



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

September 27, 2022

Hollis M. Redding  
SAI Communications, LLC  
12 Industrial Way  
Salem, NH 03079  
[hredding@saigrp.com](mailto: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Additionally, the above referenced RF Analysis contains outdated information for Cellco's installation on the tower.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