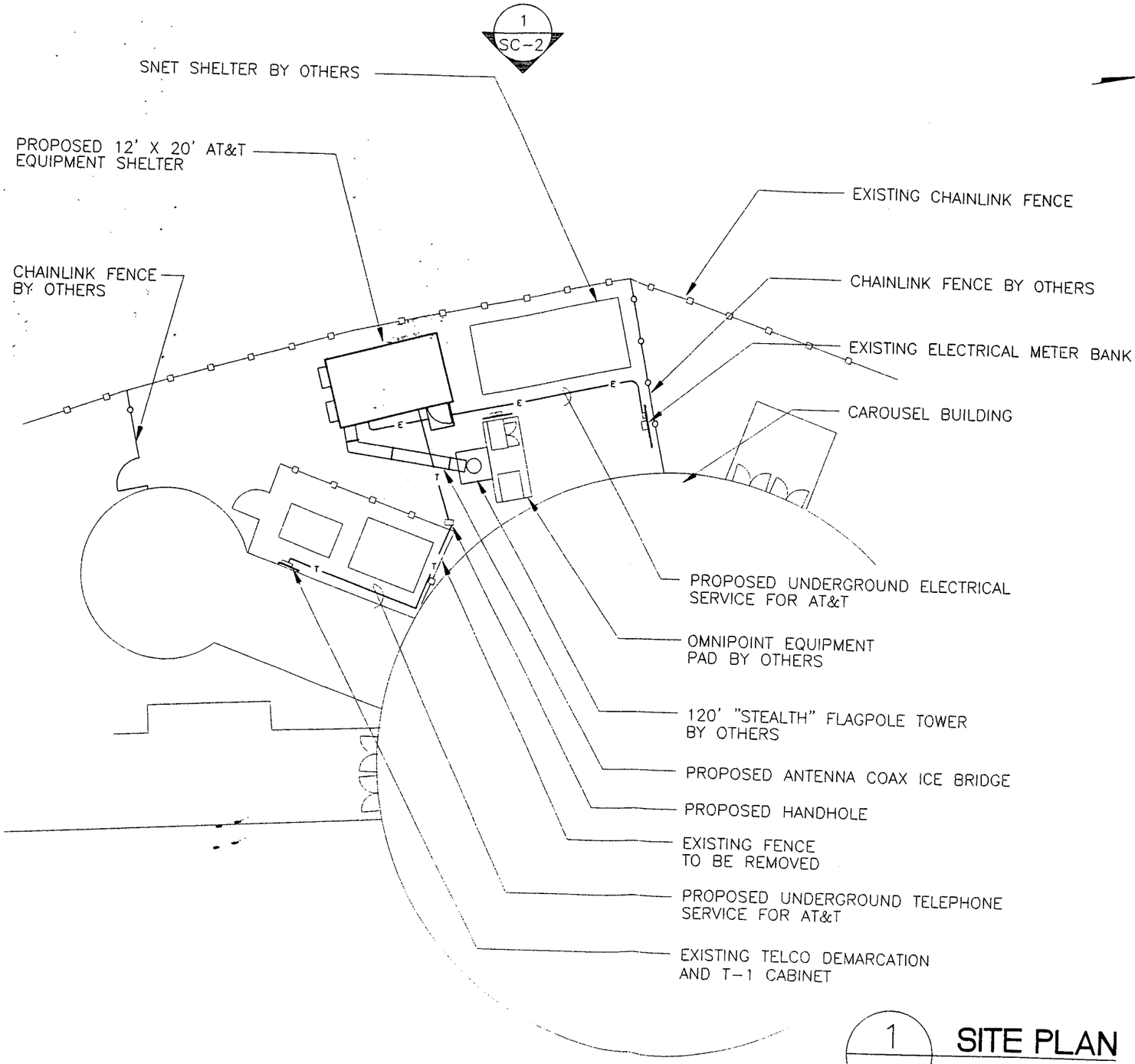
Conclusion

As delineated above, the proposed shared use of the Beardsley Facility satisfies the criteria set forth in C.G.S. § 16-50aa, and advances the General Assembly's and the Siting Council's goal of preventing the proliferation of towers in the State of Connecticut. AT&T Wireless therefore requests the Siting Council issue an order approving the proposed shared use of the Beardsley Facility.

Respectfully submitted,

Christopher B. Fisher, Esq.
On behalf of AT&T Wireless

cc: Mayor, City of Bridgeport
Melanie J. Howlett, Esq.
Neil J. Alexander, Esq.



1 / SC-1 **SITE PLAN**
NOT TO SCALE

REVISIONS		
00	08/29/00	C.T. SITING COUNCIL

AT&T
149 WATER STREET - 2C & 2D
NORWALK, CT 06854

Natcomm, LLC - Engineering Consultants
Natcomm, LLC.
43-2 North Stamford Road
Stamford, Connecticut 06906
Tel. (203) 486-0580
Fax (203) 486-0587
Consulting Engineers / Project Management
Civil - Structural - Mechanical - Electrical

PROFESSIONAL ENGINEER SEAL

BEARDSLEY ZOOLOGICAL GARDENS
1875 NOBLE AVENUE
BRIDGEPORT, CT 06606

PROJECT NO:	170A
DRAWN BY:	P.A.M.
CHECKED BY:	JJP
SCALE:	NOT TO SCALE
DATE:	07/12/00

SITE PLAN

SC-1
DWG. 1 OF 2

15. **Licensee Contact for Emergency:** Network Operations Center – (800) 832-6662

14. **Licensee's Address for Notice Purposes:** AT&T Wireless Services, Inc.
15 East Midland Avenue
Paramus, New Jersey 07652
Attn: Legal Department

Licensor: Omnipoint Communications, Inc.

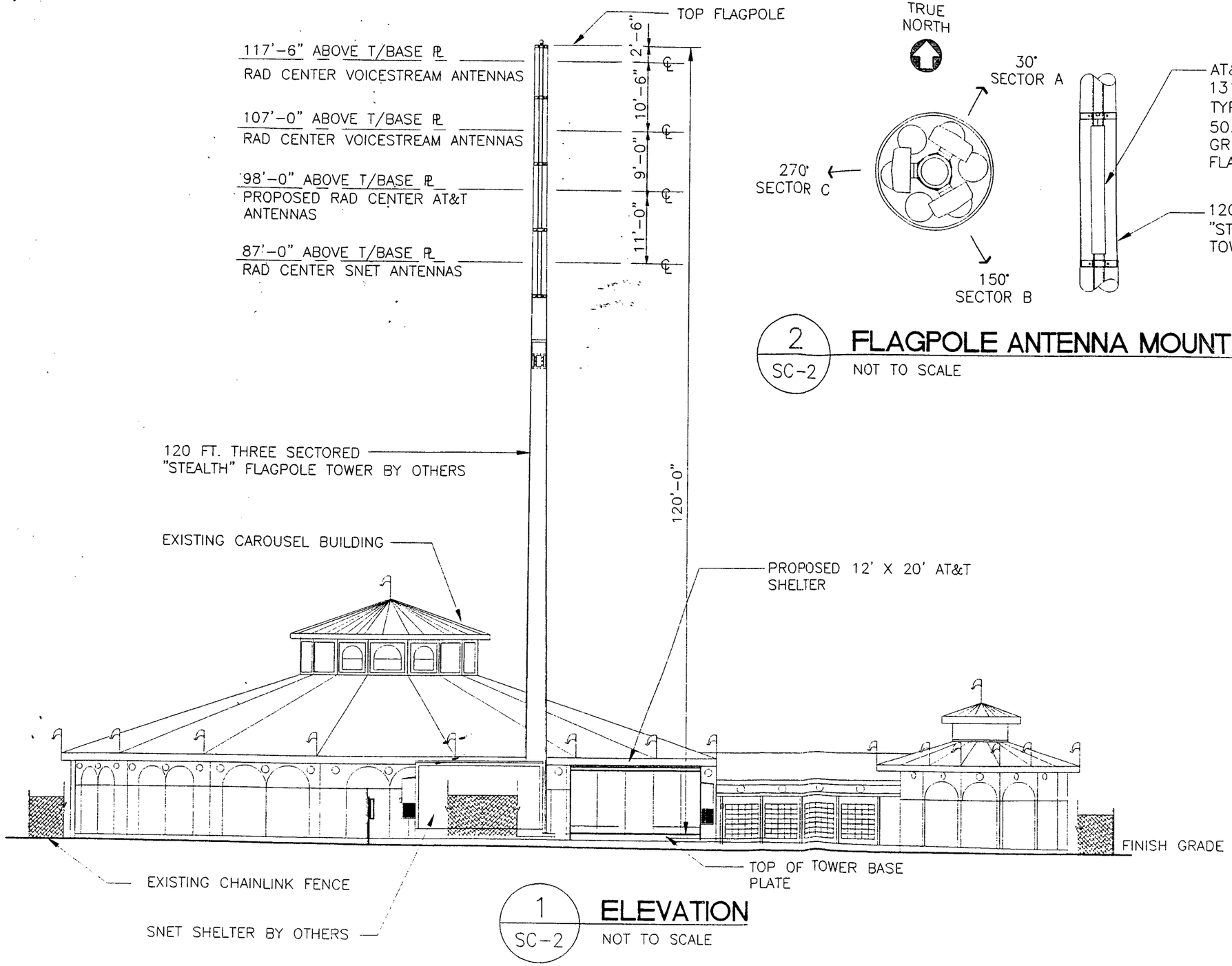
By: _____
Title: TECH DIR.
Date: 6/29/00

Licensee: AT&T Wireless Services, Inc.

By: _____
Title: System Development Manager
Date: 6/26/00

Attachments:

Exhibit 1: Description of Antennas/Dishes Locations
Exhibit 2: Description of Equipment Shelter/Room/Cabinet Locations
Exhibit 3: Plans and Specifications
Exhibit 4: Existing Liens, Rights-of-Way, Easements and Mortgages
Exhibit 5: Current Communications Users of Site (including frequencies)



1 / SC-2 **ELEVATION**
NOT TO SCALE

2 / SC-2 **FLAGPOLE ANTENNA MOUNT CONFIGURATION**
NOT TO SCALE

REVISIONS		
00	08/29/00	SITING COUNCIL

AT&T
149 WATER STREET - 2C & 2D
NORWALK, CT 06854

Natcomm, LLC - Engineering Consultants
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63-2 North Branford Road
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BEARDSLEY ZOOLOGICAL GARDENS
1875 NOBLE AVENUE
BRIDGEPORT, CT 06606

PROJECT NO:	170A
DRAWN BY:	P.A.M.
CHECKED BY:	JJP
SCALE:	NOT TO SCALE
DATE:	07/12/00

ELEVATION

SC-2
DWG. 2 OF 2

Bell Labs
Innovations for Lucent Technologies

Lucent Technologies

An Analysis of the Radiofrequency Environment in the Vicinity of a Proposed Personal Communications Services Installation Site CT-094: Beardsley Park, Bridgeport, Connecticut

Prepared by

Wireless & Optical Technologies Safety Department
Bell Laboratories
Murray Hill, New Jersey 07974-0636

Prepared for

Michael Murphy
AT&T Wireless Services
149 Water Street
Suite 2C & 2D
Norwalk, CT 06854

April 28, 2000

Table of Contents

An Analysis of the Radiofrequency Environment in the Vicinity of a Proposed Personal Communications Services Installation Site CT-094: Beardsley Park, Bridgeport, Connecticut

Summary

This report is an analysis of the radiofrequency (RF) environment surrounding the AT&T Wireless Services personal communications services (PCS) facility proposed for installation in Bridgeport, CT. The analysis, which includes contributions from the existing Omnipoint PCS antennas, utilizes engineering data provided by AT&T Wireless together with well-established analytical techniques for calculating the RF fields associated with PCS transmitting antennas. Worst-case assumptions were used to ensure safe-side estimates, i.e., the actual values will be significantly lower than the corresponding analytical values. The maximum level of RF energy associated with each transmitting antenna was compared with the appropriate frequency-dependent exposure limit, and these individual comparisons were combined to ensure that the total RF environment is in compliance with safety guidelines.

The results of this analysis indicate that the total maximum level of RF energy in areas normally accessible to the public is below all applicable health and safety limits. Specifically, the maximum level of RF energy associated with *simultaneous and continuous operation of all proposed and existing transmitters* will be less than 0.10% of the safety criteria adopted by the Federal Communications Commission as mandated by the Telecommunications Act of 1996. The Telecommunications Act of 1996 is the applicable Federal law with respect to consideration of the environmental effects of RF emissions in the siting of personal wireless facilities.

The total maximum level of RF energy will also be less than 0.10% of the exposure limits of ANSI, IEEE, NCRP and the limits used by all states that regulate RF exposure.

1. Introduction

This report was prepared in response to a request from AT&T Wireless Services for an analysis of the radiofrequency (RF) environment in the vicinity of the proposed personal communications services (PCS) facility, and an opinion regarding the concern for public health associated with long-term exposure in this environment. The analysis includes contributions to the RF environment from operation of the existing Omnipoint PCS antennas.

The Telecommunications Act of 1996[1] is the applicable *Federal law* with respect to consideration of environmental effects of RF emissions in the siting of wireless facilities. Regarding personal wireless services, e.g., PCS and cellular radio, Section 704 of the Telecommunications Act of 1996 states the following:

> "No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

Therefore, the purpose of this report is to ensure that the total RF environment associated with the proposed and existing facilities complies with Federal Communications Commission (FCC) guidelines as required by the Telecommunications Act of 1996.

2. Technical Data

The proposed AT&T Wireless Services PCS antennas are to be mounted on a flagpole located at Beardsley Park in Bridgeport, CT. Existing at the site are Omnipoint PCS antennas. The PCS antennas transmit at frequencies between 1930 and 1990 million-hertz (MHz).
The actual RF power propagated from a PCS antenna is usually less than 10 watts per transmitter (channel) and the actual *total* RF power is usually less than 200 watts per sector (assuming the maximum number of transmitters are installed and operate *simultaneously and continuously*). These are extremely low power systems when compared with other familiar radio systems such as AM, FM, and television broadcast, which operate upwards of 50,000 watts. The attached figure, which depicts the electromagnetic spectrum, lists familiar uses of RF energy. Table 1 lists engineering specifications for the proposed and existing installations.

3. Environmental Levels of RF Energy

The antennas used for PCS radio propagate most of the RF energy in a relatively narrow beam (in the vertical plane) directed toward the horizon. The small amount of energy that is directed along radials below the horizon results in a RF environment directly under the antennas that is not remarkably different from the environment at points more distant.

The methodology used to calculate the exposure levels follows that outlined by the FCC in OET Bulletin No. 65[1] and is explained in detail in the Appendix. For the case at hand, the maximal potential exposure levels associated with *simultaneous and continuous operation* of all proposed and existing transmitters can be readily calculated at any point in a plane at any height above grade. Based on the information shown in Table 1, the maximum power densities associated with the proposed and existing antennas at 6 ft and 16 ft above grade are shown in Table 2A.

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1. Federal Communications Commission Office of Engineering & Technology, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Radiation,* OET Bulletin No. 65, Edition 97-01 (August 1997).

The values shown for 16 ft above grade are representative of the maximum power density immediately outside the second floor of nearby buildings (assuming level terrain). These levels are also shown in Table 2A as a percentage of the FCC's maximum permissible exposure (MPE) values found in the Telecommunications Act of 1996 (specifically, in the FCC *Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation* [2]).

The power density values shown in Table 2A and 2B are the theoretical maxima that could occur and are not typical values. For example, the calculations include the effect of 100% field reinforcement from in-phase reflections. The assumption was also made that each transmitter operates continuously at maximum power. However, the intermittent nature of the transmission from cellular radio systems will result in time-weighted-average values that will be lower than those shown in Tables 2A and 2B. Experience has shown that the analytical technique used is extremely conservative. That is, actual power density levels have always been found to be smaller than the corresponding calculated levels [3]. Also, levels inside nearby homes and buildings, particularly this building, will be lower than those immediately outside because of the high attenuation of common building materials at these frequencies and, hence, will not be significantly different from typical ambient levels.

4. Comparison of Environmental Levels with RF Safety Criteria

Tables 2A and 2B show the calculated RF power density levels in the vicinity of the proposed and existing installations; Table 3 shows federal, state and consensus exposure limits for human exposure to RF energy at the frequencies of interest. Because the MPEs vary with frequency, the calculated RF levels for each transmitting antenna must first be compared to the appropriate MPE (the individual percentages are shown in Tables 2A and 2B), and the results of these comparisons combined before compliance with safety guidelines can be shown. With respect to FCC limits for public exposure, comparisons of the weighted combined analytical results indicate that the total maximal level associated with these antennas in areas normally accessible to the public will be less than 0.10% of the MPE.

5. Discussion of Safety Criteria

Publicity given to speculation about possible associations between health effects and exposure to magnetic fields from electric-power distribution lines, electric shavers and from the use of hand-held cellular telephones has heightened concern among some members of the public about the possibility that health effects may be associated with any exposure to electromagnetic energy. Many people feel uneasy about new or unfamiliar technology and often want absolute proof that something is safe. Such absolute guarantees are not possible since it is virtually impossible to prove that something does not exist. However, sound judgments can be made as to the safety of a physical agent based on the weight of the pertinent scientific evidence. This is exactly how safety guidelines are developed.

The overwhelming weight of scientific evidence unequivocally indicates that biological effects associated with exposure to RF energy are threshold effects, i.e., unless the exposure level is sufficiently high the effect will not occur regardless of exposure duration. (Unlike ionizing radiation, e.g., X-rays and nuclear radiation, repeated exposures to low level RF radiation, or nonionizing radiation, are not cumulative.) Thus, it is relatively straightforward to derive safety limits. By adding safety factors to the threshold level at which the most sensitive effect occurs, conservative exposure guidelines have been developed to ensure safety.

At present, there are more than 10,000 reports in the scientific literature which address the subject of RF bioeffects. These reports, most of which describe the results of epidemiology studies, animal and cell-culture studies, have been critically reviewed by leading researchers in the field and all new studies are continuously being reviewed by various groups and organizations whose interest is developing health standards. These include the U.S. Environmental Protection Agency, the National Institute for Occupational Safety and Health, the National Council on Radiation Protection and Measurements, the standards committees sponsored by the Institute of Electrical and Electronics Engineers, the International Radiation Protection Association under the sponsorship of the World Health Organization, and the National Radiological Protection Board of the UK. All of these groups have recently either reaffirmed existing health standards, developed and adopted new health standards, or proposed health standards for exposure to RF energy.

For example, in 1986, the National Council on Radiation Protection and Measurements (NCRP) published recommended limits for occupational and public exposure[4]. These recommendations were based on the results of an extensive critical review of the scientific literature by a committee of the leading researchers in the field of bioelectromagnetics. The literature selected included many controversial studies reporting effects at low levels. The results of all studies were weighed, analyzed and a consensus obtained establishing a conservative threshold upon which safety guidelines should be based. This threshold corresponds to the level at which the most sensitive, reproducible effects that could be related to human health were reported in the scientific literature. Safety factors were incorporated to ensure that the resulting guidelines would be at least ten to fifty times lower than the established threshold, even under worst-case exposure conditions. The NCRP recommended that continuous occupational exposure or exposure of the public should not exceed approximately those values indicated in Table 3. (See Table 3 for a summary of the corresponding safety criteria recommended by various organizations throughout the world.)

In July of 1986, the Environmental Protection Agency published a notice in the Federal Register, calling for public comment on recommended guidance for exposure of the public[5]. Three different limits were proposed. In 1987 the EPA abandoned its efforts and failed to adopt official federal exposure guidelines. However, in 1993 and 1996 the EPA, in its comments on the FCC's Notice of Proposed Rule Making to adopt safety guidelines[6], recommended adoption of the 1986 NCRP limits[4].

In September 1991, the RF safety standard developed by Subcommittee 4 of the Institute of Electrical and Electronics Engineers (IEEE) Standards Coordinating Committee SCC-28 was approved by the IEEE Standards Board[7]. (Until 1988 IEEE SCC-28 was known as the American National Standards Institute (ANSI) C95 Committee—established in 1959.) In November 1992, the ANSI Board of Standards Review approved the IEEE standard for use as an American National Standard. The limits of this standard are identical to the 1982 ANSI RFPGs[8] for occupational exposure and approximately one-fifth of these values for exposure of the general public at the frequencies of interest. Like those of the NCRP, these limits resulted from an extensive critical review of the scientific literature by a large committee of preeminently qualified scientists, most of whom were from academia and from research laboratories of federal public health agencies.

The panels of scientists from the World Health Organization's International Commission on Non-Ionizing Radiation Protection (ICNIRP)[9] and the National Radiological Protection Board in the United Kingdom[10] independently developed and in 1993 published guidelines similar to those

of ANSI/IEEE. In 1997, after another critical review of the latest scientific evidence, ICNIRP reaffirmed the limits published in 1993[11]. Also, what was formerly the USSR, which traditionally had the lowest exposure guides, twice has revised upward its limits for public exposure. Thus, there is a converging consensus of the world's scientific community as to what constitutes safe levels of exposure.

Finally, in implementing the National Environmental Policy Act regarding potentially hazardous RF radiation from radio services regulated by the FCC, the Commission's Rules require that licensees filing applications after January 1, 1997[2] ensure that their facilities will comply with the 1996 FCC MPE limits outlined in 47 CFR §1.1310[3][3]. (Under the terms of the Telecommunications Act of 1996, no local government may regulate the placement of wireless facilities based on RF emissions to the extent that these emissions comply with the FCC regulations [1].)

With respect to the proposed and existing antennas, be assured that the actual exposure levels in the vicinity of the Bridgeport, CT installation will be below any health standard used anywhere in the world and literally thousands of times below any level reported to be associated with any verifiable functional change in humans or laboratory animals. This holds true even when all transmitters operate *simultaneously and continuously at their highest power.* Power density levels of this magnitude are not even a subject of speculation with regard to an association with adverse health effects.

6. For Further Information

Anyone interested can obtain additional information about the environmental impact of PCS and cellular radio communications from:

Dr. Robert Cleveland, Jr.
Federal Communications Commission, Office of Engineering and Technology
Room 7002, 2000 M Street NW
Washington, DC 20554
(202) 418-2422

2. The FCC extended the transition period to October 15, 1997. Second Memorandum Opinion and Order and Notice of Proposed Rulemaking, ET Docket 93-62, FCC 97-303, adopted August 25, 1997. Prior to this date the FCC required most licensees to comply with 1982 ANSI C95.1 limits.

3. Although all FCC licensees will be required to comply with 47 CFR §1.1310 limits, the FCC will continue to exclude certain land mobile services from proving compliance with these limits 47 CFR §1.1307. Previously, although licensees had to comply with the 1982 ANSI C95.1 limits, the FCC categorically excluded land mobile services, including paging, cellular, ESMR and two-way radio, from hazard analyses because "individually or cumulatively they do not have a significant effect on the quality of the human environment"[12]. The FCC pointed out that there was no evidence of excessive exposure to RF radiation during routine normal operation of these radio services.

7. Conclusion

This report is an analysis of the radiofrequency (RF) environment surrounding the AT&T Wireless Services personal communications services (PCS) facility proposed for installation in Bridgeport, CT. The analysis, which includes contributions from the existing Omnipoint PCS antennas, utilizes engineering data provided by AT&T Wireless together with well-established analytical techniques for calculating the RF fields associated with PCS transmitting antennas. Worst-case assumptions were used to ensure safe-side estimates, i.e., the actual values will be significantly lower than the corresponding analytical values. The maximum level of RF energy associated with each transmitting antenna was compared with the appropriate frequency-dependent exposure limit, and these individual comparisons were combined to ensure that the total RF environment is in compliance with safety guidelines.

The results of this analysis indicate that the total maximum level of RF energy in areas normally accessible to the public is below all applicable health and safety limits. Specifically, the maximum level of RF energy associated with *simultaneous and continuous operation of all proposed and existing transmitters* will be less than 0.10% of the safety criteria adopted by the Federal Communications Commission as mandated by the Telecommunications Act of 1996. The Telecommunications Act of 1996 is the applicable Federal law with respect to consideration of the environmental effects of RF emissions in the siting of personal wireless facilities.

The total maximum level of RF energy will also be less than 0.10% of the exposure limits of ANSI, IEEE, NCRP and the limits used by all states that regulate RF exposure.

8. References

[1] Telecommunications Act of 1996, Title VII, Section 704, *Facilities Siting; Radio Frequency Emissions Standards*

[2] Federal Communication Commission 47 CFR Parts 1, 2, 15, 24 and 97. "*Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation.*" (August 6, 1996)

[3] Petersen, R.C., and Testagrossa, P.A., "Radiofrequency Fields Associated with Cellular-Radio Cell-Site Antennas," *Bioelectromagnetics*, Vol. 13, No. 6. (1992)

[4] *Biological Effects and Exposure Criteria for Radio Frequency Electromagnetic Fields,* NCRP Report No. 86, National Council on Radiation Protection and Measurements, Bethesda, MD. (1986)

[5] Federal Register, Vol. 51, No. 146, Wednesday, July 30, 1986.

[6] Notice of Proposed Rule Making *In the Matter of Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation*, August 13, 1993. ET Docket No. 93-62

[7] *IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz,* ANSI/IEEE C95.1-1992, Institute of Electrical and Electronics Engineers, Piscataway, NJ. (1991)

[8] American National Standard *Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz,* ANSI C95.1-1982, American National Standards Institute, New York, NY. (1982)

[9] *Electromagnetic Fields (300 Hz to 300 GHz),* Environmental Health Criteria 137, World Health Organization, Geneva, Switzerland. (1993)

[10] *Board Statement on Restrictions on Human Exposure to Static and Time Varying Electromagnetic Fields and Radiation,* Documents of the NRPB, Vol. 4, No. 5, National Radiological Protection Board, Chilton, Didcot, Oxon, United Kingdom. (1993)

[11] "Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300 GHz) - ICNIRP Guidelines," *Health Physics*, Vol. 74, No. 4, pp. 494-522. (1998)

[12] Action by the Commission February 12, 1987, by Second Report and Order (FCC 87-63), and Third Notice of Proposed Rulemaking (FCC 87-64). General Docket No. 79-144.

Enclosure: Figure. Electromagnetic Spectrum

Table 1: Engineering Specifications for the Proposed and Existing Radio Systems Bridgeport, CT

Site Specifications	AT&T Wireless	Omnipoint
maximum ERP† per channel	100 watts	400 watts
actual radiated power per channel	3.7 watts	12.7 watts
actual *total* radiated power per sector	29 watts	25 watts
number of transmit/receive antennas	N/A	N/A
number of transmit antennas	1 per sector	1 per sector
number of receive antennas	1 per sector	1 per sector
maximum number of transmitters	8 per sector	2 per sector
number of sectors configured	3	3
antenna centerline height above grade	98 ft	118 ft
antenna manufacturer	EMS Wireless*	EMS Wireless*
model number	RR90-17-04DP	RR90-17-00DP
gain	16.5 dBi	17.15 dBi
type	directional	directional
downtilt	4°	0°

† *Effective Radiated Power* - ERP is a measure of how well an antenna concentrates RF energy; it is not the actual power radiated from the antenna. To illustrate the difference, compare the brightness of an ordinary 100 watt light bulb with that from a 100 watt spot-light. Even though both are 100 watts, the spot-light appears brighter because it concentrates the light in one direction. In this direction, the spot-light effectively appears to be emitting more than 100 watts. In other directions, there is almost no light emitted by the spot-light and it effectively appears to be much less than 100 watts.

* This EMS model antenna contains two antenna arrays (Tx/Rx) in a single radome, i.e., there is only one structure per sector.

- some of these specifications are based on typical site configurations for this carrier in this region.

Table 2A: Calculated Maximum Levels and the Levels as a Percentage of 1996 FCC MPEs* for the Proposed and Existing Antennas, Bridgeport, CT

Provider	Power Density (mW/cm^2)		% of MPEs*	
	6 ft AMGL†	16 ft AMGL†	6 ft AMGL†	16 ft AMGL†
AT&T Wireless	< 0.00036	< 0.00046	0.036%	0.046%
Omnipoint	< 0.00018	< 0.00022	0.018%	0.022%
		TOTAL	0.054%	0.068%

* MPE: The FCC limits for maximum permissible exposure (same as 1986 NCRP limits at the frequencies of interest)
† AMGL: above mean grade level

Table 2B: Calculated Levels at Base of Structure and the Levels as a Percentage of 1996 FCC MPEs* for the Proposed and Existing Antennas, Bridgeport, CT

Provider	Power Density (mW/cm^2)		% of MPEs*	
	6 ft AMGL†	16 ft AMGL†	6 ft AMGL†	16 ft AMGL†
AT&T Wireless	< 0.000005	< 0.000007	0.0005%	0.0007%
Omnipoint	< 0.000018	< 0.000022	0.0018%	0.0022%
		TOTAL	0.0023%	0.0029%

* MPE: The FCC limits for maximum permissible exposure (same as 1986 NCRP limits at the frequencies of interest)
† AMGL: above mean grade level

Table 3: Summary of International, Federal, State and Consensus Safety Criteria for Exposure to Radiofrequency Energy at Frequencies Used for PCS and Cellular Radio Systems

Organization/Government Agency	Exposure Population	Power Density (mW/cm^2)	
		Cellular Radio	PCS
International Safety Criteria/Recommendations			
International Commission on Non-Ionizing Radiation Protection (1997)	Occupational	2.06	4.87
(*Health Physics* 74:4, 494-522. 1998)[1]	Public	0.41	0.98
National Radiological Protection Board	Occupational	5.00	10.00
(NRPB, 1993)	Public	2.79	10.00
Federal Requirements			
Federal Communications Commission	Occupational	2.75	5.00
(47 CFR §1.1310)	Public	0.55	1.00
Consensus Standards and Recommendations			
American National Standards Institute	Occupational	2.75	5.00
(ANSI C95.1 - 1982)	Public	2.75	5.00
Institute of Electrical and Electronics Engineers	Occupational	2.75	6.50
(ANSI/IEEE C95.1-1999 Edition)[2]	Public	0.55	1.30
National Council on Radiation Protection & Measurements	Occupational	2.75	5.00
(NCRP Report 86, 1986)	Public	0.55	1.00
State Codes			
New Jersey (NJAC 7:28-42)	Public	2.75	5.00
Massachusetts (Department of Health 105 CMR 122)	Public	0.55	1.00
New York State[3]	Public	0.55	1.00

NOTES:
1. Reaffirmed in 1997 and published with modification in 1998.
2. Incorporating IEEE Standard C95.1-1991 and IEEE Standard C95.1a-1998.
3. State of New York Department of Health follows NCRP Report 86.

APPENDIX - Analytical Technique

This appendix describes the methodology used to predict the radiofrequency (RF) electromagnetic environment surrounding the proposed AT&T PCS antennas. As a conservative measure, the methodology applies "worst-case" conditions that result in an over-estimate of the RF environment, e.g., the calculations include the effect of field reinforcement from in-phase reflections. Therefore, the predicted values are the theoretical maxima that could occur and not typical values. The actual power density levels have always been found to be smaller than the corresponding predicted levels[4]. The methodology described follows that outlined by the Federal Communications Commission (FCC) in their OET Bulletin No. 65[5].

For each transmitting antenna, the maximum RF power density at 6 ft above grade was estimated by performing a series of power density predictions for depression angles below the horizon from 5° to 90°. This was done using the vertical gain pattern of each antenna provided by the antenna manufacturer and by using the following equation:

$$S = \left(\frac{N \times P_N \times G_\theta \times 1.64}{4\pi R^2} \right)$$

and

$$S_{max} = 4 \times S$$

where:

S = plane wave equivalent power density

S_{max} = factor of 4 assumes a 100% ground reflection (resulting in a doubling of the field strength and a four-fold increase in power density)

N = maximum number of transmitters (channels)

P_N = actual power per channel input to the antenna

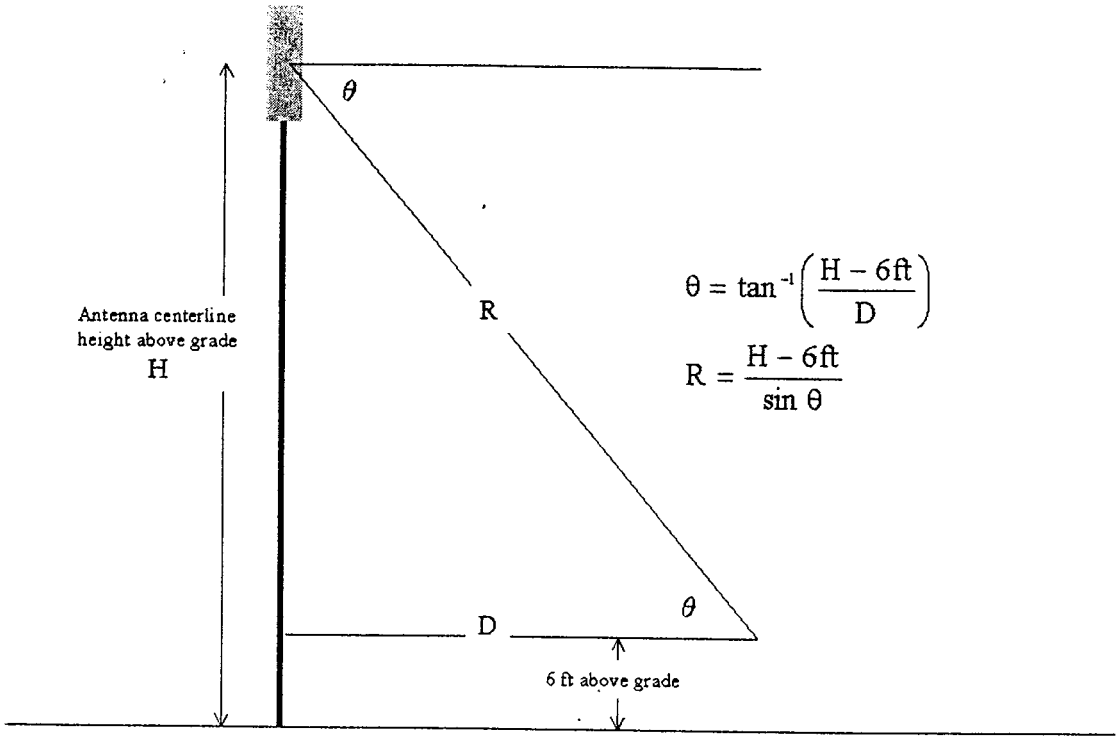
G_θ = far-field gain (numeric) of the antenna relative to a half-wave dipole in the direction of point of interest

R = distance (radial or slant) from the antenna center to point of interest

1.64 = gain of a half-wave dipole (2.15 dB) over an isotropic radiator

4. Petersen, R.C., and Testagrossa, P.A., Radiofrequency Fields Associated with Cellular-Radio Cell-Site Antennas, *Bioelectromagnetics, Vol. 13, No. 6 (1992).*

5. Federal Communications Commission Office of Engineering & Technology, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Radiation,* OET Bulletin No. 65, Edition 97-01 (August 1997).



Based on the technical specifications for the site outlined in Table 1, the maximum RF power density (S_{max}) associated with the AT&T PCS antennas occurs at a depression angle of 70° below the horizon and is calculated as follows:

$$R = (H\text{-}6)/\sin\theta = (98\text{-}6)/\sin(70°) = 97.9 \text{ ft}$$

$G_{70°}$ = -6.75 dBd (from antenna elevation gain pattern)

$$P_N = ERP/G_{max} = \frac{100}{10^{(14.35dBd/10)}} = 3.7 \text{ watts per channel}$$

$$S_{max} = 4x\frac{N x P_N x 10^{(G_\theta/10)} x 1.64}{4\pi R^2}$$

$$= 4x\frac{8ch x 3.7W/ch x 10^{(-6.75dBd/10)} x 1.64}{4x3.14x(97.9ft x 12in/ft x 2.54cm/in)^2}$$

$S_{max} = 3.64 \times 10^{-7}$ W/cm^2 = 0.000364 mW/cm^2

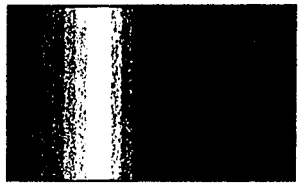
$$\text{AND \% of MPE} = \frac{0.000364\ mW/cm^2}{1\ mW/cm^2} \times 100\% = 0.036\%$$

ELECTROMAGNETIC SPECTRUM

Non-Ionizing Radiation

Ionizing Radiation

ELF, VF | Radio Frequencies | Infrared | UV | X-rays, γ-rays



AM Radio: *535 - 1605 kHz*
CB Radio: *27 MHz*
Cordless Phones: *49 MHz*
TV Ch 2-6: *54 - 88 MHz*
FM Radio: *88 - 108 MHz*
Marine Radio: *160 MHz*
TV Ch 7-13: *174 - 216 MHz*
TV UHF Ch 14-69: *470 - 800 MHz*
Cellular Radio, Specialized Mobile Radio, Paging: *806 - 946 MHz*
Antitheft devices: *10-20 kHz and/or 915 MHz*
Microwave oven: *915 and 2450 MHz*
Personal Communication Services: *1800 - 2200 MHz*
Intrusion alarms / door openers: *10.5 GHz*
Microwave radio: *1 - 40 GHz*
Satellite Communications: *100 MHz - 275 GHz*

Power Frequency

10^3 10^6 10^9 10^{12} 10^{15} 10^{18}

60 Hz 1kHz 1MHz 1GHz Frequency (Hz) →

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September 29, 2000

BY HAND
Mr. Joel Rinebold
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

Re: AT&T Wireless Services request for the
Shared Use of an Approved Tower Facility
at the Beardsley Zoological Gardens
1875 Noble Avenue, Bridgeport, Connecticut

Dear Mr. Rinebold:

On behalf of AT&T Wireless PCS, LLC d/b/a AT&T Wireless Services, we respectfully enclose an original and twenty copies of its revised plans prepared by Natcomm, LLC, including a site plan and elevation, reflecting the change from a 12' x 20' equipment shelter to equipment cabinets located on a 8'-6" x 15' equipment pad. AT&T's revised plans are consistent with the Voicestream proposed installation and approval by the Planning & Zoning Commission of the City of Bridgeport, a copy of which is enclosed for your review. Please be advised that these revised plans do not incorporate the stockade fencing and landscaping around the compound required as a condition of Voicestream's approval because Voicestream has not finalized those details and submitted its revised drawings to the City of Bridgeport. Based on prior discussions with the City Attorney's Office we respectfully request that the Council approve AT&T's tower sharing request.

Should the Council or staff have any questions regarding this matter, please do not hesitate to contact us.

Respectfully submitted,

Christopher B. Fisher, Esq.
On behalf of AT&T Wireless

cc: Mayor, City of Bridgeport
Melanie J. Howlett, Esq.
Neil J. Alexander, Esq.
Jennifer Young Gaudet, Esq.
Michael Murphy, AT&T Wireless Services

ZONING DEPARTMENT

DEVELOPMENT ADMINISTRATION

City of Bridgeport

DATE: March 31, 2000

OUR FILE: # 2K-07

Attorney J. Brendan Sharkey
100 Filley Street
Bloomfield, CT 06002

RE: Site Plan Review
1875 Noble Avenue
Bridgeport, CT

Dear Attorney Sharkey:

At its meeting held on Monday, March 27, 2000, the Planning & Zoning Commission voted to approve conditionally the application submitted by you which sought a Site Plan Review under Sec. 14-2 of the Bridgeport Zoning Regulations to permit the installation of a 120' high flagpole which will house telecommunications antennas & associated equipment within the Beardsley Zoo pavilion in a ZOOLOGICAL PARK ZONE.

The Commission stipulated the following conditions for its approval:

1. Stockade fencing not less that 6' high shall be installed to encompass & enclose the proposed equipment area.
2. No equipment shall exceed the height of the fencing required in condition No. 1 above.
3. Arborvitae trees no less than 6' high shall be planted at 6' intervals around the perimeter of the equipment enclosure area.
4. All required fencing & landscape trees are to be maintained at all times.
5. A "Removal Bond" as determined by the City Attorney's Office shall be filed with the Bridgeport Zoning Department prior to the Certification Of An Application For Zoning Compliance.

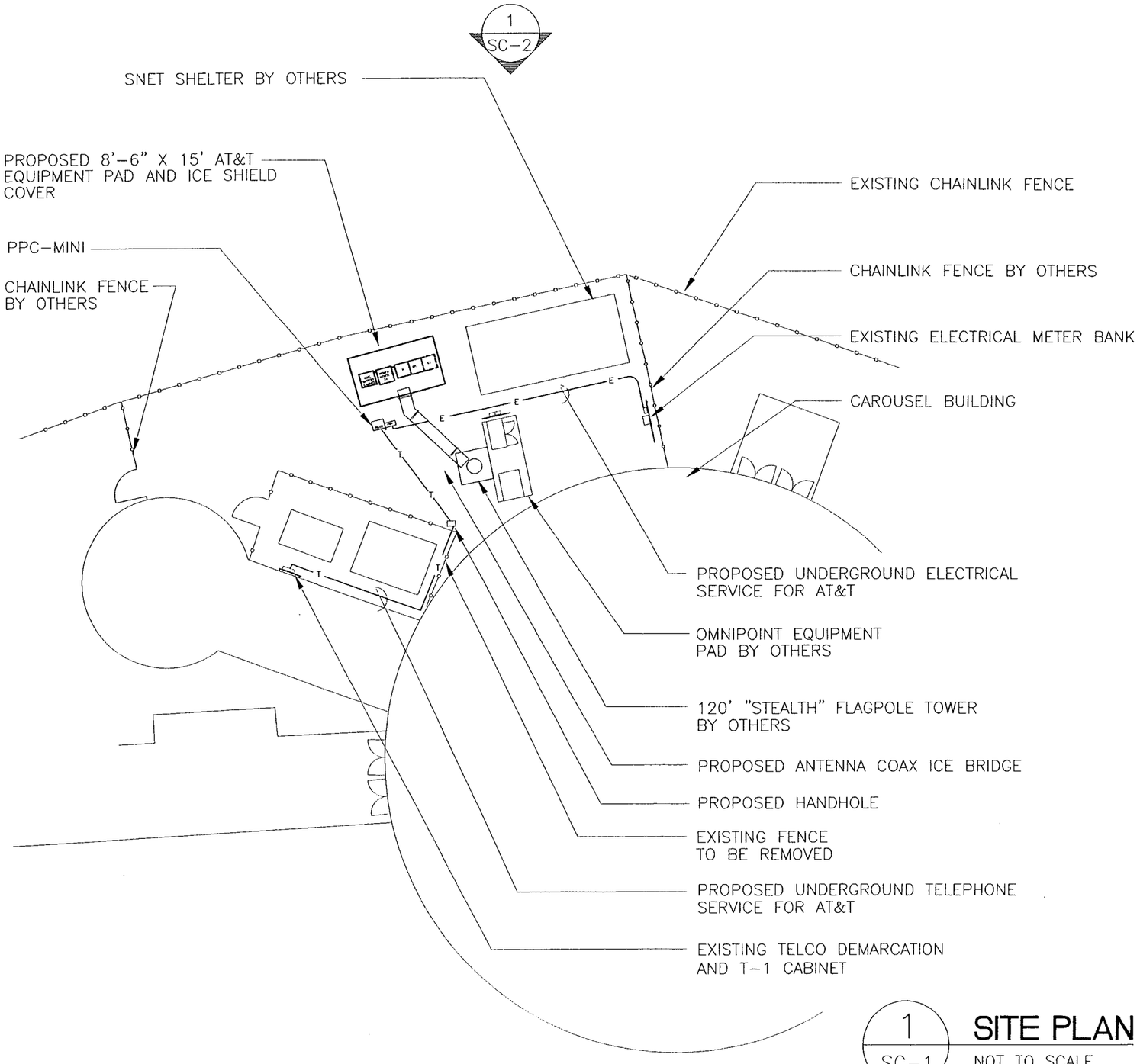
The Commission assigned the following reason for its action:

1. As to the Site Plan Review, the project, as approved, complies with the standards of Sec. 14-2-5 of the Bridgeport Zoning Regulations.

Very truly yours,

William A. Shaw, Clerk
Planning & Zoning Commission

WAS:map



1 / SC-1 **SITE PLAN**
NOT TO SCALE

REVISIONS		
00	09/21/00	CT SITING COUNCIL

AT&T
149 WATER STREET - 2C & 2D
NORWALK, CT 06854

Natcomm, LLC - Engineering Consultants
Natcomm, LLC.
63-2 North Branford Road
Branford, Connecticut 06405
Tel. (203) 488-0580
Fax (203) 488-8587
Consulting Engineers - Project Management
Civil - Structural - Mechanical - Electrical

PROFESSIONAL ENGINEER SEAL

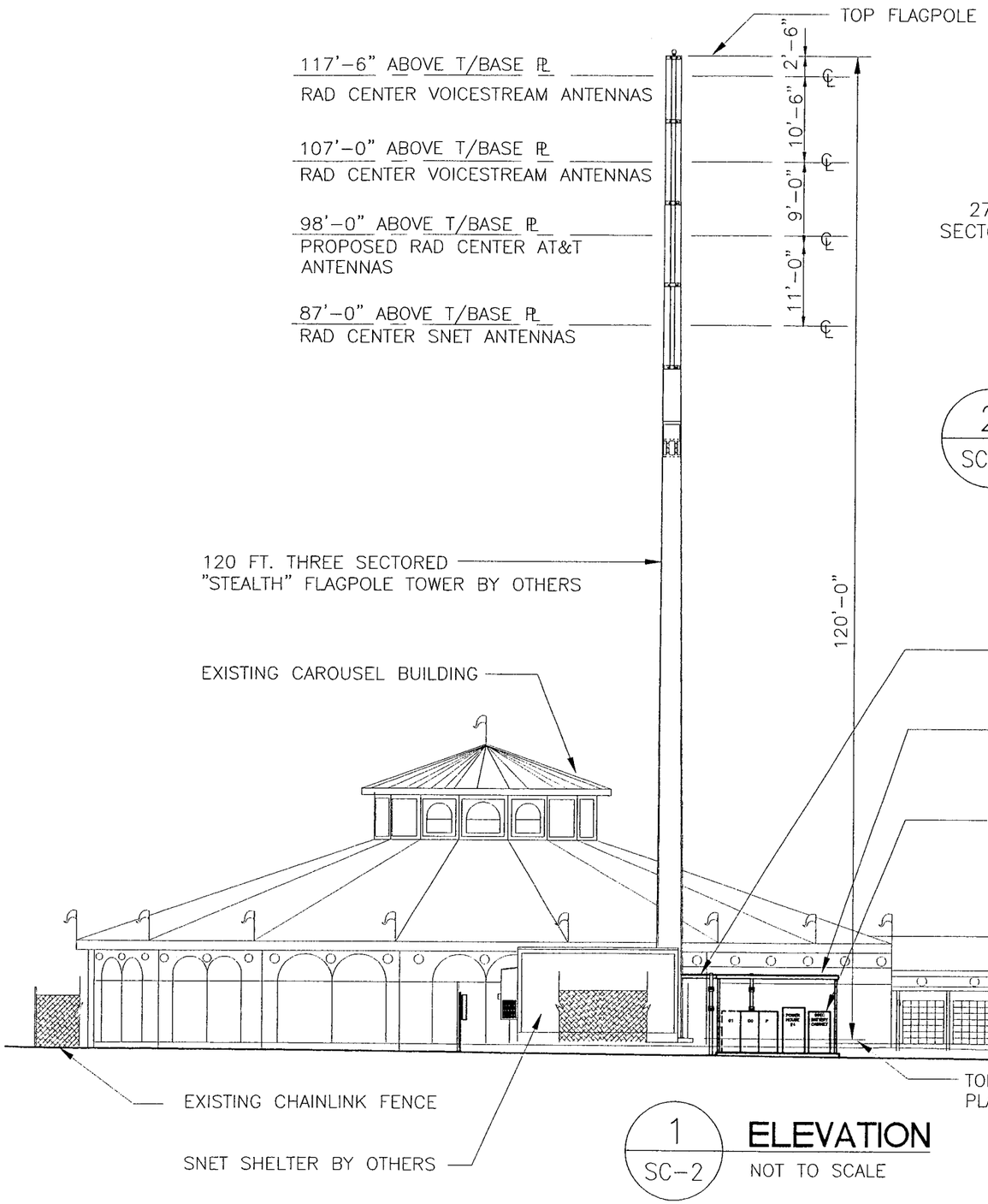
BEARDSLEY ZOOLOGICAL GARDENS

1875 NOBLE AVENUE
BRIDGEPORT, CT 06606

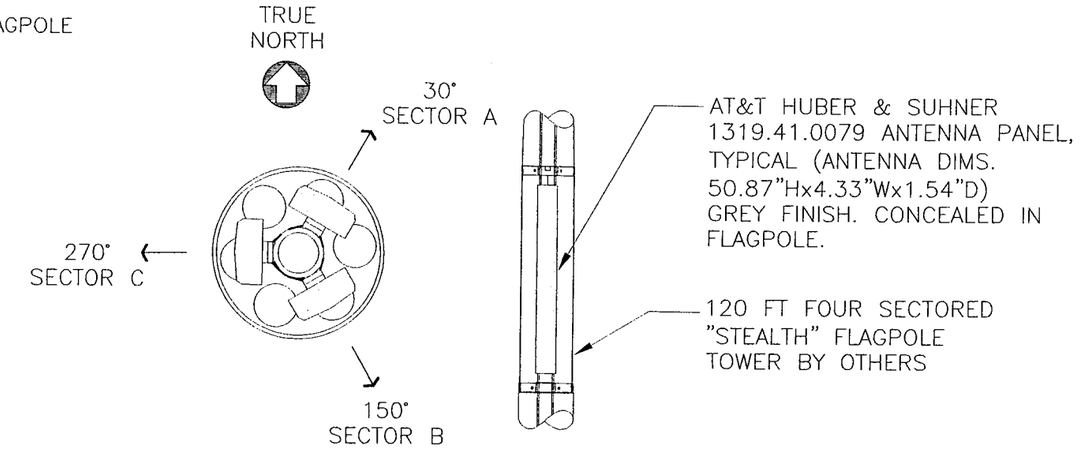
PROJECT NO:	170A
DRAWN BY:	P.A.M.
CHECKED BY:	JJP
SCALE:	NOT TO SCALE
DATE:	07/12/00

SITE PLAN

SC-1
DWG. 1 OF 2



1 / SC-2 **ELEVATION**
NOT TO SCALE



2 / SC-2 **FLAGPOLE ANTENNA MOUNT CONFIGURATION**
NOT TO SCALE

REVISIONS		
00	09/21/00	CT SITING COUNCIL

AT&T
149 WATER STREET - 2C & 2D
NORWALK, CT 06854

Natcomm, LLC
63-2 North Branford Road
Branford, Connecticut 06405
Tel. (203) 488-0580
Fax (203) 488-8587
Consulting Engineers - Project Management
Civil-Structural-Mechanical-Electrical

PROFESSIONAL ENGINEER SEAL

BEARDSLEY ZOOLOGICAL GARDENS

1875 NOBLE AVENUE
BRIDGEPORT, CT 06606

PROJECT NO:	170A
DRAWN BY:	P.A.M.
CHECKED BY:	JJP
SCALE:	NOT TO SCALE
DATE:	07/12/00

ELEVATION

SC-2
DWG. 2 OF 2

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September 19, 2000

VIA FAX (860) 827-2950
Mr. Joel Rinebold
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

Re: TS-AT&T-015-000901

Dear Mr. Rinebold:

Yesterday, we received a telephone message from Ms. Melanie Howlett, Esq., of the Bridgeport City Attorney's office with respect to the above referenced matter. We have also spoken with and been provided additional information by representatives of Voicestream with respect to the design of their facility at the Beardsley Zoo. Please be advised that AT&T will revise its plans to incorporate at grade equipment cabinets similar to those of Voicestream's versus the shelter currently proposed. We respectfully request that the Council approve AT&T's tower sharing request at today's meeting subject to a condition incorporating the equipment design change. Thank you for your assistance in this regard.

Very Truly Yours,

Christopher B. Fisher

cc: Robert K. Erling
Melanie Howlett, Esq.
Neil Alexander, Esq.

CUDDY & FEDER & WORBY LLP

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MARYANN M. PALERMO
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LOUIS R. TAFFERA

September 15, 2000

VIA FEDERAL EXPRESS
Mr. Robert K. Erling
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RECEIVED
SEP 18 2000
CONNECTICUT
SITING COUNCIL

Re: AT&T Wireless Services request for the
Shared Use of an Approved Tower Facility
at the Beardsley Zoological Gardens
1875 Noble Avenue, Bridgeport, Connecticut

Dear Mr. Erling:

On behalf of AT&T Wireless PCS, LLC d/b/a AT&T Wireless Services, we respectfully enclose an original and twenty copies of its response to the Siting Council's interrogatory dated September 4, 2000 for the above referenced site.

Should the Council or staff have any questions or require any further information please do not hesitate to contact us.

Very Truly Yours,

Linda Grant

Linda Grant

Encl.

cc: Christopher B. Fisher, Esq.

IN RE: REQUEST FOR SHARED USE OF	)	
AN APPROVED TOWER LOCATED AT THE	)	TS-AT&T-015-000901
BEARDSLEY ZOOLOGICAL GARDENS,	)	
1875 NOBLE AVENUE,	)	September 15, 2000
BRIDGEPORT,CONNECTICUT	)	

AT&T WIRELESS PCS, INC.
RESPONSE TO INTERROGATORIES

AT&T Wireless PCS, Inc. ("AT&T") respectfully submits the following response to the Siting Council's interrogatory dated September 4, 2000 in support of its tower sharing request involving an approved communications tower located at the Beardsley Zoological Gardens, 1875 Noble Avenue in the City of Bridgeport.

Interrogatory 1

Q1. Describe the architectural treatment proposed for the SNET and AT&T equipment shelters at the Beardsley Zoological Gardens. Would the proposed shelters be consistent with the surroundings within the Beardsley Zoological Gardens?

R1. The AT&T equipment shelter will have a typical aggregate finish. During the City of Bridgeport's site plan review of Voicestream's application for the flagpole and associated equipment, future co-location by AT&T and SNET was discussed by Voicestream. As such, the site plan approved by the City Planning & Zoning Commission identified the fenced area and footprint of AT&T and SNET's shelters. Further, we are advised that a condition of Voicestream's site plan approval includes a requirement that there be stockade fencing and landscaping around the compound including AT&T's shelter. AT&T's plans provided to the Council are based on those made available to AT&T by Voicestream and do not show these improvements because Voicestream is in the process of revising its plans with the City and obtaining all permits for the site. Regardless, the City Planning & Zoning Commission's review and approval of Voicestream's application included provisions to ensure that wireless equipment within the fenced area would be consistent with the surroundings within the Beardsley Zoological Gardens.

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2000, a copy of the foregoing was served via first class mail on the following:

Mayor, City of Bridgeport
Melanie J. Howlett, Esq.

Christopher B. Fisher

C&F&W: 266921. 01

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square
New Britain, Connecticut 06051
Phone: (860) 827-2935
Fax: (860) 827-2950

September 8, 2000

Honorable Joseph P. Ganim
Mayor
City of Bridgeport
City Hall
999 Broad Street
Bridgeport, CT 06604

RE: **TS-AT&T-015-000901** - AT&T Wireless PCS, LLC d/b/a AT&T Wireless Services request for an order to approve tower sharing at an existing telecommunications facility located at 1875 Noble Avenue, Bridgeport, Connecticut.

Dear Mayor Ganim:

The Connecticut Siting Council (Council) received this request for tower sharing, pursuant to Connecticut General Statutes § 16-50aa.

The Council will consider this item at the next meeting scheduled for September 19, 2000, at 2:30 p.m. in Hearing Room One, Ten Franklin Square, New Britain, Connecticut.

Please call me or inform the Council if you have any questions or comments regarding this proposal.

Thank you for your cooperation and consideration.

Very truly yours,

Joel M. Rinebold
Executive Director

JMR/RKE/grg

Enclosure: Notice of Tower Sharing

c: Ms. Melanie J. Howlett, Assistant City Attorney, City of Bridgeport

Logged

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

10 Franklin Square
New Britain, Connecticut 06051
Phone: (860) 827-2935
Fax: (860) 827-2950

FACSIMILE TRANSMISSION SHEET

DATE: September 4, 2000

TO: Attorney Christopher Fisher
Cuddy, Feder & Worby
90 Maple Avenue
White Plains, NY 10601

Work No.: ( )
Fax No.: (914) 761-5372

FROM: Robert K. Erling
Connecticut Siting Council

Work No.: (860) 827-2935
Fax No.: (860) 827-2950

Total number of pages (including this sheet): 2

Re: Please review the attached interrogatories and return your response to my attention by September 18, 2000.
Thank you for your attention to this matter.

If problems occur during transmission, please contact at 860-827-2935.

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square
New Britain, Connecticut 06051
Phone: (860) 827-2935
Fax: (860) 827-2950

AT&T
Interrogatories
TS-AT&T-015-000901
Beardsley Zoological Gardens
Bridgeport, Connecticut

1. Describe the architectural treatment proposed for the SNET and AT&T equipment shelters at the Beardsley Zoological Gardens. Would the proposed shelters be consistent with the surroundings within the Beardsley Zoological Gardens?