



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

October 12, 2022

Hollis M. Redding
SAI Communications, LLC
12 Industrial Way
Salem, NH 03079
hredding@saigrp.com

RE: **EM-AT&T-062-220912** - New Cingular Wireless PCS, LLC (AT&T) notice of intent to modify an existing telecommunications facility located at 265 Benham Street, Hamden, Connecticut.

Dear Hollis Redding:

The Connecticut Siting Council (Council) is in receipt of your correspondence of October 12, 2022 requesting an extension of time to submit documentation required to make the above-referenced filing complete in response to the Council's incomplete notice dated September 27, 2022.

The Council hereby grants an extension of time to submit the required documentation by November 18, 2022.

Thank you for your attention to this matter.

Sincerely,

Melanie Bachman
Executive Director

MAB/RDM/laf

Enclosures: Correspondence from Hollis Redding, dated October 12, 2022
Incomplete filing letter, dated September 27, 2022

laf



October 12, 2022

Ms. Melanie A. Bachman
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Response to Incomplete Letter EM-AT&T-062-220912
New Cingular Wireless PCS LLC ("AT&T") Site CT2040
265 Benham Street, Hamden, CT 06514

Dear Ms. Bachman:

I am in receipt of your incomplete letter dated September 27, 2022. AT&T respectfully requests an extension of time to provide the revised RF Analysis Report to your office. Thank you.

Please let me know if you have any questions. I appreciate your time.

Sincerely,

Hollis M. Redding

Hollis M. Redding
SAI Communications, LLC
Mobile: 860-834-6964
hredding@saigrp.com



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September 27, 2022

Hollis M. Redding
SAI Communications, LLC
12 Industrial Way
Salem, NH 03079
hredding@saigrp.com

RE: **EM-AT&T-062-220912** - New Cingular Wireless PCS, LLC (AT&T) notice of intent to modify an existing telecommunications facility located at 265 Benham Street, Hamden, Connecticut.

Dear Hollis Redding:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on September 12, 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 a deficiency in the Radio Frequency Emissions Analysis Report (RF Analysis) prepared by C Squared Systems, LLC dated July 13, 2022. The RF Analysis indicates a calculated, Maximum Permissible Exposure (%MPE) of 73.9 % at ground level (70 feet) for AT&T's proposed antennas, however staff calculates AT&T's %MPE to be 77.4% using the Federal Communications Commission (FCC) OET Bulletin 65 accounting for a 6-foot person at ground level and using a -10 dB adjustment. The cumulative calculated %MPE for this facility which includes all carriers' antennas and AT&T's proposed antennas would be 116.7%. This exceeds the FCC's allowable General Public/Uncontrolled cumulative MPE limit of 100%.

Additionally, the above referenced RF Analysis contains outdated information for Cellco's installation on the tower. Tower mapping conducted by Hudson Design Group on May 10, 2021 included with EM-CING-062-220119, approved by the Council on February 22, 2022, indicates Cellco is located on the tower at 80 feet above ground level.

Therefore, the exempt modification request is incomplete at this time. The Council recommends that AT&T provide an RF Analysis including a rigorous far-field analysis for all carriers 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 October 18, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to October 18, 2022. **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 incompleteness shall have the effect of tolling the 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/RDM/emr