



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

December 6, 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) is in receipt of your correspondence of December 5, 2022 submitted in response to the Council's November 8, 2022 and November 17, 2022 notifications of an incomplete request for exempt modification with regard to the above-referenced matter.

The submissions render the request for exempt modification complete and the Council will process the request in accordance with the Federal Communications Commission 60-day timeframe.

Thank you for your attention and cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie A. Bachman".

Melanie A. Bachman
Executive Director

MAB/IN/emr

emr

From: Barbadora, Jeff <Jeff.Barbadora@crowncastle.com>

Sent: Monday, December 5, 2022 8:33 AM

To: Robidoux, Evan <Evan.Robidoux@ct.gov>

Cc: CSC-DL Siting Council <Siting.Council@ct.gov>

Subject: RE: Council 2nd Incomplete Letter for EM-T-MOBILE-014-221018 (150 North Main Street, Branford)

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Good morning,

Please see attached updated RF analysis as requested in this 2nd Incomplete Letter.

Please let me know if you have any questions.

Thanks,

Jeffrey Barbadora

Site Acquisition Specialist

781-970-0053

Crown Castle

1800 W. Park Drive, Suite 250

Westborough, MA 01581



FOX HILL TELECOM

Radio Frequency Emissions Analysis Report



Site ID: CTNH107A

NH107/Global/Cherry Hill
150 North Main Street
Branford, CT 06405

December 3, 2022

Fox Hill Telecom Project Number: 221569

Site Compliance Summary	
Compliance Status:	COMPLIANT
Site total MPE% of FCC general population allowable limit:	2.46 %



December 3, 2022

T-MOBILE

Attn: RF Manager
35 Griffin Road South
Bloomfield, CT 06009

Emissions Analysis for Site: **CTNH107A – NH107/Global/Cherry Hill**

Fox Hill Telecom, Inc (“Fox Hill”) was directed to analyze the proposed upgrades to the T-MOBILE facility located at **150 North Main Street, Branford, CT**, for the purpose of determining whether the emissions from the Proposed T-MOBILE Antenna Installation located on this property are within specified federal limits.

All information used in this report was analyzed as a percentage of current Maximum Permissible Exposure (% MPE) as listed in the FCC OET Bulletin 65 Edition 97-01 and ANSI/IEEE Std C95.1. The FCC regulates Maximum Permissible Exposure in units of microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$). The number of $\mu\text{W}/\text{cm}^2$ calculated at each sample point is called the power density. The exposure limit for power density varies depending upon the frequencies being utilized. Wireless Carriers and Paging Services use different frequency bands each with different exposure limits, therefore it is necessary to report results and limits in terms of percent MPE rather than power density.

All results were compared to the FCC (Federal Communications Commission) radio frequency exposure rules, 47 CFR 1.1307(b)(1) – (b)(3), to determine compliance with the Maximum Permissible Exposure (MPE) limits for General Population/Uncontrolled environments as defined below.

General population/uncontrolled exposure limits apply to situations in which the general population may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general population would always be considered under this category when exposure is not employment related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

General population exposure to radio frequencies is regulated and enforced in units of microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$). The general population exposure limits for the 600 MHz & 700 MHz bands are approximately $400 \mu\text{W}/\text{cm}^2$ and $467 \mu\text{W}/\text{cm}^2$ respectively. The general population exposure limit for the 1900 MHz (PCS), 2100 MHz (AWS) and 2500 MHz (BRS) bands is $1000 \mu\text{W}/\text{cm}^2$. Because each carrier will be using different frequency bands, and each frequency band has different exposure limits, it is necessary to report percent of MPE rather than power density.



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Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Additional details can be found in FCC OET 65.



CALCULATIONS

Calculations were performed for the proposed upgrades to the T-MOBILE antenna facility located at **150 North Main Street, Branford, CT**, using the equipment information listed below. All calculations were performed per the specifications under FCC OET 65 for far field modeling calculations.

In OET-65, plane wave power densities in the Far Field of an antenna are calculated by considering antenna gain and reflective waves that would contribute to exposure.

Since the radiation pattern of an antenna has developed in the **Far Field** region the power gain in specific directions needs to be considered in exposure predictions to yield an Effective Radiated Power (ERP) in each specific direction from the antenna. Also, since the vertical radiation pattern of the antenna is considered, the exposure calculations would most likely be reduced significantly at ground level, resulting in a more realistic estimate of the actual exposure levels.

Additionally, to model a truly "worst case" prediction of exposure levels at or near a surface, such as at ground-level or on a rooftop, reflection off the surface of antenna radiation power can be assumed, resulting in a potential four-fold increase in power density in calculating far field power density values.

With these factors Considered, the worst case **Far Field prediction model** utilized in this analysis is determined by the following equation:

Equation 9 per FCC OET65 for Far Field Modeling

$$S = \frac{33.4 \text{ ERP}}{R^2}$$

S = Power Density

ERP = Effective Radiated Power from antenna

R = Distance from the antenna (meters)

Predicted far field power density values for all carriers identified in this report were calculated 6 feet above the ground level and are displayed as a percentage of the applicable FCC standards. All emissions values for other carriers were calculated using the same Far Field model outlined above, using industry standard radio configurations and frequency band selection based upon available licenses in this geographic area for emissions contribution estimates.



For each T-Mobile sector the following channel counts, frequency bands and power levels were utilized as shown in *Table 1*:

Technology	Frequency Band	Channel Count	Transmit Power per Channel (W)
LTE / 5G NR	600 MHz	2	40
LTE	700 MHz	2	20
LTE	1900 MHz (PCS)	4	40
LTE	2100 MHz (AWS)	4	40
LTE / 5G NR	2500 MHz (BRS)	8	20

Table 1: Channel Data Table



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The following T-Mobile antennas listed in *Table 2* were used in the modeling for transmission in the 600 MHz, 700 MHz, 1900 MHz (PCS), 2100 MHz (AWS) and 2500 MHz (BRS) frequency bands. This is based on feedback from the carrier with regards to anticipated antenna selection. Maximum gain values for all antennas are listed in the Inventory and Power Data table below.

Sector	Antenna Number	Antenna Make / Model	Antenna Centerline (ft)
A	1	RFS APXVAALL24_43-U-NA20	147
A	2	Commscope VV-65B-R1	147
A	3	Ericsson AIR6419 B41	147
B	1	RFS APXVAALL24_43-U-NA20	147
B	2	Commscope VV-65B-R1	147
B	3	Ericsson AIR6419 B41	147
C	1	RFS APXVAALL24_43-U-NA20	147
C	2	Commscope VV-65B-R1	147
C	3	Ericsson AIR6419 B41	147

Table 2: Antenna Data

All calculations were done with respect to uncontrolled / general population threshold limits.



RESULTS

Per the calculations completed for the proposed T-MOBILE configurations *Table 3* shows resulting emissions power levels and percentages of the FCC's allowable general population limit.

Antenna ID	Antenna Make / Model	Frequency Bands	Antenna Gain (dBd)	Channel Count	Total TX Power (W)	ERP (W)	MPE %
Antenna A1	RFS APXVAALL24_43-U-NA20	600 MHz / 700 MHz	13.65 / 13.85	4	120	2,824.56	0.12
Antenna A2	Commscope VV-65B-R1	1900 MHz (PCS) / 2100 MHz (AWS)	16.55 / 16.85	8	320	14,976.45	0.27
Antenna A3	Ericsson AIR6419 B41	2500 MHz (BRS)	21.5	8	160	22,600.60	0.41
Sector A Composite MPE%							0.80
Antenna B1	RFS APXVAALL24_43-U-NA20	600 MHz / 700 MHz	13.65 / 13.85	4	120	2,824.56	0.12
Antenna B2	Commscope VV-65B-R1	1900 MHz (PCS) / 2100 MHz (AWS)	16.55 / 16.85	8	320	14,976.45	0.27
Antenna B3	Ericsson AIR6419 B41	2500 MHz (BRS)	21.5	8	160	22,600.60	0.41
Sector B Composite MPE%							0.80
Antenna C1	RFS APXVAALL24_43-U-NA20	600 MHz / 700 MHz	13.65 / 13.85	4	120	2,824.56	0.12
Antenna C2	Commscope VV-65B-R1	1900 MHz (PCS) / 2100 MHz (AWS)	16.55 / 16.85	8	320	14,976.45	0.27
Antenna C3	Ericsson AIR6419 B41	2500 MHz (BRS)	21.5	8	160	22,600.60	0.41
Sector C Composite MPE%							0.80

Table 3: T-MOBILE Emissions Levels



The Following table (*table 4*) shows all additional identified carriers on site and their emissions contribution estimates, along with the newly calculated maximum T-MOBILE MPE contributions per this report. FCC OET 65 specifies that for carriers utilizing directional antennas that the highest recorded sector value be used for composite site MPE values due to their greatly reduced emissions contributions in the directions of the adjacent sectors. For this site, all three T-Mobile sectors have the same configuration yielding the same results on all three sectors. *Table 5* below shows a summary for each T-MOBILE Sector as well as the composite estimated MPE value for the site.

Site Composite MPE%	
Carrier	MPE%
T-MOBILE – Max Per Sector Value	0.80 %
DISH	0.77 %
AT&T	0.78 %
PageNet	0.11 %
Site Total MPE %:	2.46 %

Table 4: All Carrier MPE Contributions

T-MOBILE Sector A Total:	0.80 %
T-MOBILE Sector B Total:	0.80 %
T-MOBILE Sector C Total:	0.80 %
Site Total:	2.46 %

Table 5: Site MPE Summary



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Table 6 below details a breakdown by frequency band and technology for the MPE power values for the maximum calculated T-MOBILE sector(s). For this site, all three T-Mobile sectors have the same configuration yielding the same results on all three sectors.

T-MOBILE _ Frequency Band / Technology Max Power Values (Per Sector)	# Channels	Watts ERP (Per Channel)	Height (feet)	Total Power Density ($\mu\text{W}/\text{cm}^2$)	Frequency (MHz)	Allowable MPE ($\mu\text{W}/\text{cm}^2$)	Calculated % MPE
T-Mobile 600 MHz LTE / 5G NR	2	926.96	147	0.34	600 MHz	400	0.08%
T-Mobile 700 MHz LTE	2	485.32	147	0.18	700 MHz	467	0.04%
T-Mobile 1900 MHz (PCS) LTE	4	1,807.42	147	1.31	1900 MHz (PCS)	1000	0.13%
T-Mobile 2100 MHz (AWS) LTE	4	1,936.69	147	1.40	2100 MHz (AWS)	1000	0.14%
T-Mobile 2500 MHz (BRS) LTE / 5G NR	8	2,825.08	147	4.09	2500 MHz (BRS)	1000	0.41%
						Total:	0.80 %

Table 6: T-MOBILE Maximum Sector MPE Power Values



Summary

All calculations performed for this analysis yielded results that were **within** the allowable limits for general population exposure to RF Emissions.

The anticipated maximum composite contributions from the T-MOBILE facility as well as the site composite emissions estimates value with regards to compliance with FCC's allowable limits for general population exposure to RF Emissions are shown here:

T-MOBILE Sector	Power Density Value (%)
Sector A:	0.80 %
Sector B:	0.80 %
Sector C:	0.80 %
T-MOBILE Maximum Total (per sector):	0.80 %
Site Total:	2.46 %
Site Compliance Status:	COMPLIANT

The estimated composite MPE value for this site assuming all carriers present is **2.46 %** of the allowable FCC established general population limit sampled at the ground level. This is based upon the far field calculations performed for all carriers identified in this report.

FCC guidelines state that if a site is found to be out of compliance (over allowable thresholds), that carriers over a 5% contribution to the composite value will require measures to bring the site into compliance. For this facility, the composite estimated values calculated were well within the allowable 100% threshold standard per the federal government.

Scott Heffernan
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