



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 23, 2022

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

RE: **EM-AT&T-064-220301** – 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 March 1, 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 (RF) Analysis Report prepared by EBI Consulting, dated February 21, 2022 and provided in Exhibit F. The power density analysis indicates a calculated, Maximum Permissible Exposure (%MPE) of 48.7% for AT&T's antennas and a cumulative %MPE of 94.9% for the facility. The Council acknowledged a request for exempt modification from T-Mobile and approved a request for tower sharing from DISH in February of 2022. The above referenced RF analysis does not account for T-Mobile's and DISH's latest %MPE values. The cumulative calculated %MPE for the facility which includes all carriers' antennas and AT&T's proposed antennas would be 118.2%. This exceeds the FCC's allowable General Public/Uncontrolled cumulative MPE limit of 100%.

Please see attached power density data table showing pre-existing conditions for radio Frequency emissions and post modification results. Please see T-Mobile's and DISH's filings for this facility which can be found on the Council's website under the Decisions page in Hartford under the filing numbers EM-T-MOBILE-064-220114 and TS-DISH-064-220126 or by following the links below:

https://portal.ct.gov/-/media/CSC/2_EMS-medialibrary/Hartford/WestonSt/T_MOBILE/em-t-mobile-064-220114_filing_WestonSt.pdf

https://portal.ct.gov/-/media/CSC/2_EMS-medialibrary/Hartford/WestonSt/DISH/TS-DISH-064-220126_filing_92-WESTON-STREET-HARTFORD.pdf

In addition, 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 a Cumulative Power Density report for the proposed modifications to the facility with a cumulative %MPE at or below 100%, on or before April 25, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to April 25, 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 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 black ink, appearing to read 'Melanie Bachman', written in a cursive style.

Melanie Bachman
Executive Director

MAB/IN/emr

Enclosure: Power Density data table for 92 Weston Street, Hartford, Connecticut.

Control Number	Site	Carrier	#Channel	RP/Ch (W	Ant Ht	MHz	Power D	S	%MPE	Site Total
Power Density Calculations										
TS-DISH-064-220118	Hartford - 92 Weston Street	DISH	4	224	54	600	0.1399	0.4000	3.50%	6.89%
TS-DISH-064-220118	Hartford - 92 Weston Street	DISH	4	543	54	1900	0.3390	1.0000	3.39%	
TS-VER-056-200407	Hartford - 92 Weston Street	Verizon	1	6907	64	1970	0.7384	1.0000	7.38%	
TS-VER-056-200407	Hartford - 92 Weston Street	Verizon	1	385	64	28000	0.0412	1.0000	0.41%	27.67%
TS-VER-056-200407	Hartford - 92 Weston Street	Verizon	1	942	64	3600	0.1007	1.0000	1.01%	
TS-VER-056-200407	Hartford - 92 Weston Street	Verizon	1	6907	64	2110	0.7384	1.0000	7.38%	
TS-VER-056-200407	Hartford - 92 Weston Street	Verizon	1	2946	64	869	0.3149	0.5793	5.44%	
TS-VER-056-200407	Hartford - 92 Weston Street	Verizon	1	2814	64	746	0.3008	0.4973	6.05%	
EM-T-Mobile-064-200709	Hartford - 92 Weston Street	T-Mobile-AWS-LTE	4	1538	76	1900	0.4515	1.0000	4.52%	
EM-T-Mobile-064-200709	Hartford - 92 Weston Street	T-Mobile-PCS-LTE	2	2308	76	2100	0.3388	1.0000	3.39%	
EM-T-Mobile-064-200709	Hartford - 92 Weston Street	T-Mobile-AWS-UMTS	1	584	76	1900	0.0429	1.0000	0.43%	
EM-T-Mobile-064-200709	Hartford - 92 Weston Street	T-Mobile-PCS-UMTS	1	1045	76	2100	0.0767	1.0000	0.77%	
EM-T-Mobile-064-200709	Hartford - 92 Weston Street	T-Mobile-PCS-GSM	2	789	76	600	0.1158	0.4000	2.90%	
EM-T-Mobile-064-200709	Hartford - 92 Weston Street	T-Mobile-LTE	2	433	76	700	0.0636	0.4667	1.36%	13.36%
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	2	592	108	600	0.0409	0.4000	1.02%	
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	1	1578	108	600	0.0545	0.4000	1.36%	
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	2	695	108	700	0.0480	0.4667	1.03%	
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	4	1052	108	1900	0.1455	1.0000	1.45%	20.72%
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	2	2105	108	1900	0.1455	1.0000	1.46%	
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	2	2649	108	2100	0.1831	1.0000	1.83%	
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	1	11045	108	2500	0.3818	1.0000	3.82%	68.64%
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	1	1074	108	2500	0.0371	1.0000	0.37%	
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	1	22089	108	2500	0.7635	1.0000	7.64%	
EM-T-Mobile-064-220114	Hartford - 92 Weston Street	Sprint/T-Mobile	1	2148	108	2500	0.0742	1.0000	0.74%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	4	630	90	700	0.1284	0.4667	2.75%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	2	630	90	700	0.0642	0.4667	1.38%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	4	1297	90	1900	0.2644	1.0000	2.64%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	4	1365	90	2100	0.2783	1.0000	2.78%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	1	31997	90	3700	1.6308	1.0000	16.31%	49.52%
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	1	31997	90	3700	1.6308	1.0000	16.31%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	4	612	90	700	0.1248	0.4667	2.67%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	4	703	90	850	0.1433	0.5667	2.53%	
EM-AT&T-064-220301	Hartford - 92 Weston Street	AT&T	4	1054	90	2300	0.2149	1.0000	2.15%	118.16%