

VIA ELECTRONIC MAIL

March 15, 2023

Denise Sabo Northeast Site Solutions 4 Angela's Way Burlington CT 06013 denise@northeastsitesolutions.com

RE: **EM-VER-060-230301** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at Long Hill Road (a/k/a 131 Manor Road), Guilford, Connecticut.

Dear Denise Sabo:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on March 1, 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 October 7, 2022 includes a stamp but no signature of a Professional Engineer.
- the Mount Analysis prepared by Maser Consulting dated June 7, 2022 does not include a stamp and signature by a Professional Engineer duly licensed in the State of Connecticut, and cites ANSI/TIA-222-H but does not specifically cite the 2022 Connecticut State Building Code (CSBC) effective October 1, 2022 and
- 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 provided with the request includes a far-field analysis for Verizon but does not include a cumulative far-field analysis for all entities on the tower. 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 and Mount Analysis that are both stamped and signed by a Professional Engineer duly licensed in the State of Connecticut, and comport with the current 2022 CSBC; 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 April 14, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to April 14, 2023. Please provide an electronic version 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 incompletion 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,

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Melanie Bachman Executive Director

MAB/ANM/laf