



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

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**

