



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

August 4, 2022

Sharon Bateman
Site Acquisition Project Manager – Pacific NW
Centerline Communications, LLC
22539 NE 46th Street
Redmond, WA 98053
sbateman@clinellc.com

RE: **EM-VER-057-220616** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 36 Ritch Avenue, Greenwich, Connecticut.

Dear Ms. Bateman:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on June 16, 2022. On July 18, 2022, the Council issued a letter (enclosed) stating that the request for exempt modification was incomplete because the NIER Study Report (Original RF Report) prepared by Tower Engineering Professionals, Inc. dated March 5, 2022 included inconsistent values for ERP associated with Verizon's 3700 MHz antenna within the exempt modification request and did not include an updated %MPE for each carrier and resulted in a cumulative %MPE of 142.47%. The Council recommended that Verizon provide a revised and updated cumulative Radio Frequency Analysis Report including a rigorous far-field analysis for Verizon 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 July 26, 2022, the Council received an electronic mail with a revised RF Report (Revised RF Report) dated April 19, 2022 with a cumulative power density analysis including corrected T-Mobile data and Verizon C-Band data. Council staff reviewed the response to the incomplete request and identified, as stated on page 11 of the report, that a near-field analysis was performed. Additionally, when Council staff performs the calculation using the numbers provided in the Revised RF Report and including a 6-foot person and a -10 dB adjustment, the result is a cumulative %MPE of 108.5%.

Therefore, the exempt modification request remains incomplete at this time.

The Council recommends that Verizon provide a revised and updated cumulative Radio Frequency Analysis Report including a rigorous far-field analysis for Verizon 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 2, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to September 2, 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/MP

Enclosure: Incomplete Letter dated July 18, 2022.

c: John Coleman, Centerline Communications, LLC



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July 18, 2022

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

RE: **EM-VER-057-220616** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 36 Ritch Avenue, Greenwich, Connecticut.

Dear Mr. Coleman:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on June 16, 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 deficiencies in the NIER Study Report (RF Report) prepared by Tower Engineering Professionals, Inc. dated March 5, 2022. Page 6 of the RF Report indicates a percent Maximum Permissible Exposure (%MPE) of 28.94% for AT&T (consistent with Council records) and a %MPE of 10.90% for T-Mobile which is not consistent with Council records. (See attached table.) Additionally, page 6 of the RF report indicates 1,928 Watts ERP for Verizon for its C-Band at 3730 MHz; this is inconsistent with the 26,125 Watts ERP for Verizon's C-Band listed on the Cumulative Power Density Table (Verizon PD Table) included in Verizon's exempt modification filing received June 16, 2022.

Council staff calculated the power density for the proposed Verizon modification using the data provided in its records for AT&T and T-Mobile and the Verizon PD Table. 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, the results indicate that the requested modification, as proposed, would produce radio frequency emissions with a %MPE of 77.13% for each sector of Verizon's antennas. Adding this to the 28.91% (AT&T) and 36.43% (T-Mobile) results in a cumulative %MPE of 142.47% with Verizon's antennas. This exceeds the FCC's allowable General Public/Uncontrolled cumulative MPE limit of 100%.

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Verizon provide a revised and updated cumulative Radio Frequency Analysis Report including a rigorous far-field analysis for Verizon 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 August 15, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to August 15, 2022. **Please provide an electronic version of the requested information for the incomplete exempt modification to be rendered complete and processed. Please**

