



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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

VIA ELECTRONIC MAIL

September 23, 2022

Domenica Tatasciore
Site Acquisition Specialist
Crown Castle
1800 W. Park Drive
Westborough, MA 01581
Domenica.Tatasciore@crowncastle.com

RE: **EM-AT&T-044-220817** – AT&T notice of intent to modify an existing telecommunications facility located at 59 Commerce Street, East Haven, Connecticut.

Dear Domenica Tatasciore:

The Connecticut Siting Council (Council) is in receipt of your email of September 21, 2022 requesting an extension of time to submit documentation required to make the above-referenced filing complete in response to the Council's incomplete notice dated September 1, 2022.

The Council hereby grants an extension of time to submit the required documentation by October 28, 2022.

Thank you for your attention to this matter.

Sincerely,

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

Melanie A. Bachman
Executive Director

MAB/RDM/emr

Enclosures: Extension Request Letter from Domenica Tatasciore of September 21, 2022
Incomplete filing letter dated September 1, 2022



Crown Castle
3 Corporate Park Drive, Suite 101
Clifton Park, NY 12065

September 21, 2022

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

RE: **Notice of Exempt Modification for ATT - EM-AT&T-044-220817**
Crown #842862; ATT Site ID CTL05048
259 Commerce Street, East Haven, CT 06512
Latitude: 41° 15' 22.88" / Longitude: -72° 52' 32.80"

Dear Ms. Bachman:

I am in receipt of your letter, dated September 1, 2022, notifying me that the RF analysis does not account for T-Mobile's and Metro by T-Mobile's existing installations on the tower and that the cumulative %MPE for the facility which includes all carriers' antennas and AT&T's proposed antennas would exceed the FCC's allowable General Public/Uncontrolled cumulative MPE limit of 100%. Your letter further cited that if additional time is needed to gather and submit a revised report, then I am to submit a written request for an extension of time prior to September 28, 2022. Please accept this letter as my formal request for an extension of time and that I understand that the exempt modification is incomplete until I forward an electronic version of the information you requested to be rendered complete and processed.

Sincerely,

A handwritten signature in blue ink that reads 'Domenica Tatasciore'.

Domenica Tatasciore
Site Acquisition Specialist
1800 W. Park Drive
Westborough, MA 01581
(508) 621-9161/ Domenica.Tatasciore@crowncastle.com

The Foundation for a Wireless World.

CrownCastle.com



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VIA ELECTRONIC MAIL

September 1, 2022

Domenica Tatasciore
Site Acquisition Specialist
Crown Castle
1800 W. Park Drive
Westborough, MA 01581
Domenica.Tatasciore@crowncastle.com

RE: **EM-AT&T-044-220817** - AT&T notice of intent to modify an existing telecommunications facility located at 259 Commerce Street, East Haven, Connecticut.

Dear Ms. Tatasciore:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on August 17, 2022.

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

Staff has reviewed this exempt modification request for completeness and has identified a deficiency in the Radio Frequency Safety Survey Report (RF Analysis) prepared by MobileComm Professionals, Inc., dated August 2, 2022. The RF Analysis indicates a calculated Maximum Permissible Exposure (%MPE) of 16.3% at ground level for AT&T's proposed antennas, however staff calculates AT&T's %MPE to be 107% using the Federal Communications Commission (FCC) OET Bulletin 65 accounting for a 6-foot person at ground level and using a -10 dB adjustment.

Additionally, the above referenced RF analysis does not account for T-Mobile's and Metro by T-Mobile's existing installations on the tower. The cumulative calculated %MPE for the facility which includes all carriers' antennas and AT&T's proposed antennas would be 179%. This exceeds the FCC's allowable General Public/Uncontrolled cumulative MPE limit of 100%.

Please refer to the Council's 2015 exempt modification filing memo (link added below) for filing requirements and procedures.

<https://portal.ct.gov/-/media/CSC/Guides/EMFilingMemo111015pdf.pdf>

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Crown Castle provide an RF Analysis including a rigorous far-field analysis for AT&T that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, on or before September 28, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to September 28, 2022. **Please provide an electronic version of the requested information for the incomplete exempt modification to be rendered complete and processed. Please include the Council's exempt modification identification number referenced above with the submittal.**

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

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie Bachman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Melanie Bachman
Executive Director

MAB/rm