



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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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](mailto: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