



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](mailto:siting.council@ct.gov)

Web Site: [portal.ct.gov/csc](http://portal.ct.gov/csc)

**VIA ELECTRONIC MAIL**

February 16, 2022

G. Scott Shepherd  
Property Development Specialist II  
SBA Communications  
134 Flanders Rd., Suite 125  
Westborough, MA 01581  
[GShepherd@sbsite.com](mailto:GShepherd@sbsite.com)

RE: **EM-T-MOBILE-044-220127** - T-Mobile notice of intent to modify an existing telecommunications facility located at 60 Commerce Street, East Haven, Connecticut.

Dear Mr. Shepherd:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on January 27, 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 Emissions Analysis Report prepared by Centerline Communications, dated January 25, 2022. The Radio Frequency Analysis Report indicates a calculated, Maximum Permissible Exposure (%MPE) of 9.21 % at ground level accounting for both T-Mobile and Verizon. Council staff calculated the power density for the proposed T-Mobile modification using the data provided in Site Antenna Data Table on Page 6 of the report. Using the Federal Communications Commission (FCC) OET Bulletin 65 predictive methods accounting for the -10 dB off beam pattern adjustment and a 6-foot tall person at ground level at the base of the tower and results indicate that the requested modification, as proposed, would produce radio frequency emissions with a %MPE of 136.67% for each sector of T-Mobile's antennas and a cumulative %MPE of 143.88% with Verizon's antennas. 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 SBA provide a Radio Frequency Analysis Report for the proposed modifications to the facility with a cumulative %MPE at or below 100%, on or before March 18, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to March 18, 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/FOC/emr