

EM-POCKET-054-080917

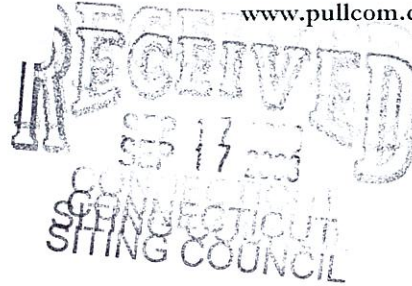
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September 16, 2008

Via Federal Express

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



Re: Notice of Exempt Modification
SBA Communications Corporation Telecommunications Facility
175 Dickinson Road, Glastonbury, Connecticut

Dear Mr. Phelps:

Youghiogheny Communications-Northeast, LLC, doing business as Pocket Communications ("Pocket"), intends to install antennas and appurtenant equipment at the existing 180 foot monopole facility owned by SBA Communications Corporation and located at 175 Dickinson Road, Glastonbury, 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 Richard J. Johnson, Town Manager, Town of Glastonbury.

The existing Facility consists of a 180 foot self-supporting monopole tower capable of supporting multiple carriers within a fenced compound. The coordinates for the Facility are **Lat: 41°-39'-21"** and **Long: °72-31'-24"**. The tower is located approximately 600 feet north of Dickinson Road, roughly 1,800 southwest of Route 2. The Facility is located in the south central portion of Glastonbury, roughly one mile to the northwest of Glastonbury's corner with Marlborough and East Hampton (see Site Map, attached as Exhibit A). The tower currently supports AT&T antennas at the one hundred thirty seven foot (137') level centerline AGL (above ground level), Sprint antennas at the one hundred fifty eight foot level (158') AGL, Verizon antennas at the one hundred sixty seven foot level (167') AGL, , and T-Mobile antennas at the one hundred seventy seven foot level (177') AGL. Pocket proposes to install three Kathrein 742-213 flush mount antennas on the tower at the one hundred forty seven foot centerline (147') AGL, and a Nortel CDMA Micro BTS 3231 cabinet, mounted on an existing pad, contained

Page 2

within a six foot by six foot (6'-0" x 6'-0") lease area. A small GPS antenna will be mounted to the existing ice bridge that will be used from the lease area to the tower. Utilities will be run via a proposed underground conduit from an existing utility backboard, within the compound (See Design Drawings and Equipment Specifications, attached as Exhibits B and C respectively).

For the following reasons, the proposed modifications to the Dickinson 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 147 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 15.18% 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 Glastonbury Facility constitutes an exempt modification under R.C.S.A. Section 16-50j-72(b)(2)

Respectfully Submitted,



Carrie L. Larson

cc: Richard J. Johnson, Town Manager
Randall Chapman and Ronald & Beverly Bronzi, underlying property owner

Exhibit A

Site Map

Pocket Site HFCT0386A

175 Dickinson Road

Glastonbury, Connecticut

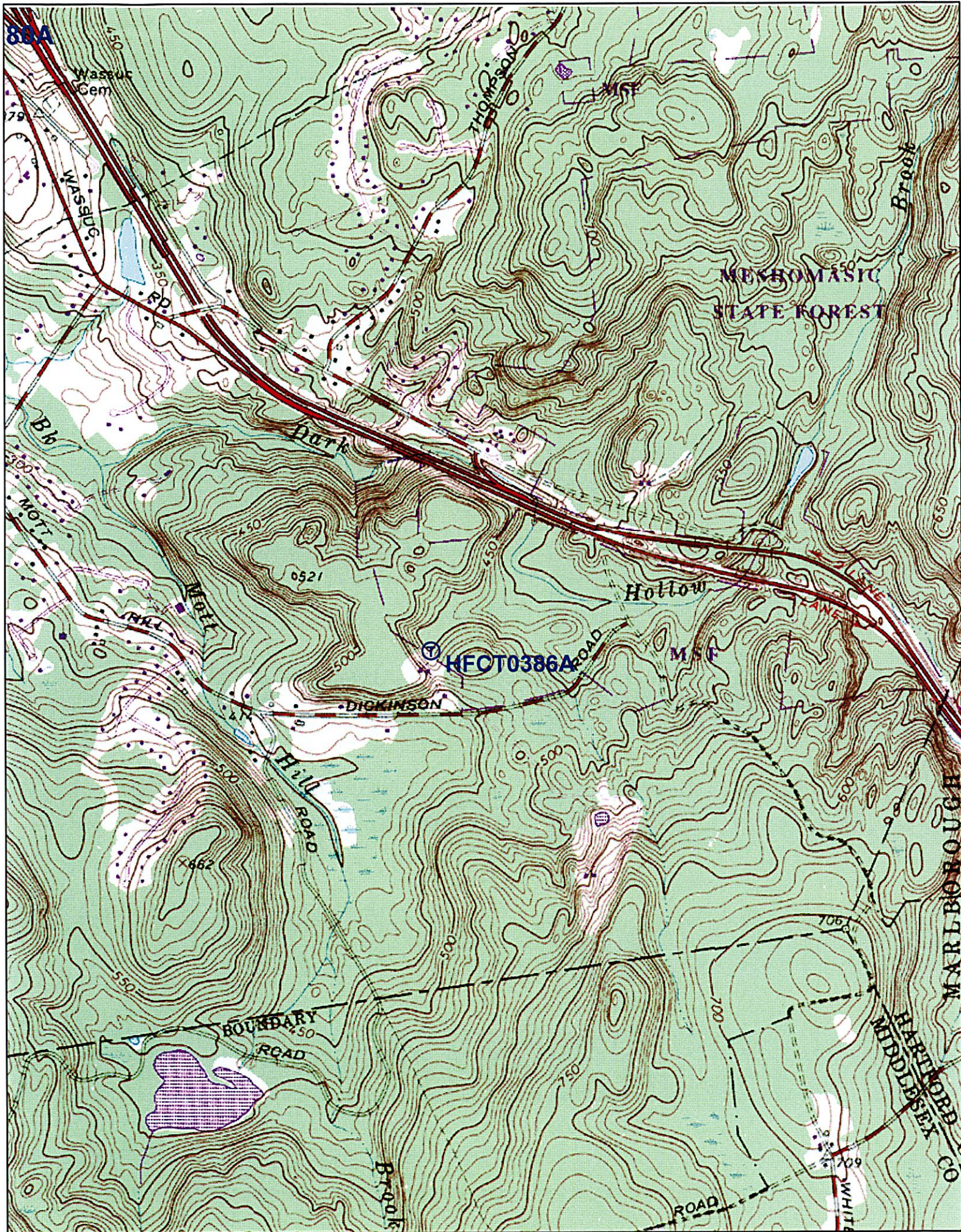


Exhibit B

Design Drawings

Pocket Site HFCT0386A

175 Dickinson Road

Glastonbury, Connecticut

HFCT0386A
GLASTONBURY
180' MONOPOLE

REAL ESTATE _____

RF _____

OPS/CONSTRUCTION _____

LEGAL/COMPLIANCE _____

NET DESIGN _____

184 TO EXIT 55W (SR2) FOR 9 MILES TO EXIT 10 (MANCHESTER RD.) FOR .1 MILES TO L ON NEW LONDON TURNPIKE FOR .15 MILES AND STAY ON WASSUC RD. FOR .45 MILES TO R ON COUNTRY CLUB RD. FOR .5 MILES TO R ON MOTT HILL RD. FOR .3 MILES TO THE WP ACCESS ROAD ON THE L

POCKET COMMUNICATIONS MAINTENANCE CREW (TYPICALLY ONE PERSON) WILL MAKE AN

CONSTRUCTION NOTES

1. FIELD VERIFICATION: CONTRACTOR SHALL FIELD VERIFY SCOPE OF WORK, POCKET COMMUNICATIONS ANTENNA MOUNT LOCATION AND ANTENNAS TO BE INSTALLED.
2. COORDINATION OF WORK: CONTRACTOR SHOULD COORDINATE RF WORK AND SITE ACCESS WITH POCKET COMMUNICATIONS.
3. GRAVEL SURFACE IN AREAS OF COMPOUND THAT ARE DISTURBED BY CONSTRUCTION SHALL BE REPLACED TO ORIGINAL CONDITION BY CONTRACTOR.

GENERAL NOTES

1. FOR THE PURPOSE OF CONSTRUCTION DRAWING, THE FOLLOWING DEFINITIONS SHALL APPLY:
(CONTRACTOR - GENERAL CONTRACTOR)
OWNER - POCKET COMMUNICATIONS
DEM - ORIGINAL EQUIPMENT MANUFACTURER
2. PRIOR TO THE SUBMISSION OF BIDS, THE BIDDING CONTRACTOR SHALL VISIT THE CELL SITE TO FAMILIARIZE WITH THE EXISTING CONDITIONS AND TO CONFIRM THAT THE WORK CAN BE ACCOMPLISHED AS SHOWN ON THE CONSTRUCTION DRAWINGS. ANY DISCREPANCIES SHALL BE BROUGHT TO THE ATTENTION OF CONTRACTOR.
3. ALL MATERIALS FURNISHED AND INSTALLED SHALL BE IN STRICT ACCORDANCE WITH ALL APPLICABLE

CODES, REGULATIONS, AND ORDINANCES.

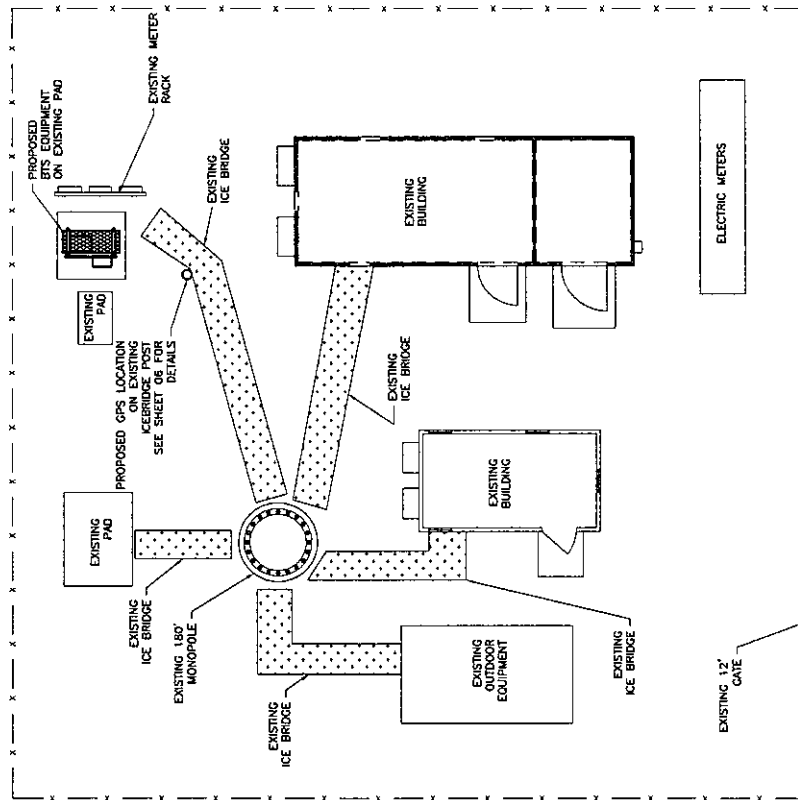
CONTRACTOR SHALL ISSUE ALL APPROPRIATE ORDINANCES, RULES, REGULATIONS, AND LAWFUL ORDERS OF ANY PUBLIC AUTHORITY REGARDING THE PERFORMANCE OF THE WORK. ALL WORK CARRIED OUT SHALL COMPLY WITH ALL APPLICABLE ORDINANCES, RULES, REGULATIONS, AND LAWFUL ORDERS OF ANY PUBLIC AUTHORITY REGARDING THE PERFORMANCE OF THE WORK. ALL WORK CARRIED OUT SHALL COMPLY WITH ALL APPLICABLE

MANUFACTURER'S RECOMMENDATIONS UNLESS SPECIFICALLY STATED OTHERWISE.

6. IF THE SPECIFIED EQUIPMENT CANNOT BE INSTALLED AS SHOWN ON THESE DRAWINGS, THE CONTRACTOR SHALL PROPOSE AN ALTERNATIVE INSTALLATION FOR APPROVAL.
7. CONTRACTOR SHALL DETERMINE ACTUAL ROUTING OF CONDUIT, POWER AND T1 CABLES, GROUNDING CABLES AS SHOWN ON THE POWER, GROUNDING AND TELCO PLAN DRAWING.
8. THE CONTRACTOR SHALL PROTECT EXISTING IMPROVEMENTS, PAVEMENTS, CURBS, GROUNDING CABLES AS SHOWN ON THE ELECTRICAL PLAN.
9. CONTRACTOR SHALL LEGALLY AND PROPERLY DISPOSE OF ALL SCRAP MATERIALS SUCH AS

COAXIAL CABLES AND OTHER ITEMS REMOVED FROM THE EXISTING FACILITY. ANTENNAS REMOVED SHALL BE RETURNED TO THE OWNER'S DESIGNATED LOCATION.

10. CONTRACTOR TO OBTAIN REQUIRED NOTICE TO PROCEED DOCUMENTS FROM THE TOWER OWNER BEFORE COMMENCING CONSTRUCTION.



SITE PLAN
11x17 SCALE: 3/32" = 1'-0"
22x34 SCALE: 3/16" = 1'-0"

TELCO



POCKET COMMUNICATIONS

PROJECT GLASTONBURY

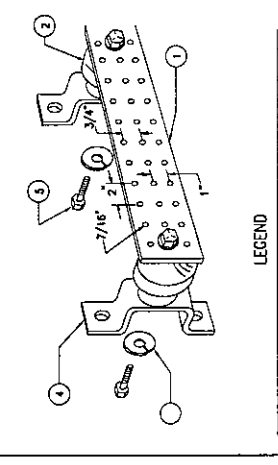
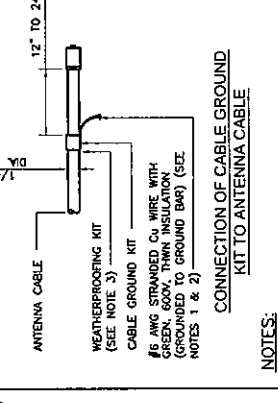
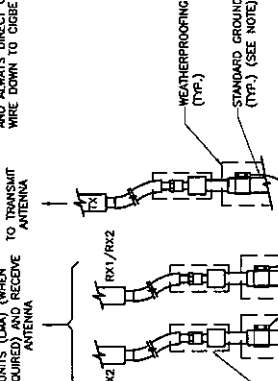
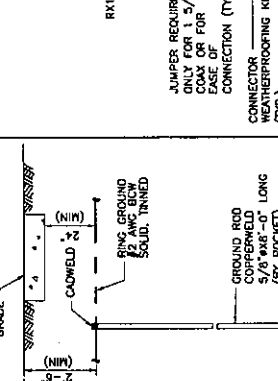
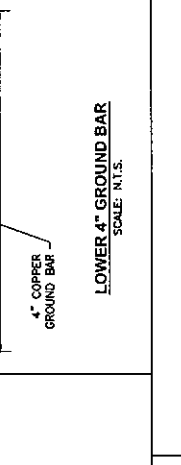
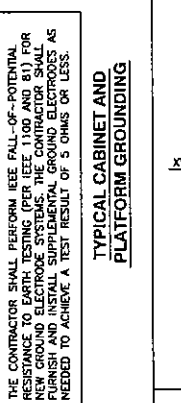
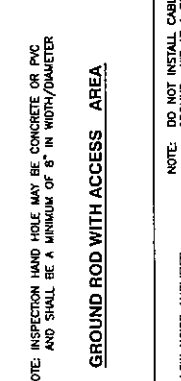
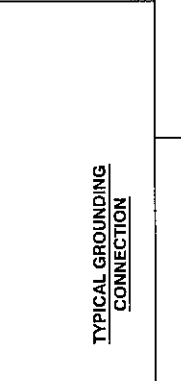
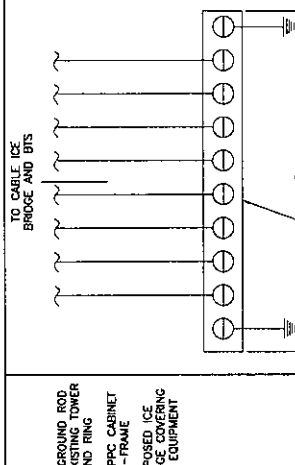
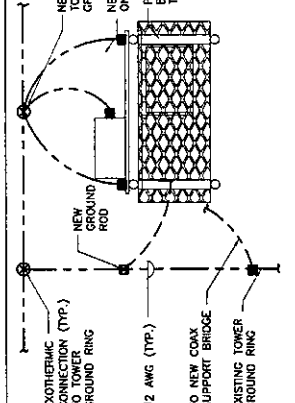
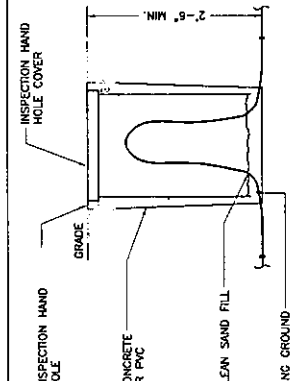
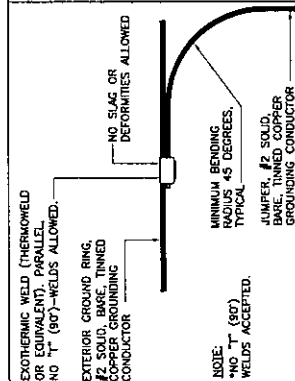
SHEET SITE PLAN

THE POCKET COMMUNICATIONS DOCUMENT AND THE PROJECT SITE PLAN ARE THE PROPERTY OF POCKET COMMUNICATIONS. THIS DOCUMENT IS NOT TO BE REPRODUCED OR COPIED WITHOUT WRITTEN PERMISSION OF POCKET COMMUNICATIONS.



PROJECT NO. 08448
DATE: 7/11/08
APP. NO. 08448
REV. NO.

02

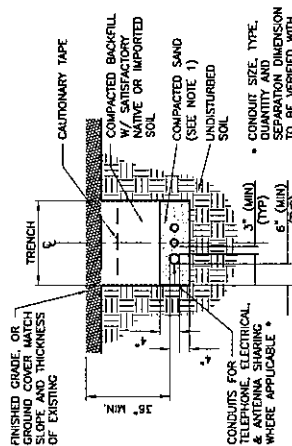


PANEL 'SSC'									
LOAD DESCRIPTION	LOAD BREAKER COT (A) SIZE (NO.)	PHASE	CT (B) SIZE (NO.)	LOAD DESCRIPTION	LOAD BREAKER COT (A) SIZE (NO.)	PHASE	CT (B) SIZE (NO.)	LOAD DESCRIPTION	LOAD BREAKER COT (A) SIZE (NO.)
BTS CABINET	2.5	30/2	1	TYSS	2	30/2	2, 2	TYSS	2
LIGHTING	8	10/1	5	SPACE	6	-	-	SPACE	6
SPACE	-	-	7	SPACE	8	-	-	SPACE	8
SPACE	-	-	9	SPACE	10	-	-	SPACE	10
SPACE	-	-	11	SPACE	12	-	-	SPACE	12
SPACE	-	-	13	SPACE	14	-	-	SPACE	14
SPACE	-	-	15	SPACE	16	-	-	SPACE	16
SPACE	-	-	17	SPACE	18	-	-	SPACE	18
SPACE	-	-	19	SPACE	20	-	-	SPACE	20
SPACE	-	-	21	SPACE	22	-	-	SPACE	22
SPACE	-	-	23	SPACE	24	-	-	SPACE	24
LOAD SUB-TOTAL	5.6	LOAD TOTAL	10.3 kVA	LOAD SUB-TOTAL	4.4	LOAD TOTAL	10.3 kVA	LOAD SUB-TOTAL	4.4

100A MCB, 120/240V, 1Ø, 3W, 65,000 AIC	
TOTAL CONNECTED LOAD	10.3 kW
25% OF LARGEST CONT. LOAD	1250 W
TOTAL LOADS	11.5 kW 47.9 AMPS

NOTE: ALL NON-OPTIONAL BREAKERS PROVIDED BY SSC MFR

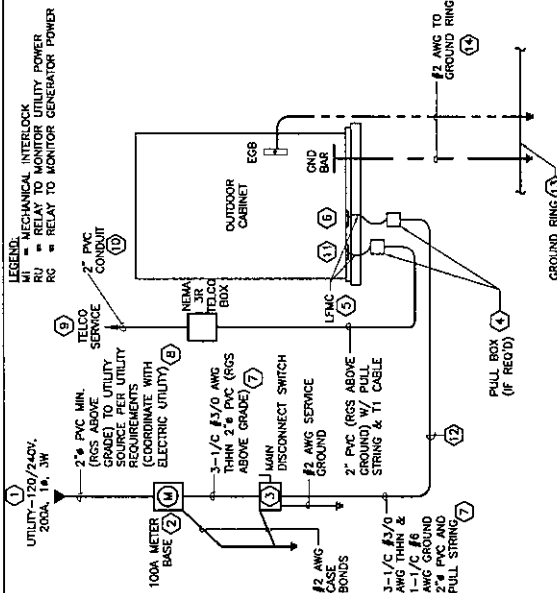
PANEL SCHEDULE



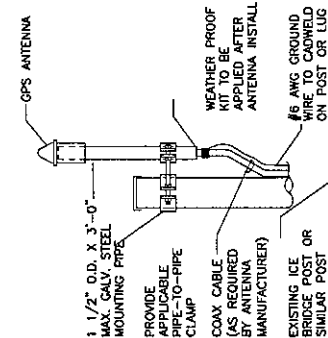
NOTES: 1. LEAN CONCRETE, RED-COLORED TOP, MAY BE USED IN PLACE OF COMPACTED SAND.

DIRECT BURIED CONDUIT

NTS



POWER, TELCO & GROUND SINGLE LINE DIAGRAM FOR OUTDOOR CABINET



NOTES:
LOCATION OF ANTENNA MUST HAVE CLEAR VIEW OF SOUTHERN SKY AND CANNOT HAVE ANY OBSTACLES EXCEEDING 10' OF THE SURFACE AREA OF A HEMISPHERE AROUND THE GPS ANTENNA.

ALL GPS ANTENNA LOCATIONS MUST BE ABLE TO RECEIVE CLEAR SIGNALS FROM A MINIMUM OF FOUR (4) SATELLITES. VERIFY WITH HANDHELD GPS BEFORE FINAL LOCATION OF GPS ANTENNA.

GPS ANTENNA PIPE MOUNT

SCALE: N.T.S.

REFERENCE NOTES

- ELECTRICAL DEMARCATION POINT. ELECTRICAL CONTRACTOR TO COORDINATE WITH LOCAL UTILITY POWER FOR SERVICE TO METER.
- CONTRACTOR TO SUPPLY AND INSTALL A 100A, 120/208/240V 1Ø, 3W, 65,000 AIC MCB. THE MCB SHALL BE INSTALLED IN THE MAIN DISCONNECT SWITCH. THE MCB SHALL BE INSTALLED IN THE MAIN DISCONNECT SWITCH. THE MCB SHALL BE INSTALLED IN THE MAIN DISCONNECT SWITCH.
- CONTRACTOR TO SUPPLY AND INSTALL NEMA 3R 100A FUSIBLE DISCONNECT SWITCH WITH COORDINABLE HANDLE. PROVIDE WITH 100A FUSIBLE DISCONNECT SWITCH WITH COORDINABLE HANDLE. PROVIDE WITH 100A FUSIBLE DISCONNECT SWITCH WITH COORDINABLE HANDLE.
- WEATHER TIGHT JUNCTION BOX (IF REQUIRED). SIZE TO NEC CODE FOR APPLICATION.
- LIQUID TIGHT, FLEXIBLE METALLIC CONDUIT W/ W/ WEATHER TIGHT FITTINGS AND SUPPORTS. SIZE AND CONTENTS TO MATCH ASSOCIATED USE (POWER OR TELCO).
- UTILITY POWER ENTRY INTO CABINET. COORDINATE TERMINATION WITH CABINET MANUFACTURER.
- CONTRACTOR SUPPLY AND INSTALL 2\"/>

NOTES

- CONTRACTOR SHALL PROVIDE 100AMP, SINGLE PHASE, 120/240 VAC, 60HZ SERVICE FOR SITE.
- CONTRACTOR SHALL COORDINATE WITH UTILITY COMPANY BEFORE THE START OF CONSTRUCTION. POWER AND TELCO CONDUIT SHALL BE PROVIDED AND INSTALLED PER UTILITY REQUIREMENTS.
- FOR COMPLETE INTERNAL WIRING AND ARRANGEMENT REFER TO DRAWINGS PROVIDED BY AC OR TELCO PANEL MANUFACTURER.
- ALL SERVICE EQUIPMENT AND INSTALLATIONS SHALL COMPLY WITH THE N.E.C. AND UTILITY COMPANY AND LOCAL CODE REQUIREMENTS.
- CONTRACTOR SHALL INSTALL SUFFICIENT LENGTHS OF LFMC INCLUDING ALL CONDUIT FITTINGS (NUTS, REDUCING BUSHINGS, ELBOWS, COUPLINGS, ETC) NECESSARY FOR CONNECTION FROM IMC CONDUIT TO THE PURCELL POWER CABINET.
- CONTRACTOR SHALL PROVIDE ELECTRICAL SERVICE EQUIPMENT WITH FAULT CURRENT RATINGS GREATER THAN THE AVAILABLE FAULT CURRENT FROM THE POWER UTILITY.
- CONTRACTOR SHALL VERIFY THAT THE MAIN BREAKING JUMPER AND GROUNDING ELECTRODE CONDUCTOR IS INSTALLED PROPERLY IN MAIN DISCONNECT SWITCH.

GENERAL ELECTRICAL NOTES:

- ALL ELECTRICAL AND GROUNDING WORK SHALL BE PERFORMED IN ACCORDANCE WITH THE PROJECT SPECIFICATIONS, NEC AND ALL APPLICABLE LOCAL CODES.
- CONDUIT ROUTINGS ARE SCHEMATIC. CONTRACTOR SHALL VERIFY ROUTING AND LENGTHS PRIOR TO CONSTRUCTION.
- WIRING, RACEWAY AND SUPPORT METHODS AND MATERIALS SHALL COMPLY WITH THE REQUIREMENTS OF THE NEC AND TELCORDIA.
- THE CONTRACTOR SHALL NOTIFY AND OBTAIN NECESSARY NOTIFICATION BEFORE COMMENCING WORK ON THE AC POWER DISTRIBUTION PANELS.
- THE CONTRACTOR SHALL PROVIDE NECESSARY TAGGING ON THE BREAKERS, CABLES AND DISTRIBUTION PANELS IN ACCORDANCE WITH THE APPLICABLE CODES AND STANDARDS TO SAFEGUARD AGAINST LIFE AND PROPERTY.

NO.	DATE	ISSUED FOR CONSTRUCTION
01	08/19/08	ISSUED FOR CONSTRUCTION

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE. IT IS THE POLICY OF THE NATIONAL ARCHIVES TO MAKE ALL INFORMATION CONTAINED HEREIN AVAILABLE TO THE PUBLIC.



PROJECT NO.	JSH
DATE	7/21/08
APP. NO.	08448
APP. NO.	06

Exhibit C

Equipment Specifications

Pocket Site HFCT0386A

175 Dickinson Road

Glastonbury, Connecticut

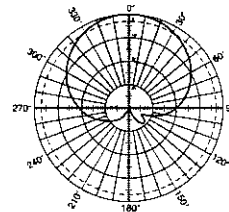
Kathrein's X-polarized adjustable electrical downtilt antennas offer the wireless carrier the ability to tailor polarization diversity sites for optimum performance. Using variable downtilt, only a few models need be procured to accommodate the needs of widely varying conditions. Remotely controlled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

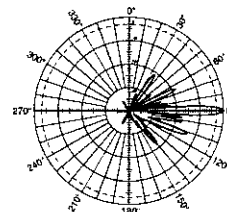
General specifications:

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.



Horizontal pattern
±45°- polarization



Vertical pattern
±45°- polarization



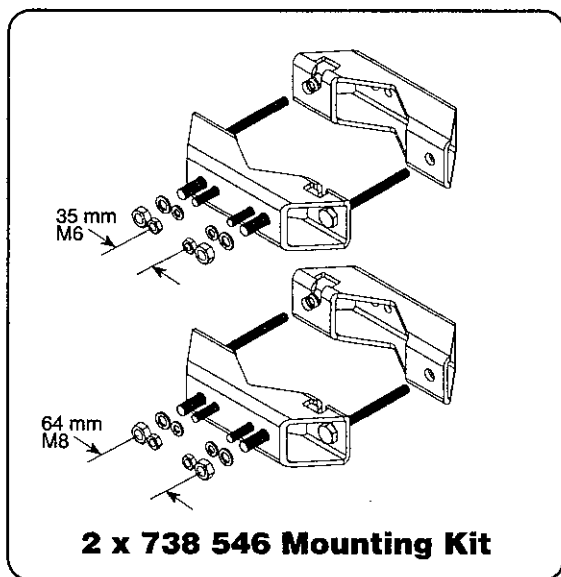
Specifications:	1710–1880 MHz	1850–1990 MHz	1920–2170 MHz
Gain	19 dBi	19.2 dBi	19.5 dBi
+45° and -45° polarization horizontal beamwidth	67° (half-power)	65° (half-power)	63° (half-power)
+45° and -45° polarization vertical beamwidth	4.7° (half-power)	4.5° (half-power)	4.3° (half-power)
Vertical Pattern–sidelobe 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



10642-H
936.2074/h

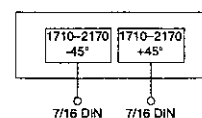
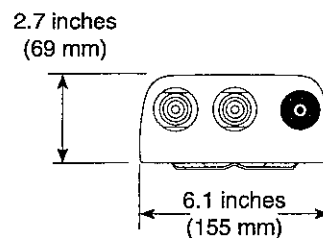
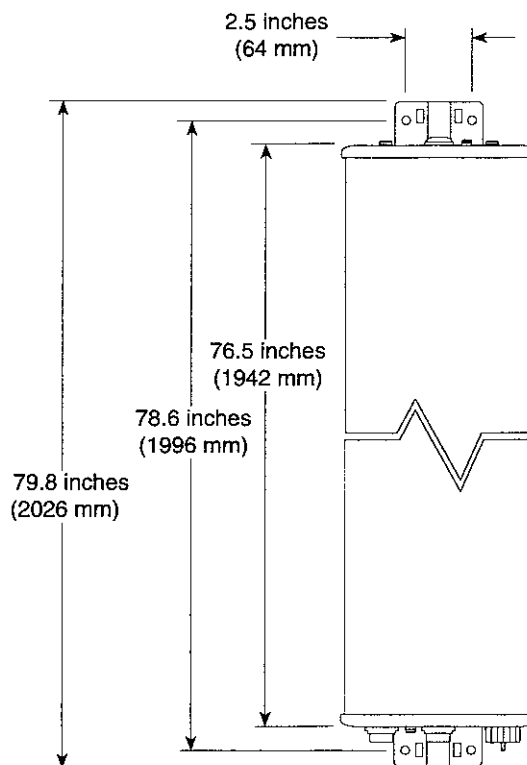


* Mechanical design is based on environmental conditions as stipulated in EIA-222-F (June 1996) and/or ETS 300 019-1-4 which include the static mechanical load imposed on an antenna by wind at maximum velocity. See the Engineering Section of the catalog for further details.



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.

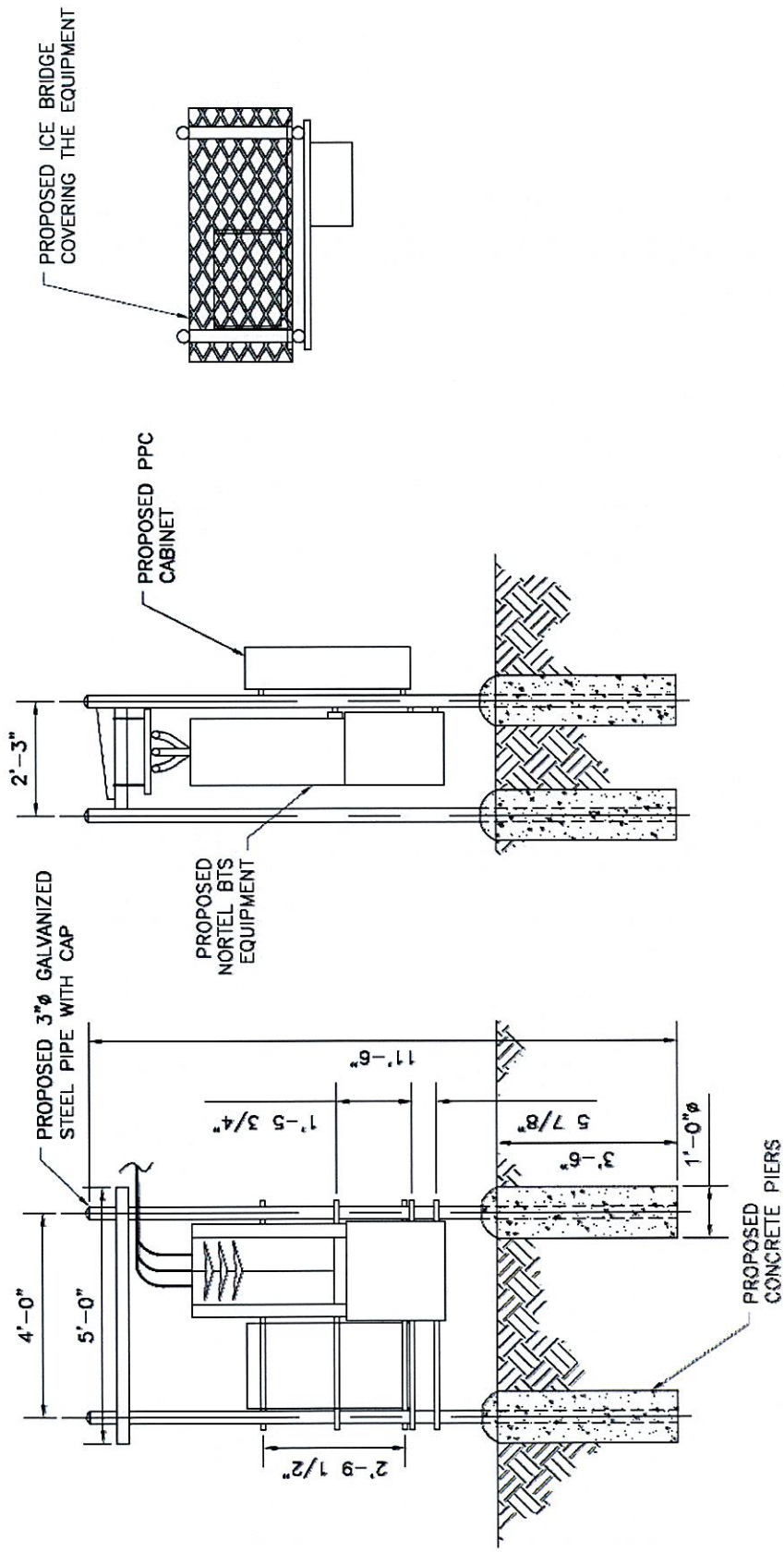


Order Information:

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.

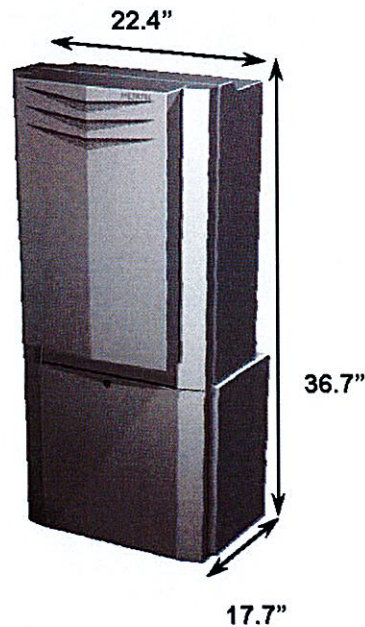


Exhibit D

Power Density Calculations

Pocket Site HFCT0386A

175 Dickinson Road

Glastonbury, 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-0386

175 Dickinson Road, Glastonbury, 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 installed on the existing tower at 175 Dickinson Road, Glastonbury, 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:

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

Where:

EIRP = Effective Isotropic Radiated Power

R = 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)
VoiceStream	1930	177	4	470	1880
Verizon	880	167	9	285	2565
Verizon	1900	167	3	400	1200
Sprint	1962.5	158	11	122	1342
Cingular	880	137	2	296	592
Cingular	1930	137	2	427	854
Pocket	2130-2133.75	147	3	631	1893

Table 1: Proposed Carrier Information

The calculated result for the cumulative %MPE is 15.18%.

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.

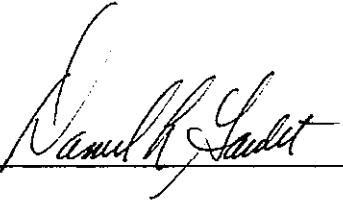
5. Conclusion

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 15.18% 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.



Daniel I. Goulet
C Squared Systems, LLC

August 6, 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

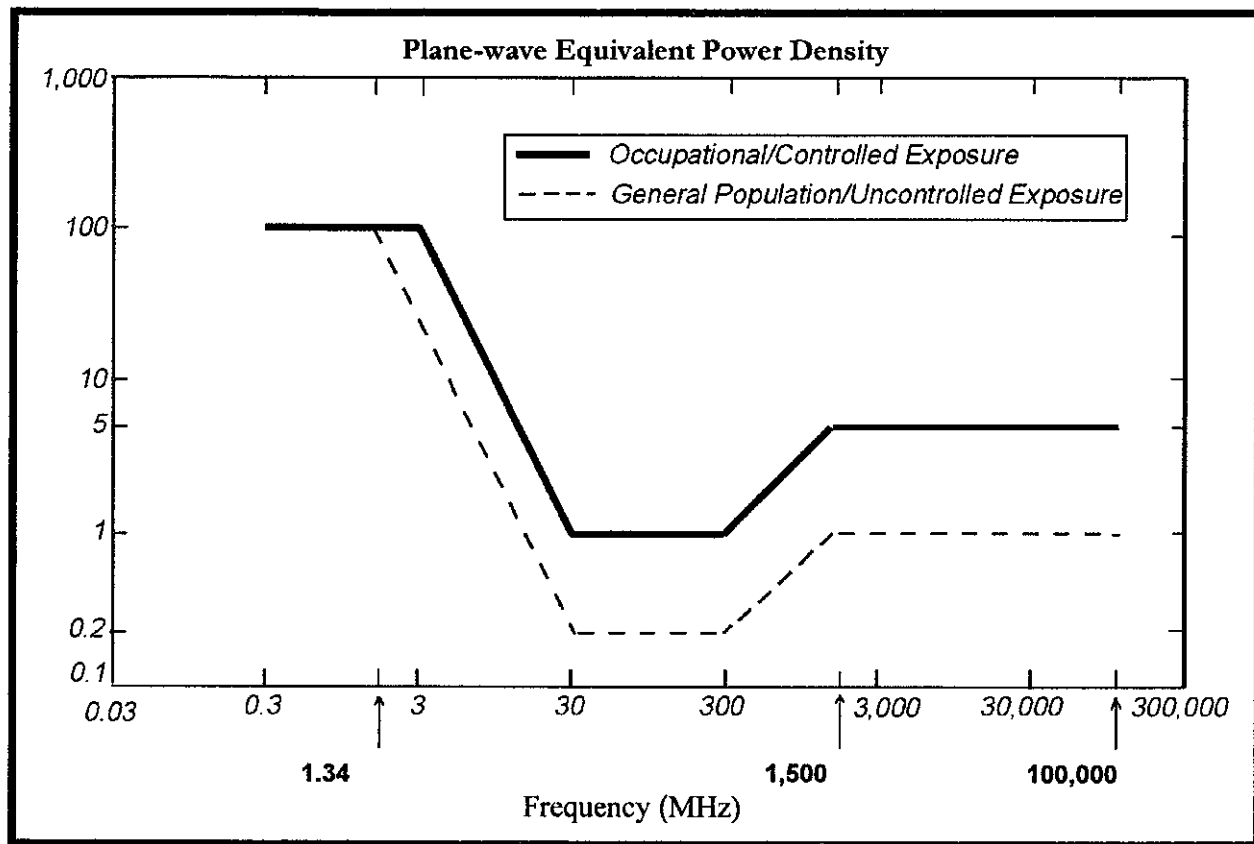
(B) Limits for General Population/Uncontrolled Exposure

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 HFCT0386A

175 Dickinson Road

Glastonbury, Connecticut



**Structural Analysis for
SBA Network Services, Inc.**

176' Monopole

**Site Name: Glastonbury
Site ID: CT02216-S**

FDH Project Number 08-02004E S3

Prepared By:

A handwritten signature in black ink, reading "Adrian L. Creech".

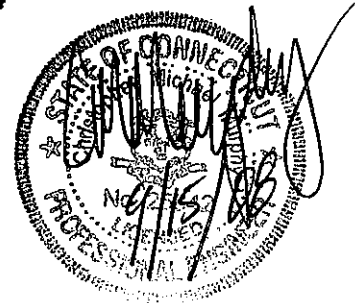
Adrian L. Creech, EI
Project Engineer

Reviewed By:

A handwritten signature in black ink, reading "Christopher M. Murphy".

Christopher M. Murphy, PE
Vice President
CT PE License No. 25842

FDH Engineering, Inc.
2730 Rowland Road, Suite 100
Raleigh, NC 27615
(919)-755-1012
info@fdh-inc.com



September 15, 2008

Prepared pursuant to ANSI/TIA-222-G Structural Standards for Antenna Supporting Structures and Antennas

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 Conclusions
 Recommendations

APPURTENANCE LISTING..... 4

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GENERAL COMMENTS..... 6

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POLE PROFILE..... 7

BASE LEVEL DRAWING..... 8

EXECUTIVE SUMMARY

At the request of SBA Network Services, FDH Engineering performed a structural analysis of the existing monopole located in Glastonbury, CT to determine whether the tower is structurally adequate to support both the existing and proposed loads, pursuant to the *Structural Standard for Antenna Supporting Structures and Antennas, ANSI/TIA-222-G*. Information pertaining to the existing/proposed antenna loading, current tower geometry, and member sizes was obtained from Paul J. Ford and Company (Job No. 29200-887) original design drawings dated June 20, 2000, Sterling Engineering (Project No. 061-285) structural analysis report dated November 20, 2003, and SBA Network Services, Inc.

The *basic design wind speed* per *ANSI/TIA-222-G* standards is 105 MPH without ice and 50 MPH with 1" of radial ice.

Conclusions

With the existing and proposed antennas from Pocket Communications in place at 147 ft., the tower meets the requirements of the *ANSI/TIA-222-G* standards. Furthermore, provided the foundation was constructed per the original design drawings (see Paul J. Ford & Co Job No. 28200-887), the foundation should have the necessary capacity to support both the proposed and existing loading. For a more detailed description of the analysis of the tower, see the **Results** section of this report.

Our structural analysis has been performed assuming all information provided to FDH is accurate (i.e. the steel data, tower layout, current antenna loading, and proposed antenna loading) and that the tower will be properly erected and maintained per the original design drawings.

Recommendations

To ensure the requirements of the *ANSI/TIA-222-G* standards are met with the existing and proposed loading in place, we have the following recommendations:

1. The proposed coax should be installed inside the pole's shaft but may be installed outside the pole's shaft in a single row if necessary.

APPURTENANCE LISTING

The proposed and existing antennas with their corresponding cables/coax lines are shown in **Table 1**. *If the actual layout determined in the field deviates from this layout, FDH should be contacted to perform a revised analysis*

Table 1 – Appurtenance Loading

Existing Loading:

No.	Centerline Elevation (ft)	Coax and Lines ¹	Carrier	Mount Type	Description
1-6	177	(12) 1-5/8" ²	T-Mobile	(3) 12' T-Arms (assumed)	(6) EMS RR90-17-02DP (12) MHA's
7-18	167	(12) 1-5/8"	Verizon	(1) 13' low Profile Platform (assumed)	(6) Antel WPA-80090/4CF (6) Decibel DB948F85T2E-M
19-30	157	(12) 1-5/8" ³	Sprint	(1) 13' low Profile Platform (assumed)	(12) Decibel DB980H90
31-42	137	(12) 1-5/8" ⁴	Cingular	(1) 13' low Profile Platform (assumed)	(12) CSS DUO1417-8686

¹ Coax installed inside the pole's shaft unless otherwise noted.

² Currently, T-Mobile has (4) antennas, (8) MHA's, and (4) coax installed at 177 ft. According to information provided by SBA, T-Mobile may install up to (6) antennas, (12) MHA's, and (12) coax. Evaluation performed with full loading in place.

³ Currently, Sprint has (6) antennas and (6) coax installed at 157 ft. According to information provided by SBA, Sprint may install up to (12) antennas and (12) coax. Evaluation performed with full loading in place.

⁴ Currently, Cingular has (9) antennas, (6) TMA's, and (9) coax installed at 137 ft. According to information provided by SBA, Cingular may install up to (12) antennas and (12) coax. The (3) additional coax are assumed to be ran outside the pole's shaft. Evaluation performed with full loading in place.

Proposed Loading:

No.	Centerline Elevation (ft)	Coax and Lines	Carrier	Mount Type	Description
1-3	147	(6) 1-5/8"	Pocket Communications	Flush Mount	(3) Kathrein 742-213

RESULTS

Based on information obtained from the original design drawings, the yield strength of steel for individual members was as follows:

Table 2 - Material Strength

Member Type	Yield Strength
Tower Shaft Sections	65 ksi
Base Plate	50 ksi
Anchor Bolts	75 ksi

Table 3 displays the ratio (as a percentage) of actual force in the member to their capacities. Values greater than 100% indicate locations where the maximum force in the member exceeds its capacity. *Note: Capacities up to 105% are considered acceptable.* **Table 4** displays the maximum foundation reactions.

If the assumptions outlined in this report differ from actual field conditions, FDH should be contacted to perform a revised analysis. Furthermore, as no information pertaining to the allowable twist and sway requirements for the existing or proposed appurtenances was provided, deflection and rotation were not taken into consideration when performing this analysis.

See the **Appendix** for detailed modeling information.

Table 3 – Summary of Working Percentage of Structural Components

Section No.	Elevation ft	% Capacity
L1	176 - 131.25	49.7
L2	131.25 - 86.5	67.7
L3	86.5 - 42.75	75.4
L4	42.75 - 0	76.6
	Anchor Bolts	OK
	Base Plate	OK

Table 4 – Maximum Base Reactions

Base Reaction	Current Analysis (ANSI/TIA-222-G)	Original Design* (TIA/EIA-222-F)
Axial	59 k	47 k
Shear	38 k	38 k
Moment	4,387 k-ft	5,100 k-ft

* Current analysis reactions are within an allowable factor of 1.35 per ANSI/TIA-222-G when the original design reactions are based on an allowable stress design.

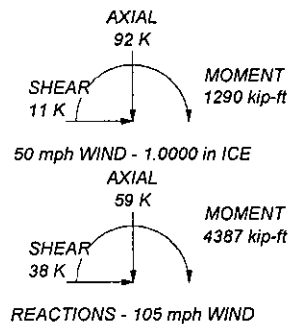
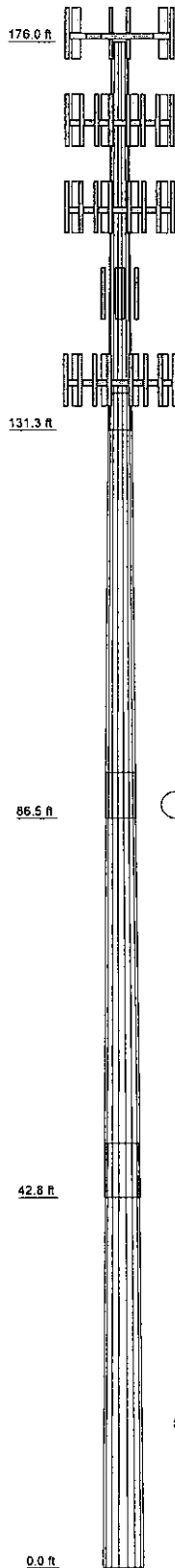
GENERAL COMMENTS

This engineering analysis is based upon the theoretical capacity of the structure. It is not a condition assessment of the tower and its foundation. It is the responsibility of SBA to verify that the tower modeled and analyzed is the correct structure (with accurate antenna loading information) modeled. If there are substantial modifications to be made or the assumptions made in this analysis are not accurate, FDH Engineering should be notified immediately to perform a revised analysis.

LIMITATIONS

All opinions and conclusions are considered accurate to a reasonable degree of engineering certainty based upon the evidence available at the time of this report. All opinions and conclusions are subject to revision based upon receipt of new or additional/updated information. All services are provided exercising a level of care and diligence equivalent to the standard and care of our profession. No other warranty or guarantee, expressed or implied, is offered. Our services are confidential in nature and we will not release this report to any other party without the client's consent. The use of this engineering work is limited to the express purpose for which it was commissioned and it may not be reused, copied, or distributed for any other purpose without the written consent of FDH Engineering, Inc.

Section	1	2	3	4	5
Length (ft)	44.75	49.00	49.00	49.00	49.00
Number of Sides	18	18	18	18	18
Thickness (in)	0.2500	0.3750	0.4375	0.5000	0.5000
Lap Splice (ft)	4.25	5.25	6.25	6.25	6.25
Top Dia (in)	24.0000	31.4796	35.3487	46.8957	46.8957
Bot Dia (in)	32.8170	41.1330	49.0020	56.5500	56.5500
Grade	A607-65	A607-65	A607-65	A607-65	A607-65
Weight (K)	3.4	7.1	10.1	13.6	13.6



DESIGNED APPURTENANCE LOADING

TYPE	ELEVATION	TYPE	ELEVATION
(2) RR90-17-02DP w/Mount Pipe	177	(2) DB948F85T2E-M w/Mount Pipe	167
(2) RR90-17-02DP w/Mount Pipe	177	13' Low Profile Platform	167
(2) RR90-17-02DP w/Mount Pipe	177	(4) DB980H90E-M w/Mount Pipe	157
(4) MHA	177	(4) DB980H90E-M w/Mount Pipe	157
(4) MHA	177	(4) DB980H90E-M w/Mount Pipe	157
(4) MHA	177	13' Low Profile Platform	157
T-Arm	177	742 213 w/ Mount Pipe	147
T-Arm	177	742 213 w/ Mount Pipe	147
T-Arm	177	742 213 w/ Mount Pipe	147
(2) WPA-80090/4CF w/ Mount Pipe	167	13' Low Profile Platform	137
(2) WPA-80090/4CF w/ Mount Pipe	167	(4) DUO1417-8686 w/Mount Pipe	137
(2) WPA-80090/4CF w/ Mount Pipe	167	(4) DUO1417-8686 w/Mount Pipe	137
(2) DB948F85T2E-M w/Mount Pipe	167	(4) DUO1417-8686 w/Mount Pipe	137
(2) DB948F85T2E-M w/Mount Pipe	167		

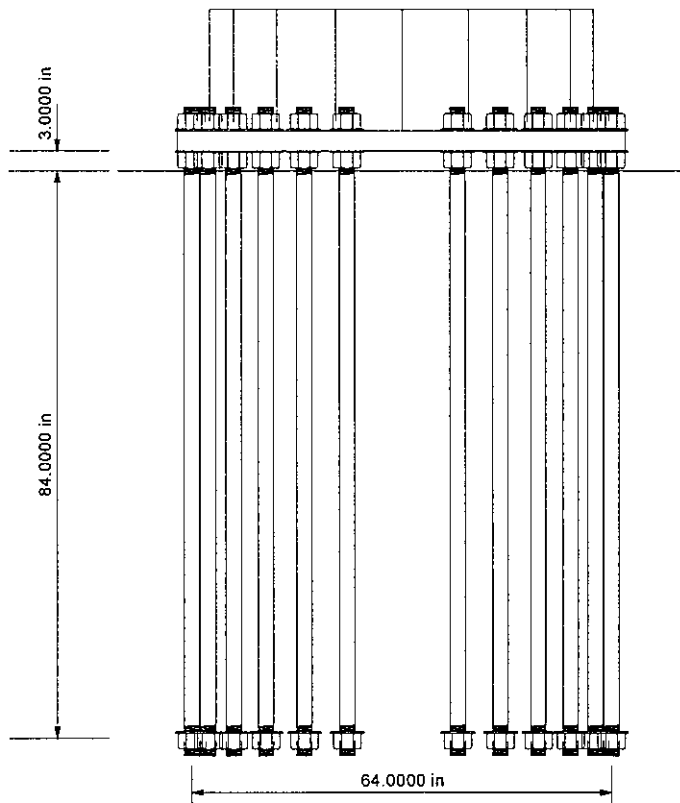
MATERIAL STRENGTH

GRADE	Fy	Fu	GRADE	Fy	Fu
A607-65	65 ksi	80 ksi			

TOWER DESIGN NOTES

1. Tower is located in Hartford County, Connecticut.
2. Tower designed for Exposure C to the TIA-222-G Standard.
3. Tower designed for a 105 mph basic wind in accordance with the TIA-222-G Standard.
4. Tower is also designed for a 50 mph basic wind with 1.00 in ice. Ice is considered to increase in thickness with height.
5. Deflections are based upon a 60 mph wind.
6. TOWER RATING: 76.6%

FDH Engineering, Inc. 2730 Rowland Road, Suite 100 Raleigh, NC Phone: (919) 755-1012 FAX: (919) 755-1031		Job: Glastonbury CT02216-S	
		Project: 08-02004E S3	
Tower Analysis	Client: SBA Network Services	Drawn by: ALC	App'd:
	Code: TIA-222-G	Date: 09/15/08	Scale: NTS
	Path:	Dwg No. E-1	



1. Plate thickness is 3.0000 in.
2. Plate grade is A572-50.
3. Anchor bolt grade is A615-75.
4. f'_c is 3 ksi.

EFDH ENGINEERING Tower Analysis	FDH Engineering, Inc.			Job:	Glastonbury CT02216-S	
	2730 Rowland Road, Suite 100			Project:	08-02004E S3	
	Raleigh, NC			Client:	SBA Network Services	Drawn by: ALC
	Phone: (919) 755-1012	Date:	09/15/08			
	FAX: (919) 755-1031	Scale:	NTS			
	Path:					