



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

September 8, 2022

Ersilia Davis
Crown Castle
1777 Sentry Parkway W
VEVA 17, Suite 400
Blue Bell, PA 19422
edavis@nbcllc.com

RE: **EM-AT&T-064-220630** – AT&T notice of intent to modify an existing telecommunications facility located at 92 Weston Street, Hartford, Connecticut.

Dear Ersilia Davis:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on June 30, 2022. On July 22, 2022, the Council issued a letter (enclosed) stating that the request for exempt modification was incomplete because the Radio Frequency Emissions Analysis Report (RF Analysis) prepared by MobileComm Professionals, Inc., dated June 18, 2022 calculated the Maximum Permissible Exposure (%MPE) of 6.08 % at ground level for AT&T's proposed antennas, however staff calculates AT&T's %MPE to be 36.16% using Federal Communications Commission (FCC) OET Bulletin 65 methodology and the RF analysis did not account for Cellco's, T-Mobile/Sprint's and DISH's existing/approved installations on the tower. Council staff calculated the cumulative %MPE to be 104.8%.

The Council recommended that AT&T provide a revised and updated cumulative Radio Frequency Analysis Report including a rigorous far-field analysis for AT&T 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 August 16, 2022, the Council received Revised RF Report dated August 11, 2022 with a cumulative power density analysis that included a near-field analysis and RF data for Cellco's, T-Mobile/Sprint's and DISH's existing/approved installations on the tower. However, when AT&T's RF information is calculated using the Council's database, the result is a cumulative %MPE of 111.5%, with a 42.9% MPE value for AT&T. Therefore, the exempt modification request remains incomplete at this time.

The Council recommends that AT&T provide a revised cumulative Radio Frequency Analysis Report including a rigorous **far-field analysis** for AT&T 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 September 29, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to September 29, 2022. **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,

A handwritten signature in cursive script, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

MAB/MP

Enclosure: Incomplete Letter dated July 18, 2022.

c: John Coleman, Centerline Communications, LLC



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VIA ELECTRONIC MAIL

July 22, 2022

Ersilia Davis
Crown Castle
1777 Sentry Parkway W
VEVA 17, Suite 400
Blue Bell, PA 19422
edavis@nbcllc.com

RE: **EM-AT&T-064-220630** – AT&T notice of intent to modify an existing telecommunications facility located at 92 Weston Street, Hartford, Connecticut.

Dear Ms. Davis:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on June 30, 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 MobileComm Professionals, Inc., dated June 18, 2022. The RF Analysis indicates a calculated, Maximum Permissible Exposure (%MPE) of 6.08 % at ground level for AT&T's proposed antennas, however staff calculates AT&T's %MPE to be 36.16% using the Federal Communications Commission (FCC) OET Bulletin 65 accounting for a 6-foot person at ground level and using a -10 dB adjustment. Additionally, the above referenced RF analysis does not account for Celco's, T-Mobile/Sprint's and DISH's existing installations on the tower. The cumulative calculated %MPE for the facility which includes all carriers' antennas and AT&T's proposed antennas would be 104.8%. This exceeds the FCC's allowable General Public/Uncontrolled cumulative MPE limit of 100%.

Please refer to the Council's 2015 exempt modification filing memo (link added below) for filing requirements and procedures.

<https://portal.ct.gov/-/media/CSC/Guides/EMFilingMemo111015pdf.pdf>

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Crown Castle provide an RF Analysis including a rigorous far-field analysis for AT&T 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 25, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to August 25, 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 dark ink, appearing to read "Melanie Bachman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Melanie Bachman
Executive Director

MAB/RDM/emr