



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

March 30, 2022

John Coleman
Project Manager
c/o Cellco Partnership d/b/a Verizon Wireless
Centerline Communications, LLC
750 West Center Street, Floor 3
West Bridgewater, MA 02379
jcoleman@clinellc.com

RE: **EM-VER-057-211118** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 48 Ritch Avenue West, Greenwich, Connecticut.

Dear Mr. Coleman:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on November 18, 2021. On December 30, 2021, the Council issued a letter (enclosed) stating that the request for exempt modification was incomplete because the cumulative power density including existing carrier installations and Verizon's proposed equipment would be greater than 100 percent of the Maximum Permissible Exposure (MPE). The Council's incomplete letter stated the percent MPE for other carrier installations at the facility is approximately 65.34 percent, without accounting for Verizon's existing or proposed equipment. With Verizon's equipment, the cumulative MPE would be 127.09 percent.

On March 22, 2022, the Council received an electronic mail including a report prepared by Tower Engineering Professionals, dated March 5, 2022, with a revised power density analysis that appears to provide the same information as the original power density analysis but with a reduction to the power (Total ERP) to the 3700 MHz frequency band, which resulted in a reduction to the MPE of the 3700 MHz frequency band. However, with that one reduction in power, 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, resulted in a cumulative percent MPE of 109.02% including Verizon's and other carriers' antennas. See attached.

Additionally, page 11 of the report provided states "as this study is concerned only with Near Field calculations, we will only describe the model used for this study" while the last line on page 12 states "this is the equation is [sic] utilized for the Far Field exposure predictions herein." Therefore, it is unclear whether a near field or a far field analysis was used in calculating the MPE for Verizon's antennas.

Therefore, the exempt modification request remains incomplete at this time. The Council recommends that Centerline Communications provide a revised power density analysis using the calculated power density percent MPE for the other existing carriers as provided on the attached table, clearly stating whether a near-field or far-field analysis was used and accounting for a 6-foot person at the base of the tower and resulting in a maximum MPE of less than or equal to 100% on or before April 29, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to April 29, 2022. **Please provide an electronic version and one hard copy 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 Federal Communications Commission (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,



Melanie Bachman
Executive Director

MAB/CW/emr

Enclosure: Incomplete Letter dated December 30, 2021.

Cumulative Power Density table

EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	2057	77	1900	0.2935	1.0000	2.93%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	2308	77	2100	0.3293	1.0000	3.29%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	592	77	600	0.0845	0.4000	2.11%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	1	1578	77	600	0.1126	0.4000	2.81%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	649	77	700	0.0926	0.4667	1.98%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	2204	77	1900	0.3145	1.0000	3.14%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	1295	77	2100	0.1848	1.0000	1.85%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	6413	77	2500	0.9150	1.0000	9.15%	
EM-AT&T-057-200824	Greenwich - 36 Ritch Avenue/48 Ritch Avenue	T-Mobile	2	6413	77	2500	0.9150	1.0000	9.15%	36.43%
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-UMTS	1	488	67	850	0.0472	0.5667	0.83%	
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-UMTS	1	1476	67	700	0.1426	0.4667	3.06%	
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-UMTS	1	2951	67	700	0.2852	0.4667	6.11%	
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-LTE	1	1000	67	850	0.0966	0.5667	1.71%	
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-WCS	1	1000	67	850	0.0966	0.5667	1.71%	
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-LTE	2	4842	67	1900	0.9359	1.0000	9.36%	
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-PCS-L	1	5070	67	2100	0.4900	1.0000	4.90%	
EM-AT&T-057-191021	Greenwich - 36 Ritch Avenue	AT&T-AWS	1	1285	67	2300	0.1242	1.0000	1.24%	28.91%
EM-VER-057-211118	Greenwich - 36 Ritch Avenue	Verizon	1	2954	57	751	0.4084	0.5007	8.16%	
EM-VER-057-211118	Greenwich - 36 Ritch Avenue	Verizon	1	998	57	877	0.1380	0.5847	2.36%	
EM-VER-057-211118	Greenwich - 36 Ritch Avenue	Verizon	1	3365	57	874	0.4653	0.5827	7.98%	
EM-VER-057-211118	Greenwich - 36 Ritch Avenue	Verizon	1	8139	57	1980	1.1253	1.0000	11.25%	
EM-VER-057-211118	Greenwich - 36 Ritch Avenue	Verizon	1	8141	57	2120	1.1256	1.0000	11.26%	43.68%
EM-VER-057-211118	Greenwich - 36 Ritch Avenue	Verizon	1	1929	57	3730	0.2667	1.0000	2.67%	109.02%



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VIA ELECTRONIC MAIL

December 30, 2021

John Coleman
Project Manager
c/o Cellco Partnership d/b/a Verizon Wireless
Centerline Communications, LLC
750 West Center Street, Floor 3
West Bridgewater, MA 02379
jcoleman@clinellc.com

RE: **EM-VER-057-211118** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 48 Ritch Avenue West, Greenwich, Connecticut.

Dear Mr. Coleman:

The Connecticut Siting Council (Council) received this notice of intent to modify the above-referenced facility on November 18, 2021.

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 request. The cumulative power density information provided in the exempt modification request shows a total percentage of Maximum Permissible Exposure (MPE) of approximately 61.75 percent for Verizon's antennas; however, other existing carriers are not included within the MPE calculation. The power density for other carrier installations at the facility is approximately 65.34 percent, and with Verizon's proposed equipment, would be 127.09 percent, exceeding 100 percent of the MPE. The cumulative MPE must be at or below 100 percent with all carrier's antennas.

Therefore, this exempt modification request is incomplete at this time. The Council recommends that Centerline Communications provide a cumulative power density analysis including Verizon's proposed antennas in addition to all existing antennas of other wireless carriers documenting an MPE at or below 100 percent, on or before January 28, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to January 28, 2022. **Please provide an electronic version and one hard copy 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 Federal Communications Commission (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 cursive script, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

MAB/CMW/emr