# Robinson+Cole

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Also admitted in Massachusetts and New York

October 2, 2023

Melanie A. Bachman Executive Director/Staff Attorney Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Notice of Exempt Modification – Facility Modifications Cellco Partnership d/b/a Verizon Wireless

P2P Project - 126 Ledge Road, Darien, Connecticut

Dear Attorney Bachman:

Cellco Partnership d/b/a Verizon Wireless ("Cellco") currently holds a license, issued by the Federal Communications Commission ("FCC"), to provide wireless communications services in the 28 GHz frequency range. To meet its FCC license requirements for frequency use and deployment, Cellco plans to deploy a new, "Point to Point" ("P2P") 28 GHz microwave system at numerous cell sites in Connecticut. Initially, these frequencies will help Cellco maintain certain security systems currently used to monitor cell site equipment. This notice pertains to the P2P system that will be deployed at Cellco's existing cell site at 126 Ledge Road in Darien, Connecticut (the "Darien Cell Site").

To establish the referenced P2P system, Cellco will install two (2) point to point microwave dish antennas on the roof of the existing equipment shelter at the Darien Cell Site. Unlike the broadcast antennas on the tower, the P2P dish antennas will communicate only with each other. Shelter-mounted dish antennas will be installed at opposite ends of the shelter roof, approximately 20 feet apart, at a height of approximately twelve (12) feet above grade. The antennas would be attached to a non-penetrating ballast-mounted antenna mast. A copy of the Proposed Shelter View, antenna mount illustration and dish antenna specifications are included in <u>Attachment 1</u>.

Please accept this letter as notification pursuant to R.C.S.A. § 16-50j-73, for construction that constitutes an exempt modification pursuant to R.C.S.A. § 16-50j-72(b)(2). In accordance with R.C.S.A. § 16-50j-73, a copy of this letter is being sent to Chief Elected Officials and Land Use Officers in the Town of Darien. The Town of Darien is the owner of the property at 126 Ledge Road.

27947724-v1

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Melanie A. Bachman, Esq. October 2, 2023 Page 2

The planned modifications to the listed facilities fall squarely within those activities explicitly provided for in R.C.S.A. § 16-50j-72(b)(2).

- 1. The proposed modifications will not result in an increase in the height of the existing tower. The proposed 28 GHz antennas will be installed on roof of the existing equipment shelter, approximately 12 feet above grade.
- 2. The proposed modifications will not require the extension of the site boundary.
- 3. The proposed modifications will not increase noise levels at the facility by six decibels or more, or to levels that exceed state and local criteria.
- 4. The installation of the 28 GHz antennas will not increase radio frequency ("RF") emissions at the facility to a level at or above the Federal Communications Commission (FCC) safety standard. Included in <a href="Attachment 2">Attachment 2</a> is a Calculated Radio Frequency Emissions Report verifying that RF emissions from the Darien Cell Site with the P2P system installed will comply with the FCC Standards.
- 5. The proposed modifications will not cause a change or alteration in the physical or environmental characteristics of the site.
- 6. According to the attached August 14, 2023, letter from Dewberry Engineers Incorporated, Cellco's existing equipment shelter roof and the proposed ballast sled antenna mounting system can support the proposed 28 GHz antenna installations. A copy of the Dewberry letter is included in <a href="Attachment 3">Attachment 3</a>.

A Certificate of Mailing verifying that this filing was sent to the municipal officials and the property owner is included in <u>Attachment 4</u>.

For the foregoing reasons, Cellco respectfully submits that the proposed modifications to the above-referenced telecommunications facility constitutes an exempt modification under R.C.S.A. § 16-50j-72(b)(2).

Sincerely,

Kenneth C. Baldwin

Enclosures Copy to:

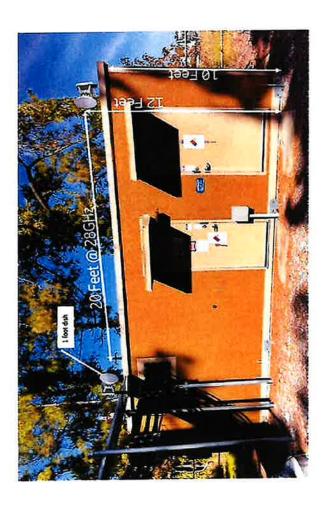
Monica McNally, First Selectman Jeremy Ginsberg, Director of Land Use Aleksey Tyurin, Verizon Wireless

# **ATTACHMENT 1**

# Proposed shelter view



- Rohn Non-Penetrating Roof mount (not quoted HW/Logistics per RFP)
- 30-inch mast
- Quick assembly
- 8 blocks @ 32lbs = 256 lbs of ballast (TBD)
- Cable management will consist of
- Zip ties
- Angle adaptors with snap-ins
- PVC pipe runs across roof top
- Possible Fiberbond chase (still being reviewed)



- Hatch plate to be used
- Existing grounding points
  - No new penetrations

Roof or walls

- Existing rack power 2 x 10amp
- Existing cable trays



# **Technical Specifications**

**WTM 4100** 

ANSI with A2C+ Operation



# **General Specifications**

| General                                    | 10 To |   |
|--|---|---|
| Frequency Bands                            |   | 5 - 38 GHz  |
| Physical Configurations                    |   | 1+0, 2+0 ACCP (via A2C+), 2+0 XPIC (via external OMT)       |
| Modulation and Coding                      | Fixed or Adaptive   | QPSK to 4096 QAM / Hitless AM                               |
| Channel Sizes                              |   | 3.75, 5, 10, 20, 25, 30, 40, 50, 60, 80 and 100 MHz         |
| Capacity (standard single channel)         | Airlink Capacity  | up to 918 Mbit/s*   |
| Capacity (A2C mode)                        | Airlink Capacity  | up to 1836 Mbit/s*  |
| Encryption                                 |   | 256-bit AES Payload Encryption                              |
| Design Tools                               | Recommended   | Aviat Design™ on aviatcloud.com (includes MIMO, Multi-band) |
|  | Supported   | Pathloss 5 (basic support only)                             |
| Power Supply                               |   |   |
| Voltage                                    | DC  | ±20 to 57V  |
|  | PoE   | 48Vdc (44 to 58Vdc)   |
| Consumption                                |   | 50 Watts nominal  |
|  |   | 65 Watts maximum  |
| Physical                                   |   |   |
| Size (h-w-d), including antenna interfaces |   | 11.5in x 10.5in x 4in (295mm x 270mm x 95mm)                |
| Weight, including antenna interfaces       |   | 12lbs (5.5 kg)  |
| Operating Temperature                      | Guaranteed  | -27 to +131°F (-33° to +55°C)                               |
| <del></del>                                | Extended  | -49 to +159°F (-45° to +65°C)                               |
| Humidity                                   | Guaranteed  | 100%  |
| Altitude                                   | Guaranteed  | 15,000 ft (4500m)   |
| Standards Compliance                       |   |   |
| EMC  |   | FCC CFR 47, Part 15, ICES-003                               |
| Operation                                  |   | EN 300 019-2-4, Class 4.1                                   |
| Safety                                     |   | UL 60950-1, UL 60950-22, UL 62368-1                         |
| RF Performance                             |   | FCC CFR 47, Part 101  |
|  | All Federal Frequer   | ncies Manual of Regulations for Federal Radio               |
|  |   | Frequency Management  |
| Maximum Permissible Exposure               |   | EN 50385  |
| Water Ingress                              |   | IEC 60529, IP66   |
| Lightning Protection                       |   | Internal, compliant to IEC 61000-4-5, Class 5               |
| Security                                   |   | FIPS 197 validated (Certificate A980)                       |

## Transmitter / Receiver

| Transmitter                        | 20 Electrical Control of the Control |   |
|------------------------------------|--|---|
| Transmit Power Tolerance           | 5-28 GHz   | ± 2.0 dB  |
|                                    | 38 GHz   | ± 2.5 dB  |
| Transmitter Source                 |  | Synthesized   |
| Frequency Stability                |  | ± 5 ppm   |
| Manual Transmitter Power Control F | Range  | Configurable in 0.1 dB steps from min to max power levels |
| Automatic Transmitter Power Contro | ol Range   | Configurable over the 20dB attenuation range              |
|                                    | Resolution / Speed   | 0.1 dB steps / 50dB/s                                     |
| Synthesizer Resolution             |  | 250 KHz   |
| Transmitter Mute                   |  | > 50 dB   |
|                                    |  |   |



#### Transmitter / Receiver

| Receiver                             |   | Carrie Williams     |
|--------------------------------------|---|---------------------|
| Receiver Source                      |   | Synthesized         |
| Frequency Stability                  |   | ± 5 ppm             |
| Receiver Overload                    | BER = 1E-6                                    | -20 dBm             |
| Residual (Background) Bit Error Rate |   | Better than 1E-13   |
| RSSI Accuracy [4]                    | -30 to -70 dBm, -27 to +131°F (-33° to +55°C) | Better than ± 2.5dB |
|                                      | -20 to -30 dBm, -27 to +131°F (-33° to +55°C) | Better than ± 3.5dB |
|                                      | -20 to -30 dBm, -49 to +149°F (-45° to +65°C) | Better than ± 4.5dB |

# Networking

| CE/L2                    |   |
|--------------------------|---|
| Switch capability        | 50 Gbps non-blocking                                |
| Quality of Service (QoS) | 8 COS, Scheduling, Policing, Storm Control, Shaping |
| QoS Mapping              | PCP (802.1p), DSCP, H-QoS                           |
| VLANs                    | IEEE 802.1Q and IEEE 802.1ad (Q-in-Q)               |
| Spanning Tree            | Rapid and multiple protocols (RSTP, MSTP)           |
| Ethernet OAM             | IEEE 802.3ah, IEEE 802.1ag, ITU-T Y.1731            |
| Congestion Avoidance     | WRED, per queue                                     |
|                          | Packet Buffer – 180 Mbyte                           |
| Jumbo frames             | Up to 9600 bytes                                    |
| Synchronisation          |   |
| Precision Time Protocol  | IEEE 1588v2 TC or BC                                |

# **General Specifications**

| Interfaces                              |                      |  |
|---|----------------------|--|
| Traffic                                 | 2x fixed RJ45        | 10/100/1000BT Electrical                             |
|   | 2x optional SFP      | 1, 2.5 & 10Gbps speeds, both                         |
| 7                                       |                      | Optical (Single and Multi-mode) and Electrical       |
| Power                                   | Direct               | 24Vdc or 48Vdc                                       |
|   | Power over Ethernet  | Via 10/100/1000BT Electrical port                    |
| USB support                             | Management           | Local setup, sw/fw upgrade, config backup            |
| Wireless connection                     |                      | via Wifi   |
| RSSI                                    |                      | Dual voltmeter pins                                  |
| Management                              |                      |  |
| Local Management                        |                      | Configuration save & load                            |
| -                                       |                      | Wireless USB dongle to support Wifi                  |
| *                                       |                      | Aviat OS software upgrade                            |
| Event Capture                           |                      | Event and Alarm capture, time stamp and logging      |
| Statistics                              |                      | RMON 1 Ethernet and radio performance statistics     |
| Network Management                      |                      | SNMPv2c ProVision or MIB interface support           |
| *************************************** | IPv4 addressing with | an In-Band Management VLAN. Telnet or SSH access     |
|   |                      | Aviat Cloud – Manage Advanced                        |
| Clock                                   | Simple Netwo         | rk Time Protocol (SNTP V4), embedded real time clock |

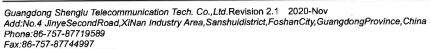


#### **Microwave Antenna Specifications**

#### SLA0328S3S49A20 0.3m Ultra High Performance Antenna Flange Type Rectangular



|                                    | <b>Electrical Specif</b>      | ications         |                             |            |       |  |
|------------------------------------|-------------------------------|------------------|-----------------------------|------------|-------|--|
| Frequency (GHz)                    |                               | 27.5~2           | 29.5                        |            |       |  |
| Polarization                       | Single                        | (V or H)         |                             |            |       |  |
| Gain , Low(dBi)                    |                               | 37.7             |                             |            |       |  |
| Gain, Mid(dBi)                     |                               | 38               |                             |            |       |  |
| Gain, Top(dBi)                     |                               | 38.3             |                             |            |       |  |
| Beam Width                         |                               | 2.0°             |                             |            |       |  |
| Cross-pol. Discrimination_XPD (d   | В)                            | 30               |                             |            |       |  |
| F/B Ratio (dB)                     |                               | 64               |                             |            |       |  |
| VSWR / RL (dB)                     |                               | 1.3/17           | 7.7                         |            |       |  |
| Regulatory Compliance              |                               |                  | N 302217                    | Range 4 Cl | ass 3 |  |
| Tell 2 Section 3 Deal of N         | Mechanical Spec               | ifications       |                             |            |       |  |
| Diameter (m)                       |                               | 0.3              |                             |            |       |  |
| Antenna Color                      |                               | Cool G           | Cool Gray 1C                |            |       |  |
| Radome Options                     |                               | Foam             | Foam                        |            |       |  |
| Interface Type                     |                               | UBR32            | UBR320 OR Customized        |            |       |  |
| Side Struts, Included              | 0                             |                  |                             |            |       |  |
| Azimuth Adjustment                 |                               |                  | Coarse : 360 ° Fine : ±15 ° |            |       |  |
| Elevation Adjustment               |                               |                  | Fine: ±15°                  |            |       |  |
| Diameter of Mounting Pole (mm)     |                               |                  | Ф51~Ф114                    |            |       |  |
| Wind Velocity Survival Rating (km  |                               | 252              | -                           |            |       |  |
| Wind Velocity Operational (km/h    | )                             | 200              | 200                         |            |       |  |
| Ice-load (mm)                      |                               | 25.4             |                             |            |       |  |
| Operational Temperature (°C)       |                               | -45~+6           | -45~+60                     |            |       |  |
| Packaging                          |                               |                  | Carton                      |            |       |  |
| L×W×H (mm)                         |                               |                  | 480*480*267                 |            |       |  |
| and the second of the second       | Wind Load Speci               | fications        |                             |            |       |  |
| Axial Force (N) @ survival wind sp | 444                           | 444              |                             |            |       |  |
| Side Force (N) @ survival wind sp  | 219                           | 219              |                             |            |       |  |
| Twisting Moment (N•m) @ surviv     | al wind speed                 | 141              |                             | _          |       |  |
| c/ B                               | Dimensions<br>(mm)            | <b>ФА</b><br>386 | B<br>318                    | 137        | 180   |  |
| OA OA                              | Note:  1. The values of B and |                  |                             |            |       |  |

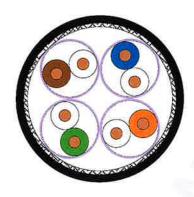


2. The thickness of the radome is not included in the dimensions of A and C

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Technisches Datenblatt - Technical Data Sheet – Technisches Datenblatt – Technical Data Sheet – Technisches Datenblatt

#### 02YSCH 4X2X0.62/1.5-100 PIMF BK Cat 6<sub>A</sub>



#### **Design:**

#### Wire

Bare copper wire (22AWG) Insulation of foamed Polyethylene (PE) with skin Ø 0.62 mm (0,024 in dia) Ø 1.50 mm (0,059 in dia)

Page 1/2

#### **Screened pair**

2 wires twisted to a pair Alulaminate foil overlapped, applied longitudinally

#### Core

4 screened pairs Sequence of colors: WH/BL, WH/OR, WH/GN, WH/BR Shield braiding of tinned copper wires Coverage about 80%

#### Jacket:

Thermoplastic copolymer (FRNC)BK Wall thickness about 0.80 mm

Ø (8.8 $\pm$ 0.3) mm (0.346 $\pm$ 0.012 in dia)

Inkjet -marking: "sequential length in metres" LEONI L \* S/FTP CAT 6A SOLID CABLE 22AWG 4PR "internal lot number"

#### Electrical data at 20° C

| Coductor resistance              | $\leq$ | 65           | Ohm/km   |
|----------------------------------|--------|--------------|----------|
| Insulation resistance            | $\geq$ | 5            | GOhm*km  |
| Capacitance (1kHz)               |        | 46           | pF/m     |
| Phase delay                      |        | 460          | ns/100 m |
| Skew at 100 MHz                  |        | 10           | ns/100 m |
| Characteristic impedance 100 MHz |        | $100 \pm 10$ | Ohm      |
| Operating voltage (peak)         |        | 125          | V        |
| Test voltage                     |        | 1000         | V        |

| LEONI Cable (China) Co., Ltd. Phone +86 (0)519-8512-5671 Fax +86 (0)519 | 9-8512-5660 | Internet www.leon |
|---|-------------|-------------------|
|---|-------------|-------------------|

Date of issue: 01.04.2019 Technical modification reserved Creator: LCC BG IN/ Alex
Number: C45497-F2863-C1

Up-dating : 21.06.2019 Name: HA

Supersedes : E: 01.04.2019 M: 01.04.2019

# **ATTACHMENT 2**



C Squared Systems, LLC
65 Dartmouth Drive
Auburn, NH 03032
(603) 644-2800
support@csquaredsystems.com

# Calculated Radio Frequency Emissions Report



Darien
126 Ledge Road, Darien, CT 06820

September 27, 2023

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#### 1. Introduction

The purpose of this report is to investigate compliance with applicable FCC regulations for the proposed installation of Verizon's 28 GHz microwave antenna to be mounted at 12' AGL on roof of the equipment shelter located at 126 Ledge Road in Darien, CT. The coordinates of the monopole tower are 41° 4' 20.75" N, 73° 28' 41.4" W.

Verizon is proposing the following:

1) Install one (1) 28 GHz point-to-point microwave system.

This report considers the planned<sup>1</sup> antenna configuration for Verizon as well as existing antenna configuration for AT&T<sup>2</sup>, DISH<sup>3</sup>, Sprint<sup>4</sup>, T-Mobile<sup>5</sup>, and Verizon<sup>6</sup> to derive the resulting % MPE of its proposed installation.

#### 2. FCC Guidelines for Evaluating RF Radiation Exposure Limits

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by OET Bulletin 65 Edition 97-01. These new rules include Maximum Permissible Exposure (MPE) limits for transmitters operating between 300 kHz and 100 GHz. The FCC MPE limits are based upon those recommended by the National Council on Radiation Protection and Measurements (NCRP), developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI).

The FCC general population/uncontrolled limits set the maximum exposure to which most people may be subjected. General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.

Public exposure to radio frequencies is regulated and enforced in units of milliwatts per square centimeter (mW/cm<sup>2</sup>). The general population exposure limits for the various frequency ranges are defined in the attached "FCC Limits for Maximum Permissible Exposure (MPE)" in Attachment C of this report.

Higher exposure limits are permitted under the occupational/controlled exposure category, but only for persons who are exposed as a consequence of their employment and who have been made fully aware of the potential for exposure, and they must be able to exercise control over their exposure. General population/uncontrolled limits are five times more stringent than the levels that are acceptable for occupational, or radio frequency trained individuals. Attachment C contains excerpts from OET Bulletin 65 and defines the Maximum Exposure Limit.

Finally, it should be noted that the MPE limits adopted by the FCC for both general population/uncontrolled exposure and for occupational/controlled exposure incorporate a substantial margin of safety and have been established to be well below levels generally accepted as having the potential to cause adverse health effects.

\_

<sup>&</sup>lt;sup>1</sup> As referenced to Verizon's Far Field Calculation sheet updated 06/07/2023 included in Attachment D.

<sup>&</sup>lt;sup>2</sup> As referenced to AT&T's Connecticut Siting Council Notice of Exempt Modification – 126 Ledge Road, Darien, Connecticut, dated May 26, 2022

<sup>&</sup>lt;sup>3</sup> As referenced to DISH's Connecticut Siting Council Tower Share Application - 126 Ledge Road, Darien, Connecticut, dated May 23, 2022

<sup>&</sup>lt;sup>4</sup> As referenced to DISH's Connecticut Siting Council Tower Share Application - 126 Ledge Road, Darien, Connecticut, dated May 23, 2022

<sup>&</sup>lt;sup>5</sup> As referenced to T-Mobile's Connecticut Siting Council Notice of Exempt Modification - 126 Ledge Road, Darien, Connecticut, dated December 11, 2020

<sup>&</sup>lt;sup>6</sup> As referenced to Verizon's Radio Frequency Design Sheet (RFDS) updated 8/4/2022



#### 3. RF Exposure Prediction Methods

The emission field calculation results displayed in the following figures were generated using the following formula as outlined in FCC bulletin OET 65:

Power Density = 
$$\left(\frac{GRF^2 \times 1.64 \times ERP}{4\pi \times R^2}\right)$$
 X Off Beam Loss

Where:

EIRP = Effective Isotropic Radiated Power

$$R = \text{Radial Distance} = \sqrt{\left(H^2 + V^2\right)}$$

H = Horizontal Distance from antenna in meters

V = Vertical Distance from radiation center of antenna in meters

Off Beam Loss is determined by the selected antenna patterns

Ground reflection factor (GRF) of 1.6

These calculations assume that the antennas are operating at 100 percent capacity, that all antenna channels are transmitting simultaneously, and that the radio transmitters are operating at full power. Obstructions (trees, buildings, etc.) that would normally attenuate the signal are not taken into account. The calculations assume even terrain in the area of study and do not take into account actual terrain elevations which could attenuate the signal. As a result, the predicted signal levels reported below are much higher than the actual signal levels will be from the final installations.



#### 4. Antenna Inventory

Table 1 below outlines Verizon's existing antenna configuration for the site. The associated data sheets and antenna patterns for these specific antenna models are included in Attachment C.

| Operator |       | TX<br>Freq<br>(MHz) | Power at<br>Antenna<br>(Watts) | Ant<br>Gain<br>(dBi) | Power<br>EIRP<br>(Watts) | Antenna Model   | Beam<br>Width | Mech.<br>Tilt | Length<br>(ft) | Antenna<br>Centerline<br>Height<br>(ft) |
|----------|-------|---------------------|--------------------------------|----------------------|--------------------------|-----------------|---------------|---------------|----------------|---|
|          |       | 750                 | 160                            | 14.4                 | 4407                     |                 | 60.5          |               |                |   |
|          |       | 850                 | 160                            | 14                   | 4019                     | MX06FRO660-03   | 53            | 0             | 5.94           | 102                                     |
|          | Alpha | 1900                | 160                            | 18.0                 | 10095                    | MIXOUI ROUUU-US | 55            | U             | 3.74           | 102                                     |
|          |       | 2100                | 240                            | 18.2                 | 15857                    |                 | 55.5          |               |                |   |
|          |       | 3700                | 200                            | 25.5                 | 70963                    | MT6407-77A      |               | 0             | 2.92           | 102                                     |
|          |       | 750                 | 160                            | 14.4                 | 4407                     |                 | 60.5          |               | 5.94           | 102                                     |
|          |       | 850                 | 160                            | 14                   | 4019                     | MX06FRO660-03   | 53            | 0             |                |   |
|          | Beta  | 1900                | 160                            | 18.0                 | 10095                    | MA00PRO000-05   | 55            |               |                |   |
| Verizon  |       | 2100                | 240                            | 18.2                 | 15857                    |                 | 55.5          |               |                |   |
|          |       | 3700                | 200                            | 25.5                 | 70963                    | MT6407-77A      | +             | 0             | 2.92           | 102                                     |
|          |       | 750                 | 160                            | 14.4                 | 4407                     |                 | 60.5          |               | 5.94           | 102                                     |
|          |       | 850                 | 160                            | 14                   | 4019                     | MX06FRO660-03   | 53            | 0             |                |   |
|          | Gamma | 1900                | 160                            | 18.0                 | 10095                    | MAUGEROGOU-U3   | 55            |               | 3.77           |   |
|          |       | 2100                | 240                            | 18.2                 | 15857                    |                 | 55.5          |               |                |   |
|          |       | 3700                | 200                            | 25.5                 | 70963                    | MT6407-77A      |               | 0             | 2.92           | 102                                     |
|          | P2P   | 28000               | 0.2                            | 38                   | 1287                     | SLA0328S3S49A20 | 2.0           | 0             | 1              | 12                                      |

Table 1: Proposed Antenna Inventory



#### 5. Calculation Results

The calculated power density results are shown in Figure 1 below. For completeness, the calculations for this analysis range from 0 feet horizontal distance (directly below the antennas) to a value of 3,000 feet horizontal distance from the site. In addition to the other worst-case scenario considerations that were previously mentioned, the power density calculations to each horizontal distance point away from the antennas was completed using a local maximum off beam antenna gain (within  $\pm$  5 degrees of the true mathematical angle) to incorporate a realistic worst-case scenario.

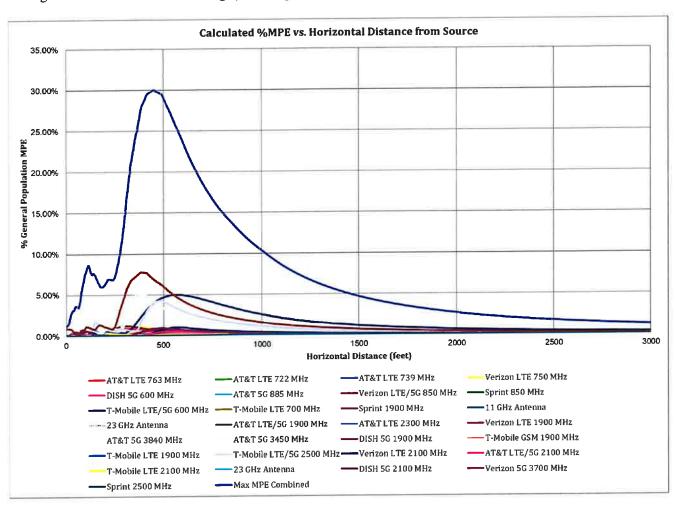


Figure 1: Graph of General Population % MPE vs. Distance

The highest combined value for % MPE for existing emitters (30.02% of the General Population limit) is calculated to occur at a horizontal distance of 451 feet from antennas. The maximum %MPE generated by the proposed 28 GHz microwave system is 0.12% and occurs at the distance of 344 feet. While the peak % MPE generated by the proposed 28 GHz microwave system does not occur at the same point as the peak cumulative %MPE for all existing emitters, as a very conservative calculation of the total %MPE, we add the 30.02% predicted at 451 feet to the 0.12% predicted for the 28 GHz system at 344 feet to arrive at a total maximum % MPE of 30.14%.

Please note that the percent of MPE calculations close to the site take into account off beam loss, which is determined from the vertical pattern of the antennas used. Therefore, RF power density levels may increase as the distance from the site increases. At distances of approximately 1500 feet and beyond, one would now be in the main beam of the antenna pattern and off beam loss is no longer considered. Beyond this point, RF levels become calculated solely on distance from the site and the percent of MPE decreases significantly as distance from the site increases.



Table 2 below lists percent of MPE values as well as the associated parameters that were included in the calculations. The highest percent of MPE value was calculated to occur at a horizontal distance of 451 feet from the site (reference Figure 1).

As stated in Section 3, all calculations assume that the antennas are operating at 100 percent capacity, that all antenna channels are transmitting simultaneously, and that the radio transmitters are operating at full power. Obstructions (trees, buildings etc.) that would normally attenuate the signal are not taken into account. In addition, a six foot height offset was considered in this analysis to account for average human height. As a result, the predicted signal levels are significantly higher than the actual signal levels will be from the final configuration. The results presented in Figure 1 and Table 2 assume level ground elevation from the base of the tower out to the horizontal distances calculated.

| Carrier                  | Number of<br>Transmitters | Power out of<br>Base Station Per<br>Transmitter<br>(Watts) | Antenna<br>Height<br>(Feet) | Distance to<br>the Base of<br>Antennas<br>(Feet) | Power    | Limit<br>(mW/cm²) | %<br>MPE |
|--------------------------|---------------------------|--|-----------------------------|--|----------|-------------------|----------|
| 11 GHz Antenna           | 2                         | 0.5  | 94.0                        | 451  | 0.000034 | 1.000             | 0.00%    |
| 23 GHz Antenna           | 1                         | 0.5  | 95.0                        | 451  | 0.000000 | 1.000             | 0.00%    |
| 23 GHz Antenna           | 1                         | 0.5  | 92.0                        | 451  | 0.000000 | 1.000             | 0.00%    |
| AT&T 5G 3450 MHz         | 1                         | 108.4  | 89.0                        | 451  | 0.040121 | 1.000             | 4.01%    |
| AT&T 5G 3840 MHz         | 1                         | 108.4  | 89.0                        | 451  | 0.041531 | 1.000             | 4.15%    |
| AT&T 5G 885 MHz          | 1                         | 60.0   | 89.0                        | 451  | 0.001259 | 0.590             | 0.21%    |
| AT&T LTE 2300 MHz        | 1                         | 75.0   | 89.0                        | 451  | 0.000767 | 1.000             | 0.08%    |
| AT&T LTE 722 MHz         | 1                         | 60.0   | 89.0                        | 451  | 0.001289 | 0.481             | 0.27%    |
| AT&T LTE 739 MHz         | 1                         | 60.0   | 89.0                        | 451  | 0.001158 | 0.493             | 0.24%    |
| AT&T LTE 763 MHz         | 1                         | 120.0  | 89.0                        | 451  | 0.002918 | 0.509             | 0.57%    |
| AT&T LTE/5G 1900 MHz     | 1                         | 120.0  | 89.0                        | 451  | 0.002424 | 1.000             | 0.24%    |
| AT&T LTE/5G 2100 MHz     | 1                         | 180.0  | 89.0                        | 451  | 0.003403 | 1.000             | 0.34%    |
| DISH 5G 1900 MHz         | 4                         | 40.0   | 76.0                        | 451  | 0.008086 | 1.000             | 0.81%    |
| DISH 5G 2100 MHz         | 4                         | 40.0   | 76.0                        | 451  | 0.008939 | 1.000             | 0.89%    |
| DISH 5G 600 MHz          | 4                         | 30.0   | 76.0                        | 451  | 0.002483 | 0.400             | 0.62%    |
| Sprint 1900 MHz          | 4                         | 45.0   | 117.0                       | 451  | 0.000210 | 1,000             | 0.02%    |
| Sprint 2500 MHz          | 8                         | 20.0   | 117.0                       | 451  | 0.000213 | 1.000             | 0.02%    |
| Sprint 850 MHz           | 2                         | 50.0   | 117.0                       | 451  | 0.000343 | 0.567             | 0.06%    |
| T-Mobile GSM 1900 MHz    | 4                         | 30.0   | 110.0                       | 451  | 0.000638 | 1.000             | 0.06%    |
| T-Mobile LTE 1900 MHz    | 2                         | 60.0   | 110.0                       | 451  | 0.000807 | 1.000             | 0.08%    |
| T-Mobile LTE 2100 MHz    | 2                         | 60.0   | 110.0                       | 451  | 0.000486 | 1.000             | 0.05%    |
| T-Mobile LTE 700 MHz     | 1                         | 60.0   | 110.0                       | 451  | 0.000190 | 0.467             | 0.04%    |
| T-Mobile LTE/5G 2500 MHz | 4                         | 40.0   | 110.0                       | 451  | 0.041076 | 1.000             | 4.11%    |
| T-Mobile LTE/5G 600 MHz  | 10                        | 140.0  | 110,0                       | 451  | 0.016112 | 0.400             | 4.03%    |
| Verizon 5G 3700 MHz      | 1                         | 200.0  | 102.0                       | 451  | 0.068249 | 1.000             | 6.82%    |
| Verizon LTE 1900 MHz     | 1                         | 160.0  | 102.0                       | 451  | 0.002752 | 1.000             | 0.28%    |
| Verizon LTE 2100 MHz     | 1                         | 240.0  | 102.0                       | 451  | 0.004218 | 1.000             | 0.42%    |
| Verizon LTE 750 MHz      | 1                         | 160.0  | 102.0                       | 451  | 0.004339 | 0.500             | 0.87%    |
| Verizon LTE/5G 850 MHz   | 1                         | 160.0  | 102.0                       | 451  | 0.004051 | 0.567             | 0.71%    |
|                          |                           |  |                             |  |          | Total             | 30.02%   |
| Verizon LTE 28GHz        | 1                         | 0.2  | 12.0                        | 344  | 0.001248 | 1.000             | 0.12%    |
|                          |                           | N  |                             |  |          | Grand Total       | 30.14%   |

Table 2: Maximum Percent of General Population Exposure Values



#### 6. Conclusion

The above analysis verifies that RF exposure levels from the site with Verizon's proposed 28 GHz microwave antenna will be well below the maximum permissible levels as outlined by the FCC in the OET Bulletin 65 Ed. 97-01. Using the conservative calculation methods and parameters detailed above, the maximum cumulative percent of MPE in consideration of all existing transmitters and the proposed 28 GHz microwave system is calculated to be 30.14% of the FCC limit (General Population/Uncontrolled). This maximum cumulative percent of MPE value is calculated to occur 451 feet away from the site.

#### 7. Statement of Certification

I certify to the best of my knowledge that the statements in this report are true and accurate. The calculations follow guidelines set forth in ANSI/IEEE Std. C95.3, ANSI/IEEE Std. C95.1 and FCC OET Bulletin 65 Edition 97-01.

Report Prepared By:

Ram Acharya

RF Engineer 1

C Squared Systems, LLC

Mark & Fand

September 26, 2023

Date

Reviewed/Approved By:

Martin Lavin

Senior RF Engineer C Squared Systems, LLC September 27, 2023 Date



#### **Attachment A: References**

OET Bulletin 65 - Edition 97-01 - August 1997 Federal Communications Commission Office of Engineering & Technology

IEEE C95.1-2005, IEEE Standard Safety Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz IEEE-SA Standards Board

IEEE C95.3-2002 (R2008), IEEE Recommended Practice for Measurements and Computations of Radio Frequency Electromagnetic Fields With Respect to Human Exposure to Such Fields, 100 kHz-300 GHz IEEE-SA Standards Board

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#### Attachment B: FCC Limits for Maximum Permissible Exposure (MPE)

## (A) Limits for Occupational/Controlled Exposure<sup>7</sup>

| Frequency Range (MHz) | Electric Field<br>Strength (E)<br>(V/m) | Magnetic Field<br>Strength (E)<br>(A/m) | Power Density (S)<br>(mW/cm <sup>2</sup> ) | Averaging Time $ E ^2$ , $ H ^2$ or S (minutes) |
|-----------------------|---|---|--|---|
| 0.3-3.0               | 614                                     | 1.63                                    | (100)*                                     | 6   |
| 3.0-30                | 1842/f                                  | 4.89/f                                  | $(900/f^2)*$                               | 6   |
| 30-300                | 61.4                                    | 0.163                                   | 1.0  | 6   |
| 300-1500              | <u></u>                                 | -                                       | f/300                                      | 6   |
| 500-100,000           | -                                       | ; <b></b> (                             | 5  | 6   |

#### (B) Limits for General Population/Uncontrolled Exposure<sup>8</sup>

| Frequency Range (MHz) | Electric Field<br>Strength (E)<br>(V/m) | Magnetic Field<br>Strength (E)<br>(A/m) | Power Density (S)<br>(mW/cm <sup>2</sup> ) | Averaging Time $ E ^2$ , $ H ^2$ or S (minutes) |
|-----------------------|---|---|--|---|
| 0.3-1.34              | 614                                     | 1.63                                    | (100)*                                     | 30  |
| 1.34-30               | 824/f                                   | 2.19/f                                  | $(180/f^2)*$                               | 30  |
| 30-300                | 27.5                                    | 0.073                                   | 0.2  | 30  |
| 300-1500              | <u>=</u> 1                              | 3.00                                    | f/1500                                     | 30  |
| 1500-100,000          | .=0                                     | •                                       | 1.0  | 30  |

f = frequency in MHz \* Plane-wave equivalent power density

Table 3: FCC Limits for Maximum Permissible Exposure

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Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

<sup>&</sup>lt;sup>8</sup> General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.



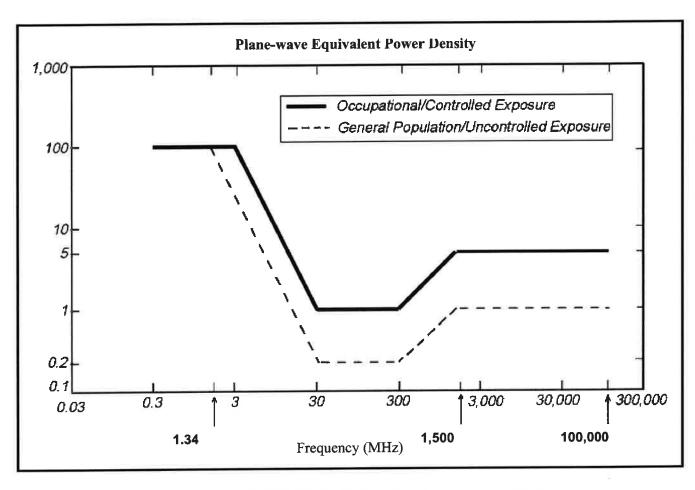


Figure 2: Graph of FCC Limits for Maximum Permissible Exposure (MPE)



#### Attachment C: Verizon Antenna Model Data Sheets and Electrical Patterns

#### LTE 750 MHz

Manufacturer: JMA

Model #: MX06FRO660-03

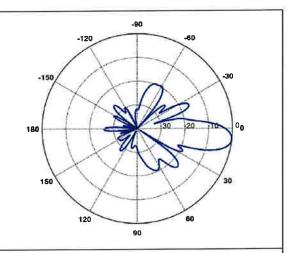
Frequency Band: 698-798 MHz

Gain: 14.4 dBi

Vertical Beamwidth: 13.1° Horizontal Beamwidth: 60.5°

Polarization: ±45°

Dimensions (L x W x D): 71.3" x 15.4" x 10.7"



#### LTE 850 MHz

Manufacturer: JMA

Model #: MX06FRO660-03

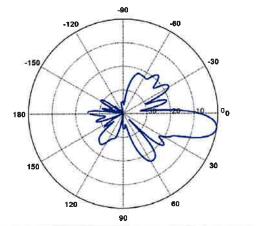
Frequency Band: 824-894 MHz

Gain: 14.0 dBi

Vertical Beamwidth: 11.8° Horizontal Beamwidth: 53°

Polarization: ±45°

Dimensions (L x W x D): 71.3" x 15.4" x 10.7"





#### **LTE 1900 MHz**

Manufacturer: JMA

Model #: MX06FRO660-03

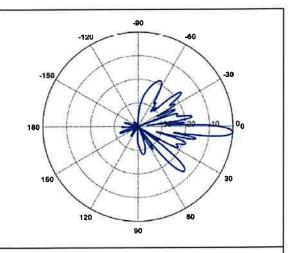
Frequency Band: 1850-1990 MHz

Gain: 18.0 dBi

Vertical Beamwidth: 5.5° Horizontal Beamwidth: 55°

Polarization: ±45°

Dimensions (L x W x D): 71.3" x 15.4" x 10.7"



#### **LTE 2100 MHz**

Manufacturer: JMA

Model #: MX06FRO660-03

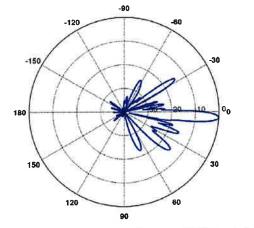
Frequency Band: 1920-2180 MHz

Gain: 18.2 dBi

Vertical Beamwidth: 5.5° Horizontal Beamwidth: 55.5°

Polarization: ±45°

Dimensions (L x W x D): 71.3" x 15.4" x 10.7"





#### Attachment D: Far Field Calculation Sheet

|  | 20 077 |  |  |
|--|--------|--|--|
| Band   | 28 GHz |  |  |
| Operating Frequency (MHz)                                      | 27,500 |  |  |
| General Population MPE<br>(mW/cm^2)                            | 1.000  |  |  |
| ERP Per Transmitter (Watts)                                    | 785    |  |  |
| Number of Transmitters   | 1      |  |  |
| Antenna Centerline<br>(feet)                                   | 12     |  |  |
| Total ERP (Watts)  | 785    |  |  |
| Total ERP (dBm)  | 59     |  |  |
| Maximum % of General  Population Limit                         | 0.12%  |  |  |
| Distance to Maximum % of<br>General Population Limit<br>(feet) | 344    |  |  |

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# **ATTACHMENT 3**



August 14, 2023

Alex Tyurin Verizon Wireless 99 East River Drive East Hartford, CT 06108

Dear Mr. Tyurin:

Verizon Wireless has proposed to install (2) new Rohn FRM Ballast Sleds, (2) new 0.3m Microwave Antenna, and (2) WTM4000 Radio on the rooftop of an equipment shelter at various locations in Connecticut. The proposed equipment will be mounted on the rooftop of the ground mounted equipment shelter with a maximum height of 15' to the CL of the dish. This assessment letter is limited to Connecticut sites only.

Dewberry Engineers Inc. (Dewberry) has reviewed the latest antenna design provided by Verizon Wireless and has determined, based on a maximum ultimate wind speed of 140 mph, exposure D, per ANSI/TIA-222-H and 2022 CT State Building Code, that the proposed ballast sled and equipment shelter roof have adequate capacity to support the proposed equipment configuration. Each proposed ballast sled requires (6) CMU ballast blocks (34 lb . ea.), equaling 204 lbs of ballast to be evenly distributed across both trays. The proposed ballast sled, including ballast blocks, do not exceed the 40 psf minimum allowable roof live load of the existing shelter. The proposed ballast frame is controlled by overturning moment and the maximum utilization of the proposed mount is 43.0%. Dewberry assumes that the new antennas and associated equipment are installed per the manufacturer's specifications.

This assessment is based on our assumption that the ground mounted equipment shelter, and proposed ballast mounts are in good condition and were constructed in accordance with ANSI/TIA-222-H standards and the 2022 CT State Building Code. If, during construction, any damage, deterioration, and/or discrepancies are noticed, Dewberry is to be notified to assess any deviation from the assumed condition. Any alteration in equipment loading described above and on the associated plans will void any conclusions expressed herein and will require further analysis and design. No structural qualification is made or implied by this structural letter for existing structural members not supporting the proposed installation.

If you have any questions, please do not hesitate to call me at 617-531-0744.

Sincerely,

Engineers

CONVECTION

CONVECT **Dewberry Engineers Inc.** 

CENSE 108/14/2023
P.E. (CT) Brandon Kelsey, P.E. (CT) CT License No.: 36967 Structural Project Engineer

# **ATTACHMENT 4**



## Certificate of Mailing — Firm

| Name and Address of Sender   | TOTAL NO. of Pieces Listed by Sender of Pieces Received at Post Office  |  | Affix Stamp Here |                  |                |  |  |
|--|---|--|------------------|------------------|----------------|--|--|
| Kenneth C. Baldwin, Esq.<br>Robinson & Cole LLP<br>280 Trumbull Street<br>Hartford, CT 06103 | Postmaster, per (name of receiving employee)  | neopost 10/02/2023 US POSTAGE \$003.55  ZIP 06103 041L12203937 |                  |                  |                |  |  |
| USPS® Tracking Number<br>Firm-specific Identifier  | Address<br>(Name, Street ety, State, and ZIP Code™)   | Postage  | Fee              | Special Handling | Parcel Airlift |  |  |
| 1.<br>2.<br>3.   | Monica McNally, First Selectman Town of Darien 2 Renshaw Road Darien, CT 06820 Jeremy Ginsberg, Director of Land Use Town of Darien 2 Renshaw Road Darien, CT 06820 |  | UCT 1 - 2023     | 10N 06103        |                |  |  |
| 4.   |   |  |                  |                  |                |  |  |
| 5.   |   |  |                  |                  |                |  |  |
| 6.   |   |  |                  |                  |                |  |  |
|  |   |  |                  |                  |                |  |  |