

PULLMAN & COMLEY, LLC
ATTORNEYS AT LAW

CARRIE L. LARSON
90 State House Square
Hartford, CT 06103-3702
p (860) 424-4312
f (860) 424-4370

www.pullcom.com

September 15, 2008

EM-POCKET-049-080916

Via Federal Express

S. Derek Phelps, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

ORIGINAL



Re: Notice of Exempt Modification
Sprint Sites USA Telecommunications Facility
188 Moody Road, Enfield, Connecticut

Dear Mr. Phelps:

Youghiogheny Communications-Northeast, LLC, doing business as Pocket Communications ("Pocket"), intends to install antennas and appurtenant equipment at the existing 190-foot monopole facility owned by Sprint Sites USA and located at 188 Moody Road, Enfield, Connecticut ("Facility"). Pocket Communications provides prepaid, flat rate wireless voice and data services to more than a quarter of a million subscribers. Pocket is licensed by the Federal Communications Commission (FCC) to provide PCS wireless telecommunications service in the State of Connecticut, which includes the area to be served by the proposed installation. This installation constitutes an exempt modification pursuant to the Public Utility Environmental Standards Act, Connecticut General Statutes Section 16-50g et. seq. (PUESA), and Section 16-50j-72(b)(2) of the Regulations of the Connecticut State Agencies adopted pursuant to PUESA. In accordance with R.C.S.A. Section 16-50j-73, a copy of this notice has been sent to Matthew W. Coppler, Town Manager of Enfield.

The existing Facility consists of a 190-foot self-supporting monopole tower capable of supporting multiple carriers within a fenced compound. The coordinates for the Facility are **Lat: 42-00-07 and Long: 72-31-20**. The tower is approximately 600 feet south of Moody Road, roughly a mile east of North Maple Street (Route 192). The facility is roughly 5,000 feet west of the Somers town line, in the northeast portion of Enfield (see Site Map, attached as Exhibit A). The tower currently supports AT&T antennas at the one hundred fifty eight foot level (158') centerline AGL (above ground level); Sprint antennas at the one hundred seventy foot level (170') AGL, Nextel antennas at the one hundred eighty foot level (180') AGL; and T-Mobile antennas at the one hundred eighty eight foot level (188') AGL. Pocket proposes to install three Kathrein 742-213 antennas at the one hundred forty eight foot level (148') AGL and a Nortel CDMA Micro BTS 3231 cabinet, mounted on an "H-Frame," contained within a six foot by six foot (6'-0" x 6'-0") lease area. A small GPS antenna will be mounted to an ice bridge which will

Page 2

run from the lease area to the tower. Utilities will be run via a proposed underground conduit from an existing utility backboard, located within the northwest corner of the compound (See Design Drawings and Equipment Specifications, attached as Exhibits B and C respectively). (See Design Drawings, attached as Exhibit B and Equipment Specifications, attached as Exhibit C).

For the following reasons, the proposed modifications to the Moody Road Facility meet the exempt modification criteria set forth in R.C.S.A. Section 16-50j-72(b)(2):

1. The proposed modification will not increase the height of the tower as Pocket's antennas will be installed at a center line height of approximately 148 feet.
2. The installation of Pocket's equipment and shelter will not require an extension of the site boundaries.
3. The proposed modifications will not increase the noise levels at the existing Facility by six decibels or more.
4. The operation of the additional antennas will not increase the total radio frequency (RF) power density, measured at the site boundary, to a level at or above the standard adopted by the Connecticut Department of Environmental Protection as set forth in Section 22a-162 of the Connecticut General Statutes and MPE limits established by the Federal Communications Commission. The worst-case RF power density calculations for the proposed Pocket antennas would be 10.23% of the FCC standard (see general power density calculations table, attached as Exhibit D).

Also attached, Exhibit E, is a structural analysis confirming that the tower can support the existing and proposed antennas and associated equipment.

For the foregoing reasons, Pocket respectfully submits that the proposed antenna installation and equipment at the Enfield Facility constitutes an exempt modification under R.C.S.A. Section 16-50j-72(b)(2)

Respectfully Submitted,



Carrie L. Larson

cc: Matthew W. Coppler, Town Manager, Town of Enfield
Troiano Realty Corp. underlying property owner

Exhibit A

Site Map

Pocket Site HFCT0331A

188 Moody Road

Enfield, Connecticut

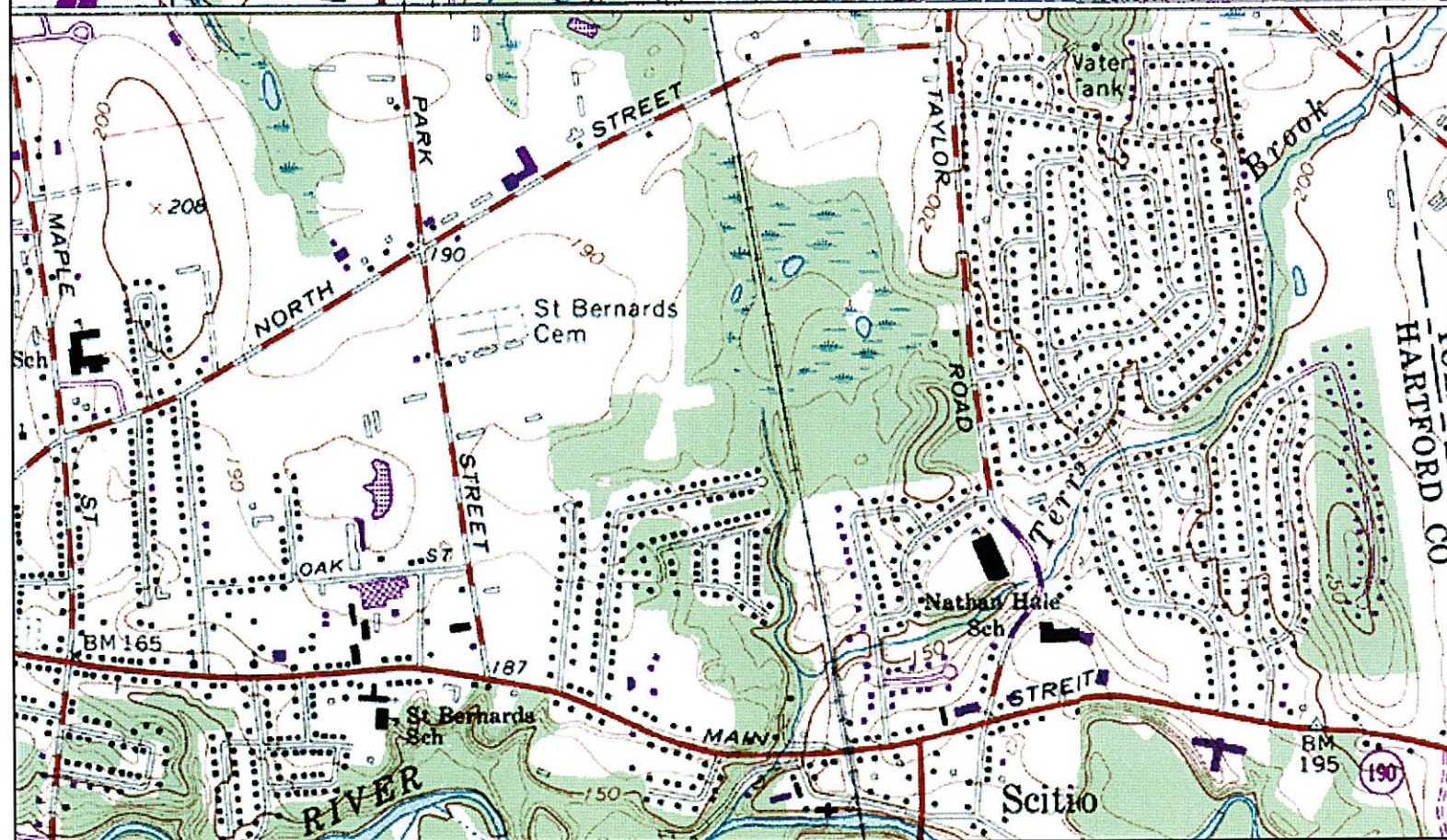
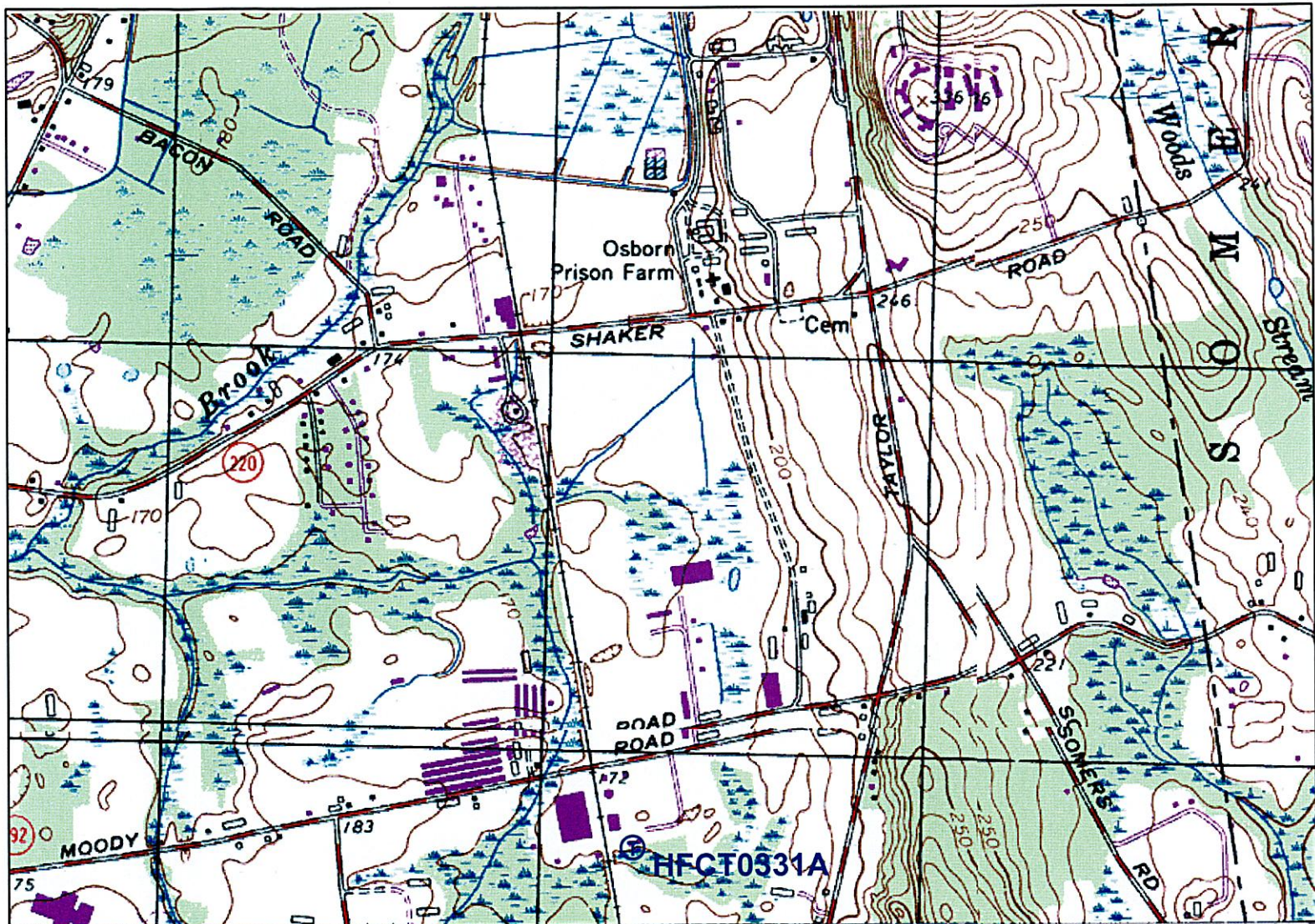


Exhibit B

Design Drawings

Pocket Site HFCT0331A

188 Moody Road

Enfield, Connecticut

PROJECT INFORMATION	
TOWER OWNER:	SPRINT SITES US 255 CONCERNWAY DRIVE SUITE 201 ALPHARETTA, GA 30004
OWNER SITE ID:	CI-0084
APPLICANT:	YOUNG & RUBICAM COMMUNICATIONS- NORTHEAST LLC 2819 NW LOOP 410 SAN ANTONIO, TX 78230
SITE ADDRESS:	188 MOODY ROAD ENFIELD, CT 06032
COUNTY:	HARTFORD
LATITUDE:	42.0019
LONGITUDE:	-72.52189
STRUCTURE HEIGHT:	190' AGL
ZONING CLASSIFICATION:	N/A
POWER COMPANY:	CONNECTICUT SITING COUNCIL
TELEPHONE COMPANY:	833-8P 1-800-947-2121
DESIGN FIRM:	URS CORPORATION 500 ENTERPRISE DRIVE, SUITE 3B FARMINGTON, CT 06030 PHONE 860-563-8882

DRAWING INDEX	
01	TITLE SHEET
02	SITE PLAN, DETAIL AND NOTES
03	TOWER ELEVATION, ANTENNA PLAN AND DETAILS
04	GROUNDING DETAILS
05	GROUNDING PLAN AND DETAILS
06	ELECTRICAL DETAILS

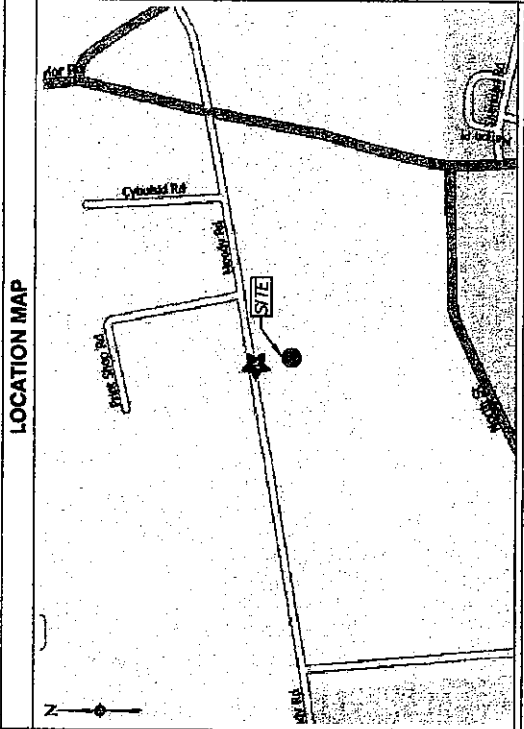
STRUCTURAL REVIEW

A TOWER ANALYSIS HAS NOT BEEN PERFORMED FOR THE PRESENT DRAWINGS. THE EXISTING TOWER HAS NOT BEEN EVALUATED FOR REPLACEMENT/ADDITION OF ANTENNAS, COAX CABLES AND EQUIPMENT. NO WORK SHALL OCCUR ON THIS TOWER UNTIL THE ISSUANCE OF A PASSING STRUCTURAL ANALYSIS TO THE COMMUNITY. ALL REINFORCEMENT (IF REQUIRED) SHALL BE PERFORMED PRIOR TO ANY WORK UNDER THIS CONTRACT BEING PERFORMED.

APPROVALS	
REAL ESTATE	RF
OPS/CONSTRUCTION	LEGAL/COMPLIANCE
NET DESIGN	

SMART WIRELESS

HFCT0331 **188 MOODY ROAD** **190' MONOPOLE**



DRIVING DIRECTIONS

FROM HARTFORD:
 TAKE I-84 EAST/ US-6 EAST TOWARD BOSTON, MERGE ONTO I-84 NORTH VIA EXIT 51 TOWARD SPRINGFIELD, MERGE ONTO CT-180 E/HAZARD AVE VIA EXIT 47E TOWARD HAZARDVILLE/SOMERS, TURN LEFT ONTO N MAPLE ST/CT-182, TURN RIGHT ONTO MOODY RD, END AT 188 MOODY RD ENFIELD, CT 06032-3208

APPLICABLE BUILDING CODES AND STANDARDS

CONTRACTOR'S WORK SHALL COMPLY WITH ALL APPLICABLE NATIONAL, STATE, AND LOCAL BUILDING CODES. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND THE CONTRACT AWARD SHALL COVER THE DESIGN.

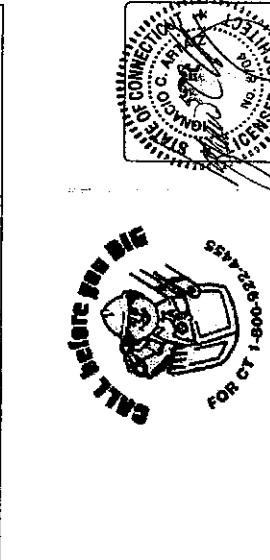
BUILDING CODE:
 CONNECTICUT STATE BUILDING CODE
 2003 INTERNATIONAL BUILDING CODE
 2003 INTERNATIONAL MECHANICAL CODE
 2003 INTERNATIONAL EXISTING BUILDING CODE
 2003 CONNECTICUT SUPPLEMENT

ELECTRICAL CODE:
 2005 NATIONAL ELECTRICAL CODE
 CONNECTICUT STATE ELECTRICAL CODE
 2003 INTERNATIONAL FIRE CODE

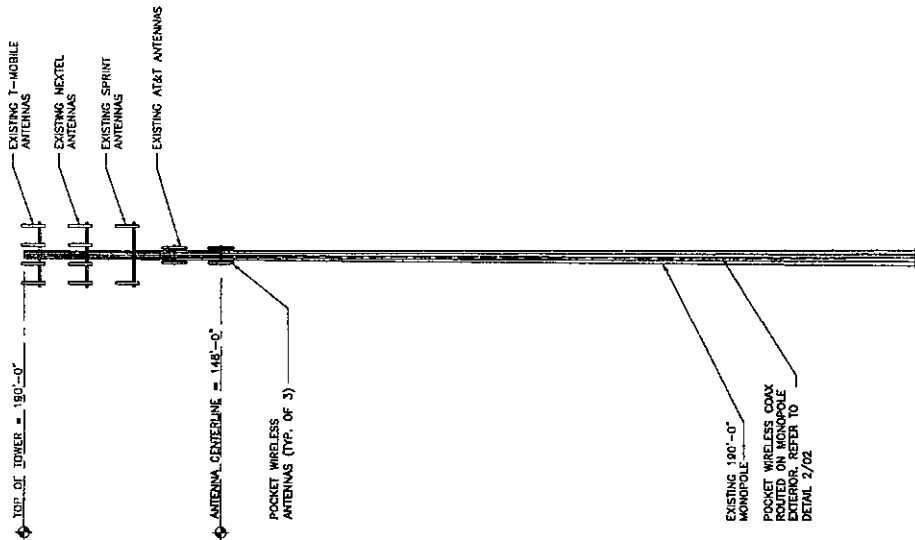
CONTRACTOR'S WORK SHALL COMPLY WITH THE LATEST APPROVED EDITION OF THE FOLLOWING STANDARDS:
 AMERICAN CONCRETE INSTITUTE (ACI) 318, BUILDING CODE REQUIREMENTS FOR STRUCTURAL CONCRETE
 AMERICAN INSTITUTE OF STEEL CONSTRUCTION (AISC), MANUAL OF STEEL CONSTRUCTION, ASD, NINTH EDITION
 TELECOMMUNICATIONS INDUSTRY ASSOCIATION (TIA) 222-F, STRUCTURAL STANDARD FOR STEEL TOWERS AND ANTENNA SUPPORTING STRUCTURES
 TIA 407 COMMERCIAL BUILDING GROUNDING AND BONDING REQUIREMENTS FOR TELECOMMUNICATIONS
 INSTITUTE FOR ELECTRICAL AND ELECTRONICS ENGINEERS (IEEE) 81, GUIDE FOR MEASURING EARTH RESISTIVITY, GROUND IMPEDANCE, AND EARTH SURFACE POTENTIALS OF A GROUNDING SYSTEM
 IEEE 1100 (1999) RECOMMENDED PRACTICE FOR POWERING AND GROUNDING OF ELECTRONIC EQUIPMENT
 IEEE C82.41, RECOMMENDED PRACTICES ON SURGE VOLTAGES IN LOW VOLTAGE AC POWER CIRCUITS (FOR LOCATION CATEGORY "C1" AND "HIGH SYSTEM EXPOSURE")
 TELCORDIA GR-1275 GENERAL INSTALLATION REQUIREMENTS
 TELCORDIA GR-1503 COAXIAL CABLE CONNECTIONS
 ANSI T1.311, FOR TELECOM - DC POWER SYSTEMS - TELECOM, ENVIRONMENTAL PROTECTION FOR ANY CONFLICTS BETWEEN SECTIONS OF LISTED CODES AND STANDARDS REGARDING MATERIAL, METHODS OF CONSTRUCTION, OR OTHER REQUIREMENTS, THE MOST RESTRICTIVE REQUIREMENT SHALL GOVERN, WHERE THERE IS CONFLICT BETWEEN A GENERAL REQUIREMENT AND A SPECIFIC REQUIREMENT, THE SPECIFIC REQUIREMENT SHALL GOVERN.

SITE NOTES

- THIS SITE IS UNIMPAVED AND IS RESTRICTED TO OUTDOOR EQUIPMENT. IT WILL BE USED FOR THE TRANSMISSION OF RADIO SIGNALS FOR THE PURPOSE OF PROVIDING PUBLIC CELLULAR SERVICE.
- POCKET COMMUNICATIONS CERTIFIES THAT THIS TELEPHONE EQUIPMENT FACILITY WILL BE SERVED ONLY BY POCKET COMMUNICATIONS EMPLOYEES AND THE WORK ASSOCIATED WITH THE FACILITY CANNOT BE PERFORMED BY HANDICAPPED PERSONS. THIS FACILITY WILL BE FREQUENTLY VISITED BY POCKET COMMUNICATIONS EMPLOYEES. THIS FACILITY IS EXEMPT FROM THE REQUIREMENTS OF THE AMERICANS WITH DISABILITIES ACT (ADA) APPENDIX B, SECTION 4.11.6(1)(B).
- NO POTABLE WATER SUPPLY IS TO BE PROVIDED AT THIS LOCATION.
- NO WASTE WATER WILL BE GENERATED AT THIS LOCATION.
- NO SOLID WASTE WILL BE GENERATED AT THIS LOCATION.
- POCKET COMMUNICATIONS WILL PROVIDE A MAINTENANCE CREW (TYPICALLY ONE PERSON) WILL MAKE AN APPEARANCE OF ONE TRIP PER MONTH AT ONE HOUR PER VISIT.

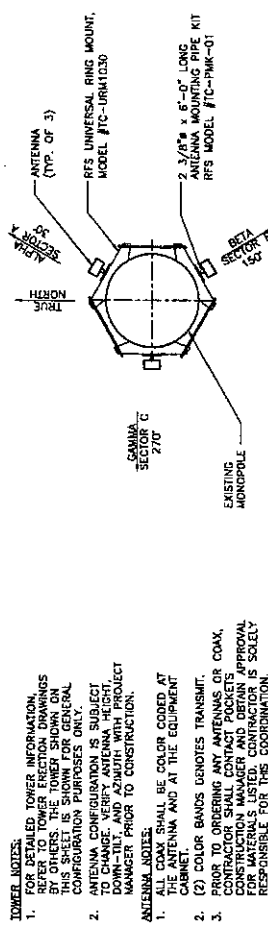


A TOWER ANALYSIS HAS NOT BEEN PERFORMED FOR THE PREPARATION OF THESE PLANS. AS OF THE ISSUANCE OF THESE PLANS, THE EXISTING TOWER HAS NOT BEEN EVALUATED FOR REPLACEMENT/ADDITION OF ANTENNAS. ANY ADDITIONAL ANTENNAS TO BE INSTALLED ON THIS TOWER SHALL BE FORWARDED TO URS CORPORATION. ALL STRUCTURAL TOWER ANALYSIS, A COPY OF THE TOWER ANALYSIS SHALL BE FORWARDED TO URS CORPORATION. ALL REINFORCEMENT (IF REQUIRED) SHALL BE PERFORMED PRIOR TO ANY WORK UNDER THIS CONTRACT BEING PERFORMED.

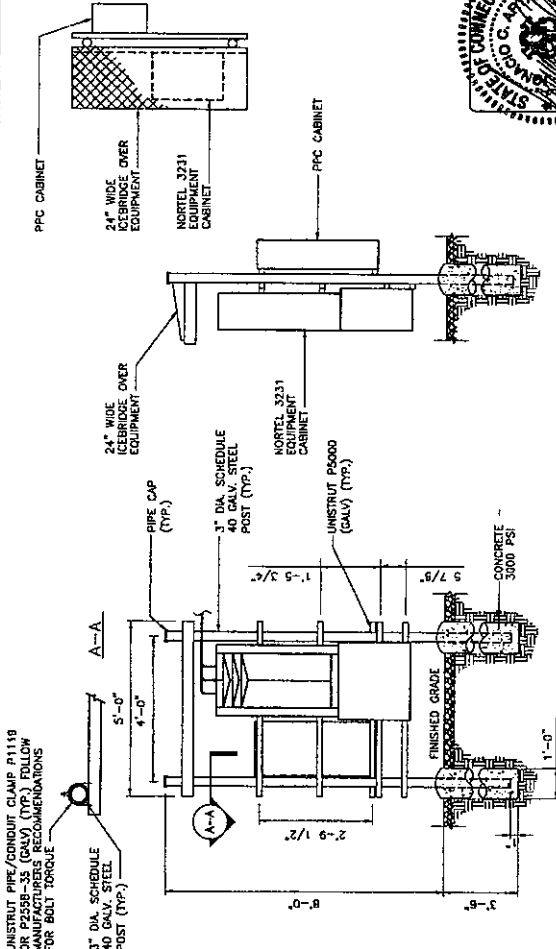


1 TOWER ELEVATION
SCALE: N.T.S.

ANTENNA KEY									
ANTENNA #	ANTENNA VENDOR	ANTENNA MODEL	ANTENNA COAX CODE	ANTENNA COAX COLOR	ANTENNA COAX SIZE	MECHANICAL DOWN TILT	C/A HEIGHT	AZIMUTH	NO. COAX PER ANTENNA
1	A-1	(1) RED BAND	KATHREIN	742 213	30"	148'-0"	0"	1 5/8"	2
2	B-1	(1) BLUE BAND	KATHREIN	742 213	150"	148'-0"	0"	1 5/8"	2
3	C-1	(1) BROWN BAND	KATHREIN	742 213	270"	148'-0"	0"	1 5/8"	2



2 ANTENNA SECTOR PLAN
SCALE: N.T.S.

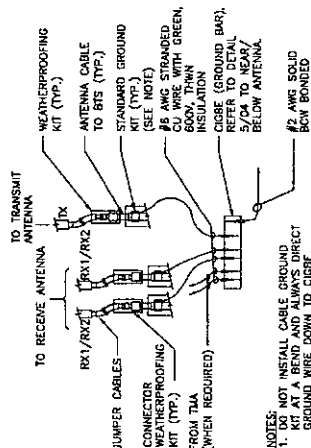
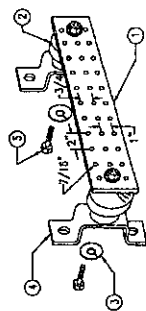
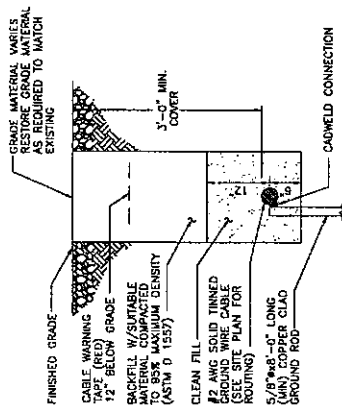
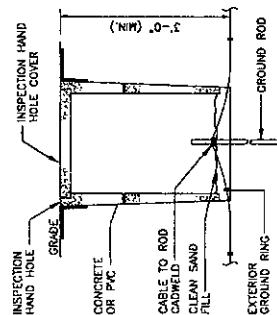


3 CABINET SUPPORT FRAME
SCALE: N.T.S.

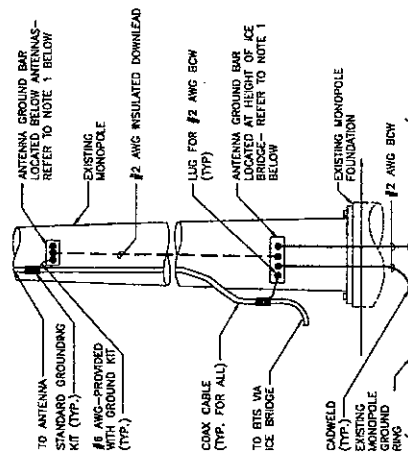
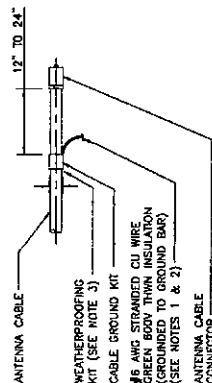
URS CORPORATION
POCKET WIRELESS
1000 W. WYOMING AVE.
DENVER, CO 80202
TEL: 303.733.1000
FAX: 303.733.1001
WWW.URS-CORP.COM

PROJECT: POCKET WIRELESS
SHEET: TOWER ELEVATION, ANTENNA PLAN AND DETAILS
DATE: 08/19/02
DRAWN BY: JES
CHECKED BY: JES
SCALE: N.T.S.

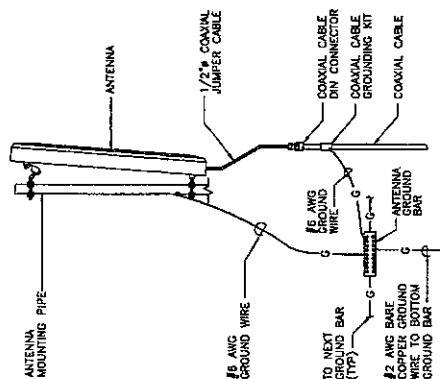
03



GROUND ROD
7 WITH INSPECTION HANDHOLE
04 SCALE: N.T.S.



3	CONNECTION OF CABLE GROUND KIT TO ANTENNA CABLE	90-137, MAY
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1 TYPICAL ANTENNA GROUNDING DETAIL



6 EGR DETAIL
04 SCALE: N.T.S.

GROUND ROD
WITH INSULATION
04 SCALE N.T.S.

Smart Wireless
pocket.

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URS

1000 ENTERPRISE DRIVE
ROCKY HILL, CT. 06387

PC1005-36923925	JES	JCF
08-19-08		

04

100A MCB, 120/208/240V, 1ø, 3 WIRE, 65,000 AIC		
TOTAL CONNECTED LOAD	11.5 KW	
25% OF LARGEST CONT. LOAD	1.25 KW	
TOTAL LOADS	12.75 KW	
NOTE: ALL NON-OPTIONAL BREAKERS PROVIDED BY SSC MFR		

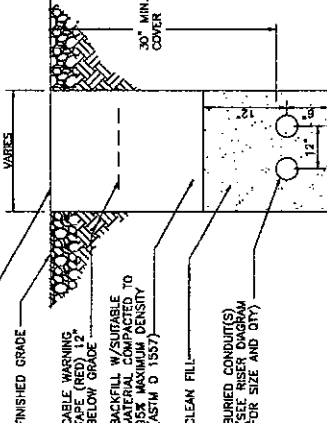
1. ALL ELECTRICAL AND GROUNDING WORK SHALL BE PERFORMED IN ACCORDANCE WITH PROJECT SPECIFICATIONS, NEC AND ALL APPLICABLE LOCAL CODES.
2. CONDUIT ROUTINGS ARE SCHEMATIC, CONTRACTOR SHALL VERIFY ROUTING AND LENGTHS PRIOR TO INSTALLATION.
3. WIRING, RACEWAYS AND SUPPORT METHODS AND MATERIALS SHALL COMPLY WITH THE REQUIREMENTS OF THE NEC AND TEXAS.
4. THE CONTRACTOR SHALL PROVIDE AND MAINTAIN NECESSARY AUTHORIZATION BEFORE COMMENCING WORK ON ANY ELECTRICAL INSTALLATION.
5. THE CONTRACTOR SHALL PROVIDE NECESSARY TAPING ON THE BREAKERS, CABLES, AND DISTRIBUTION PANELS IN ACCORDANCE WITH THE APPLICABLE CODES AND STANDARDS TO SAFEGUARD AGAINST FIRE.



1. MOUNT 11-VESS UNIT ON EQUIPMENT FRAME. HOUSING THE DSK UNIT. USE APPROPRIATE STAINLESS STEEL BOLTS TO SECURE THE UNIT TO THE FRAME. THE UNIT MUST BE MOUNTED TO THE FRAME WITH THE UNIT'S TOP SURFACE FLUSH WITH THE FRAME'S TOP SURFACE.
2. ATTACH PING TERMINAL FROM SUPPLIED GROUND CONDUCTOR TO DSKS GROUND STUD. SECURELY FASTEN WITH SUPPLIED WASHER AND NUT. REFER TO MANUFACTURER'S INSTRUCTIONS. FOR PROPER PERFORMANCE, THE GROUND CONDUCTOR LENGTH SHOULD BE LIMITED TO NO SHARP BENDS ON COILS.
3. WHEN TURNS IS MOUNTED ON EQUIPMENT FRAME, BOND THE GROUND CONDUCTOR TO THE EQUIPMENT FRAME GROUND. ENSURE PROPER GROUNDING SURFACES. WHEN TURNS IS MOUNTED ON THE TELCO BOND BOARD, BOND THE GROUND CONDUCTOR TO THE TELCO BOND BOARD. REFER TO THE TELCO BOND BOARD INSTRUCTIONS FOR PROPER GROUNDING SURFACES.



- GRADE MATERIAL VARIES
RESTORE GRADE MATERIAL
AS REQUIRED TO MATCH
EXISTING



- ECTONIC ATHEROMA TRENCH DETAIL NOTES:

1. THE CLEAN FILL SHALL PASS THROUGH A 3/8" MESH SCREEN AND SHALL NOT BE CONTAMINATED BY STONES, BRICKS, OR OTHER FOREIGN MATTER. THE CONDUITS SHALL BE INSTALLED IN A TRENCH DEEPER THAN 2' IN MAXIMUM WIDTH. THE TRENCH SHALL BE BACKFILLED IMMEDIATELY FOLLOWING PLACEMENT OF THE CONDUITS.
2. WHERE EXISTING UTILITIES ARE LIKELY TO BE ENCOUNTERED, CONTRACTOR SHALL HAND DIG AND PROTECT EXISTING UTILITIES.

**TYPICAL ELECTRICAL/
TELEPHONE TRENCH DETAIL**

- | | |
|----|---------------|
| 4 | TELEPHONE |
| 05 | SCALE: N.T.S. |

pocket.
SMART WIRELESS
HFCT0331, 188 MOODY ROAD
ELECTRICAL DETAILS

ELECTRICAL DETAILS

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LWS CORPORATION

URS

800-272-7720
800 ENTERPRISE DRIVE
ROCKY HILL, CT. 06067
1-800-338-3863

JCF
JFS
08-19-05
PC1005-35923825

60



Exhibit C

Equipment Specifications

Pocket Site HFCT0331A

188 Moody Road

Enfield, Connecticut

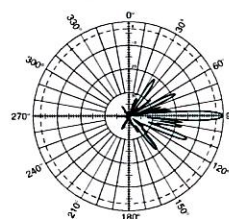
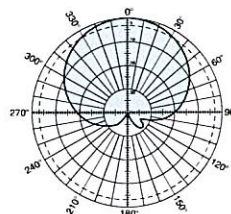
Kathrein's X-polarized adjustable electrical downtilt antennas offer the wireless carrier the ability to tailor polarization diversity sites for optimum performance. Using variable downtilt, only a few models need be procured to accommodate the needs of widely varying conditions. Remotely controlled downtilt is available as a retrofitable option.

- 0-6° downtilt range.
- UV resistant pulltruded fiberglass radome.
- DC Grounded metallic parts for impulse suppression.
- No moving electrical connections.
- Wideband vector dipole technology.
- Optional remote downtilt Control.
- Will accommodate future 3G / UMTS applications.

General specifications:

Frequency range	1710–2170 MHz
VSWR	< 1.5:1
Impedance	50 ohms
Intermodulation (2x20w)	IM3: <-150 dBc
Polarization	+45° and -45°
Front-to-back ratio (180°±30°)	>30 dB (co-polar) >25 dB (total power)
Maximum input power	300 watts per input (at 50°C)
Electrical downtilt continuously adjustable	0–6 degrees
Connector	2 x 7/16 DIN female
Isolation	>30 dB
Cross polar ratio	
Main direction 0°	25 dB (typical)
Sector ±60°	>10 dB
Weight	22 lb (10 kg)
Dimensions	76.5 x 6.1 x 2.7 inches (1942 x 155 x 69 mm)
Equivalent flat plate area	4.62 ft² (0.429 m²)
Wind survival rating*	120 mph (200 kph)
Shipping dimensions	87.2 x 6.8 x 3.6 inches (2214 x 172 x 92 mm)
Shipping weight	24.3 lb (11 kg)
Mounting	Fixed and tilt mount options are available for 2 to 4.6 inch (50 to 115 mm) OD masts.

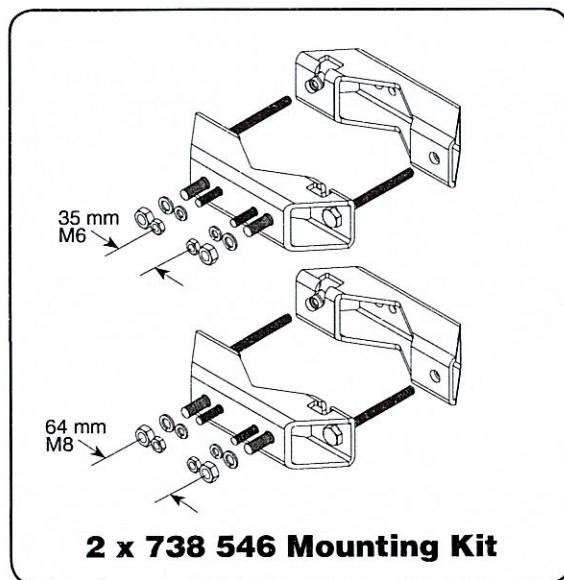
See reverse for order information.



Specifications:	1710–1880 MHz	1850–1990 MHz	1920–2170 MHz
Gain	19 dBi	19.2 dBi	19.5 dBi
+45° and -45° polarization horizontal beamwidth	67° (half-power)	65° (half-power)	63° (half-power)
+45° and -45° polarization vertical beamwidth	4.7° (half-power)	4.5° (half-power)	4.3° (half-power)
Vertical Pattern—sidelobe suppression for first side-lobe above main beam	0° 2° 4° 6° T 18 17 15 15 dB	0° 2° 4° 6° T 18 18 17 15 dB	0° 2° 4° 6° T 18 18 17 15 dB

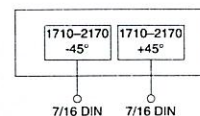
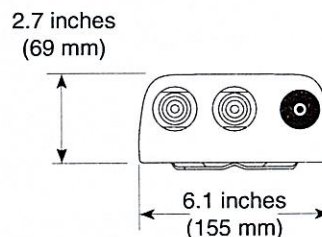
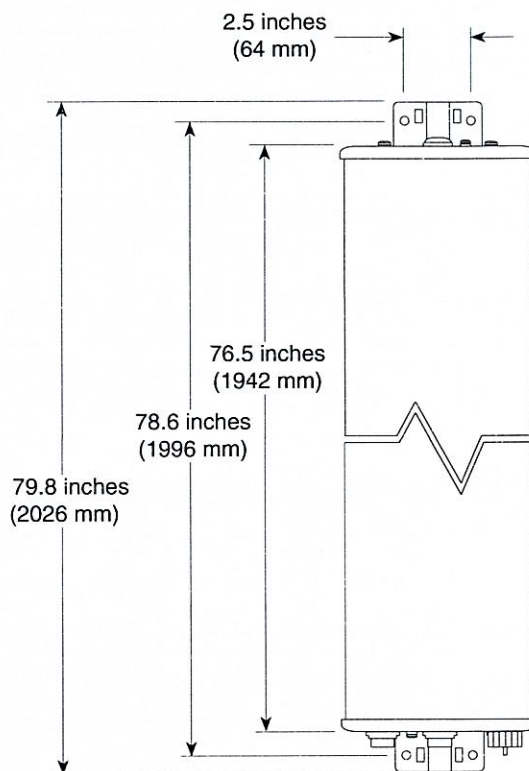


*Mechanical design is based on environmental conditions as stipulated in EIA-222-F (June 1996) and/or ETS 300 019-1-4 which include the static mechanical load imposed on an antenna by wind at maximum velocity. See the Engineering Section of the catalog for further details.



Mounting Options:

Model	Description
2 x 738 546	Mounting Kit for 2 to 4.6 inch (50 to 115 mm) OD mast.
737 978	Tilt Kit for use with the above mounting kit, 0–11 degrees downtilt angle. (requires 2 x 738 546 Mounting Kit)
742 263	Three-panel Sector Mounting Kit (120 deg. ea.) for 3.5 inch (89 mm) OD mast.

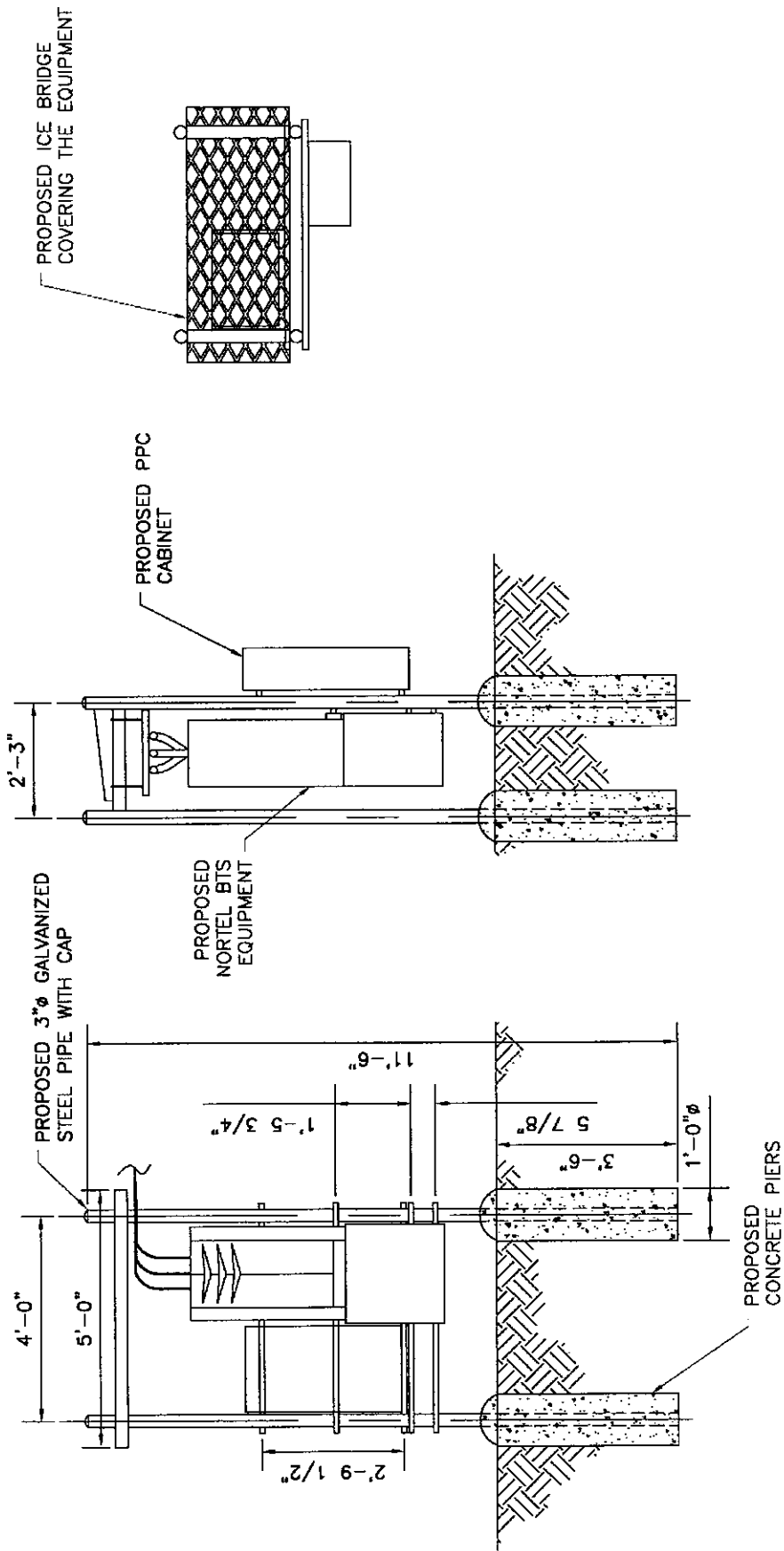


Order Information:

Model	Description
742 213	Antenna with 7/16 DIN connectors 0°–6° adjustable electrical downtilt

All specifications are subject to change without notice. The latest specifications are available at www.kathrein-scala.com.

Kathrein Inc., Scala Division Post Office Box 4580 Medford, OR 97501 (USA) Phone: (541) 779-6500 Fax: (541) 779-3991
Email: communications@kathrein.com Internet: www.kathrein-scala.com



Pocket/Youghiogheny Communications – Northeast, LLC
 Rack Detail



CDMA BTS 3231 AWS 1.7/2.1 GHz (Outdoor/Indoor)

CDMA BTS 3231

Industry's Highest Capacity AWS Micro BTS

The CDMA BTS 3231 is the latest extension to Nortel Networks BTS (Base Transceiver Station) portfolio providing the ideal solution for urban, sub-urban and rural deployments. The CDMA BTS 3231 is a 3-carrier, 3-sector outdoor/indoor BTS operating at the AWS band of 1.7/2.1 GHz supporting IS-95, 1XRTT and 1xEV-DO simultaneously. BTS 3231 provides flexible deployments solutions including floor, rack, and wall mount options. The power consumption of BTS3231 is industry leading consuming only 630W for 3C3S. The BTS 3231 is also very light at 240lbs making it easy

to transport to hard to reach locations such as the top of a high rise building.

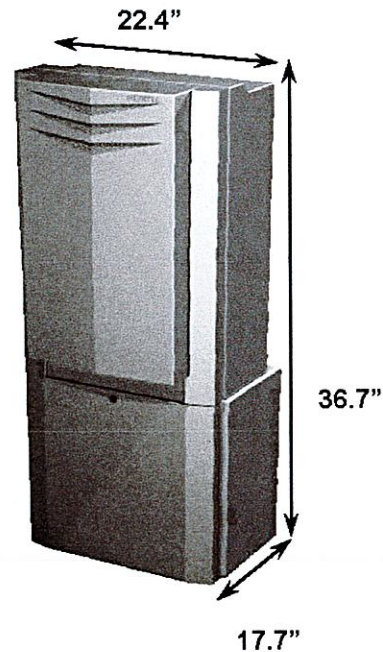


Exhibit D

Power Density Calculations

Pocket Site HFCT0331A

188 Moody Road

Enfield, Connecticut



C Squared Systems, LLC
920 Candia Road
Manchester, NH 03109
Phone: (603) 657 9702
E-mail:

support@csquaredsystems.com

Calculated Radio Frequency Emissions



CT-0331

188 Moody Street, Enfield, CT

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1. Introduction

The purpose of this report is to investigate compliance with applicable FCC regulations for the proposed Pocket antennas to be installed on the existing tower at 188 Moody Street, Enfield, CT.

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. As a result, the predicted signal levels are much more conservative (higher) than the actual signal levels will be from the finished installation.

Public exposure to radio frequencies is regulated and enforced in units of microwatts per square centimeter (mW/cm^2). The number of mW/cm^2 emitted is called the power density. The general population exposure limit for the cellular band is $0.567\text{--}0.593 \text{ mW}/\text{cm}^2$, and the general population exposure limit for the PCS/AWS band is $1.0 \text{ mW}/\text{cm}^2$. 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.

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.

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 (through training), 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.”

The FCC describes exposure to radio frequency (RF) energy in terms of percentage of maximum permissible exposure (MPE) with 100% being the maximum allowed. Rather than the FCC presenting the user specification in terms of complex power density figures over a specified surface area, this MPE measure is particularly useful, and even more so when considering that power density limits actually vary by frequency because of the different absorptive properties of the human body at different frequencies.

MPE limits are specified as time-averaged exposure limits. This means that exposure can be averaged over 30 minutes for general population / uncontrolled exposure (or 6 minutes for occupational / controlled exposure). However, for the case of exposure of the general public, time averaging is usually not applied because of uncertainties over exact exposure conditions and difficulty in controlling time of exposure. Therefore, the typical conservative approach is to assume that any RF exposure to the general public will be continuous.

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.

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 limits for Maximum Permissible Exposure (MPE) for transmitters operating between 300 kHz and 100 GHz. The FCC MPE limits are based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP), the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI).

Attachment B contains excerpts from OET Bulletin 65 and defines the Maximum Exposure Limit. As shown in these excerpts, each frequency band has different exposure limits, requiring power density to be reported as a percent of Maximum Permissible Exposure (MPE) when dealing with carriers transmitting in different frequency bands.

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:

$$\text{Power Density} = \left(\frac{\text{EIRP}}{\pi \times R^2} \right) \times \text{Off Beam Loss}$$

Where:

EIRP = Effective Isotropic Radiated Power

$R = \text{Radial Distance} = \sqrt{H^2 + V^2}$

H = Horizontal Distance from antenna

V = Vertical Distance from bottom of antenna

Off Beam Loss is determined by the selected antenna patterns

4. Calculation Results

Table 1 below outlines the power assumptions used to compute the power density.

Carrier	Operating Frequency (MHz)	Antenna Height (Feet)	Number of Trans.	Effective Radiated Power (ERP) Per Transmitter (Watts)	Total ERP (Watts)
AT&T GSM	1900	158	2	625	1,250
AT&T UMTS	880	158	1	500	500
Sprint-Nextel	851	180	9	100	900
Sprint-Nextel	1962.5	170	11	291	3,201
T-Mobile	1945	188	8	138	1,104
Pocket	2130-2133.75	148	3	631	1,893

Table 1: Proposed Carrier Information

The calculated result for the cumulative %MPE is 10.23%.

Please note that for distances of 100 feet or less, a nominal 10 dB of attenuation due to antenna pattern is assumed. Also, as noted in the introduction, obstructions (trees, buildings etc.) that would normally attenuate the signal are not taken into account. As a result, the predicted signal levels are more conservative (higher) than the actual signal levels will be from the finished installation.

5. Conclusion

The above analysis verifies that emissions from the proposed site will be well below the maximum power density levels as outlined by the FCC in the OET Bulletin 65 Ed. 97-01. Even when using conservative methods, the cumulative power density from the proposed transmit antennas at the existing facility is well below the limits for the general public. The highest expected percent of Maximum Permissible Exposure at the base of the tower is 10.23% of the FCC limit.

Please note that for distances of 100 feet or less, a nominal 10 dB of attenuation due to antenna pattern is assumed. Also, as noted in the introduction, obstructions (trees, buildings etc.) that would normally attenuate the signal are not taken into account. As a result, the predicted signal levels are more conservative (higher) than the actual signal levels will be from the finished installation.

6. 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.

A handwritten signature in black ink, appearing to read "Daniel I. Goulet", is written over a horizontal line.

Daniel I. Goulet
C Squared Systems, LLC

August 27, 2008
Date

Attachment A: References

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

ANSI C95.1-1982, American National Standard Safety Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz. IEEE-SA Standards Board

IEEE Std C95.3-1991 (Reaff 1997), IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave. IEEE-SA Standards Board

Attachment B: FCC Limits For Maximum Permissible Exposure (MPE)

(A) Limits for Occupational/Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (E) (A/m)	Power Density (S) (mW/cm ²)	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	-	-	f/300	6
1500-100,000	-	-	5	6

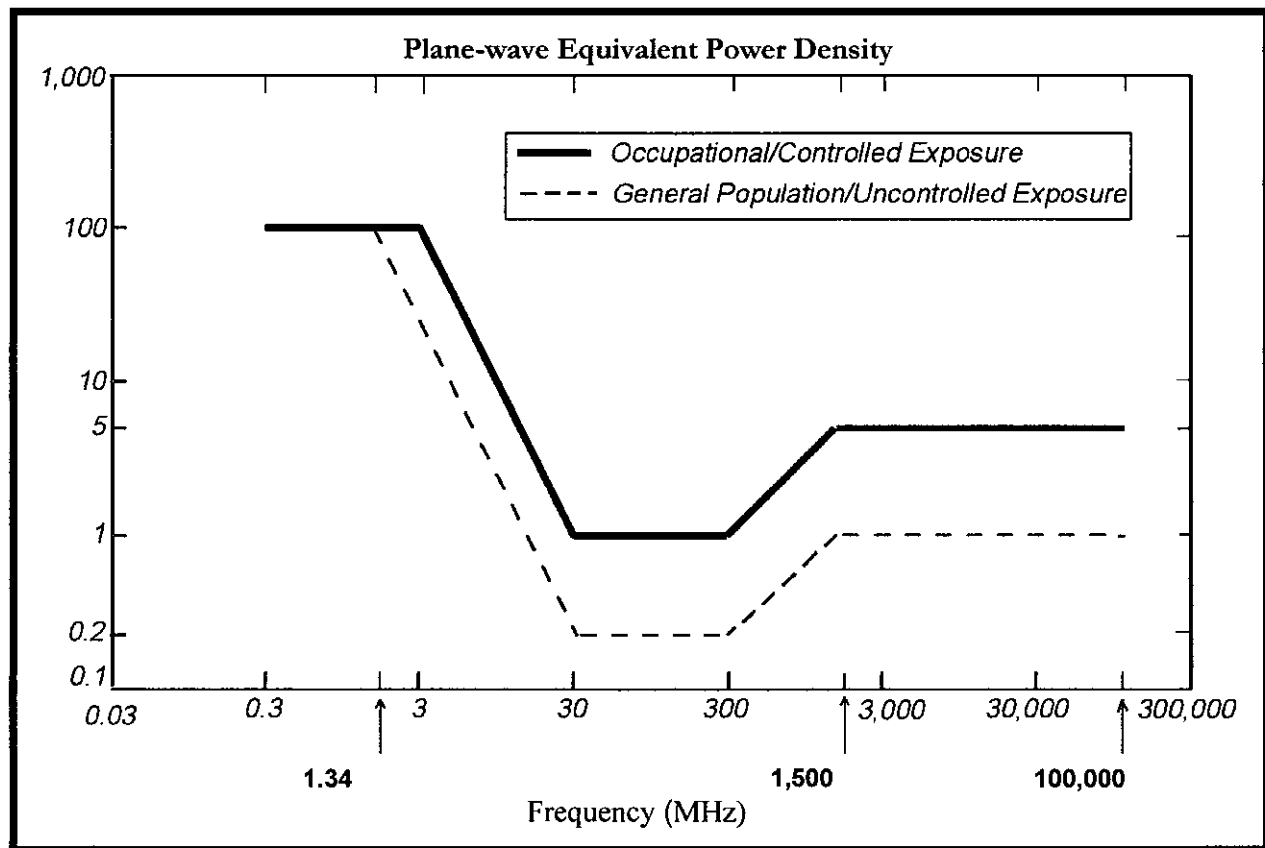
(B) Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (E) (A/m)	Power Density (S) (mW/cm ²)	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	-	-	f/1500	30
1500-100,000	-	-	1.0	30

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

NOTE 1: 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.

NOTE 2: 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 can not exercise control over their exposure.



• FCC Limits for Maximum Permissible Exposure (MPE)

Exhibit E

Structural Analysis

Pocket Site HFCT0331A

188 Moody Road

Enfield, Connecticut

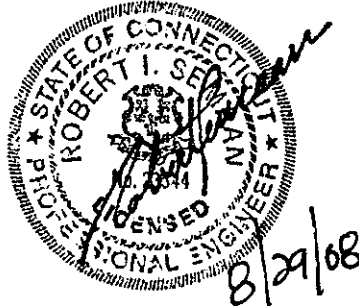
1079 N. 205th Street
Elkhorn, NE 68022
Ph: 402-289-1888
Fax: 402-289-1861

SEMAAN ENGINEERING SOLUTIONS

188 ft SUMMIT Monopole Structural Analysis

**Prepared for:
Sprint Sites USA
2393 Pendley Road
Suite 200
Cumming, GA 30041**

**Site: CT0054
For: Youghioghny Communications
Enfield, CT**



August 28, 2008

Ms. Jen Ilacqua
Sprint Sites USA
2393 Pendley Road
Suite 200
Cumming, GA 30041

Re: Site Number CT0054 – Enfield, CT.

Dear Ms. Ilacqua:

We have completed the structural analysis for the existing monopole, located at the above referenced site. The purpose of this analysis is to determine that the existing monopole design is in conformance with the TIA/EIA-222 Rev F standard and local building codes for the proposed antennae loads installation. Refer to the Review and Recommendations section at the end of this report for the analysis results.

Description of Structure:

The structure is a 188 ft SUMMIT Monopole.

Refer to SUMMIT / PJF Job no.29200-155 dated February 12, for a detailed description of the structure.

Method of analysis:

The tower was analyzed using Semaan Engineering Solutions' software suite for communication structures. The structural analysis is performed using the SAPS finite element engine. The method is 3D, non-linear, which accounts for the second order geometric effects due to the displacements. It also treats guys as exact cable elements and therefore is ideal for guyed towers. The analysis was performed in conformance with TIA/EIA-222 Rev F and local building codes for a basic wind speed of 80 mph and 1/2" radial ice with reduced wind speed (fastest mile). This is in conformance with the IBC 2006: Section 1609.1.1, Exception (4) and Section 3108.4. Wind is applied to the structure, accessories and antennas.

Structure loading:

The following loads were used in the tower analysis:

Elev (ft)	Qty	Antennas	Mounts	Coax	Carrier
188.0	12	TMA	(3) T-Arms	(18) 1 5/8	T-Mobile
	9	APX16PV-16PVL			
178.0	2	VHLP800-11	Low Profile Platform	(2) 1/2 (15) 1 5/8	Sprint
	3	DTMA-BRS160			
	3	XP4-65-R			
	9	DB848H90E			
168.0	6	DB980F90E-M	Low Profile Platform	(6) 1 5/8	AT&T Wireless
158.0	6	LGP 2140 TMA	(3) T-Arms	(6) 1 5/8	
	3	Powerwave 7770.00			

Proposed Loads:

Elev (ft)	Qty	Antennas	Mounts	Coax	Carrier
148.0	3	742 213	(3) Standoff	(6) 1 5/8	Youghiogheny Communication

All new access holes shall be reinforced with welded rims that are compatible with the pole and to be sized and supplied by pole manufacturer.
All transmission lines are assumed running inside of pole shaft.

Results of Analysis:

Refer to the attached Computer Summary sheets for detailed analysis results.

Structure:

The existing monopole is structurally capable of supporting the existing and proposed antennas.

The maximum structure usage is: 97.8%.

Foundation:

Pole Reactions	Original Design Reactions	Current Analysis Reactions	% Of Design
Moment (ft-kips)	3,850.00	3,608.96	93.7
Shear (kips)	30.00	26.14	87.1

The analysis reactions are less than the design reactions therefore no foundation modifications are required.

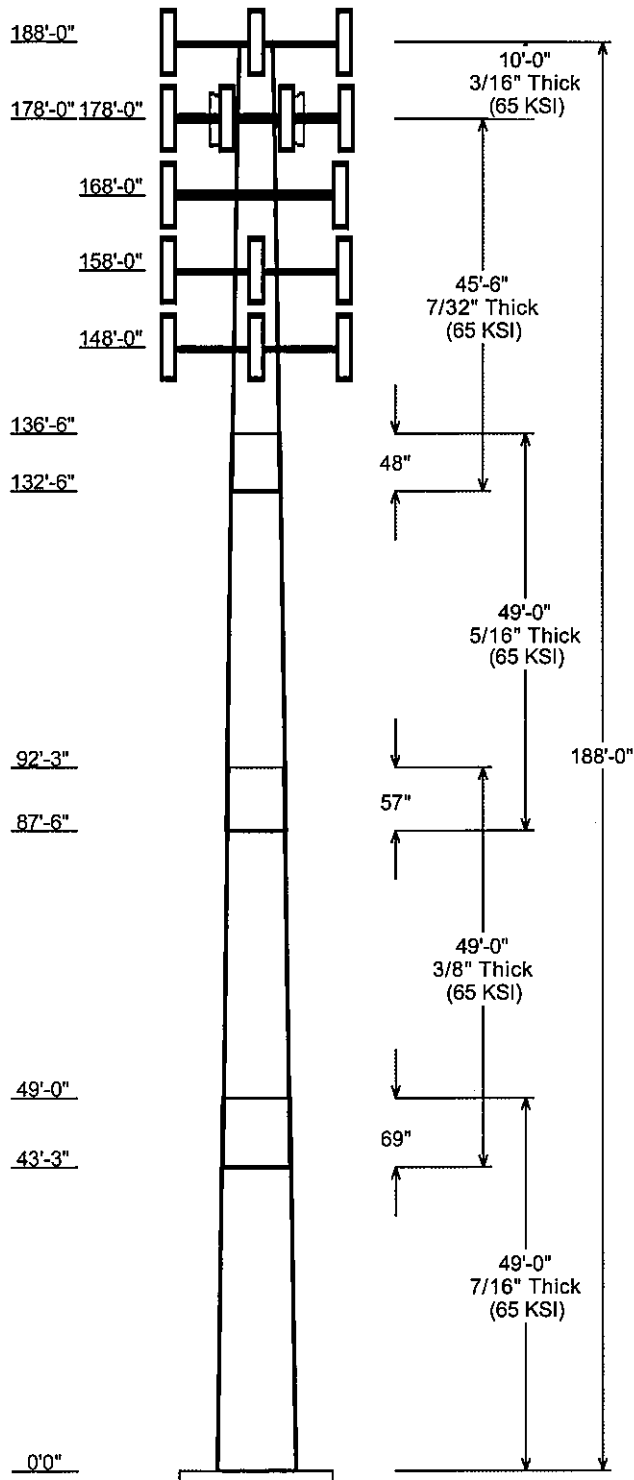
Review and Recommendations:

Based on the analysis results, the existing structure meets the requirements per the TIA/EIA-222 Rev F standards for a basic wind speed of 80 mph and 1/2" radial ice with reduced wind speed.

SEMAAN ENGINEERING SOLUTIONS

1079 N.204th Avenue
 Elkhorn, NE 68022
 Phone: 402-289-1888
 Fax: 402-289-1861

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**Job Information**

Pole: CT0054 Code: TIA/EIA-222 Rev F
 Description:
 Client: Sprint Sites USA - GA 2
 Location: Enfield, CT
 Shape: 18 Sides Base Elev (ft): 0.00
 Height: 188.00 (ft) Taper: 0.166025(in/ft)

Sections Properties

Shaft Section	Length (ft)	Diameter (in)		Thick Joint (in) Type	Overlap Length (in)	Taper (in/ft)	Steel Grade (ksi)
		Across Flats Top	Across Flats Bottom				
1	49.000	43.60	51.74	0.438	0.000	0.166025	65
2	49.000	37.17	45.30	0.375 Slip Joint	69.000	0.166025	65
3	49.000	30.45	38.58	0.313 Slip Joint	57.000	0.166025	65
4	45.500	24.00	31.55	0.219 Slip Joint	48.000	0.166025	65
5	10.000	22.34	24.00	0.188 Butt Joint	0.000	0.166025	65

Discrete Appurtenance

Attach Elev (ft)	Force Elev (ft)	Qty	Description
188.000	188.000	12	TMA
188.000	188.000	3	T-Arms
188.000	188.000	9	APX16PV-16PVL
178.000	178.000	1	Low Profile Platform
178.000	178.000	2	VHLP800-11
178.000	178.000	3	DTMA-BRS160
178.000	178.000	3	XP4-65-R
178.000	178.000	9	DB848H90E
168.000	168.000	1	Low Profile Platform
168.000	168.000	6	DB980F90E-M
158.000	158.000	3	T-Arms
158.000	158.000	6	LGP 2140 TMA
158.000	158.000	3	Powerwave 7770.00
148.000	148.000	3	3 ft Standoff
148.000	148.000	3	742 213

Linear Appurtenance

Elev (ft) From	To	Description	Exposed To Wind
0.000	148.0	1 5/8 Coax	No
0.000	158.0	1 5/8 Coax	No
0.000	168.0	1 5/8 Coax	No
0.000	178.0	1 5/8 Coax	No
0.000	178.0	1/2" Coax	No
0.000	188.0	1 5/8 Coax	No

Load Cases

No Ice	80.00 mph Wind with No Ice
Ice	69.28 mph Wind with Ice
Twist/Sway	50.00 mph Wind with No Ice

Reactions

Load Case	Moment (Kip-ft)	Shear (Kips)	Axial (Kips)
No Ice	3608.96	26.14	34.99
Ice	3055.14	21.39	42.08
Twist/Sway	1413.64	10.21	35.04

Dish Deflections

Load Case	Attach Elev (ft)	Deflection (in)	Rotation (deg)
No Ice			
Ice			
Twist/Sway			