



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

May 4, 2023

Jack Andrews  
Centerline Communications  
10130 Donleigh Drive  
Columbia, MD 21046  
[jmandrews@clinellc.com](mailto:jmandrews@clinellc.com)

RE: **EM-VER-057-230418** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 36 Ritch Avenue, Greenwich, Connecticut.

Dear Jack Andrews:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on April 18, 2023.

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 the following deficiencies:

- a. The Structural Analysis dated July 28, 2021 cites the 2018 Connecticut State Building Code (CSBC); the Mount Analysis dated July 7, 2021 and associated drawings dated September 21, 2021, cite ANSI/TIA-222-H with no indication of which version of the CSBC was used; and construction drawings dated September 24, 2021 cite International Building Code with no indication of which version was used. The State of Connecticut has adopted the 2022 CSBC effective October 1, 2022.
- b. The Council had received a request for exempt modification from AT&T and a request for tower share from DISH for the same facility in August of 2022. The above-referenced request for exempt modification does not include the approved equipment for AT&T or DISH; however, the structural analysis included in AT&T's request for exempt modification does appear to include the equipment for both AT&T and DISH. Please see AT&T's exempt modification filing for this facility, which may be found on the Council's website under the Decisions page in Greenwich under the filing number EM- EM-AT&T-057-220808 or by following the link:  
[https://portal.ct.gov/-/media/CSC/2\\_EMS-medialibrary/Greenwich/RitchAve/ATT\\_CING/em-att-057-220808\\_filing\\_RitchAveWest\\_Greenwich.pdf](https://portal.ct.gov/-/media/CSC/2_EMS-medialibrary/Greenwich/RitchAve/ATT_CING/em-att-057-220808_filing_RitchAveWest_Greenwich.pdf)
- c. On September 23, 2022, the Council issued a memorandum to telecommunications industry representatives requiring a cumulative far-field Radio Frequency Power Density Analysis to be provided with all telecommunications exempt modification requests. The radio frequency emissions report dated April 19, 2022 provided with the response does not include a far-field analysis. A copy of the memorandum is available on the Council's website at the following link: [20220923-farfieldmemo\\_final.pdf](#) (ct.gov).

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Verizon provide an updated Structural Analysis, Mount Analysis, and construction drawings that comport with the current 2022 CSBC; a Structural Analysis that includes proposed and approved equipment owned and operated by Verizon and other entities located at this facility; and an RF Analysis including a rigorous cumulative far-field analysis for all entities located on the tower 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 June 2, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to June 2, 2023. **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/ANM/laf